January 17, 2019

Mr. Francisco Guzman  
California Water Plan Update 2018  
Strategic Water Planning Branch  
Statewide Integrated Water Management  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Sent via email to: cwpcom@water.ca.gov

Subject: Comments on Public Review Draft of Water Plan Update 2018

Dear Mr. Guzman:

Thank you for the opportunity to provide comments on the Public Review Draft of Water Plan Update 2018 (Update 2018). The San Diego County Water Authority (Water Authority) appreciates the inclusive approach that the Department of Water Resources (DWR) took during the update process. Preparation of the comments below was guided by the recommendations contained in DWR’s Reviewer’s Guide.

General Comments

1. Link Update 2018’s Recommended Actions to California Water Action Plan

The California Water Action Plan (CWAP) identified 10 priority actions to guide the state’s effort to create more resilient, reliable water systems and to restore critical ecosystems. Other than general references to the CWAP, Update 2018 does not directly link its recommended actions to the 10 priority actions in the CWAP. For clarity, Update 2018’s recommended actions should be linked to the CWAP’s 10 priority actions.

2. Strengthen State’s Commitment to Integrated Regional Water Management

The Water Authority appreciates Update 2018’s acknowledgement that integrated regional water management “has delivered significant value and continues to be an effective way for the State to fund local and regional activities” (Page 4-2). Going forward, DWR should work with integrated regional water management practitioners to implement the recommendations in the Stakeholder Perspectives document, thereby strengthening the State’s commitment to integrated regional water
management and providing further support to the state’s 48 integrated regional water management planning regions.

3. Funding Mechanisms and Opposition to Water Surcharge Fee

Funding and investing in water resource sustainability should have the support of voters, the Legislature, policy makers, and local water agencies. The implementation of any funding mechanism should include an opportunity for those entities to be heard and to provide input. Update 2018 includes three funding scenarios. The first with an emphasis on general obligation bonds, the second with an emphasis on the state general fund, and the third as a combination of the first two scenarios. The Water Authority supports the use of these “current” funding mechanisms since they avoid the use of a water surcharge fee, something that water agencies throughout the state, including the Water Authority, continue to oppose.

4. Water Surcharge Fee

There are multiple types of water use surcharges/taxes being proposed throughout the state. The imposition of an additional charge on retail customer’s water bills will compromise an individual agency’s ability to raise sufficient funding to maintain critical infrastructure and provide for water supply reliability in the face of climate change and aging infrastructure challenges. The proposed water use surcharge would exacerbate the ratepayer fatigue already being experienced to support existing water agency sustainability programs. A water use surcharge would also work against affordability since regressive taxes are punitive towards those in the lower middle-class (as opposed to a progressive tax such as the personal income tax which is used to support increased State general fund spending). In addition, without showing a nexus between the water use surcharge and benefits, the surcharge could face legal and political challenges.

Specific Comments

5. Page ES-1, fourth paragraph

The Water Authority appreciates Update 2018’s recognition that, “Some communities that are proactively planning and investing in water management strategies have shown resilience.” However, it would be more accurate to state that proportionally, “many” communities that are proactively planning have shown resilience. In addition, it would be more accurate to state that proportionally, only “some” communities remain vulnerable.

6. Page 1-8, first paragraph

The text states that “capital expenditures have continued to be made largely in reaction to emergencies and extreme events.” This statement does not accurately recognize the significant proactive capital planning and implementation conducted in the San Diego region and other regions of the state.
7. Page 2-1, List of Critical Challenges

The list should include the Colorado River, which is either the sole source or one of the sources of water for more than 16 million Californians, the multi-billion-dollar Southern California economy, and agricultural enterprises that supply the nation. The Colorado River is in a deepening drought cycle that may lead to a shortage declaration being declared by the US Interior Secretary that would reduce deliveries to California and six other states.

8. Page 3-1, Goal 1, Improve Integrated Watershed Management

The goal should be stated as “Strengthen State Support for Integrated Regional Water Management.” DWR staff, during the DWR Water Plan Update webinar on January 8, 2019, attempted to clarify “Integrated Watershed Management” as referring not to governance on a watershed scale, but to management on a watershed scale. As we and others have noted in the past, management on a watershed scale isn’t appropriate in all planning regions. Any “one size fits all” approach will not work in a state as large and diverse as California. Each planning region should have the latitude to determine the appropriate scale on which to plan. If the goal language is not revised as recommended, please define “Integrated Watershed Management” to definitively state that it includes IRWM as a concept that is being implemented by 48 regional programs that employ integrated water management strategies.

9. Page 3-1, Goal 1, Recommended Action 1.1

We support the recommendation for base-level support for IRWM planning regions. The Stakeholder Perspectives document, in Strategy 2 (Strengthen Practices), recommends annual funding of $250,000 “to help support key operations … beginning as soon as possible.” We also support the preparation (and implementation) of recommendations to “strengthen timely and meaningful communication with vulnerable communities.” We hope DWR will seek participation in this effort from IRWM practitioners.

10. Page 3-2, Goal 3, Recommended Action 3.2

Please revise this statement so it refers to multi-benefit projects of “all sizes” rather than “large-scale.” That said, we strongly support this recommended action to facilitate multi-benefit water management programs. The 48 IRWM planning regions offer a tried and true venue for implementation of such projects.

11. Page 3-3, Goal 4, Recommended Action 4.2

The text should reflect that many IRWM regional water management groups have actively engaged with disadvantaged communities and DAC liaisons for quite some time, offering funding for planning and implementation projects and opportunities to help shape policies. State agencies should demonstrate alignment with IRWM by building on these existing efforts. In keeping with this sentiment, we recommend changing the recommendation to: Engage actively with disadvantaged community liaisons via IRWM groups or other watershed/regional planning efforts.
Thank you for the opportunity to comment on the Public Review Draft of Update 2018. If you have any questions or would like additional information about the Water Authority's comments, please contact Jeff Stephenson, Principal Water Resources Specialist, at 858-522-6750, or jstephenson@sdcwa.org.

Sincerely,

Kelley Gage
Director of Water Resources
San Diego County Water Authority