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**DEPARTMENT OF WATER RESOURCES**

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8 **BEFORE THE**  
9 **CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

10 **HEARING IN THE MATTER OF CALIFORNIA**  
11 **DEPARTMENT OF WATER RESOURCES**  
12 **AND UNITED STATES BUREAU OF**  
13 **RECLAMATION REQUEST FOR A CHANGE**  
14 **IN POINT OF DIVERSION FOR CALIFORNIA**  
**WATER FIX**

**TESTIMONY OF BRANDON GOSHI**

15 I, Brandon Goshi, do hereby declare:

16 **I. INTRODUCTION**

17 My name is Brandon Goshi. A summary of my expertise is included in my statement  
18 of qualifications, a true and correct copy of my statement of qualifications has been  
19 submitted as DWR-1204.

20 **II. OVERVIEW OF TESTIMONY**

21 This rebuttal testimony provides response to issues raised by Protestants relating to  
22 Urban Water Management Plans (UWMP) and the development of local and regional water  
23 supplies in Southern California.

24 Specifically, I reviewed the written and oral testimony of Doug Obegi of NRDC. A  
25 summary of my opinions is provided below:

- 26 • MWD and its member agencies conducted an extensive participatory process in  
27 the preparation of MWD's UWMP, which was approved and certified by its 38-

1 member Board of Directors representing the 26 member agencies and certified  
2 by the California Department of Water Resources.

- 3 • NRDC's assessment and "Mismatched" report has flawed conclusions derived  
4 from a failure to adequately and appropriately compare information reported in  
5 relevant water agencies' UWMPs.
- 6 • NRDC did not verify or clarify their inappropriate conclusions with relevant water  
7 agencies prior to publishing and relying upon their own findings in this hearing.
- 8 • MWD has a strong history of planning and developing implementation of  
9 conservation and local resources.

10 **III. MWD AND ITS MEMBER AGENCIES CONDUCTED AN EXTENSIVE**  
11 **PARTICIPATORY PROCESS IN THE PREPARATION OF MWD'S UWMP**

12 In NRDC-1, Mr. Obegi testified that the report, *Mismatched: A Comparison of Future*  
13 *Water Supply* ("Mismatched Report") (NRDC-3) provides evidence of inconsistency  
14 between the MWD's UWMP and the UWMPs of its member agencies. Much of the  
15 purported inconsistency can be attributed to fundamental flaws in the comparison analyses  
16 performed by NRDC.

17 MWD's UWMP contains consistent and coordinated information that was developed  
18 and reviewed by its member agencies during the extensive development process for the  
19 MWD's Integrated Water Resources Plan and the UWMP. The coordination process was  
20 conducted over the course of a year. In total, there were 21 technical coordination  
21 meetings held with member agency staff and management and 11 Board committee  
22 meetings. During the process, information on projection and forecasting methodology was  
23 presented and data sets distributed to the member agencies on demographic projections,  
24 demand forecasts and local supply projections. MWD staff also met with member agency  
25 staff upon request to review data and discuss any agency-specific questions or issues. In  
26 addition, MWD also held a public workshop, which 450 members of the public, including  
27 member agency staff, attended. MWD's UWMP was ultimately approved and certified by  
28 the MWD Board of Directors, which is made up of 38 members who directly represent the

1 26 member agencies. It is important to note that MWD's UWMP, as well as the UWMPs of  
2 its member agencies were certified as compliant with State law by the Department of Water  
3 Resources. (DWR-1335, pp. 5-1 to 5-5.)

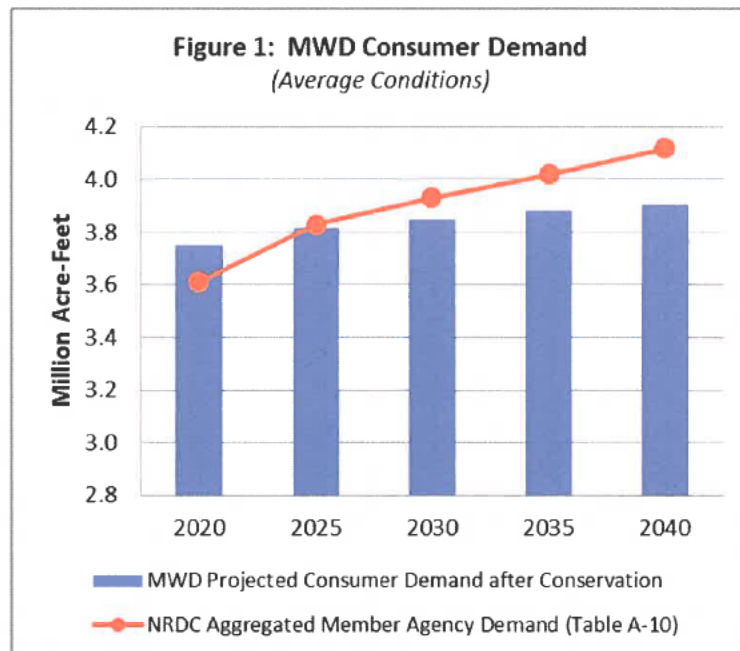
4 **IV. NRDC "MISMATCHED" REPORT MISREPRESENTS BOTH THE**  
5 **ACCOMPLISHMENTS AND FUTURE NEEDS FOR LOCAL AND**  
6 **REGIONAL WATER INVESTMENTS AND CONSERVATION**

7 In NRDC-1 at page 2, Mr. Obegi asserts that there are "opportunities to create  
8 millions of acre feet of water supply through local and regional projects within the service  
9 areas of contractors of the State Water Project (SWP) and Central Valley Project (CVP)"  
10 and that "regional and local water supply projects including improved agricultural and urban  
11 water use efficiency, water recycling, and stormwater capture are technically feasible, cost-  
12 effective, and would create significant jobs in these communities." To support this point, he  
13 references his Mismatched Report." In the report and in his testimony, Mr. Obegi also cites  
14 a mismatch between estimates of future water demands by MWD and its member agencies  
15 as a reason for asserting that Southern California has overestimated water demands and  
16 the need for future water development. (See e.g., NRDC-1 at p. 3.) Mr. Obegi attempts to  
17 make this conclusion by underestimating local and regional supply development and by  
18 overestimating future water demands; hence he indicates MWD has overstated the needs  
19 for additional water supply reliability that would come from WaterFix. (See e.g., NRDC-1 at  
20 pp. 3-4.) Mr. Obegi's conclusion is incorrect.

21 Mr. Obegi has made flawed conclusions about the consistency of local and regional  
22 supplies and future demands between MWD's and its member agencies' UWMPs. First, it  
23 is a complex process to aggregate the UWMPs of MWD's member agencies and compare  
24 it directly to MWD's UWMP. Each agency may present required information through the  
25 UWMP's differently, making aggregation difficult. Based on his testimony, in my opinion,  
26 Mr. Obegi has no training in preparing or reviewing UWMP's (NRDC-1, p. 3 ["NRDC simply  
27 reviewed and synthesized data . . .].) It is my opinion that this led to erroneous  
28

1 interpretations of member agency data and resulted in misrepresentations of data  
2 comparisons and related conclusions.

3       Regarding future water demands, in his testimony, Mr. Obegi shows a comparison of  
4 Per Capita Demand for Water and concludes that a direct comparison shows that MWD's  
5 estimates exceed the member agencies' estimates by 40 to 80 gallons per capita per day.  
6 (NRDC-1, p. 3.) This conclusion was fundamentally flawed in that NRDC included non-  
7 consumptive demands for water as reported in MWD's UWMP and compared them to  
8 mostly consumptive demands for water as reported by some or all of the member agencies.  
9 This is an inappropriate comparison. Mr. Obegi also did not account for whether or not  
10 estimates of future conservation programs were included in MWD's or the member  
11 agencies' demand projections. He testified to not being aware of these differences and  
12 how they should be accounted for. (April 9, 2018, Transcript, Vol. 26, p. 34:3 through p.  
13 36:2.) He also testified to not being aware that a more correct accounting of the demands,  
14 which adjusted for the non-consumptive demands and future conservation, reconciled  
15 much of the difference cited by NRDC and put MWD's and the member agencies' demands  
16 within about 5 percent of each other. (April 9, 2018, Transcript, Vol. 26, p. 36:16 through  
17 37:1-24.)



1           Regarding local and regional supplies, in his testimony, Mr. Obegi states that by  
2 2040 local water agencies are projecting 229,000 acre-feet more in local supply  
3 development than MWD. (NRDC-1, p. 4.) He continues to conclude that this difference is  
4 due to MWD's conservative methodology of only including projects currently producing  
5 water, projects under construction, and local supply targets identified in its Integrated Water  
6 Resources Plan. (NRDC-1, p. 5.) He also cites that MWD's UWMP does not include  
7 planned or proposed water supply projects, specifically naming the proposed water  
8 recycling project in Carson and the PURE Water San Diego water recycling project, both  
9 projects of significant size. (NRDC-1, pp. 4- 5.) It is true that the MWD's member agencies  
10 may have included potential future projects in their UWMP analyses of future local supplies  
11 that MWD does not count in its UWMP. It is my opinion that MWD's member agencies'  
12 have been optimistic with regard to their reporting of identified vs. actual development of  
13 local supplies and the loss or reduction of existing supplies. MWD performed a comparison  
14 of actual 2015 local production with projected 2015 local production for a sample of 18  
15 member agencies whose past UWMP's were available and contained comparable  
16 information. That comparison showed that in the 2000 UWMPs, the member agencies  
17 projected 778,489 acre-feet more production for 2015 than was actually produced and  
18 available in 2015. The difference in projections and actuals narrowed as the UWMP's  
19 moved closer towards 2015, but there was still a difference of 321,424 acre-feet between  
20 the 2010 UWMPs and actual local supply production just five years later. See Table 1.

21                           **Table 1: 18 Member Agencies<sup>1</sup> - All Local Supplies**

	Projected Production for 2015	Actual Production in MA 2015 UWMP	<i>[Actual] - [Projected] Difference</i>	<i>% Lower Than Projection</i>
2000 UWMP	1,863,391	1,084,902	<i>(778,489)</i>	<i>-42%</i>
2005 UWMP	1,681,644		<i>(596,742)</i>	<i>-35%</i>
2010 UWMP	1,406,326		<i>(321,424)</i>	<i>-23%</i>

22           1. Member Agencies whose past UWMPs were available and contained comparable local supply information to their respective 2015 UWMPs.

23                           **V.     MWD HAS A LONG STANDING PLANNING HISTORY AND TRACK**  
24                           **RECORD OF DEVELOPMENT AND IMPLEMENTATION OF**  
25                           **CONSERVATION AND LOCAL RESOURCES**

1 I agree with Mr. Obegi's admission at NRDC-1, page 1 that WaterFix is part of an "all  
2 of the above" strategy of developing a diversified water resources approach that includes  
3 needed investments in local and regional water supply projects. The "all of the above"  
4 strategy for MWD is the result of long-standing planning and implementation efforts by  
5 MWD and its member agencies. The strategy and process has already resulted in  
6 substantial development of local resources and supplies. Following the severe drought in  
7 California that spanned from the mid-1980's to the early 1990's, MWD initiated a  
8 coordinated regional water resource planning effort known as the Integrated Water  
9 Resources Planning process. This process was intended to identify the necessary  
10 investments needed to ensure water supply reliability for the region. On the approval of the  
11 inaugural 1996 Integrated Water Resources Plan, MWD developed regional incentive-  
12 based approaches for increasing the development of structural water conservation  
13 programs and local supplies, specifically recycled water and groundwater recovery. In  
14 addition to conservation and local supplies, approaches were developed to improve  
15 conjunctive use groundwater storage within the local groundwater basins in Southern  
16 California.

17 As of June 30, 2017 MWD's Conservation Credits Program has invested \$772  
18 million in conservation programs implemented at the local level resulting in total water  
19 savings of 2.6 million acre-feet. MWD's Local Resources Program has invested \$448  
20 million in recycled water resulting in 180,000 acre-feet of annual recycled water production.  
21 Through the same program, \$151 million was invested in groundwater recovery projects  
22 resulting in 48,000 acre-feet of annual groundwater production. This is in addition to local  
23 agency investments which have resulted in an additional 280,000 acre-feet of annual  
24 recycled water production and 41,000 acre-feet of annual groundwater production from  
25 groundwater recovery projects.

26 MWD's most recent update of the IRP in 2015 continued the commitment to  
27 developing and maintaining local supplies and conservation, in addition to and in  
28 conjunction with WaterFix, and improving the reliability of Colorado River supplies.

Executed on this 9 day of July, 2018 in Los Angeles, California.

  
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Brandon Goshi

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