

Submitted via electronic mail to agwue@water.ca.gov

August 22, 2025

Jennifer Morales
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Water Use Efficiency Branch
Department of Water Resources
P.O. Box 942836-0001
Sacramento, CA 94236-0001

Re: ACWA Comment Letter regarding Draft 2025 Agricultural Water Management Plan Guidebook

Dear Ms. Jennifer Morales,

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide public comments to the California Department of Water Resources (DWR) on the Draft 2025 Agricultural Water Management Plan (AWMP) Guidebook (Guidebook). ACWA represents approximately 470 public water agencies that collectively deliver approximately 90 percent of the water in California for domestic, agricultural, and industrial uses.

ACWA appreciates DWR's release of the Guidebook to aid suppliers in complying with the required elements under the Agricultural Water Management Planning Act, the Agricultural Water Measurement Regulation, and Assembly Bill 1668. ACWA supports California's advancement of long-term efficient and wise use of water in a manner that is feasible, cost-effective, and minimizes unintended impacts to California's communities. To that end, we offer the following comments to DWR to maximize the utility of AWMPs and minimize unintended confusion by suppliers when submitting reporting data.

1. Simplify the AWMP Submission Process

Within 30 days of adopting an AWMP, an agricultural water supplier must make a copy available for public review on their website in addition to providing copies to a number of different entities: DWR, the California State Library, any groundwater entity in the area, and any city/county the water supplier provides supplies to (Section 3.1.3). However, it is currently unclear how AWMPs are being utilized by interested parties and whether it is necessary to invest effort in circulating additional copies. ACWA recommends allowing a water supplier to satisfy submittal requirements by submitting a plan to DWR and concurrently posting a copy on their website for public access. Any other distribution of AWMPs should be coordinated by DWR or interested parties should be directed to the water supplier's website where the AWMP is posted.

2. Clearly Separate Required Data Versus Suggested Data

The goal of the Guidebook is to clearly identify information and elements required by the California Water Code (Water Code), as well as potential additional information Agricultural Water Suppliers can include for future planning. To that extent, the 2025 Guidebook includes the addition of a template and the inclusion of additional informational appendixes, such as Appendix D, which provides a crosswalk for AWMPs with Urban Water Management Plans. ACWA recognizes the effort DWR staff has made to denote what is statutorily required, however the Guidebook is layered with recommendations on what could be included in an AWMP. ACWA suggests that the Guidebook make a clear distinction between data that is required by DWR and supplemental data to avoid unintended prescriptive effects.

3. Provide Clarity on How AWMP Data is Utilized

Over a decade has elapsed since AMWPs have been required. It would be beneficial for DWR to assess how the data is being utilized for water management. ACWA recognizes the important goal of AWMPs improving agricultural water use efficiency and serving as long-term planning documents for water suppliers. However, water reporting requires significant staff resources; for smaller agencies with less capacity, these requirements impose an even greater cost. Although data is submitted in a 5-year cycle, the redundancy in reporting across the Water Code is leading to duplicative reporting requirements. As such, ACWA requests an update on how DWR *and* interested parties, such as the entities receiving AWMP copies, are utilizing the data. Additionally, soliciting input from agricultural suppliers on what information has proved fruitful may lead to a more effective reporting cycle.

ACWA looks forward to collaborating on how to effectively provide data that is beneficial to suppliers and communities across the state. ACWA stands ready to collaborate with and appreciates the opportunity to provide input to the state agency on this effort. Please do not hesitate to contact me at amberr@acwa.com or (916) 441-4545 if you have any questions regarding ACWA's input.

Sincerely,

A handwritten signature in dark ink, appearing to read "Amber Rossow". The signature is fluid and cursive, with the first name "Amber" being more prominent than the last name "Rossow".

Amber Rossow
State Relations Advocate
Association of California Water Agencies

cc: Ryan Bailey, Water Use Efficiency Branch, Department of Water Resources
Mr. Marwan Khalifa, Interim Executive Director, Association of California Water Agencies
Ms. Cindy Tuck, Deputy Executive Director, Association of California Water Agencies