



**CALIFORNIA NEEDS NEW AND MODERN APPROACHES TO SUPPLY
WATER FOR CITIES AND RURAL COMMUNITIES, FARMS, FISH, BIRDS
AND RECREATION IN THE 21ST CENTURY**
November 13, 2017

Water suppliers in every part of California call on the Governor and both the state and federal administrations to embrace a coordinated and modern 21st century approach to water management for the Bay-Delta by protecting all beneficial uses of water.

We share the current interest to improve fisheries and our agencies have made substantial investments and advanced programs for the benefit of fish. Furthermore, water suppliers acknowledge flow as an important component of habitat, and encourage a new approach where every drop of water serves a specific and targeted beneficial use or multiple uses. However, a flow only approach that fails to take steps to incorporate flow with habitat and other important species functions, such as proposed by the State Water Board in the Water Quality Control Planning process, will not improve species. Continuing on the path set by the State Water Board will not help the environment, it will not help water supplies throughout the State, and it will not help California successfully implement groundwater management. It could lead to an adjudication of the entire Bay-Delta watershed, which would threaten progress on ecosystem restoration and other priority water issues in the California Water Action Plan.

We offer this statement to set a new path. We support California's co-equal goals of protecting, restoring and enhancing the Delta ecosystem and providing more reliable water supplies for California. We believe these goals can be achieved by holistically planning for ecosystem functions to ensure the most efficient use of water for all beneficial uses, by using the interaction of flow with other habitat aspects to create the type of conditions that allow us to meet our objectives. This requires us to take into account the altered physical landscape in California and our highly managed water system, which must be addressed in combination with appropriate hydrology to protect and balance all beneficial uses of water.

A Flow Only Approach Does Not Work for Modern California

A flow only approach is at the core of the State Water Board's Phase I San Joaquin River Substitute Environmental Document (SED) and its recently released Phase II scientific basis report. These proposals, if implemented, would have significant negative impacts throughout California because they:

- focus on one beneficial use of water (instream flow for fish) without balancing and protecting all beneficial water uses, including water for drinking and sanitation for cities and rural communities, fire suppression, farms, salmon, birds and wildlife along the Pacific Flyway, hydroelectric generation, and recreational opportunities;
- ignore the state policy for "One Delta, One Science" and the Delta Science Program's conclusion that directing more water to a sterile and inhospitable rip-rapped channel in the Delta will not benefit fish or other aquatic species, regardless of how much water is applied;
- will deplete reservoir storage and thus lose the benefit of water storage (including carryover storage) in such a way that will create greater risk for all beneficial uses during dry years, such as 2014-15, particularly under various climate change scenarios evaluated by the state administration;
- undermine significant fishery efforts and success stories in areas upstream of the Delta, which have benefitted from integrating functional flows with habitat improvements and partnerships among our agencies; and
- result in less surface water put into groundwater to help California comply with the Sustainable Groundwater Management Act (SGMA) without significant economic impacts.

California Should Embrace a Modern, Functional Flow Approach for 21st Century California

Together, the water suppliers embracing this statement serve water for 39 million people, the safest and most productive agricultural economy in the world, the wildlife refuges and ricelands that serve birds and wildlife along the Pacific Flyway, hydro-electric generation, recreation and many other beneficial uses of water. We are actively implementing progressive and innovative 21st century water management to serve nearly every beneficial use of water in California. To support these efforts throughout California, we need state and federal agencies to also embrace a practical and progressive approach that will empower 21st century water resources management. These initiatives are consistent with the California Water Action Plan and will create positive, transformative change in the management of California's water resources.

The Natural Resources Agency's Resiliency Strategies, for both smelt and salmon, are prime examples of this progressive approach. The Resiliency Strategies pursue a new and innovative path to improve conditions for fish using scientifically based conceptual models to advance habitat and nourishment by connecting water and land with the volume, rate, and timing of flows. For example, the use of flows in the Yolo Bypass to export food to the Delta demonstrated that the right amount of flow at the right place and the right time can provide the ecosystem functions key to species success. Importantly, these programs can be achieved without negatively affecting other beneficial uses. We support this new path and implore the state and federal administrations to build upon the successes in the Resiliency Strategies by pursuing the following actions:

- Advance the landscape scale ecosystem improvements that are being implemented in many parts of the Central Valley to restore ecological functions to California’s highly-altered landscape. These programs include: (i) the numerous actions underway and planned for Eco-Restore, (ii) the Yolo and Sutter Bypasses, (iii) the San Francisco Estuary Institute’s (SFEI) Delta Renewed, and (iv) the various Fish-Food Programs in the bypasses, ricelands and other managed wetlands in the traditional floodplain. The modern, scientific, approach in all of these programs--to spread water out and slow it down--is the approach recommended by the leading scientists at the Delta Science Program and the University of California, and better matches the ecosystem functions in which the Bay-Delta species evolved. Evacuating water from storage and quickly conveying it through a sterile, inhospitable channel through the Delta cannot produce the type of ecosystem functions necessary to meet co-equal goals. This latter approach, in combination with other factors, has led to fish declines and makes California more vulnerable for the next drought.
- Fully evaluate the nearly 1.3 million acre-feet (maf) of water that has been redirected annually to Delta outflow over the past two decades, largely through the 2008 and 2009 OCAP Biological Opinions and State Water Board Decision 1641. Only a small portion of this water was intentionally meant for outflow; the remainder is incidental to other restrictions. With the current flow-only regime failing for fish and wildlife and water supply reliability, an adaptive management approach would suggest that the state and federal agencies evaluate and then re-purpose this water to more effectively and efficiently to benefit fish and wildlife beneficial uses, and other beneficial uses of water. This should be done in the context of co-equal goals and directing water for more functional and targeted flows connected to land as part of Delta Renewed and the other landscape scale ecosystem programs.
- Further develop the opportunities and mechanism for water acquisitions and re-operations to help balance supply and demand, and provide water for the Delta Smelt Resiliency Strategy’s “Outflow Augmentation” adaptive management effort.

For the past several decades, the principal stressor addressed through various regulatory processes has been flow, and fishery populations have continued to decline, notwithstanding the ever-greater quantities of water directed at “solving” the problem. In the California Water Action Plan, the administration committed itself to seeking transformative change by embracing new science and re-thinking old assumptions. Transformative change will not occur if we continue on the same path. The programs described above come directly from the California Water Action Plan and the Natural Resources Agency has seen the way that these programs have galvanized a wide variety of stakeholders to collaborate to restore the ecosystem.

California is one of the most progressive parts of the world and California’s citizens deserve a modern and innovative, 21st century water management approach to support and reasonably protect all beneficial uses of water throughout California. We welcome the opportunity to discuss these multi-faceted, collaborative approaches and we stand ready to work with the administrations, including the resources agencies and State Water Board members and staff, to craft a solution that improves the environment and works for all beneficial uses of water.

#####