



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

February 5, 2020

Ms. Nancy Vogel  
Director  
Governor's Water Portfolio Program  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, California 95814

Transmittal Via E-Mail: [input@waterresilience.ca.gov](mailto:input@waterresilience.ca.gov)

**RE: Comments on the Draft Water Resilience Initiative Portfolio**

Dear Ms. Vogel:

On behalf of the Rural County Representatives of California (RCRC), we appreciate the opportunity to provide input on the Draft Water Resilience Initiative Portfolio (Draft). RCRC is an association of thirty-seven rural California counties, and the RCRC Board of Directors is comprised of elected supervisors from those member counties.

Collectively, our member counties encompass 56 percent of California's land mass; much of California's publicly-owned land including 75 percent of the United States Forest Service land in California; and represent approximately 10 percent of the population. Our mission is to ensure that the unique interests of these "working landscape" counties with economies driven by the health our forests, farmlands, and watersheds as well as tourism are included as part of the public policy dialogue.

We appreciate that the Draft creates an opportunity for us to step back and re-assess how we think about California's collective water future: from the upper watersheds to the managed systems that support our communities. The Public Comment Draft outlines a series of actions that recognizes regional diversity, local water management challenges, and the need for statewide investments in a variety of sectors. RCRC believes the comprehensive nature of the Draft is both its strength as well as its weakness. Namely, we would suggest that effort be made to identify priorities that can be achieved in specified timeframes; without some sense of the priorities, we are concerned that everything is a priority effectively translating into nothing being a priority, or so history would suggest.

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We have several general comments to offer that affect various sections within the Draft, including:

- Implementation of a number of the efforts identified in the Draft depend upon a robust level of “connectivity.” We are concerned that without a significant investment in broadband deployment, regulatory improvements and an implementation plan to connect California, the approaches identified in the Draft will fail in its aims: whether it is in our quest to achieve greater water use efficiency or measuring our stream flows for water management purposes. This is particularly true in rural California where both access and speed of service have proven to be impediments to the use of water management technologies or the date behind the use of these technologies. We are greatly encouraged that the Draft includes Proposal No. 24.1, which acknowledges this issue, and request that this proposal be specifically identified as a high priority for the State.
- We are likewise encouraged that the Draft includes several Proposals aimed at increasing use of high flows for groundwater recharge and storage within groundwater aquifers. However, we would recommend that the draft specifically acknowledge and direct attention to utilizing the state’s flood flows as an asset outlined in the Central Valley Flood Plan (“Plan”). The Plan provides a path forward for a range of actions from groundwater recharge projects, including Flood-Mar (Flood-Managed Aquifer Recharge), to opportunities to improve the state’s salmonid population numbers by replicating some of the floodplains along selected sections of our rivers and streams.
- While RCRC is not a party to the Voluntary Agreements (VA) discussions, we continue to believe it is the best process by which to update the Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary. We support the Administration’s leadership in the VA process as well as the elements of the Draft that are consistent with these ongoing discussions.
- Adequate funding for the various opportunities identified in the Draft is key to its success. However, this must include monies for projects in rural California. Our rural parts of the state tend to lack the financial resources necessary, and at times the expertise, to put itself in a competitive position for many of these projects, particularly infrastructure projects. We request that the Draft specifically acknowledge the need for dedicated funding set aside for projects in rural and upper watershed areas.

With that, RCRC provides the following comments and suggestions which we offer in a spirit of assisting the Administration in further articulating the pathway forward for statewide water resilience.

#### Maintain and Diversify Water Supplies

Overall, the recommendations to maintain and diversify water supplies strikes the right balance for state support of local efforts. Our member counties view the state/local

partnership as foundational to achieving long term resiliency for both surface and groundwater.

Proposal No. 1.1 addresses implementing the “Safe and Affordable Drinking Water Act of 2019”. Many of our rural communities suffer from both an inadequate water supply and water of poor quality. Implementation of this statute by the State Water Resources Control Board (SWRCB) will address this situation but only if progress can be identified. We appreciate that the SWRCB is working with representatives of affected communities as program details are developed; we encourage the Administration to continue to its efforts in this area as we strive for safe and affordable drinking water for all communities.

Proposal No. 3.2 calls for a state interagency team to work with stakeholders to address potential changes and land use and agriculture arising from implementation of the Sustainable Groundwater Management Act. We strongly recommend that these stakeholders specifically include rural County Supervisors and other representatives of rural counties. A large proportion of the aforementioned changes in land use and agriculture will occur in rural unincorporated areas, within the land use jurisdiction of rural counties. It is therefore critical that rural county leaders be intimately involved in these discussions from beginning to end.

Many of the recommendations will assist groundwater sustainability agencies (GSA) in setting and meeting sustainability goals. As GSAs move forward on implementing their future, it is imperative that actions to advance groundwater recharge opportunities are streamlined, particularly as it relates to taking advantage of “high-flow” events which can be unpredictable and “flashy”. We also support technical assistance to facilitate the redirection of water during these periods (Proposal No. 3.4).

RCRC also appreciates that the Draft recognizes and provides support for the use of aerial electromagnetic survey methods (Proposal No. 3.7). This technology has been used by our counties and water agency partners to enhance the understanding of the geology and aquifer formations allowing for better groundwater management and will provide critical data as GSAs identify and work with counties (as they exercise their land use authority) in protecting key recharge lands to meet sustainability goals.

With climate change shifting our precipitation patterns to rainfall (vs. our historical reliance on snowpack), we support the acceleration of state permitting and approval of projects selected on the Water Storage Investment Program (Proposition 1) in a way that improves water reliability and provides the best opportunity for fish and wildlife to thrive.

#### Protect and Enhance Natural Systems

In our experience, the most successful and resilient efforts to protect natural systems comes from partnerships with local agencies and landowners. With that in mind, as the Administration implements the Draft, we encourage it to be mindful of the critical role

these partnerships play in achieving our vision for these natural systems and the working landscapes that are a part of their ecosystem.

One note of caution we would offer involves the role of dams in our current landscapes. While we recognize the impacts dams have on certain habitats, we would urge careful consideration before implementing proposals to remove existing dam infrastructure (Proposal 10.3). The Draft should counterbalance these proposals with recognition that well-maintained, economically viable infrastructure can both provide water supply to support local communities and substantially advance California's climate goals through hydropower. Unfortunately, current renewable energy policy which does not recognize the critical contribution of hydropower. We recommend that the Draft include a proposal to re-evaluate this approach. The elimination of economically viable hydroelectric facilities can have severe consequences for local water supplies, ecosystems, and the local economy. For instance, in Butte County, where for over a century, Pacific Gas and Electric's hydroelectric facilities, including canals, have been integral to the water supply for homes, farms and the wetland corridors. This facility and its canals are being abandoned after it sustained damage during the Camp Fire. Part of the reasoning is that, absent hydroelectric power being included as a renewable resource, the business model is no longer sustainable for the company.

Proposal No. 15 calls out the need for continued investment in the upper watersheds: these investments are critical to groundwater recharge, aquatic ecosystems and fire suppression. California has experienced a record number of severe wildfire events in recent years and should prepare for future ones. What we learned following the Camp Fire, Carr Fire, Tubbs Fire, and other wildfire events is that monitoring and protecting watersheds from toxic runoff created unique challenges. For example, there is a critical need to deploy best management practices (BMP) to prevent toxic runoff from damaged properties. Additionally, monitoring creeks, streams and groundwater is necessary to characterize the extent of contamination and whether BMP efforts are effective. Currently, the responsibility to implement and monitor the use and effectiveness of BMP protocols does not fall with any specific state or local agency. RCRC recommends that the State coordinate this mission following large wildfire events to provide the expertise, funding, supplies, and labor to promptly install BMPs; maintain them during the course of the rainy season; and remove as well as properly dispose of any materials used in implementing BMPs at the completion of the debris clean-up activities.

Currently, the Draft does not specifically address the devastating impacts from wildfires, we recommend that a reference be included to those efforts directed at reducing fire risk in the upper watershed. This would be in concert with actions being taken by the Administration in other arenas. RCRC has been actively engaged in and supports efforts to increase the pace and scale of state/federal investments in forest stewardship for upper watersheds and the state's forested landscapes, generally. As we noted in our earlier comments, given the amount of overburden vegetation in California's forests and

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wildlands and returning to a more sustainable landscape in these areas, is a long-term investment that will require our dedication for decades not years. We applaud the efforts that have been made to date and the use of public/private partnerships to reduce the number of communities that are threatened by catastrophic fire events. We recommend that the Draft specifically acknowledge and commit to continuing these efforts, including:

- Continued development of a comprehensive approach to improving forested landscapes;
- Increasing the pace and scale of ecologically appropriate, active forest management and prescribed burns; and,
- Adoption of policies that increase the economic feasibility of forest restoration using a range of options from encouraging innovative wood products to the use of next generation biomass facilities.

RCRC appreciates the opportunity to share our comments on the Draft and re-affirm our commitment to working with the Administration as we strive to achieve watersheds that are more resilient throughout California.

Sincerely,



MARY-ANN WARMERDAM  
Senior Legislative Advocate

cc: Wade Crowfoot, California Secretary for Natural Resources  
Jared Blumenfeld, Secretary, California Environmental Protection Agency  
Karen Ross, Secretary, California Department of Food & Agriculture  
Jennifer Montgomery, Director, Governor's Forest Management Task Force