

Outline of Proposed CWC Comments for California Water Plan Update 2013

The Commission previously provided general comments on the public review draft of the California Water Plan Update 2013. Commission staff has now reviewed Volume 3, which contains specific Resources Management Strategies and recommendation.

While all of the Strategic Plan's Objectives and specific Resource Management Strategies touch upon issues of great interest to the Commission, this is an opportunity to provide comments on several cross-cutting themes and specific recommendations.

Commission may also want to address issue of the significant funding reductions to the Water Plan programs, planning, data collection, technical work and outreach activities that are expected in the years ahead and urge the Administration and the Legislature to provide the necessary financial resources to continue the work of the Water Plan Update.

Cross-cutting themes for Commission comments:

- **Integrated Activities, including Interdependence and Integration of Water Storage Projects:**
 - Acknowledge benefits of integrated resource planning for water storage and conveyance projects.
 - The Water Plan's chapters on Groundwater and Conjunctive Management, Water Transfers, System Reoperation highlight the interdependence of these resource management strategies with improved storage and conveyance.
 - Commission has done considerable work to quantify and measure the public benefits of water storage, which has resulted in a broader understanding of the interdependence of these projects.
 - Underscore the importance of evaluating individual projects in the context of the systemwide benefits they provide for sustainable water management and the environment when doing project planning or considering financing strategies.

- **Funding for Innovation and Infrastructure:**
 - Many of the Plan's chapters recommend funding for specific types of projects and Resource Management Strategies.
 - Commission supports new investments and believes the State must strategically consider projects that provide maximum benefits. Funding

must be evaluated within the context of a broad statewide funding plan or strategy.

- Commission supports the related Objective 17, *Improve Integrated Water Management Finance Strategy and Investments*.

- **Climate Change:**

- Acknowledge the value of considering climate change impacts in every Resource Management Strategy.
- The plan provides important new data and information that can inform decisions at all levels.
- Commission also recommends that a separate chapter or appendix document summarize the role of each resource management strategy in addressing climate change.

- **Agency Alignment and Collaboration:**

- Theme of improved agency alignment is highlighted throughout the document.
- Collaboration at all levels and throughout project development and operations is critical to effective management of California's water and provides confidence to the public
- Theme aligns closely with the Commission's strategic plan Goal 3C to improve coordination between federal, state, tribal and local public agencies and stakeholders.

- **Improved Data and Technical Assistance:**

- Objective 10, *Improve Data, Analysis, and Decision Support Tools* and many of the Resource Management Strategies identify the need for improved data collection, sharing of data, data consistency, and technical assistance.
- Commission strongly supports efforts by the State to improve the integrity, consistency and accessibility of data that enables better water management.

- **Outreach and Education:**

- Commission supports the many outreach and education actions and recommendations

- Demonstrates the commitment to increased opportunities for public discourse, engagement and transparency for water projects, programs, decisions, and actions.

Specific Recommendations: (This list includes topics which are directly related to the Commission’s strategic plan as well as areas of interest to the Commission that have been highlighted during public meetings. The Commission may wish to consider comments on other recommendation areas as well.)

	Topic and Recommendation	Commission Comments	Link(s) to Strategic Plan	Section
1	Water Rights: The state should clarify policy and improve incentives, assurances, and water rights protections to allay fears over the loss of water rights resulting from improved water use efficiency.	The Commission agrees that it is important to recognize and work to protect existing water rights, including tribal water rights, when considering new water management strategies.	Goal 3A	Chapter 2 (Agricultural Water Use Efficiency), Recommendation 1
2	Conservation Rate Structures: DWR and other agencies should evaluate the effectiveness of rate structures in conservation and assist utilities in developing sustainable conservation rate structures.	The Commission has been made aware of the challenges water agencies face when implementing conservation pricing, including a briefing on potential rate structure, Consumption-Based Fixed Revenue at its May 2013. Commission supports this recommendation to continue to evaluate effective approaches to promote conservation and rate structures.	Goal 3	Chapter 3 (Urban Water Use Efficiency), Recommendation 1
3	The Energy-Water Nexus: This section highlights the connection between urban water use, energy, and greenhouse gases.	The Commission supports additional work and research to promote energy savings through water conservation measures and increase awareness of the water-energy nexus by the public and policymakers. This item, which has been discussed with the Commission in the context of the State Water Project energy use and production, as well as the October 2013 AB 32 update. Recognition of the water-energy nexus will become	Goal 3E	Chapter 3 (Urban Water), Box 3-13

		increasingly important as the state adapts to climate change. important issue.		
4	Quantification of Benefits: This section stresses the importance of quantifying the benefits of system reoperation strategies.	The Commission's document Description and Screening of Potential Tools and Methods to Quantify the Public Benefits of Water Storage Projects provides guidance on economic methods for quantifying the public benefits of System Reoperation Projects. The California Water Plan may wish to reference that document in this section.	Goal 3B	Chapter 7 (System Reoperation), Body, Pages 7-8 and 7-9
5	Water Transfers: The approval process of state and federal agencies for water transfers should be streamlined where approvals are required, while protecting water rights, the environment, and local economic interests.	At the Commission's joint meeting with the California Food and Agriculture Board in September 2013, this issue was addressed. The Commission supports additional work to consider how state, federal, and local agencies can most effectively manage water transfers while addressing economic, environmental, and third-party impacts.	Goal 3A	Chapter 8 (Water Transfers), Recommendation 3D
6	Bulletin 118: The Water Plan used the development of this Resource Management Strategy to fill the need for an updated Bulletin 118. Bulletin 118 has not been updated since 2003 due to funding constraints.	The Commission commends DWR on this collaborative approach to provide important data and information that will support sound groundwater management decisions, especially in light of funding constraints that have prevented DWR from updating Bulletin 118.	Goal 3C	Chapter 9 (Conjunctive Management), Body, Page 9-9
7	Bond Funding: Projects will request bond funding from California Water Commission by 2016.	While discussions on a revised water bond continue, the Commission is working with DWR on sound methodologies for quantifying public benefits of water storage projects, and strategies for effectively investing in the public benefits of water projects in California.		Chapter 9 (Conjunctive Management), Recommendation 10F
8	Surface Storage Investigations: CALFED signatories and stakeholders should continue to prioritize	The Commission has been briefed on DWR's Surface Storage investigations as part of its overall work on water storage projects and	Goal 3B	Chapter 13 (Surface Storage – CALFED), Recommendation

	work efforts to complete the feasibility and environmental studies of the surface storage investigations.	supports the ongoing development of work that will inform future decisions and funding for projects to address the state's water management needs.		1
9	Drinking Water Standards and Costs: The cost of providing drinking water in compliance with all drinking water standards is steadily increasing due to increasing costs for energy and materials and increasing regulations requiring higher levels of treatment.	The Commission has identified this issue as one of great significance and importance to the state. A greater understanding of the relationship between increasing treatment standards, costs for water management, and energy use is needed to fully understand the impacts of these changes on current and planned water management activities in communities throughout the state.	Goal 3E	Chapter 15 (Drinking Water), Body, Pages 15-8 and 15-9
10	Disadvantaged Communities and Environmental Justice: This Resource Management Strategy contains a basic description of Environmental Justice issues and activities.	The Commission recommends that, in addition to the information already provided in this chapter, that inclusion of a stronger statement about the importance of Environmental Justice and access to safe drinking water would be beneficial.		Chapter 15 (Drinking Water), Body, Page 15-16
11	Ecosystem Restoration: Multidisciplinary approaches to water, flood, and forest management should be promoted. Efforts should recognize the value of ecosystem services and meadow restoration.	The Commission has identified the issue of improved forest and meadow management activities as one which warrants further study and understanding for water supply and ecosystem benefits. Additionally, the Commission recognizes that ecosystem services are typically not valued in a traditional sense so considering how to best develop system of payments for ecosystem services may be an effective way to ensure they are appropriately valued in water management.	Goal 3B	Chapter 22 (Ecosystem Restoration), Recommendation 2 and Chapter 23 (Forest Management), Body, Pages 23-5 to 23-7