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February 6, 2020

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County of San Diego

Nancy Vogel
Director of the Governor's Water Portfolio Program
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Delivered via e-mail to: input@waterresilience.ca.gov

Subject: Comments on the Draft Water Resiliency Portfolio

Dear Ms. Vogel:

The San Diego County Water Authority (Water Authority) appreciates the opportunity to provide feedback on Governor Gavin Newsom's draft Water Resilience Portfolio. The draft document reflects a collaborative and comprehensive approach to improving water resource management and security, and demonstrates the innovation and strong leadership needed to address California's water challenges.

The portfolio clearly recognizes unique local and regional conditions and that "a one-size-fits-all approach to building water resilience does not work in California." In the San Diego region, we have found this to be true and the region has invested more than \$3.5 billion to address our unique water resiliency challenges. As the goals and actions detailed in the portfolio are implemented, we look forward to collaborating with the state on the multi-benefit projects and programs our region is exploring to continue to support our thriving community and address the distinct challenges facing our area. With that goal in mind, the Water Authority and its member agencies provide the following comments and recommendations on the draft portfolio:

Maintain and Diversify Water Supplies: We strongly support the development of a diverse and flexible approach to water supply reliability. Regional supply diversification should include the proactive pursuit of water use efficiency and water waste reduction. We also believe it is important to recognize that there is a limit to the amount of cost-effective demand reduction that is feasible. Water planners cannot rely on conservation alone for resiliency. They must have the ability to build water resource portfolios based on the needs of the local community using a variety of water sources in addition to pursuing feasible water use efficiency and water waste elimination.

Action 2.1: We appreciate the inclusion of this action item and the reliance on existing legislation to implement water use efficiency goals. We do ask, however, that the following language be added to the action item to reflect the stakeholder process described in SB 606 and AB 1668:

Through a robust stakeholder process, implement existing “Make Conservation A Way of Life” laws (SB 606 and AB 1668, 2018), which create new efficiency standards for residential use and reporting requirements for agricultural use.

Action 2.4: We support the continued partnership between water and energy and the opportunity to implement water savings programs that have the additional benefit of helping the state meet its energy reduction targets. We believe that the action could be clarified to match its intent with the following language:

To foster partnership between water and energy, with public and stakeholder input, update the assumptions and methodologies of the Water Energy Cost Effectiveness Calculator, which helps investor-owned utilities maximize the energy savings associated with water conservation.

Action 4: We agree with strong support for local and regional recycled water and reuse programs. Water reuse is anticipated to grow in quantity and importance in the San Diego region and the state over the next several decades to help reduce reliance on the delta consistent with state policy. State financial and regulatory support of this key water supply is vital to improving resiliency throughout the state.

Action 6: We support the inclusion of desalination, both brackish and ocean water, in the resilience portfolio. This reliable source of supply can help insulate communities and regions against extreme drought conditions anticipated with climate change. The decision to invest in desalination to increase local resiliency is complex and requires the consideration of many factors. To support local decision makers, we ask that the following language change be made to the goal:

Enable use of brackish and ocean water desalination technology where it is ~~cost-effective and environmentally~~ locally determined to be appropriate.

Action 6.2: To ensure that desalination is held to the same threshold as other alternative sources of water supply, we request that the action be modified as follows:

Team with federal and academic partners to develop desalination technologies that treat a variety of water types for various uses, with a goal of enabling manufacturing of energy-efficient desalination technologies in the U.S. at a lower cost, same or better quality, and reduced environmental impact ~~than non-traditional water sources.~~

Action 7: We appreciate the inclusion of this goal regarding expansion of surface water storage in the portfolio where it can benefit both water supply and the environment. Considering the recent approval of the Colorado River Drought Contingency Plan and the upcoming discussions on the new Colorado River Operating Guidelines, we ask that a new Action 7.3 be added under this goal to address storage in the Colorado River system to support its long-term sustainability. As such, we ask that the following language be added:

New Action 7.3: Support participation in the Lake Mead Intentionally Created Surplus (ICS) Program to support the Colorado River Drought Contingency Plan

and help reduce the risk of a shortage in the Colorado River Basin, for those users with qualified conserved water and with environmental coverage.

Action 19.4: We appreciate the inclusion of Goal 19 to modernize inter-regional conveyance to help regions capture, store, and move water in the portfolio. We ask that the following language be added to Action 19.4 to reflect the full spectrum of regional benefits that the multi-use conveyance project could yield. Such benefits include supporting environmental programs such as the State's Salton Sea Management Program, facilitating renewable energy integration and generation, improving drinking water quality conditions within historically disadvantaged communities, addressing Sustainable Groundwater Management Act requirements for overdrafted groundwater basins, and advancing potential binational projects with Mexico.

Direct the Water Commission to assess a state role in financing regional conveyance projects such as a potential Colorado River regional conveyance system that could help meet water needs in a changing climate through partnerships and multi-use projects that provide multiple regional benefits.

Action 20.1: We appreciate the inclusion of the Integrated Regional Water Management Program in the portfolio. This program provides the opportunity to collaborate across a broad spectrum of stakeholders and should play a key role in building connections and implementing the portfolio.

Action 26.2: This action should be rewritten to support regional and local drought planning. SB 606 and AB 1668 has several provisions to strengthen local drought preparedness for both urban water suppliers and smaller water systems. Additional reporting and drought contingency planning requirements will provide resources for decision making that were not available in the 2012-2016 drought. We ask that this action be rewritten to rely on these new requirements and any emergency regulations "defer to implementation of locally adopted water shortage contingency plans to the extent practicable" consistent with SB 606.

Action 29: We appreciate the state's recognition of local and regional agencies' role in achieving water resilience. We believe opportunities exist at the local and the regional level to better optimize the use of local resources, and that the state can play a role in encouraging the exploration of such opportunities to facilitate water transfers and water market opportunities. We suggest the addition of action 29.4:

New Action 29.4: Encourage regional and local water agencies to explore and facilitate water markets and water transfer opportunities to optimize the use of local water resources, including creating a marketplace and encouraging the use of regional facilities.

In addition to working with partners within California, we request an action be added to explore cross-border opportunities. Water challenges can impact communities and challenge resiliency on both sides of the border. We ask that an additional action be added to promote cross-border cooperation.

New Action 29.5: Work with local and regional partners to promote cross-border cooperation to explore and implement opportunities to improve water resiliency.

We appreciate your consideration of our comments and recommendations. We support the themes of flexibility and collaboration that are prevalent in the draft portfolio and believe the Water Authority and its member agencies have demonstrated the success of a diverse portfolio approach to water supply development.

We look forward to working with you and other stakeholders in the coming years to develop multi-benefit approaches to successfully plan for a resilient future for all of California. Please don't hesitate to contact Elizabeth Lovsted, Water Resources Manager, at 858-522-6749 or elovsted@sdcwa.org if you have any questions or need any additional information.

Sincerely,



Sandra L. Kerl
General Manager

cc: San Diego County Water Authority Board of Directors
Wade Crowfoot, Secretary for California Natural Resources Agency
Karen Ross, Secretary for California Department of Food and Agriculture
Jared Blumenfeld, Secretary for California Environmental Protection Agency