



December 19, 2016

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The Honorable Mark Cowin, Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comments on Public Review Draft Report to Implement Executive Order B-37-16 – Submitted by email to: wue@water.ca.gov

Dear Director Cowin and Chair Marcus:

The California State Association of Counties (CSAC) appreciates the opportunity to comment on the public review draft of 'Making Water Conservation a California Way of Life' for implementation of Executive Order B-37-16. CSAC is an association that represents county government before the Legislature, administrative agencies and the federal government. Representing all 58 of California's counties, CSAC places a strong emphasis on educating the public about the value and need for county programs and services critical for healthy communities.

Counties recognize the need for local programs and policies that promote water conservation and water storage, and support an approach to water conservation that promotes a permanent "conservation ethic" in California. As California faces another year of drought, we must use a variety of different tools and methods to ensure universal access to safe, reliable and affordable water. We appreciate the opportunity to work with the five agencies involved with implementing the Executive Order, and we would like to offer the following comments on the draft report.

Section 3.3 Drought Planning for Small Water Suppliers and Rural Communities

It is important to recognize and acknowledge in greater detail the complex governance structure of our water system in California. Counties have the responsibility to provide for the health and safety of their citizens. However, they are often not the water purveyor in a jurisdiction and often times have limited ability to enforce conservation policies. This is especially important when contemplating additional drought planning requirements. In order to effectively use limited planning resources at the local level, it is critical to first identify the gaps in existing planning requirements and data needed.

Furthermore, the State is engaged in a significant number of simultaneous water policy initiatives and projects, including the implementation of the Sustainable

Groundwater Management Act, California WaterFix, expenditure of Proposition 1 dollars by the California Water Commission for storage, Bay Delta Water Quality Plan, and the development of the 2018 California Water Plan Update, among others. In order to maximize our drought planning efforts, we must also acknowledge and build off the work being done in other related water planning activities.

Most critical to this discussion is the implementation of the Sustainable Groundwater Management Act (SGMA). Counties across the state are working with other local agencies to create Groundwater Sustainability Agencies (GSAs). These agencies will then develop groundwater sustainability plans (GSPs) for medium to high priority groundwater basins by 2020. There will likely be significant overlap in data required to develop GSPs and data to be used by small water systems to assess drought vulnerabilities. We support the recommendation for greater communications planning among stakeholders to help inform planning efforts.

Central to improving drought planning for small and rural communities is a demonstrated funding commitment from state agencies, and we support this recommendation under section 3.3.3. Many small and rural communities lack the technical and financial capacity to develop drought or water shortage contingency plans, in addition to their existing financial challenges for the operations and maintenance of systems, among other things. Additional resources are critical to these communities, and this work will not be able to be accomplished without further assistance.

CSAC appreciates the recommendation to improve engagement with cities and counties as well as our respective associations under section 3.3.3. We stand ready to work with the Administration and the relevant state agencies to help develop reasonable and effective solutions to improving water conservation and drought resiliency. Thank you for the opportunity to comment on the public review draft of 'Making Water Conservation a California Way of Life.' Should you have any questions or comments, please feel free to contact me at cmartinson@counites.org, or 916-327-7500, ext. 504.

Sincerely,



Cara B. Martinson
CSAC Legislative Representative

CC: Karen Ross, Secretary, California Department of Food and Agriculture
Robert B. Weisenmiller, Ph.D., Chair, California Energy Commission
Michael Picker, President, California Public Utilities Commission