April 25, 2026

Efren Lopez
Senior Water Resources Specialist
San Diego County Water Authority
4677 Overland Ave.
San Diego, CA 92123

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

Dear Mr. Lopez,

San Diego Coastkeeper and the Environmental Center of San Diego (Organizations) respectfully submit the following public comments on the San Diego County Water Authority's (SDCWA) Draft 2025 Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan (WSCP) (Draft Plan). We appreciate the opportunity to provide input on this critical planning document, which will guide multi-billion dollar investment decisions affecting ratepayers and the region's water future for decades to come.

Organizations emphasize that UWMPs should not be treated as mere regulatory formalities — they are foundational planning documents that drive consequential infrastructure and investment decisions. It is therefore essential that the Draft Plan be grounded in realistic, data-driven forecasts and a frank assessment of the challenges ahead. Organizations appreciate SDCWA's significant course correction in demand forecasting in the Draft Plan, and we offer the following comments to help ensure the final UWMP is as accurate, comprehensive, and useful as possible.

Improved Demand Forecasting

Organizations acknowledge and appreciate that the Draft Plan represents a significant improvement over prior the demand forecasting of prior UWMPs, which chronically and significantly overestimated water demand. Organizations believe this has been a primary driver of the region's ongoing water rates crisis. The Draft Plan's relatively flat demand forecast through 2050 is a dramatic and welcome course correction that better reflects two decades of sustained demand reduction. That said, the Draft Plan still overestimates future demand, and we offer the recommendations below to address that and other significant gaps.

Demand Forecast Remains High and Lacks Critical Analysis

The Draft Plan relies on the "SD15" population growth forecast to model future water demand. As with the City of San Diego's draft 2025 UWMP, this method likely overstates future demand.

However, while the City's draft included an alternate assessment using an "On Trend" scenario for water use, SDCWA's Draft UWMP does not include any alternative scenarios for comparison or consideration.[1]

The City's On Trend scenario is aptly named — both per capita and overall water use have been declining for decades. Likewise, as clearly shown in Figure ES-1, SDCWA water demand has been trending downward for approximately twenty consecutive years—not merely remaining flat. Future projections should account for this sustained trend, which reflects structural shifts in regional water use that are likely to continue. Climate forecasts are dire and are already having significant impacts. Recent and planned future rate increases are also extremely likely to drive down demand. 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. Thus water must come from more expensive supply sources, which drives rates up, which in turn will further drive demand downward. These factors strongly favor the use an "On Trend" scenario in SDCWA's Draft Plan.

The Otay Water District Demand Projections Require Scrutiny

Most SDCWA member agencies forecast declining or relatively stable demand through 2050. Yet the Draft UWMP forecasts an overall 4.3% demand increase, driven almost entirely by Otay Water District's projection of a 62% increase in water use, totaling approximately 17,734 acre-feet. Otay has not released its own draft 2025 UWMP, but its budget analysis projects only a 12% population increase by 2055. If Otay's demand projections are revised to better align with its own population projections, SDCWA's overall demand forecast could become essentially flat. SDCWA should provide a more thorough analysis of Otay's demand assumptions and include updated projections as they become available.

The Draft Plan Fails to Account for Demand Reductions Driven by Rate Increases and Climate Change

The Draft Plan contains no analysis of how rising water costs will affect demand. As the cost of the water rises, demand is likely to respond. This relationship between price and demand must be analyzed, and the Draft Plan's omission of any affordability analysis is a serious omission.

The Draft Plan also fails to account for how climate change will drive further reductions in demand through landscape conversion. Although the Draft Plan notes that warmer temperatures increase evapotranspiration and outdoor water use, it fails analyze how ratepayers may respond by replacing thirsty landscaping with drought-tolerant and native plants, particularly as water rates rise. This is a foreseeable and important feedback loop that must be included in demand forecasting and scenario planning.

The "Demand Hardening" Analysis Is Unsupported and Should Be Revised

Organizations strongly disagree with the Draft Plan's treatment of "demand hardening" in Section 9.4.3. This section asserts that "no water shortages are anticipated throughout the

[1] City of San Diego 2025 Urban Water Management Plan, https://www.sandiego.gov/sites/default/files/2026-02/2025-uwmp-public-review-draft_final-1.pdf.

planning horizon" and that "essential uses are less responsive to price increases." Draft Plan at 9-8. These assumptions are both questionable and inconsistent with the available data.

A significant share of SDCWA supplies is used for residential outdoor irrigation. By the Draft Plan's own figures, ***15–22% of the SDCWA's total water is used for single-family residential outdoor irrigation alone***.[2] Some estimates put 30–40% of total service area usage as municipal and industrial outdoor irrigation.

Outdoor irrigation is not an "essential use" in the relevant sense, nor is it inelastic. It is highly responsive to price signals, conservation programs, and landscaping requirements. Furthermore, over "the next few years, California's turf replacement requirements will move beyond pilot projects and become phased statewide mandates, with potable water irrigation of nonfunctional turf prohibited across more property types by 2027–2028." Draft Plan at 3-4. The Draft Plan specifically points out the Large Landscape Direct Install Pilot Program, and the LEAVES program. *Id*. However, the Draft Plan fails to analyze what impact these will have on SDCWA service area demand.

Furthermore, SDCWA's current per capita water use is approximately 126 gallons per capita per day (GPCD). While this represents substantial progress from 222 GPCD over thirty years ago, it remains far above comparable arid-climate cities such as Melbourne, Australia (approximately 40 GPCD) and Sydney, Australia (approximately 55 GPCD). As such, the Organizations strongly disagree with the Draft Plan's assessments regarding demand hardening. The Draft Plan should be revised to include a more robust discussion of outdoor water conservation, which represents the largest and most achievable source of future demand reductions and deserves a more thorough analysis.

The Draft Plan Must Include a More Robust Colorado River Supply Reliability Analysis

The Draft Plan's supply reliability analysis is insufficiently attentive to real and growing risks to SDCWA's imported water supplies, particularly from the Colorado River. The Colorado River Basin is experiencing unprecedented long-term drought conditions. The U.S. Bureau of Reclamation has reported that Lake Powell's water year minimum probable inflow is forecasted at just 2.78 million acre-feet, approximately 29% of the historical average and one of the lowest on record.[3] Lake Powell may decline to below the minimum power pool level of 3,490 feet by August 2026 without major intervention. Reclamation's emergency release of up to one million acre-feet of water from Flaming Gorge is a short-term measure, not a long-term solution for a structurally over-allocated river system.

Reclamation's Draft Environmental Impact Statement for *Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead* includes alternative proposals that could reduce flows

[2] M&I = 94% of total; Residential = 68% of M&I (0.94 × 0.68 = 63.9% of total); SFR = 58% of residential (0.639 × 0.58 = 37.1% of total); Outdoor SFR = 40–60% of SFR (0.371 × 0.40 to 0.371 × 0.60); Outdoor SFR = ~14.8% to 22.3% of total water use.

[3] U.S. Bureau of Reclamation, *Reclamation Acts to Protect Colorado River System During Historic Drought*, https://www.usbr.gov/newsroom/news-release/5326.

to lower basin states by between 1.48 and 4 million acre-feet.[4] The entire framework of the "Law of the River" is being reconsidered in light of our new climate reality, stalled interstate negotiations, and the imminent expiration of the 2007 Interim Guidelines. Litigation appears increasingly likely, which could further disrupt existing water rights and allocation frameworks.[5]

Despite this context, the Draft Plan does not assess any scenario involving Colorado River shortages or curtailments associated with SDCWA's Quantification Settlement Agreement (QSA) supplies from the Imperial Irrigation District. It also does not adequately assess the potential impacts of future operational guidelines on the Metropolitan Water District's (MWD) Colorado River supplies, or SDCWA's preferential rights to MWD supplies. This is a serious omission.

Generally, the Draft Plant also fails to analyze droughts and dry years *outside* of the SDCWA service area. Because the vast majority of SDCWA supplies comes from the Colorado River, the Organizations strongly recommends that the Draft Plan include a dedicated section on drought and dry-year conditions in the Colorado River Basin, including the associated snowpack and runoff, including analysis of scenarios involving reduced QSA supply availability and impacts to MWD's Colorado River supplies. The Draft Plant should not simply assume that SDCWA will receive all of its QSA supplies from IID, as well as the ability to purchase approximately 350,000–400,000 acre-feet per year from MWD through 2050 without reductions or disruption.

The Draft Plan Must Address Water Sales and Affordability

The Draft UWMP does not address our region's extremely high water rates, nor SDCWA's recent and prospective water sales to agencies outside its jurisdiction, even though such sales could have significant impacts on regional rates, demand, and supply planning. SDCWA is already exploring options to sell water from the Carlsbad desalination facility to buyers in other parts of California or other states.

These water sales, particularly at higher prices to buyers in other states, would also give SDCWA greater operational flexibility, instead of being pigeonholed so tightly against its obligated purchase agreements. This critical and increasingly likely water sales scenario would have significant impacts on immediate regional water rates, and correspondingly, demands for SDCWA controlled supplies.

The Draft Plan should assess likely future water sales scenarios and their financial implications for SDCWA ratepayers. It should also include a frank discussion of the affordability impacts facing ratepayers, including the cumulative cost burdens resulting from local supply diversification and the potential future costs of regional infrastructure projects such as the Delta Conveyance Project.

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[4] https://www.usbr.gov/ColoradoRiverBasin/post2026/draft-eis/docs/executive-summary/P26-DEIS-Exec-Summary.pdf.

[5] *See* slide 35, Status of Post-2026 Negotiations, https://www.sdcwa.org/wp-content/uploads/2025/11/04232026_Presentations_Combined.pdf.

Summary of Recommendations
The Organizations respectfully requests that SDCWA revise the Draft 2025 UWMP to:

- Adopt an On Trend demand forecast (or an equivalent data-driven alternative to the SD15 model) and use it to guide future supply planning and investment decisions;
- Include additional detail and scrutiny regarding per-capita demand trends and the Otay Water District's growth projections;
- Add a substantive analysis of how rising water costs and price signals will affect future demand, including the financial implications of major regional and statewide infrastructure investments;
- Revise the "demand hardening" analysis to accurately reflect the significant remaining potential for outdoor water conservation and the anticipated impacts of California's turf replacement mandates;
- Include a dedicated section analyzing drought and dry-year supply risks on the Colorado River, including scenarios involving curtailments to QSA supplies and MWD allocations;
- Assess likely third-party water sales scenarios and their impacts on regional demand, rates, and supply planning; and
- Include a comprehensive affordability analysis, including the projected rate impacts of existing and proposed supply investments.

This Draft Plan represents an important opportunity for SDCWA to honestly confront the affordability and supply reliability challenges that will define the region's water future. The Organizations commend SDCWA for its improved demand forecasting and encourages it to go further by grounding the final UWMP in realistic projections, rigorous scenario analysis, and a forthright assessment of the financial and supply risks on the horizon.

We appreciate SDCWA's consideration of these comments and welcome the opportunity to discuss them further. Please feel free to contact us at the address below.

Respectfully submitted,

Patrick McDonough
Senior Attorney
San Diego Coastkeeper

Pam Heatherington
Director
Environmental Center of San Diego