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DELTA STEWARDSHIP COUNCIL

A California State Agency

May 7, 2020

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Abdul Khan
California Water Plan Update 2018, Strategic Water Planning Branch
Statewide Integrated Water Management, Department of Water Resources
P.O. Box 942836
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Executive Officer
Jessica R. Pearson

Via email: cwpcom@water.ca.gov

RE: Draft Handbook for Water Budget Development: With or Without Models

Dear Abdul Khan:

Thank you for the opportunity to comment on the Draft Handbook for Water Budget Development: With or Without Models (Draft Handbook). The Delta Stewardship Council (Council) recognizes that the propose of the Draft Handbook is to provide California's water resources community with information, not previously compiled in such a framework, on various methods and data sources for developing water budgets, which could be used to report water use, estimating, and planning in Groundwater Sustainability Plans (GSPs), Urban Water Management Plans (UWMPs), or Agricultural Water Management Plans (AWMPs). Based on information in the Draft Handbook, the Council understands that water budgets can be developed for any geographic area and time period, using both modeling and non-modeling approaches; and that the Draft Handbook does not prescribe methods a water agency should use to develop water budgets. Rather, the Draft Handbook catalogues existing methods that a water agency may consider using based on its needs, expertise, and available data and tools.

About the Council, the Delta Reform Act, and the Delta Plan

The Council is an independent State of California agency established by the Sacramento-San Joaquin Delta Reform Act of 2009 (SBX7 1; Delta Reform Act (Wat. Code, §§ 85000 et seq.)). As stated in the Delta Reform Act, the State has coequal goals for the Delta: providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place (Wat. Code, § 85054). The Council is charged with furthering California's coequal goals for the Delta through the adoption and implementation of the Delta Plan.

"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."

– CA Water Code §85054

The Delta Reform Act states that “[t]he policy of the State of California is to reduce reliance on the Delta in meeting California’s future water supply needs through a statewide strategy of investing in improved regional supplies, conservation, and water use efficiency. Each region that depends on water from the Delta watershed shall improve its regional self-reliance for water through investment in water use efficiency, water recycling, advanced water technologies, local and regional water supply projects, and improved regional coordination of local and regional water supply efforts.” (Wat. Code, § 85021)

Through the Delta Reform Act, the Council was granted specific regulatory and appellate authority over certain actions that take place in whole or in part in the Delta and Suisun Marsh, which are referred to as “covered actions”. A state or local agency that proposes to undertake a covered action is required to prepare a written certification of consistency with detailed findings as to whether the covered action is consistent with Delta Plan regulations and submit that certification to the Council prior to implementation of the project (Wat. Code, § 85225).

Delta Plan Policy **WR P1** (Cal. Code Regs., tit. 23, § 5003) requires covered actions (projects, plans, or programs under the authority of the Delta Plan’s regulatory policies) that would export water from, transfer water through, or use water in the Delta to contribute to reduced reliance on the Delta and improve regional self-reliance. WR P1 subsection (c)(1)(C) references Urban or Agricultural Water Management Plans prepared by water suppliers, and identifies the following information that should be included in the Plans to demonstrate that the water supplier is contributing to reduced reliance on the Delta and improved regional self-reliance:

WR P1(c)(1)(C): “...[T]he expected outcome for measurable reduction in Delta reliance and improvement in regional self-reliance. The expected outcome for measurable reduction in Delta reliance and improvement in regional self-reliance shall be reported in the Plan as the reduction in the amount of water used, or in the percentage of water used, from the Delta watershed. For the purposes of reporting, water efficiency is considered a new source of water supply, consistent with Water Code section 1011(a).” (Cal. Code Regs., tit. 23, § 5003 (c)(1)(C) (Emphasis added)).

Draft Handbook Comments

Within the Draft Handbook, Table 1-1: *Definitions of Total Water Budget Schematic Components* defines imported water as a “[v]olume of water brought from outside the water budget zone for use within the water budget zone, such as State Water Project water, Central Valley Project water, water produced from desalination of ocean water, and water produced from desalination of deep groundwater from below the base of freshwater.” (Draft Handbook, p. 10) This definition of imported water would aggregate water supplies in such a way that the resulting water budget would not be able to be used in a water supplier’s Urban or Agricultural Water Management Plan to demonstrate consistency with WR P1. The guidance on estimating and forecasting water supplies presented in the Draft Handbook aggregates imported water supplies (both from the Delta watershed and from outside the Delta watershed) in a way that would make reporting of “the reduction in the amount of water used or in the percentage of water used from the Delta watershed” difficult or impossible. It is important to the planning

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process that water estimating, budgeting, and reporting be consistent across the multiple water planning processes (e.g., GSPs, UWMPs, AWMPs) so that accounting done for one process can be leveraged in other planning activities.

Council staff recommends that the Draft Handbook include guidance that would enable water suppliers to provide the information describing measurable reductions in water used from the Delta watershed required by regulatory policy WR P1. This would include specific guidance recommending that imported water supplies be disaggregated between water supplies from the Delta watershed from other imported water supplies.

We invite DWR to engage with Council staff to clarify the importance of planning and reporting reduced reliance information and recommended additions to the Draft Handbook. Please contact Andrew Schwarz at (916) 589-0081 (andrew.schwarz@deltacouncil.ca.gov) with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Henderson", with a long horizontal flourish extending to the right.

Jeff Henderson, AICP
Deputy Executive Officer

Cc: Cindy Messer, Department of Water Resources (cindy.messer@water.ca.gov)
Kris Jones, Department of Water Resources (kris.jones@water.ca.gov)