



LEAGUE OF WOMEN VOTERS® OF CALIFORNIA

January 12, 2015

Members of the California Water Commission
Susan H. Sims, Executive Officer
California Water Commission
% California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Comments to the California Water Commission on Chapter 8 of the 2014 Water Bond, Quantification of Public Benefits of Storage Projects

Dear Commission Members and Ms. Sims:

Water Commission members and staff may be aware that throughout the development of the 2014 Water Bond, the League of Women Voters of California expressed serious concerns about provisions that enable additional surface storage and continuous appropriation of funds to the Commission. Those concerns underlay our decision not to support the water bond, despite its many other extremely worthwhile provisions. We are therefore very interested in how the Commission performs its Chapter 8 tasks as the storage selection process goes forward.

Over the years that the League has followed water issues in California, we have advocated coordinated water management strategies that support those beneficial uses the State has designated for various water bodies, with an emphasis on mitigating the damage to the Sacramento-San Joaquin Delta and San Francisco Bay Estuary ecosystem.

As the Commission follows its mission of developing policies that support integrated and sustainable water resource management and a healthy environment, it should look beyond the water bond itself to other applicable laws and statutes, including sections of the Delta Reform Act of 2009 that relate to reducing reliance on the Delta in meeting California's future water supply needs and investing in improving the sustainability of local and regional supplies.

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Any policy framework should acknowledge that reducing reliance on Delta exports over the long term can only be achieved by recognition of the over-allocation of California's surface water resources by as much as five times. To address over-allocation of resources, regulations for allocating the storage element of bond money should prioritize project strategies that include improved local supplies, watershed management, conservation, and water use efficiency.

We believe the regulations and guidelines should seek the greatest possible range of storage project types. Special emphasis should be placed on groundwater storage

projects that protect the area of origin, of particular importance to the Sacramento Valley and other areas of the state as well. Regulations should include criteria to quantify and document hydrologic connections between surface and ground water, leading to true conjunctive use projects. We believe that a key criterion for allocation of funds should be potential for correction of overdraft and potential for conjunctive use. Moreover, we believe that in extending funds for such projects, the Commission must require recipients to manage recharge and extraction in a manner that does not exceed basins' safe yields.

We advocate guidelines ensuring that ecosystem improvements in flow conditions in the Delta specify that "improvements" refer to both increased inflow and increased outflow, consistent with the State Water Resources Control Board's recognition of the need for increased flows into and through the Delta.

Finally, we have always advocated transparency in public processes. With this in mind, we believe it is essential that there be transparency and accountability in the monitoring and enforcement of grant conditions to grantee projects. Additionally, we believe before any money is allocated to a grantee, the grantee must demonstrate that the grantee has utilized its water resources wisely through conservation and recycling.

Thank you for the opportunity to comment on this important process.

Sincerely,

A handwritten signature in blue ink that reads "Helen L. Hutchison". The signature is fluid and cursive, with a long horizontal stroke at the end.

Helen L. Hutchison
President