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

Dear Ms. Vogel:

RE: Public Comment on the DRAFT Water Resilience Portfolio

On behalf of the California State Board of Food and Agriculture, we applaud the work of the Newsom Administration in developing a comprehensive strategy to secure our state's water future. The Public Comment Draft of the Water Resilience Portfolio outlines a series of actions that embraces regional diversity, local water management, and statewide investments. California, as the largest agricultural state in the nation, thrives on the availability of water to provide food for communities and jobs within our rural economies. Achieving water resilience for the state, is also achieving agricultural resilience for one of the most productive food regions in the world.

We provide the following comments and suggestions to better assist the Administration in refining our pathway forward for regional water resilience.

Maintain and Diversify Water Supplies

1. Help local water agencies achieve reliable access to safe and affordable water.

Comment/Recommendation:

The Board strongly supports and advocates access to safe and affordable drinking water for all communities. Actions cannot be validated, without recording progress. We recommend that the State Water Resources Control Board's Drinking Water Program maintain a public website tracking progress on the 1 million Californians that do not have access to safe and affordable drinking water.

2. Drive greater efficiency of water use in all sectors.

Comment (2.3):

Maintaining consistent funding to the State Water Efficiency and Enhancement Program is critical in helping to achieve water resilience on a regional scale.



Recommendation:

Technology and data are drivers of innovation and efficiency. Broadband connectivity is needed to deploy smart technologies in the field that support and drive greater efficiency in water use. Further, broadband is essential and fundamental infrastructure to secure the State's water future. Agricultural production is predominately in rural areas and 80 percent of developed water use is used to grow food and fiber. The California Broadband Council, Public Utilities Commission and other state entities should provide funding, regulatory improvements and an implementation plan to connect rural communities in California.

3. Help regions secure groundwater supplies by supporting the transition to sustainable use.

Comment/Recommendation:

SGMA implementation remains a challenge at the local level, specifically in regions with over-drafted basins. We applaud actions in this section that recognize flexibility (3.6), permitting improvements (3.8), funding (3.5) as well as stakeholder engagement (3.2) and local assistance (3.3).

We recommend the following items be considered for inclusion:

- Better define the role of State Government in relation to Groundwater Sustainability Plans, White Areas, GSA/GSP coordination, and enforcement.
- Consideration of funding opportunities/programs to support SGMA implementation at the regional level. Further incentivize practices to promote mitigation measures versus fallowing on agricultural lands as GSPs are determined.
- Engage with stakeholders to enhance flexibility and improve transparency of groundwater recharge permitting.

7. Expand smart surface water storage where it can benefit water supply and the environment.

Comment (7.1):

The Board strongly supports the acceleration of state permitting and approval of projects selected under Water Storage Investment Program (Proposition 1) in a manner that protects and enhances fish and wildlife as well as water reliability. Progress on approved and needed infrastructure is critical for the state to maintain and diversify water supplies.

8. Protect and restore water quality by driving pollution reduction from a range of sources.

Comment (8.6 and 8.7):

Technical assistance and management programs to assist in protecting water quality are essential. These programs enable broad-based collaboration and engagement on solutions at the local level.

Protect and Enhance Natural Systems

9. Help regions better protect fish and wildlife by quantifying the timing, quality and volume of flows they need.

Comment/Recommendation:

The importance of collaborative voluntary solutions to water supply and ecosystem protection (9.3) is paramount. The Board commends the Newsom Administration's dedication and commitment to the voluntary agreement process. Actions (9.1, et al) are all vital to protecting and enhancing natural systems as part of the state's water resilience. A key element that needs

to be incorporated is the establishment of a Science Panel - that involves multiple stakeholders, academics and regulators to provide scientific consensus to the identified strategies contained within the recommended actions.

11. Support the expansion of wetlands to create habitat, filter runoff, buffer floods, and recharge groundwater.

Comment/Recommendation:

The Board strongly supports the expansion of multi-benefit floodplain projects (11.3). Supporting and providing funding opportunities for multi-beneficial approach will enhance our natural ecosystems. The Water Portfolio should support and fund recommendations associated with Flood-MAR (Flood-Managed Aquifer Recharge), to move necessary research forward to support statewide water resilience.

12. Curb invasive species altering California waterways.

Comment:

Addressing invasive species is critical not only for California's waterways but for agriculture's resilience as well. Climate change is affecting our ecosystems endangering upper watersheds, impacting the Delta, and threatening food production. The prevention, detection and management of invasive species and pests is essential.

13. Simplify permitting to help launch more multi-benefit, multi-partner projects.

Comment/Recommendation:

Simplifying the permitting process to encourage multi-benefit and multi partner projects is critical. Inclusion of these actions (13.1, et al) is vital to achieving and encouraging the regional water resilience opportunities that exist. Item (13.5) should not be cost prohibitive resulting in unattended consequences.

15. Encourage investment in upper watersheds to protect water quality and supply.

Comment:

The Board encourages state/federal investment in forest and water management for upper watersheds. The impact of wildfires, resulting in increased reservoirs sediment and soil erosion, is detrimental to the overall watershed and water supply. The recently CEQA certified California Vegetation Treatment Program (CalVTP) is a significant step forward, allowing the State (CAL FIRE) to implement programs on more than 20 million acres of land, including upper watersheds.

16. Improve soil health and conservation practices on California farms and ranches.

Comment/Recommendation:

The Board strongly supports and applauds the Administration's inclusion of this priority within the Water Portfolio. Funding voluntary, incentive-based programs for soil health and conservation is essential to assisting regions in meeting water resilience goals. We recommend that this area be expanded to included incentives to promote mitigation measures in critically over-drafted basins as an opportunity to limit fallowing in some of the most agriculturally productive regions of the state.

18. Help protect the economic and ecological vitality of the Sacramento-San Joaquin Delta.

Comment/Recommendation:

The Sacramento-San Joaquin Delta is a unique and special place. It is also critical to the water supply of the state. Action (18.3) recommends a requirement for districts that receive water from Delta-based projects demonstrate in submitted water management plans how they are reducing reliance on those supplies. Water resilience relies on the flexibility of water supplies to reduce overall demand. Action (18.3) negatively impacts the ability of regions outside the Delta to address water resilience.

19. Modernize inter-regional conveyance to help regions capture, store and move water.

Comment/Recommendation:

Inter-regional conveyance is critical in allowing regions to plan and manage for water resilience. The Board strongly supports actions (19.1, et al) to address the inter-regional conveyance need for the state. We recommend that the Water Portfolio includes a state priority to establish a funding pool that can be used to finance regional conveyance projects that meet the needs of a changing climate. Our last drought demonstrated that studies and feasibility analysis will not provide solutions for our next prolonged drought. Action by the State is necessary to further expand and establish North/South and East/West conveyance infrastructure.

21. Ease movement of water across the state by simplifying water transfers.

Comment/Recommendation:

Our last drought underscored the need to simplify water transfers. The Board strongly supports continued work in this area to improve the process, transparency and ability to move water between parties. As this process continues to evolve, the Board recommends that state/federal entities involved in facilitating transfers engage with a stakeholder groups to work towards consensus on a simplified water transfer process.

As mentioned in a previous comment letter, a comprehensive strategy for California's Water Future needs to acknowledge the impact of SGMA on farming and ranching in the state. In addition, this strategy must align multi-beneficial approaches, investments, policies and programs across state government to help transition and maintain the importance of food production within our state. California's farmers and ranchers are prepared to take the necessary steps for our water future, but they cannot do it alone.

We greatly appreciate the opportunity to comment on the Water Portfolio as well as being a partner in holding public comments sessions during the outreach process. We strongly support the Administration's Water Portfolio and the recommendations contained within. Our submitted comments reflect not only the thoughts of the Board, but also the various stakeholders who provided public comments and testimony.

Sincerely,



Don J. Cameron

cc: Karen Ross, California Department of Food and Agriculture