



The SHIBATANI GROUP, INC.  
A Division of The SHIBATANI GROUP International

*Climate Change Hydrology, Water Supply Strategic Planning, New Reservoir Development  
And CVP/SWP Operational Compliance for California's Water Industry*

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**DELIVERED VIA U.S. MAIL**

Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street, 24th Floor,  
Sacramento, California 95814

**Re: Comment Letter – Climate Change Resolution**

Dear Madam Chair:

I congratulate you, your Board, and staff, on the completion of the new SWRCB Resolution, *COMPREHENSIVE RESPONSE TO CLIMATE CHANGE*. This is a very important step forward, not only for the SWRCB, but for all of the State's water resources. I strongly endorse its approval.

From a water resources regulatory perspective, the most significant provisions in this Resolution are those contained under Section IV, *Rely on Sound Modeling and Analyses* and, specifically, Numbers 17-19. This is where the SWRCB will identify, develop, and apply relevant hydroclimate data, modeling tools, and analytical approaches to its many permits, plans, policies, and decisions to address known (and projected future) climatic change effects. This new climate assessment process will represent the basis for the SWRCB's new regulatory hydrology baseline. Once these methods are being applied universally, the water resources of the State can be said to be regulated in full consideration of projected hydroclimatic effects.

While the Resolution contains many provisions, the first step with respect to Section IV, is the identification and/or development of the appropriate hydroclimate data, modeling tools, and analytical approaches available to SWRCB staff. Since most, if not all of this information already exists (and is readily available), it is merely a matter of compiling it into a concise guidance manual or similar reference document. A pilot test, on a pending permit using this new reference document would provide the proof-of-concept necessary to justify broader application. If properly implemented, none of these activities would affect the current FY 2016/2017 budget or FTE requirements.

Very sincerely yours,

**The SHIBATANI GROUP, Inc.**

Robert Shibatani  
CEO & Principal Hydrologist

RS/sj

cc: The Hon. Edmund G. Brown, Governor's Office  
John Laird, Secretary, California Natural Resources Agency