Dear Francisco Guzman:

On behalf of the North Coast Resource Partnership (NCRP) and its leadership Executive Committee, we thank you for the opportunity to comment on the California Water Plan Update 2018. The document is well-organized and in alignment with NCRP goals and objectives.

We understand that the California Water Plan Update 2018 is meant as a brief strategy document that references many supporting documents that provide more detailed information. However, we would like to see the addition of text that explicates the State’s support of the Integrated Regional Water Management (IRWM) program, especially as a mechanism for Tribal and economically disadvantaged community engagement. IRWM programs throughout the state are vital, both for imparting statewide priorities and funneling funding to communities that lack the means to pursue grant funding independently, and for bringing locally prioritized issues and values to state’s attention. The IRWM groups have provided amplification for small communities to have a voice about water management and state policy directions and goals.

The state government and local communities have spent much time and many resources investing in the IRWM planning framework and structure and significant social capital exists among IRWM participants. These collaborative groups and processes are likely to become more important as California’s towns, cities, counties and the state grapple with challenges associated with climate change. These existing partnerships address the first “systemic and Institutional” challenge listed on page 2 – 4: “fragmented and non-coordinated initiatives and governance;” and we believe they should be highlighted as part of the solution in Chapter 3.
In the case of the North Coast, and likely other regions, stakeholders worked through in some cases, decades-long feelings of animosity to reach a hard-won comity and sense of shared purpose. The NCRP has successfully funneled over $176 million to implementation projects in the North Coast that repair and replace failing infrastructure and protect and restore ecosystem services, broadened its original IRWM scope to include energy independence, and obtained funding from other entities to pursue programs and projects that reflect the region’s values and character while also incorporating statewide priorities. The NCRP has embraced its role as a regional mechanism to promote and implement local priorities, and has developed climate change analyses and mitigation and adaptation strategies for North Coast communities, economic analyses to determine monetary values associated with natural and working lands, a water and fertigation management tool, and alternative energy studies including biomass energy, energy assurance planning tools and Tribal renewable energy planning. The NCRP Tribal membership has developed multiple model ordinances and plan templates for use anywhere in the state. Likewise, many of the other resources developed for North Coast communities can be readily used in other regions of the state and resources developed by other IRWM processes may be useful to North Coast communities. Thus, the efforts of the regional groups provide benefits that extend far beyond their respective regions.

These groups have accomplished much in just over a decade. In the view of the NCRP, the state would be unwise to neglect to showcase these accomplishments and the many successes they have achieved with respect to drinking water supply, the Human Right to Water, and other goals of the Department of Water Resources.

With these thoughts in mind, we have listed below specific comments and suggested edits for the Draft California Water Plan Update 2018.

- **Comment 1**: Pages 1-1 through 1-3, State Initiatives and Investments. The context and significance of why these specific initiatives and investments are listed is lacking. Provide an explanation that ties these plans together so the reader has some understanding of how they relate to the 2018 Update more than other initiatives and investments that have occurred in recent times.

- **Comment 2**: Pages 1-1 through 1-3. We suggest adding the following description within the bullets that contain State Initiatives and Investments on pages 1-1 through 1-3, especially in light of the emphasis placed on integrated water management in the CWP Update 2018 Public Review Draft briefing:

  “The Integrated Regional Water Management Act, enacted in 2002, has been funded through various bond acts approved by California voters. These bonds have provided over $1.5 billion in State funding to support and advance integrated, multi-benefit regional projects. The local match to state resources has been impressive – often on the order of 4:1, and through the years, local cities, counties, water districts, NGOs, Tribes, and other stakeholders have established 48 regional water management groups, covering over 87% of the State’s area and 99% of its population. The benefit of regional planning is that local
communities are empowered to address their unique needs and conditions while implementing statewide goals for water supply and quality.”


- **Comment 4**: Page 3-1, Goal 1 – Improve Integrated Watershed Management. This section lacks acknowledgement and description of the importance of regional integrated watershed management. While this importance is acknowledged in Chapter 4, Scope and Setting, it is missing from this section. Add text to the introductory paragraph of Goal 1 that states: “Regional water management groups are important partners in this process; they enable California Native American Tribes and Economically Disadvantaged Communities to address local needs and conditions while also implementing statewide goals for water supply and quality.”

- **Comment 5**: Define “base-level support” in glossary.

- **Comment 6**: Page 3-1, Goal 1 – Improve Integrated Watershed Management. Add clarifying text to include what was said in the Public Review Draft Briefing: “The goal of integrated watershed management is to manage at the scale of resources (watershed scale) for optimal resource use, but there are no plans to change scale of governance. The state intends to continue to work with regional water management groups and other appropriate entities such as Disadvantaged Community Liaisons to incorporate state goals for water at the watershed scale.”

- **Comment 7**: Referencing the November 2018 letter from the North Coast Resource Partnership, we respectfully request that you do not include the Russian River Pilot in the CWP Update 2018. The stakeholder outreach process did not meaningfully engage California Native American Tribal or economically disadvantaged communities despite attempts by the NCRP, its Policy Review Panel, and agency staff to remedy this situation. If DWR does choose to include the Russian River Pilot in the Update, please remove any reference to a relationship with the North Coast Resource Partnership. The NCRP Policy Review Panel has not been approached to discuss any such relationship by California Forward or DWR.

We appreciate the Department of Water Resources ongoing commitment to improving and updating the California Water Plan and for the opportunity to provide input. If you have any questions or would like more information, please feel free to contact me or Karen Gaffney at 707.433.7377 or via email at kgaffney@westcoastwatershed.com.

Sincerely,

Trinity County Supervisor Judy Morris, Policy Review Panel Chairman
North Coast Resource Partnership