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July 22, 2005

To: Paul Dabbs
Statewide Planning Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, Ca 94236-001

Comments for the Draft California Water Plan Update

Dear Mr. Dabbs,

The Planning and Conservation League commends and thanks the Department of Water Resources for providing information in the April 2005 draft of the California Water Plan Update that demonstrates California can more than meet water needs to 2030 with implementation of regional solutions such as water conservation and water recycling.

While the draft reflects significant progress toward accomplishing the stated goal to "be a useful document for the public, water planners throughout the state, legislators and other decision-makers," the Planning and Conservation League has the following concerns and recommendations for improvement of the Final Water Plan Update.

The Plan should state the significant findings more explicitly. On pages 4, 5 and 15 of the draft Highlights, the water plan shows that we can more than meet water needs in California, and improve the reliability of existing supplies. This is new and exciting information, and should be highlighted in the water Plan.

Accordingly, the Plan should highlight the possibility that total water use in the State may decrease over the next 25 years, explicitly stating **in the Highlights document and in volume one**, "it is feasible that total water use in 2030 could be less than is used today". In this manner, information about water demand scenarios presented on pages 4-5 and page 15 can be connected and made easily comprehensible. Likewise, the plan should stress the great potential of urban water use efficiency and recycled water for increasing reliability of existing supplies. These options will be the primary way California will meet water needs into the future, and they should be highlighted.

The "less resource intensive" scenario provided in the Draft Plan, which allows for only naturally occurring conservation, is misleading. The 'less resource intensive' title implies that the scenario includes maximum efficiency. However, the scenario does not reflect implementation of efficiency measures. In order demonstrate the full range of future scenarios a scenario incorporating a highly efficient future should be included in the Final Plan. Peter Gleick at the Pacific Institute is in the

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process of modeling a "high efficiency scenario" which analyzes regional implementation of environmentally preferred strategies. This scenario will be completed by the end of August and should be included in the State Water Plan.

In addition, a clearer and explicit explanation of the different assumptions incorporated in the scenarios should be included in the Highlights document. Readers should clearly understand that the three draft scenarios do not include the potential identified in the Management Options chart on page 15 of the draft Highlights. It should also be clear exactly what 'more resource intensive' would mean. A clearer explanation should include assumptions based on population and economic influences. In order to be clearly understood, this information must be to be included in the highlights, rather than solely in the technical volume.

Though the draft Plan clearly states the need for a sustainable and reliable state water supply, issues of accessibility and equitability are left mostly unexplored. The plan should explicitly address these issues, recommending that future water management plans ensure that all Californians, including low income communities and communities of color, have access to clean, reliable and affordable water for drinking, recreation and fish consumption.

We understand that the groundwater overdraft of 1 to 2 million acre-feet included on the chart on page 5 of the draft Highlights is a very rough estimate based on decades old data. Because there is no substantiation for this number, it should not be included on the water demands chart on page 5 of the Highlights. A note stating the uncertainty of groundwater overdraft could address the issue. However, including the estimate without substantiation is misleading. Additional information should be provided regarding the current state of groundwater overdraft. The present situation should be analyzed and clearly documented within the report.

The Water Plan Update should discuss the current crisis in the Bay Delta Estuary. Four fish species and important copepods are at all time low abundance levels. The Water Plan should note that fisheries biologists point to three possible causes of the ecological collapse, toxins, invasive species and exports of freshwater from the Estuary. Given the current crash of the Bay-Delta Estuary pelagic fisheries, the Water Plan Update should not recommend increasing stresses to Bay Delta Estuary (the largest Estuary on the West coast) by recommending increasing exports from the vulnerable Estuary.

The eight choices for additional water supply should be revised to reflect the reliability and environmental ramifications of each option. The increased reliability, water quality and environmental benefits from water use efficiency, water recycling and groundwater desalination should be noted.

Surface water storage yield estimates on the water options chart should not be included until feasibility studies determine whether those projects are in fact feasible, and surface storage should be removed as an option from page 15.

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Seawater desalination and ocean water desalination should not be combined into one option. Given their vastly different costs, environmental effects, and potential implementation, groundwater and ocean water desalination should be included separately on the Supply Options chart.

The Planning and Conservation League is pleased with the open process, facilitation, and wide degree of participation solicited by the draft's authors. Moreover, this Plan avoids the outmoded "gap" analysis present in previous versions, focusing on increased water conservation to decrease demand rather than an alleged discrepancy between current water supplies and future requirements. We are pleased with the Plan's conclusion that California can feasibly use less water in 2030 than is used today, as well as its emphasis on cost effective, more reliable, and environmentally friendly options for additional supply if such an increase is necessary.

While the achievements above indicate great progress for the Department of Water Resources, true progress will only be made if DWR's actions are consistent with the Water Plan. DWR now must demonstrate with agency actions a commitment to open and transparent processes and advancing integrated regional approaches to water supply reliability.

With the above changes implemented, and with strong leadership for implementation by the Department of Water Resources, we are confident that this Water Plan Update will be a successful tool as California improves the sustainability, reliability, and access equitability of its water resources.

Sincerely,

Mindy McIntyre

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