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November 14, 2016

Joseph Byrne, Chairman
Members of the Commission
California Water Commission
P.O. Box 924836
Sacramento, CA 94326
Sent electronically to WSIPComments@cwcc.ca.gov

RE: Comments on the California Water Commission Draft Water Storage Investment Program (WSIP) Quantification Regulations dated November 7, 2016

Dear Chairman Byrne and Members of the California Water Commission:

The undersigned organizations provide the following comments to the California Water Commission's ("Commission") proposed regulations (November 7, 2016) for Proposition 1, Chapter 8 ("The Water Storage Investment Program" or "Chapter 8").

We appreciate the continued improvements the Commission has made to the regulations. However, we must reflect serious disappointment and concern regarding the Commission's recent actions and directions given to Commission staff regarding the climate change analysis requirements, especially for those projects, such as Temperance Flat, that have put significant time, effort and funds into sensitivity analysis that adequately provides the information the Commission requires to determine the project's ability to adapt to the effects of climate change.

Investment in the proposed Temperance Flat dam and reservoir will help bring stability to the Central Valley by creating a more reliable source of surface water and conjunctive use opportunities that will help groundwater agencies achieve sustainable groundwater management under the Sustainable Groundwater Management Act. Over 20 years of Federal and State investment and study, at a cost of over \$35 million by the Department of Interior and Bureau of Reclamation alone, have developed an exhaustive record of analysis supporting the benefits of the project and its adaptability to future changing climate conditions.

Adoption of the proposed climate change analysis will require extensive new evaluations be done on projects with complete or nearly complete feasibility studies. When work began on these studies in 2003, the Bureau of Reclamation, DWR, and local entities collaborated to develop a set of "Common Assumptions" that were to be used for all CALFED project feasibility studies. This process included development of a CALSIM model that reflected 2030 level of development water demand conditions, hydrologic inputs without climate change adjustments, and a consistent regulatory operational framework. As the feasibility studies progressed, these assumptions were adjusted to reflect changes at the State-wide and local levels.

The feasibility studies and climate change analysis conducted for the CALFED projects are based on a well-established Federal process which results in the information required by the Commission to make its determination as to the resiliency of a project in a changing climate. The climate change analysis proposed in the draft regulations and Technical Reference Document would penalize projects like Temperance Flat by invalidating well-developed analysis and completed feasibility studies, and imposing unanticipated costs and duplicative analysis on a region that continues to suffer the effects of the drought.

We agree with the Commission that each project should demonstrate its ability to adapt to changing conditions and a changing climate. However, the application process should not disregard the significant work that has already been done in the Federal feasibility studies in favor of an untested climate change approach that requires applicants to predict what will occur in 2070.

For these reasons we urge the Commission to adopt an approach that allows applicants to demonstrate the resiliency of public benefits under a range of potential climate change scenarios through sensitivity analyses, such as the Federal feasibility studies, rather than the prescriptive benefit-cost and cost allocation approach presented in the draft regulations and Technical Reference Document.

Sincerely,



Roger Isom, President/CEO
California Cotton Ginners & Growers Associations
Western Agricultural Processors Association



Will Scott, President
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cc:

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