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February 7, 2020

Submitted via email to: input@waterresilience.ca.gov

The Honorable Gavin Newsom, Governor
State of California
State Capitol, First Floor
Sacramento, CA 95814

Subject: Comments on Draft Water Resilience Portfolio

Dear Governor Newsom,

The California Municipal Utilities Association (CMUA), representing 49 public water utilities that serve water to over 75% of Californians, appreciates the opportunity to comment on your Administration's Draft Water Resilience Portfolio (Draft Portfolio).

We would like to recognize and commend you and your Administration for putting together a Draft Portfolio that recognizes the need for immediate action in some cases but also for sufficient time on several issues to implement recent efforts of the Legislature and the state agencies in reshaping water use in California.

In addition, we appreciate the state's commitment to the "sustained leadership and oversight, funding and cooperation" that will be needed for the successful implementation of the Final Portfolio. Of note is the action to "institutionalize better coordination across state agencies." As we collectively look toward the work needed to implement a number of significant policy priorities, including the Making Conservation a Way of Life legislation, it will be critical for state departments and agencies to proactively collaborate on the common goals we all share rather than having individual departments create discord within state government.

Agree: Importance of a Diverse Water Supply Portfolio for California

We are heartened by the recommendations in the Drought Portfolio that, if implemented, will substantially enhance state and local efforts to develop a diverse water supply portfolio. In particular, our members appreciate the emphasis on the building blocks of sustainability including surface water storage, recycled water, stormwater capture and desalination. Such efforts are critical components in securing a climate-resilient water future.

Agree: Protecting California's Upper Watersheds is Foundational to Resiliency

CMUA agrees that more investment is needed in upper watersheds, both for water supply and quality and to reduce the frequency and severity of wildfires. We appreciate the focus in Recommendations 15.1-15.3 on actions to enhance management of upper watersheds through coordination, watershed restoration and other investments.

Agree: Drought Resiliency for Small Water Systems and Rural Communities is Key

CMUA appreciates the inclusion of Recommendation 26.4 which calls for financial, technical assistance and training to help reduce drought risk to small water systems, tribal and underrepresented communities and households on private wells. As a member of the Department of Water Resources'

(DWR) County Drought Advisory Group, we believe the recommendations under development from the Department and Advisory Group to be an effective path forward to reduce the impacts of drought to the most vulnerable communities in California.

Agree: Data Streamlining Benefits the State and Local Agencies

CMUA agrees and supports Recommendation 22.3 which calls for continued streaming data submission and reporting to the state. Duplicative reporting is a drain on staff resources for both local and state agencies and all efforts to streamline reporting will result in significant benefits for all stakeholders.

Concern: State Agency Drought Response Needs to Be Refined Not Replicated

Prior to and during the recent historic drought, CMUA's member agencies played an integral role implementing successful water conservation programs in addition to raising public awareness of this critical resource. CMUA is concerned with Recommendation 26.2, which seeks to utilize the reaction by state agencies during the 2012-2016 drought as a basis for responses to future droughts. While there are always opportunities to learn from events like a severe drought, the state's response created uncertainty and exposed a significant rift between local and state agencies¹ because of draconian measures initially utilized by the state to curtail water use. Rather than being replicated, the state's response to the most recent drought demonstrated the need for a more refined and collaborative approach, including a thoughtful review of the roles and responsibilities of both the state and local water suppliers. CMUA believes this recommendation should instead propose that the overall response be reviewed for lessons learned and opportunities to coordinate in the future.

We appreciate your Administration's consideration of these comments and should you have any questions regarding this letter, please contact me at (916) 326-5802.

Sincerely,



Danielle Blacet-Hyden
Director for Water
California Municipal Utilities Association

Cc: Nancy Vogel, Director of the Governor's Water Portfolio Program

¹ [PPIC – Building Drought Resilience in California's Cities and Suburbs](#)