1100 K Street
Suite 101
Sacramento
California
95814

Telephone
916.327-7500
Facsimile
916.441.5507

August 19, 2013

The Honorable Anthony Rendon, Chairman
Assembly Water, Parks and Wildlife Committee
1020 N Street, Room 160
Sacramento, California 95814

RE: CSAC Comments -- 2013 Water Bond Framework

Dear Assembly Member Rendon:

On behalf of the California State Association of Counties (CSAC) I want to thank you for providing us with the opportunity to comment on the 2013 Water Bond Framework (framework). The following comments reiterate and supplement CSAC's August 1 comment letter regarding the Assembly's *Proposed* Principles for Developing a Water Bond.

CSAC remains pleased that the framework, consistent with the proposed principles' list of priorities, would include bond funding for Delta protections, regional self-reliance/integrated regional water management, safe drinking water, water conservation and water storage. As we indicated earlier, the identified priorities are generally consistent with the policy direction we have been given over the years on water bond and water issues.

Unfortunately, we remain concerned that the framework omits any reference to flood management. As noted in our August 1 comment letter, the Department of Water Resources' (DWR) Flood Futures Report (C*alifornia's Flood Future: Recommendations for Managing California's Flood Risk)* identifies an immediate need for more than $50 billion to complete flood management improvements and projects. The draft report also estimates that more than $100 billion of additional investment is needed for flood management projects that are not yet specifically identified. Again, we bring this to your attention to demonstrate the "statewide" need for additional investment in California's flood management system. Consequently, we urge you to include some level of funding for flood management in your water bond proposal whether it be in a separate "flood management" chapter, or as a qualified activity under the proposed water bond's climate change or delta sustainability chapters.

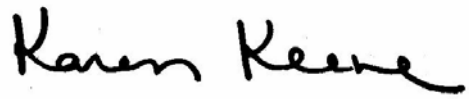
In addition to being concerned with lack of funding for flood management, the framework's general provision that would terminate authorization for water bond funds not yet appropriated is also troubling, particularly with respect to any potential repurposing of Proposition 84 and Proposition 1E funds. While balances may exist, we believe such a move may be premature and that additional information is needed regarding DWR's future plans for these funds. Any repurposing of prior bond flood prevention monies to a bond that lacks a flood management element causes us great concern.

Regarding other components of the framework, we appreciate the addition of groundwater storage to the general storage section, as well as the continuous appropriation for storage. In respect to the General Provisions section we reiterate a point made in our August letter, that the process utilized for awarding bond funds not be overly complicated and instead allow for flexibility and creativity by the applicants. Further, the competitive grant process would be far more fair to smaller communities if technical assistance and grant writing assistance was made available to agencies interested in accessing the grant funds.

Lastly, we very much appreciate that the proposed water bond will retain assurances for existing water rights and area-of-origin protections.

Thank you again for the opportunity to comment on the 2013 Water Bond Framework. Should you have any questions regarding our comments, please feel free to contact Karen Keene at 916-327-7500, ext. 511, or kkeene@counties.org.

Sincerely,



Karen Keene
Senior Legislative Representative

cc: Members and Consultant, Assembly Water, Parks and Wildlife Committee