

Sent via ELECTRONIC MAIL to RegulatoryAlignmentStudy@crowe.com

October 15, 2025

California Department of Food and Agriculture
1220 N Street
Sacramento, CA 95814

Re: Comment Letter – DRAFT Final Recommendations and Implementation Steps Released in September 2025

Dear California Department of Food and Agriculture,

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide comments on the Regulatory Alignment Study (Study) Draft Final Recommendations and Implementation Steps (Report) produced by Crowe LLP for consideration by the California Department of Food and Agriculture, California Environmental Protection Agency, and State Water Resources Control Board. ACWA represents 470 public water agencies that collectively deliver approximately 90 percent of the water in California for domestic, agricultural, and industrial uses.

ACWA values efforts to streamline administrative processes and optimize the State's data collection, particularly those within water quality regulatory programs. Water suppliers, like producers, face reporting challenges that contribute to the fragmented systems identified in the Report. Specifically, the Report's recommendations that emphasize the importance of consistent and transparent data governance resonate with ACWA's membership, such as Recommendation 13, which suggests a data framework for interagency data coordination.

For purposes of consistency, as different data initiatives are being conceived, we would encourage standardizing language that could be utilized across state agencies. Consistent use of defined terminology can improve data quality and help regulators share information more easily. ACWA also encourages continued collaboration across state agencies to enforce consistency in reporting. Inconsistent reporting, such as varying reporting cycles and data formats, limits the ability of the State to reconcile information across urban, agricultural, and groundwater suppliers. Data centralization and state agency coordination is integral to reducing duplicative reporting across all information silos, consequently relieving burdens on existing resources.

Several of the Report's recommendations could be replicated across state agencies. As recommendations are considered and implemented, ACWA suggests making progress publicly available, including challenges encountered and sources of funding utilized. Transparency about strategies and challenges could help generate ideas in other areas and help replicate successful

approaches. We are pleased to see the completion of this Study and look forward to continued progress based on its findings.

ACWA members share the same goal as the Report: supporting the State's data collection and information sharing efforts and strengthening environmental and public health outcomes. ACWA appreciates the consideration of these comments. If you have any questions or would like to discuss the comments, please contact Amber Rossow at amberr@acwa.com or (916) 669-2434.

Sincerely,



Amber Rossow
State Relations Advocate
Association of California Water Agencies

CC: Mr. Marwan Khalifa, Interim Executive Director, Association of California Water Agencies
Ms. Cindy Tuck, Deputy Executive Director, Association of California Water Agencies