



Willow Springs
Water Bank

April 13, 2015

Ms. Rachel Ballanti
Acting Executive Officer
California Water Commission
P.O. Box 942836
Sacramento, California 94236-0001

Re: Comments on the Draft Goals, Objectives, and Principles for the Water Storage Investment Program

Dear Ms. Ballanti:

This letter provides comments on the draft Goals, Objectives, and Principles for the Water Storage Investment Program.

I am the General Manager of the Willow Springs Water Bank (WSWB) located in the Antelope Valley, west of Lancaster and Palmdale. WSWB's approved 2006 Environmental Impact Report specifies a capacity of 500,000 acre-feet of water. The recharge and extraction capacities for WSWB are 100,000 acre-feet per year. We expect to expand the capacity of WSWB in the future.

We have reviewed the draft Goals, Objectives, and Principles for the Water Storage Investment Program, and have the following comments:

1. The Goals, Objectives, and Principles should recognize that some public benefits will overlap. For example, water diversions for ecosystem benefits may also provide water quality improvements. Similarly, water for emergency response may also be used to protect fish and wildlife after a seismic failure of the Delta levees.
2. To optimize the public benefits of a water storage project, a proposed project should have flexibility to decide how best to allocate storage among over-lapping public benefits. In the example cited above, the project may want to allocate all of the overlapping public benefits to the ecosystem to meet the 50% ecosystem benefit requirement contained in Proposition 1.

We appreciate this opportunity to provide our comments to the Draft, which the Commission is developing. This open process will ensure that bond funds provided to the Water Storage Investment Program will be allocated where needed most.

Sincerely,

Mark Beuhler
General Manager, Willow Springs Water Bank