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Re: Public Comment on Draft 2025 Urban Water Management Plan and Water Shortage Contingency Plan

Dear Mr. Berkoben:

San Diego Coastkeeper respectfully submits the following public comments on the City of San Diego's Draft 2025 Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan (WSCP). We commend the City for acknowledging past overestimates of water demand and for including multiple forecast scenarios. However, as described below, we urge the City to adopt a more realistic demand forecast and to strengthen several aspects of the plan before finalizing it.

Our review of the draft UWMP identified the following key findings:

- The draft UWMP appropriately acknowledges that inflated demand estimates used in past plans were overstated and contains two future water use scenarios with substantially lower demands through the 25-year forecast period.
- The draft UWMP recognizes the importance of local supply development and appropriately includes estimates for both Phase 1 and Phase 2 of the Pure Water SD project.
- The recommended future water use scenario (the "S15" scenario) would continue to overestimate demand by failing to account for additional conservation that will result from rate increases, and the rapidly changing climate. Coastkeeper strongly urges the City to instead use the "On Trend" planning scenario in these critical water planning documents.

Discussion

The draft UWMP rests on two major improvements over previous versions. First, it recognizes that past water use reductions are permanent and that total water use will remain relatively flat or decline going forward. Second, it projects that future population growth will be concentrated in the multi-family housing (MFH) sector and will therefore be more water-efficient. Despite a 22% increase in Commercial, Industrial, and Institutional (CII) sector water use between 2020 and 2025, total water use rose by less than 1% due to reductions in single-family residential (SFR) and irrigation use.

The draft UWMP presents two demand scenarios: the "S15" scenario, which assumes no additional SFR conservation and projects total retail water use increasing by approximately 3,564 acre-feet (2%) between 2025 and 2050; and the "On Trend" scenario, which assumes additional SFR conservation in response to rate increases and projects a net decrease of approximately 4,504 acre-feet (2.7%) over the same period.

The On Trend scenario projects SFR use to be more than 10,800 acre-feet lower than under the S15 scenario by 2050—a difference that becomes even larger under the hot and dry climate change scenario, which recent research has found to be increasingly likely.[1]

The City's selection of the S15 scenario as the planning basis appears intended to ensure sufficient indoor SFR use to maintain wastewater flows for the Pure Water project. However, the S15 scenario does not assess how much additional outdoor conservation is achievable and desirable. The City can maintain indoor water use and wastewater flows, while significantly reducing outdoor irrigation use. Those are not mutually exclusive scenarios. Given mounting climate change impacts and likely reductions in imported water supply, this omission is a serious planning deficiency.

Scenario selection carries significant implications for City investment decisions. Through its membership in SDCWA and MWD, the City faces imminent decisions regarding the Delta Conveyance Project, Colorado River allocation agreements, and Carlsbad desalination contract modifications. The City Council should have a full and accurate picture of affordability and supply impacts across demand scenarios. If water use follows the On Trend trajectory, the need for additional imported water investments would be substantially reduced.

Indeed, the On Trend scenario is aptly named — both per capita and overall water use have been declining for decades. Climate forecasts are dire and are already having significant impacts. Recent and planned future rate increases are also extremely likely to drive down demand in the not-so-distant future. The rapid aridification of the entire Southwest both necessitates reductions in water use through continuing conservation measures and ensures that relatively "cheap" water supplies are drying up, and thus water must come from more expensive supply sources, which drives rates up, which in turn will drive demand down. All of these factors strongly favor the use the On Trend scenario in the draft 2025 UWMP and WSCP.

Cost and Affordability Analysis

The discussion of future water costs (pp. 6-11 to 6-12) lacks adequate analysis and omits any explanation of how future cost increases could affect ratepayers and PUD finances. This gap is particularly concerning given that the City has recently approved two years of double-digit rate increases and has released financial planning documents projecting the need for additional significant rate increases. Although the On Trend scenario anticipates demand reductions in response to rate increases, the draft UWMP does not address the probability of increased household delinquency due to high bills, nor the potential implications for rate design, reserve funds, and future operations.

Drought Response Planning

In its drought assessment, the draft UWMP assumes demand will increase for multiple years before decreasing due to mandatory conservation measures. Table 6-4 projects that in a five-year drought, demand would not fall until year four. This assumption underestimates the capacity of water users to respond quickly. Evidence from prior droughts demonstrates that customers and the City can mobilize

[1] https://news.cornell.edu/stories/2025/07/climate-change-lowers-precipitation-prolongs-drought-southwest; https://www.pbs.org/newshour/science/the-southwest-smashing-heat-records-in-march-is-what-climate-change-looks-like.

conservation measures rapidly when conditions require it. The draft plan should reflect more aggressive early drought response assumptions.

Recommendations

In light of the foregoing, San Diego Coastkeeper respectfully urges the City to revise the draft UWMP to:

- Adopt the On Trend forecast as the planning basis and use it to guide future supply planning and investment decisions.
- Improve the analysis of future cost and affordability impacts, including the risk of increased household delinquency and its effects on rate design and reserve funds.
- Include a more robust discussion of outdoor water conservation opportunities. Outdoor residential irrigation remains a significant share of total City water demand and represents the largest and most achievable source of future demand reductions. It deserves more thorough analysis.
- Adopt and implement early and aggressive drought response protocols, consistent with the demonstrated capacity of water users to conserve quickly.

This UWMP presents an important opportunity for the City to move beyond disproven demand growth assumptions and to honestly account for the relationship between rising costs and declining use. While the draft acknowledges previous inflated estimates and includes a scenario reflecting the effect of future rate increases, it elects to use a less realistic scenario on the grounds of being "conservative." This is the same mentality that contributed to the current regional rates crisis. Given clear and long-standing evidence of increasing SFR conservation, particularly for outdoor residential irrigation, there is no reasonable basis for this approach.

The City should instead take a clear-eyed approach to future water demand and make budgetary and infrastructure investment decisions accordingly. We appreciate the opportunity to comment and welcome further dialogue on these issues.

Respectfully,

Phillip Musegaas
Executive Director
San Diego Coastkeeper