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Paul Dabbs, Chief
Water Resources Evaluation Section
Statewide Water Planning Branch
California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

Comments on Public Review Draft California Water Plan Update 2005

Dear Mr. Dabbs:

The Inland Empire Utilities Agency (IEUA) appreciates the opportunity to provide comments on the Public Review Draft of the California Water Plan Update 2005 (Update 2005). We were pleased to work closely with the Department of Water Resources (DWR) staff over the past five years that the Update 2005 was being developed. IEUA served on the Public Advisory Committee and participated in the Extended Review Forums. We thank the staff and their consultants for their patience and hard work throughout the process. Update 2005 reflects the quality of their effort.

Overall, the Update 2005 sets a new standard for the State's development of the California Water Plan. The new features include a truly participatory public advisory process, the use of actual, more representative data from recent wet, normal and dry years for the base year scenarios, the development of multiple and more informative future scenarios to replace the historic and limited water supply-demand gap analysis, the identification of a much larger array of water supply and resource management options and the creation of a draft plan that is more strategic and useful to the State's policy makers.

As a result of these changes, Update 2005 provides a more clear-eyed view of the current state of California water than previous water plans. Update 2005 provides a wider scope of assessment of both the challenges facing the State, including global climate change, and the diverse options available for meeting the State's future water needs.

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Further we strongly endorse DWR's new emphasis in Update 2005 on the importance of regional water planning and DWR's support for integrated regional water management. As pointed out by ACWA and others, essentially all of the significant water management and development projects that have been implemented in the past decade have been locally or regionally planned. Update 2005 clearly highlights the importance of developing local water supplies, particularly groundwater, recycled water and water efficiency, in meeting the State's future needs.

On the technical side, there remain significant data deficiencies that render Update 2005, at best, an interim report while the DWR staff complete its work of improving future water demand estimates and fulfilling the requirements to identify data assumptions as stipulated by the Burton and Machado legislation. One of the unanimous, core findings of the Advisory Committee was that the data on which DWR has based and continues to use as the base of its future projections is grossly inadequate.

For example, DWR identifies groundwater overdraft as one of the State's largest challenges, constituting a 2 million acre-feet shortage. However, DWR's estimate is based upon a 1980 report – data that is more than a quarter of a century old!! In using the 2 million acre-feet shortage estimate, no consideration appears to have been given to the number of basins that have been adjudicated in the past 25 years nor to the aggressive conjunctive management programs that have been operating in key parts of the State including the San Joaquin Valley and Southern California (including the Chino Basin) over the past five to ten years.

The information used to develop the regional water portfolios is also extremely problematic, as has been recognized by the DWR staff. The models used by DWR are virtually impossible to compare with the water planning data used by the local agencies and for this reason are not useful. One of the Advisory Committee recommendations for the next Water Plan Update is that DWR develop the portfolio models based upon the data from the 2005 Urban Water Management Plans. Another key recommendation is that DWR no longer use "applied" or "net" analysis as this is not used by many (if any) water planning agencies in the State.

Finally, IEUA endorses the continued preparation of regional reports by DWR, but in the next Update this information needs to be based much more concretely upon the 2005 Urban Water Management Plans and other regional documents. The Update 2005 contains a very loose, anecdotal discussion of the state of the South Coast region. As a point of information, the Chino Basin is one of the areas in the South Coast that has developed an integrated, conjunctive management program with the potential to develop 500,000 acre-feet of new storage in the next twenty years, enhanced new yield through enhanced stormwater, SWP and recycled water recharge, and implementation of aggressive water use efficiency programs (for example, recycled water use increases from 5,000 AF in 2000 to 95,000 AF in 2020).

IEUA wants to thank the DWR staff and its consultants for their hard work on this Update. We look forward to continuing this collaboration as DWR completes the process of improving the data on which the next Update will be based.

Sincerely,
INLAND EMPIRE UTILITIES AGENCY

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