

Permitting, Petitions, and Enforcement

Sect.	Core (Pre-drought) Workload	Drought Redirection/Priorities	Priorities for 2023 to next drought
Permitting	<ul style="list-style-type: none"> • General Water Rights permitting • Underground storage 	<ul style="list-style-type: none"> • No redirection to core permitting staff • 2023 – underground storage temp permits, coordination with DWR/diverters, Exec Order on Flood capture 	<ul style="list-style-type: none"> • Core workload • Salton Sea+ • Underground storage permitting+ • New Trailer Bill on flood capture/recharge+
Petitions	<ul style="list-style-type: none"> • Petitions • Transfers • TUCPs • Registrations • Cannabis SIURs 	<ul style="list-style-type: none"> • RR e-regs, public engagement, info orders, VA, Enforcement coordination, data management, visualizations • Watershed coordination and outreach • Transfers (record number between 2021-2023) • Drought TUCPs • Mono Lake emergency request 	<ul style="list-style-type: none"> • Core workload • Reduce registrations and cannabis SIUR backlog • Los Vaqueros petitions (WSIP project)* • Lower Priority: Russian River stakeholder coordination, data management, running curtailment model • Mono Lake Hearing (continue working, but do not prioritize hearing as per Board Member feedback) • Emerging Issue: SWP petitions
Enforcement 1	<ul style="list-style-type: none"> • Complaints, inspections, hearings • Revocations • Enforcement actions • Failure to File • Napa/RR Frost regs • Jurisdictional determinations 	<ul style="list-style-type: none"> • Curtailment inspections • Curtailment enforcement actions • Drought complaints • Info orders 	<ul style="list-style-type: none"> • Continue drought enforcement actions in progress, • DISCONTINUE: Curtailment inspections • Core workload • Complaints backlog • Restart Failure to File efforts (in progress) • Enforcement Policy
Enforcement 2	<ul style="list-style-type: none"> • <i>New section created July 2022 for drought enforcement activities</i> 	<ul style="list-style-type: none"> • Clear Lake, Merced watersheds (inspections, SB88, unpermitted reservoirs) • Recharge EO complaints/review • Drought curtailments & inspections 	<ul style="list-style-type: none"> • Wrap up drought enforcement actions • Clear Lake* enforcement • Merced River SB88 evaluations, compliance evaluations • Failure to file efforts
Can. Enf.	<ul style="list-style-type: none"> • Cannabis complaints, inspections, enf. actions 	<ul style="list-style-type: none"> • Focus on illegal cultivation in key drought watersheds (RR, Clear Lake, Trinity, Humboldt). 	<ul style="list-style-type: none"> • Core workload • Clear Lake* cannabis enforcement • Complete drought-related inspections, enforcement actions

Bay Delta Section

Sect.	Core (Pre-drought) Workload	Drought Redirection	Priorities for 2023 to next drought
Bay-Delta Sections (3 sections, reorg in 2023 with new VA and modernization PY)	<ul style="list-style-type: none"> • <i>Note: Reorg/New Sections 2023</i> • Sac/Delta WQCP Staff Report, VA analysis • LSJR/Salinity WQCP implementation • Scientific basis report update • Bio Goals • STM working group • IEP Coordination Order 90-5 • Term 91 • D1641 Compliance • SacWAM modeling • VA, Litigation support • Contract mgmt. • Delta Salinity – watermaster coordination • Dos Rios 1707 • Other Delta permitting (Merced) work 	<ul style="list-style-type: none"> • Partial redirection – some units kept on WQCP development and implementation • Delta e-reg development, implementation support • Mill/Deer e-regs • TUCPs* • Petitions for reconsideration • Temperature (90-5) response • Litigation, LTO etc. support • Enf. Coordination, support 	<ul style="list-style-type: none"> • Core workload <ul style="list-style-type: none"> ○ Order 90-5* ○ Bay Delta Plans* • Sites water right application* • Delta drought curtailment modeling (modernization)+ • Mill/Deer long-term instream flow support (main workload in new drought planning unit/section)+
Drought Planning & Special Projects	<ul style="list-style-type: none"> • <i>New drought planning unit Sept 2022</i> • Hearings & compliance (non-AHO) • Coordination with AHO, AHO referrals • Cal-AM • WaterFix/Conveyance • Backlogged Petitions Project • Fresno River Adjudication • Records room file mgmt. • Records room customer service (public window) • Scan/manage files for technical staff • Contract mgmt. • Admin records • PRAs 	<ul style="list-style-type: none"> • Drought Delta water unavailability analysis • Delta e-regs development & implementation • Admin record and litigation support • Human health and safety petitions • Methodology and implementation support (delta e-reg) • Petitions for reconsideration • Other Delta drought support as needed • Supply/demand visualization tool • PRAs • Contract mgmt. 	<ul style="list-style-type: none"> • Finish drought workload (petitions, letters, data clean up) • Finish water unavailability methodology updates to incorporate Delta accounting, return flows* • Admin record and litigation support for Delta e-reg and Mill/Deer e-reg • SB88 revisions, stakeholder engagement, revise regulations, compliance assistance*+ • Revising WUA to work as a water availability tool for new applications • Permanent instream flows for Mill, Deer, and Antelope Creeks+ • Clear Lake info order e-reg, data analysis, policy development* • Hearings (Conveyance)* • Core workload • Support digitization effort* • Lower Priority: Fresno River Adjudication • CalAM (moved to other Branch/staff, lower priority for now)

WQC, Cannabis Policy, Data, & Admin

Sect.	Unit Core (Pre-Drought) Workload	Drought Redirection	Priorities for 2023 to next drought
Water Qual. Certs	<ul style="list-style-type: none"> • Water Quality Certs • Admin Record & litigation support 	<ul style="list-style-type: none"> • No redirection, but increase in drought related WQC variance requests 	<ul style="list-style-type: none"> • Core workload
Cannabis Policy Section	<ul style="list-style-type: none"> • Develop instream flow requirements for cannabis diversions • Cannabis policy updates • Onstream pond determinations • California Environmental Flow Framework (CEFF) 	<ul style="list-style-type: none"> • RR e-reg development and implementation • DWRAT development, implementation, methodology • Drought data QAQC methodology, Standard Operating Procedures (post online) 	<ul style="list-style-type: none"> • Eel River instream flows (redirected from C-WAP) + • Cannabis instream flows public roll out and technical development+ • Cannabis Policy Update • Onstream Pond determinations for cannabis existing reservoirs
Data Modernization & Governance	<ul style="list-style-type: none"> • <i>New Section Created 2022/23</i> • <i>New Telemetry Unit created Sept. 2022</i> • <i>New UPWARD Unit created February 2022</i> RMS oversight • EWRIMS Updates, contracting • Customer support • Fee support • Data analysis 	<ul style="list-style-type: none"> • Units are new or were not redirected 	<ul style="list-style-type: none"> • UPWARD development, business process reengineering, org change mgmt., testing* • Ongoing telemetry pilot project with existing diverters, contract with Data consortium, develop RFQ for watershed pilots • Cannavision • CalAM/Mono Lake (where there's capacity)
Supply, Demand, and Instream Flow Unit	<ul style="list-style-type: none"> • <i>New Section created in 2022/23</i> • <i>New Supply Demand Unit created Sept. 2022</i> • California water action plan implementation (Ventura, Shasta, Eel, Mark West Creek) <i>Note: reorganized from WQC Section to new section in February 2023</i> 	<ul style="list-style-type: none"> • Redirected to Scott/Shasta e-reg development and implementation • Info orders • Enforcement • Admin record & litigation support 	<ul style="list-style-type: none"> • Potential redirect C-WAP Unit to Scott/Shasta actions. • Contract to expand DWRAT to new watersheds*, public process to select watersheds • Potential redirection of C-WAP streams (move Eel to Cannabis Instream Flow Unit, put others on hiatus until CDFW provides flow recommendations) <ul style="list-style-type: none"> ○ Keep Shasta as part of baseline flow development ○ Maintain Ventura mediation ○ Housekeeping on completed C-WAP products.
Admin	<ul style="list-style-type: none"> • Hiring, budgets, COVID coordination, facilities • EWRIMS contract management, customer service • Revocations • Fees, billing 	<ul style="list-style-type: none"> • Assist with curtailment portal, RMS management, SB88 inquiries, general drought assistance/uptick in related water rights public inquiries 	<ul style="list-style-type: none"> • Core workload • UPWARD subject matter experts

Other Topics Not Fully Described in Tables Above:

UPWARD development, testing, review, business process reengineering, development of standard operating procedures

- General involvement for most of the Division at some level, with some units more heavily impacted
- Scoping, review, testing – will ramp up in next six months
- CalAm Monterey – long term oversight, next steps(+)
 - Recent visit by MPWMD – indication that next year they will petition us to remove the CDO, but highly speculative and will depend on use data over next year and hydrology.
 - Generally deprioritized – moved to specialist in UPWARD section
- Fresno River Adjudication
 - Prior to drought, intent was to use extra staff and supplement with ~2-4 new PY. Drought, reprioritization of existing workload eliminated extra positions, and Finance denied positions for this work – deprioritized accordingly.
 - No anticipated available staff on horizon
 - Recommend Board rescind petition
- Fee development (permitting, petitions)
 - Generally heaviest workload in Permitting, Petitions, and in Data Quality/EWRIMS units, but limited duration and generally absorbable
- REAP (across multiple branches) & EJ tracker
 - Matrix management approach across all branches, coordinated by Admin, Registrations, and Executive SSA staff
 - Seeking clarity on EJ tracker (use, need), as current form is duplicative of existing efforts (ED Report, GO Week ahead).
- BCPs, legislative proposals
 - Major BCPs approved in 2021 and 2022 (mostly 2022);
- Bill Analyses
 - Highest level of water-rights related bills in many years
 - Analyses generally by Exec, branch and section chiefs
 - As of 7.10.23, most major water rights bills do not appear to be moving forward
- Court References (Salinas, Monterey)
 - Reimbursable, generally require 1 to 3 PY and management time
 - Board cannot decline them, must accept them
 - Two current references (Nacimiento, Salinas) with Division involvement.