



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

*Office of the General Manager*

February 23, 2018

California Water Commission  
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Dear Chair Quintero and Commissioners:

City of San Diego's Pure Water Project

The purpose of this letter is to express The Metropolitan Water District of Southern California's (Metropolitan) support for WSIP matching funds for the City of San Diego's Pure Water San Diego Program North City Phase 1 project (Pure Water Project). Because this project increases local reliability and independence, provides measurable benefits to California, and is consistent with the goals of the State's Water Action Plan, it meets the requirements in Proposition 1 for WSIP matching funds.

Unfortunately, technical review comments from the California Department of Fish and Wildlife (CDFW) on a number of WSIP applicants' projects indicate that CDFW is relying on an interpretation of the WSIP program's requirements that is unnecessarily narrow, and potentially even in conflict with the express language of Proposition 1's statutory text. As the Commission's WSIP regulations correctly recognize, "Water Code § 79701(e), declares the will of Californians that funding within Proposition 1 is provided to obtain three objectives of the California Water Action Plan: more reliable water supplies, restoration of important species and habitat, and more resilient and sustainably managed water infrastructure." (23 Cal. Code Regs., § 6000.) The Pure Water Project will result in more reliable water supplies and provide local resiliency to deal with increased weather volatility and climate change.

However, the California Department of Fish and Wildlife recently recommended that many beneficial projects statewide be deemed ineligible for WSIP funding unless they find ways to reduce diversions of water from the Sacramento-San Joaquin River Delta (Delta), apparently on an acre-foot by acre-foot basis. This approach both defeats the purpose of augmenting and diversifying local and regional water supply portfolios—a water management strategy that has been critical in meeting California's water supply needs throughout our water system's history—and essentially creates a "zero sum" game with no net increase in local water supply reliability because every new bucket of local water created is matched by subtracting a bucket of imported supply. Such a narrow view of what constitutes 'measurable improvements' for California's water supply is contrary to the intent and text of Proposition 1.

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As the largest State Water Project contractor responsible for providing water supplies to its member agencies and, through them, to nearly 19 million Californians and the trillion-dollar Southern California economy, Metropolitan cannot sacrifice SWP supplies to help local projects secure WSIP matching funds. Southern California needs such supplies in addition to expanded and diversified local and regional supplies and storage, to meet the anticipated increases in demand as California continues to grow, and to meet the challenges climate change presents in the form of less and more highly variable precipitation. Absent Metropolitan's ability to store significant SWP supplies in 2011 and 2017 when water was available, Southern California's situation would resemble Cape Town's today. Turning away available supplies in wet years as a condition for public funding takes water away from drought management supplies and actually decreases regional reliability. In turn, decreasing regional water storage and supply reliability puts increased pressure on all available water supply sources including the Delta, an outcome that seems to directly conflict with Water Code § 79701(e) and the California Water Action Plan.

Southern California voters expressed their overwhelming support for Proposition 1 and its objective of funding projects that will provide more reliable water supplies. The Metropolitan service area of Ventura, Los Angeles, Orange, Riverside, San Bernardino and San Diego counties voted 67% yes and 33% no for Proposition 1. But the current limited approach to analyzing public benefits could effectively bar all viable, shovel-ready Southern California projects from funding. We encourage the Commission to find broader, more flexible ways to demonstrate measurable Delta ecosystem improvements. Local water supply projects that provide alternative sources to meeting increased future demands avoid the need to increase diversions from the Delta. This, in turn, enables SWP contractors like Metropolitan to take and put SWP supplies into storage during wet periods, when Delta diversions have minimal or no adverse environmental impact, and then draw on those supplies during dry periods, such as California's recent multi-year droughts. Thus, every acre-foot of additional, local water supply that results from a new water storage project in Metropolitan's service area provides an immediate and measurable benefit to California and the Delta ecosystem even without 1:1 reductions in acre-feet of water diverted from the Delta.

For these reasons, Metropolitan urges the Commission to accept the demonstrated ecosystem benefits of water supply and storage projects south of the Delta, as they are an indispensable part of a statewide water management strategy that reduces reliance on diversions from the Delta to meet California's future water supply needs.

Sincerely,



Jeffrey Kightlinger  
General Manager

cc: Vic Bienes, PE  
City of SD Public Utilities Department Director