



May 12, 2021

Sent via email

Subject: Development of the 2020 Urban Water Management Plan (UWMP)

To Whom It May Concern,

The development of the 2020 Urban Water Management Plan (UWMP) including the Water Shortage Contingency Plan (WSCP) lacks a full, open, and meaningful public participation process. State law provides a minimum 14-day public notice prior to the adoption hearing. but in view of the fact that the U.S. Drought Monitor, a weekly hydrological analysis by the federal government, shows 93% of California in either “severe,” “extreme” or exceptional” drought, this suggests a public voice is more important now than ever.

Communities throughout the region are concerned about the availability of water for drinking, the environment and affordability issues. Climate change magnifies these concerns. The assumptions and projections documented in the Urban Water Management Plans, and the specific conservation and efficiency programs planned are of great interest to the community.

In these times, the following two models of participation make more sense: (1) The three groundwater sustainability planning processes under the Sustainable Groundwater Management Act (SGMA) make extensive efforts beyond the minimal legal requirements to involve the public. The three Groundwater Sustainability Plan (GSP) planning processes have held stakeholder meetings and formal public meetings to involve and educate the public on the issues affecting our groundwater. In addition, the public can review technical presentations and documents on the region’s groundwater, and initial draft segments of the GSPs, well before the Plans are released for formal public review. (2) The Los Angeles Department of Water and Power has had an ongoing public participation process tracking the development of its UWMP and WSCP, which has allowed a wide array of interests to participate and comment on the plans’ technical documents and drafts well before the draft plans are being considered for adoption. Yet here in the Sacramento region we are aware of only one plan that was released for public review in April, and it appears that some of the larger water purveyors intend to release their plans 2-3 weeks in advance of their planned adoption hearings. This is insufficient because these plans will be hundreds of pages in length and will contain extensive technical information.

We strongly urge you to immediately begin a public outreach effort to involve the public in the development of the UWMP. The adoption of the plan should be postponed until a draft has had at least 45 days of public review, followed by a formal response to public comment, and then consideration of a final

draft for adoption after the required 14 days of public review. While the State of California has established a date by which the UWMP is to be submitted, we urge you to petition the State for additional time to allow for a full and complete public airing of the document.

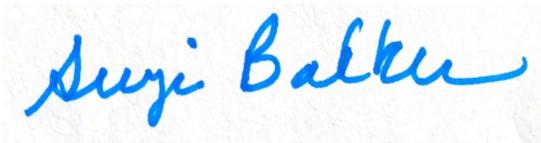
Sincerely,



Ralph Propper
President, ECOS



Barbara Leary
President, Sierra Club Sacramento Group



Suzi Bakker
President, League of Women Voters Sacramento County

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