



November 29, 2013

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The Honorable John Laird, Secretary  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

The Honorable Matthew Rodriquez, Secretary  
California Environmental Protection Agency  
1001 I Street  
Sacramento, CA 95814

The Honorable Karen Ross, Secretary  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

**RE: Public Review Draft of the California Water Action Plan**

Dear Secretaries Laird, Rodriquez and Ross:

On behalf of the California State Association of Counties (CSAC), I appreciate the opportunity to provide comments on the Public Review Draft of the California Water Action Plan (the Plan). CSAC appreciates the Administration's identification of this broad suite of actions to secure reliable water supplies, restore important species and habitat, and construct a more resilient water system.

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 and sustainable communities. As you know, counties are tasked with the responsibility of protecting the health, welfare, and safety of their citizens. As such, they should be treated as vital partners in the stewardship of our state's water resources.

Generally, we view the Plan's identified key actions to address the State's water needs as consistent with CSAC's policy direction on a wide range of water issues, including water conservation, regional self-reliance, the Delta, water storage, safe drinking water, flood protection, regulatory efficiency and financing.

There are however a few weaknesses, particularly with respect to the lack of detail provided under each action. Specifically, we would appreciate additional details regarding the establishment of agricultural and urban numeric conservation targets and the strategy for increasing the state's storage capacity.

The Plan also fails to adequately address other issues of significance to California counties including the importance of California's existing water rights system, area of origin protections, and investment in the Sierra Nevada headwaters. To this last point, we believe



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that these forested watersheds should be an integral part of the plan as the health and resiliency of these headwaters are vital to optimizing water supply.

In addition, CSAC offers the following comments and recommendations for your consideration as you finalize the Action Plan:

*Regional Self Reliance/Integrated Water Management Planning.* This action item specifies that “The administration will target funding to local projects that increase regional self-reliance and result in integrated, multi-benefit solutions for ensuring sustainable water resources.” While CSAC supports regional self-reliance and multi-benefit solutions, the final action plan in addressing target funding, should include language that ensures that the public safety benefits of local projects receive the utmost consideration in this process.

*Achieve the Co-Equal Goals for the Delta.* Counties recognize that the Sacramento-San Joaquin Delta is a region of significant statewide importance encompassing vital water, transportation, energy, agriculture and economic interests. In addition, we recognize that the Delta is in a state of crisis and there is a need for the development of new solutions to expand water resources to meet the growing needs of the state, while restoring and protecting the Delta’s fragile ecosystem. CSAC’s “Delta Policy” directs CSAC to ensure local government representation in Delta governing structure, including voting status and special recognition of Delta legacy communities.

The Plan indicates that the Delta Stewardship Council will establish a high-level interagency coordinating body to commence implementation of a suite of actions designed to achieve the co-equal goals. The Plan further notes that the Implementation Committee can play a strong role in moving forward on the actions included in this Plan. CSAC urges you to include language in the Plan that *recommends* Delta County membership on the Implementation Committee. We believe that Delta County participation on the committee will contribute to improved communication, coordination and cooperation amongst the various agencies that have responsibilities within the Delta.

*Improve Flood Protection.* Over the past five-six years, CSAC and the County Engineers Association of California (CEAC) provided significant input into the development of the Department of Water Resources’ (DWR) report titled: *California’s Flood Future Report: Recommendations for Managing California’s Flood Risk*. This comprehensive report identifies the immediate need for more than \$50 billion to complete flood management improvements and projects statewide. These flood management projects include operations, maintenance, and other identified actions.

CSAC sincerely appreciates the Plan’s acknowledgment of the need to reduce flood risk “statewide”. We believe that investment in local flood control infrastructure statewide is long overdue. In addition, we strongly support the Plan’s statement, “Remove Barriers to Local and Regional Funding for Flood Control Projects”, particularly regarding Proposition 218. CSAC urges the Administration to expedite their review of changes needed to Proposition 218 to enable local government to assess the funds needed for flood protection and stormwater run-off programs, as well.

Lastly, given this Administration’s demonstrated confidence in the ability of counties to provide a wide array of services and programs to the citizens of the state, we strongly



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encourage your three agencies to seek collaboration with CSAC and California's 58 counties in the development of specific actions related to the Water Action Plan's implementation. Again, we appreciate the opportunity to comment and look forward to being involved as you move forward.

Should you have any questions or need additional information regarding our comments, please do not hesitate to contact me at [kkeene@counties.org](mailto:kkeene@counties.org) or 916-327-7500, x-511.

Sincerely,

A handwritten signature in black ink that reads "Karen Keene".

Karen Keene  
CSAC Senior Legislative Representative

cc: The Honorable Edmund G. Brown Jr., Governor, State of California  
Mark Cowin, Director, California Department of Water Resources  
Phil Isenberg, Chair, Delta Stewardship Council  
Martha Guzman, Deputy Legislative Secretary, Office of Governor Brown