



LEAGUE OF WOMEN VOTERS OF CALIFORNIA

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Kamyar Guivetchi, P.E.
Manager, Statewide Water Planning
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Dear Mr. Guivetchi:

The League of Women Voters of California (LWVC), through its representatives on the Advisory Committee (AC) for the California Water Plan Update, has serious concerns about the Public Review Draft: Highlights published in March 2005. In spite of many improvements from Bulletin 160 editions in the past, we believe the draft does not adequately reflect the Advisory Committee's four years of consensus building toward a new approach for water resource management.

Your leadership, and that of other members of the Department of Water Resources and consultants, has been commendable and has helped the AC work effectively. However, there has been a change in emphasis which is still evident in recent documents in spite of your efforts to incorporate the AC's basic findings into Bul 160-2005.

We recommend the following amendments, general in nature, which we think better reflect the AC's process and results over four years.

1. INITIATIVES: We urge the Highlights to include three, not just two, equally important Initiatives. The new initiative should stress conservation, recycling, and nonstructural management techniques that result in efficient water use. While the Highlights draft does stress conservation in many statements, it has a second class status and appears featured, but not as strongly promoted as regionalism and infrastructure. It is evident that the existing two initiatives are Bulletin 160 priorities. Describing conservation as an initiative with the others will be more representative of AC deliberations about the necessity to enhance water efficiency for all sectors in the future.

2. SCENARIOS: The three scenarios, as described in Highlights, do not fully include a discussion of the uncertainties that lie ahead and how they can affect the scenarios. For example, global warming is not mentioned in any scenario, and we think this is an oversight. Scenarios are probable, not definite, outcomes and should be described as such. We wonder if this is why the "Less Resource Intensive" scenario comes across to us as a minor offshoot from the "Current Trends Scenario" since it is not clear what assumptions are behind each scenario.

Because of uncertainties, this section should be edited to minimize absolutes in describing scenarios. As an example, page 5 states, ". . . urban water demand will increase especially in the southern part of the state . . ." This isn't necessarily so and should be changed to "may or may not" because of uncertainties. We recommend, too, that the "Less Resource Intensive" scenario include the concept of "no net increase of natural water use" as a possible assumption which already has a track record of success. It has been applied—and worked—in parts of southern California where population increased but water use stayed flat, because of extensive efforts with conservation and increased recycling. It is also a goal in some northern California areas and should be explored statewide to see where the concept can succeed.

3. INFRASTRUCTURE. Initiative 2. There is a misunderstanding in this section about the word "infrastructure," which the public will largely interpret as maintaining old dams and building new ones. While the section on CALFED covers some other options, it is still not clear in the Highlights what nonstructural management options are and what they include. We support adding a new section, or amending another, that will amplify the value of these options, including their importance to water and ecosystem management.

4. GROUNDWATER. Little is said about groundwater management in the Highlights. While the adjudication of groundwater basins is not under the aegis of DWR or the state and is a regional issue, it seems some recognition of groundwater issues should be forthcoming in the Highlights section. We suggest that groundwater basins can be considered as part of the state's infrastructure and that the California Water Plan should include wording to support the maintenance of groundwater basins as well as other management options.

The League representatives on the AC Committee are honored to be serving on the committee, and periodically report information to our members through the League's VOTER newsletter. We thank you for this opportunity to express the League's point of view.

Sincerely,

/s/ Jacqueline Jacobberger
President

cc: Lester Snow, Director, DWR
Paul Dabbs, Statewide Planning Branch, DWR
Polly Smith and John Sullivan, LWVC representatives to the Advisory Committee