Integrated Regional Water Management
Roundtable of Regions
A consortium of IRWM Regions in California

January 22, 2019

Karla Nemeth
Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

E-transmitted to: cwpcm@water.ca.gov

Subject: Comments on public review draft of California Water Plan Update 2018

Dear Director Nemeth:

Writing on behalf of the statewide IRWM Roundtable of Regions, we thank you for the opportunity to comment on the public review draft (PRD) of California Water Plan Update 2018. The Roundtable comprises representatives of the 48 IRWM regions across California.

We appreciate the inclusive approach taken by the Department of Water Resources (DWR) prior to release of the PRD. DWR staff has been generous with its time in involving us and others as stakeholders. Our organization has been very involved with the Update over the past two years, reviewing and commenting on several drafts of the document. DWR also partnered with us to hold multiple IRWM-focused panel discussions at both the 2017 and 2018 Water Plan Plenary meetings. Many Roundtable members contributed a lot of time and effort to provide input for this important Update in the hope that it would reflect the vital role IRWM plays in sustaining and protecting California’s water resources and ensuring regional sustainability.

That said, we were disappointed to receive the PRD late last month after a long delay and find that it lacked much of the substance and context we have come to expect from the California Water Plan, particularly in the area of regional water management. Indeed, it reads like the executive summary of a more extensive document that does not appear to exist. The high-level comments that follow focus on how Integrated Regional Water Management is portrayed – or not – in Update 2018. We expect many individual Roundtable member agencies will send more detailed comments concerning the Update.

We are extremely disappointed by the fact that IRWM goes largely unmentioned in the PRD, even though it is a prominent theme in the past three Updates and is called out as one of the Actions in the California Water Action Plan. The State has invested more than $1.2 billion in grant funding
since 2002 to support IRWM planning and implementation in California’s 48 IRWM regions; Proposition 1 (2014) designates another $510 million in IRWM grant funds. Significantly more money and resources have been invested by local and regional agencies and Tribes to support essential IRWM projects.

While IRWM is far more than just funding, we appreciate that Update 2018 acknowledges, on page 4-2, that IRWM “has delivered significant value and continues to be an effective way for the State to help fund local and regional activities. Regional water management groups (RWMG) are well-positioned in many areas to interact with the State to explore planning and funding innovations”. We suggest that this comment become a recommended action under Goal 1, Improve Integrated Watershed Management. This new recommended action should be worded along the lines of “Support IRWM as an effective way for the State to help fund local and regional efforts for sustainable water management.”

Also regarding Goal 1, we would prefer that it be renamed “Strengthen State Support for Integrated Regional Water Management.” The term used in Goal 1, “Integrated Watershed Management,” implies that integrated water management should occur on a watershed, not a regional, basis. California is a very diverse state. Integrated management limited to just a watershed scale isn’t appropriate in many planning regions. Each planning region should have the latitude to determine the appropriate scale on which to plan and act, as has been previously acknowledged and approved by the State, including in the Regional Water Management Planning Act of 2002. As the 2017 preliminary draft of this Update observed, “State, regional, local and tribal governance must align planning and implementation at effective geographic scales. The determination of the appropriate geographic scale should consider the interdependent physical (especially hydrologic), biological, economic and social processes and functions within each basin.”

Other comments regarding IRWM and Update 2018 include:

- Recommended Action 1.1: We strongly support this recommended action, which calls for “base-level support to help long-term stability of IRWM programs.” Strategy 2 (Strengthen Practices) of the Stakeholder Perspectives Document for IRWM recommends annual funding of $250,000 for each IRWM regional water management group “to help support key operations.” Implementation of this strategy would be a good way to execute Recommended Action 1.1. Furthermore, we propose that the second sentence of Recommendation Action 1.1 be revised to add the Roundtable of Regions to those organizations that DWR will coordinate with while preparing recommendations to “strengthen timely and meaningful communication with vulnerable communities to inform water resources management.” IRWM practitioners will bring valuable expertise and experience to this task.

- Recommended Action 4.2: We recommend that rather than beginning a separate effort, the State should build on the work of IRWM RWMGs, which have actively and fruitfully engaged with disadvantaged community (DAC) liaisons.

- Recommended Action 5.3: The State should include IRWM practitioners, through the Roundtable of Regions, as stakeholders in the identification of and engagement with regulatory challenges. Given their experience, IRWM practitioners are well-positioned to
coalesce regulators and stakeholders to address regulatory alignment issues as they relate to regional water management and improving regional outcomes.

In a more general sense, we strongly recommend that Update 2018 be aligned with the Stakeholder Perspectives Document, which includes numerous useful recommendations for how the State should support and strengthen IRWM in such areas as government and regulatory alignment, funding, improved processes, training and performance measurement. We also urge DWR to use the wealth of information it received from thought leaders and water management experts at the 2017 and 2018 Water Plan Plenary meetings. Panel sessions at the two plenaries addressed regulatory alignment needs to support IRWM, how RWMGs and nascent groundwater sustainability agencies may work better together, how water plan updates may leverage water management planning efforts at the regional level and identification of priorities for strengthening regional water management.

We also would appreciate more acknowledgement of and additional links to the 14 supporting documents listed in the PRD. We assume the more substantive information is in these documents. It should be easy for readers to access the supporting documents for reference, but it is not. Given the review period for the draft update, we will not have the opportunity to comment on the supporting documents, or even to review the nine documents listed as “in preparation.”

In closing, we are unsure whether to request a full-scale revision of the public review draft by the new administration or to recommend that work begin immediately on a more comprehensive Update 2023. In either case, the Roundtable of Regions looks forward to continuing our working relationship with DWR’s dedicated and helpful staff and to establishing a productive partnership with the Newsom Administration as we all work together in the furtherance of Integrated Regional Water Management to the benefit of our state.

Sincerely,

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Watersheds Council of Ventura County

Mark Stadler, Interim Co-Chair
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