

# The SHIBATANI GROUP, INC.

*Water Supply Strategic Planning, Climate Change Hydrology, New Reservoir Development  
And CVP/SWP Operational Compliance for California's Water Industry*

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**DELIVERED BY EMAIL**

The Hon. Anthony Saracino, Chairman  
California Water Commission  
State of California, Resources Building  
1416 Ninth Street, Room 1131  
Sacramento, California 95814

**Re: California Water Commission  
2012 Draft Strategic Plan - Comments**

Dear Chairman Saracino:

Please accept the following observations and comments on the 2012 Draft Strategic Plan.

I applaud the efforts of the California Water Commission (hereinafter, the "Commission") at producing a very succinct, timely, and well-focused Draft Strategic Plan. I found the 2012 Draft Strategic Plan (hereinafter, the "Plan") to be well written, concise, and effective at appropriately capturing the prescient issues in contemporary California water resources. The clear enunciation of the Mission Statement and Goals was very helpful; supported by more detailed descriptions of the various Strategies. Additionally, the historical and current role of the Commission was enlightening and provides useful background to helping the public better understand the context of the Commission's various mandates. At least for me, I now better understand and appreciate the scope and responsibilities of the Commission.

I would like to offer a few observations and comments for your Commission's consideration. Some are general, some are specific, and some queries are included, but please consider these as merely observations; completely discretionary insofar as the Commission's review and deliberation is concerned.

- A ➤ It was satisfying to see water supply reliability listed prominently among the Critical Issues. Perhaps some mention of water supply reliability for other consumptive and non-consumptive uses may provide a broader appreciation of the magnitude of Statewide water supply reliability. For example, while the issue identifies *community* needs, agricultural and irrigation needs are equally compelling, especially in the Central Valley.
- B ➤ While acknowledging the State authority under which the Commission operates, the vital role of the federal Central Valley Project and, perhaps more importantly, its intertwined relationship with the SWP through the OCAP and COA should perhaps be mentioned. Since water resources management in California cannot be decoupled, the influence of the CVP or its coordinated operations is as an important element as the SWP and could easily be mentioned.
- C ➤ The acknowledgment of regional projects and local water needs was refreshing to see.

- D ➤ I was also very pleased to see the Commission's recognition of climate change among the identified critical issues in California water management. A subtle though important distinction, however, is not so much in how climatic forcings will alter inherent *variability*, but rather shift long-established hydrograph (i.e., runoff) response. All of our streams and rivers, especially those that have historically relied on a snowpack, will shift from their traditional spring-dominated flow patterns. It is this shift that will compel significant new changes to overall California water operational management practices and indeed, regulatory governance.
- E ➤ While a shifting streamflow response is already occurring, the linkage between extreme event probabilities and a changing climate is not as well defined. Under a future warming climate, extended periods of drought can be expected, but whether this will also translate into higher intensity storm cell activity is not yet incontestably established. Auto-regenerating convective cells that could produce extreme high intensity storms are dependent on numerous atmospheric variables occurring at various spatial and temporal scales. The Commission may wish to soften that statement under "Increasing Climate Variability".
- f ➤ I suspect you may receive comments from others stating that this Critical Issues listing is too limiting, but from a Statewide *water yield* and *availability* perspective, these are (at least in my somewhat biased view) the salient issues.
- G ➤ I note that much of the geographic focus appears to be on various Delta and related Central Valley activities, construction projects, initiatives, etc. Does the Commission's purview include more distal regions within the State and their related water resources management activities? For example, will it engage in discussions regarding out-of-State water importation, Sierra Nevada eastside stream management, central or north coast water issues, or those of the Imperial Valley? This is somewhat intriguing in that the comprehensive water package signed by then Governor Arnold Schwarzenegger cleared promoted a Delta and Delta watershed focus, but also included provisions affecting the entire State. So then, where does the Commission draw, or should draw the line?
- H ➤ I think that Goal 1 is excellent and fully support the Commission's role in this vital objective. Perhaps this Goal could best be enhanced, augmented, or integrated with similar public forum initiatives of ACWA, AWWA, PPIC, Water Education Foundation, California Water Plan Update 2013, etc.
- I ➤ Goal 2 is commendable and, in the interests of ensuring public transparency and technical legitimacy, provides a level of oversight of DWR that will be beneficial to all. I would, in fact, offer that Goal 2 could be expanded. I was curious with the statement under Strategy C - "*The Commission will review and inspect SWP construction and operations annually....*". [Emphasis added] What specifically, does the Commission have in mind in its annual review of SWP operations? Would this, for example, include annual DWR transfers, Table A allocations, export/inflow compliance, etc.? This will be a sensitive Goal to measure performance under.
- J ➤ Goal 3 could perhaps be strengthened within any one its Strategies by including specific reference to the U.S. Fish & Wildlife Service and NOAA Fisheries (National Marine Fisheries Service). These agencies have been at the center of several contemporary (and significant) issues regarding water operations throughout the Delta and Central Valley (e.g., delta smelt and salmonid Biological Opinions and RPAs). Their collaboration and partnership will continue to be important. How, or whether the Commission elects to participate in these ongoing discussions within the context of overall ESA consultation and the salmonid recovery mandates of the Department of Commerce will of course be up to the Commission.

- Along similar lines, how does the Commission view its role and future partnership with the Delta Stewardship Council and the BDCP? I noted that both, at least by name, were conspicuously missing from the Plan; perhaps this was intentional.
- The intent to contribute to the public discourse and body of knowledge on key water policy issues is reasonable. I would suggest adding Public Workshops as another effective means of promoting and facilitating this Strategy's purpose, much like the Commission's Water Storage Workshops of 2011.
- Finally, given the intricacies associated with many of the Strategies, does the Commission have any plans to develop Implementation Procedures or Guidelines that may help describe, in more detail, the various components, elements, and activities that would be associated with any of the identified Strategies? This may provide a convenient means of measuring progress and offer an efficient method of cross-checking activities.

Thank you for the opportunity to review and comment on the Plan. I look forward to seeing the Final Strategic Plan.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED**

**The SHIBATANI GROUP, Inc.**



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CEO & Principal Hydrologist

RS/sj