



September 9, 2015

The Honorable Joseph Byrne, Chair
California Water Commission
P.O. Box 942836
Sacramento, CA 94236-0001

Submitted via e-mail: cwc@water.ca.gov

**SUBJECT: Comments on Water Storage Investment Program Draft Regulations
Text**

Dear Chair Byrne and Commissioners:

The Santa Clara County Open Space Authority (OSA) appreciates the opportunity to comment on issues relating to the development of the Proposition 1 Water Storage Investment Program (WSIP). The OSA is an open space special district created by the California Legislature in 1993 to balance growth by permanently protecting open space, natural resources and agricultural lands (www.openspaceauthority.org). We are dedicated to preserving key portions of the natural environment and working landscapes in order to balance continuing urban growth, and we believe there is an important nexus between water storage and the health and resiliency of our natural systems.

We respectfully request that you consider the following comments as you work to finalize the draft guidelines for this important program:

Section 6001. General Provisions

Because natural and working landscapes in California provide so much of the land area through which rainfall percolates through the land surface to recharge groundwater aquifers, we encourage the Commission to structure the guidelines in a flexible manner so that proponents of groundwater storage projects can design projects to take advantage of the groundwater recharge benefits of natural and working lands.

Section 6002. General Selection Process

Given the increasing development and acceptance for methods of monetary valuation of ecosystem benefits, we suggest that this section reference the use of monetized benefits to the ecosystem wherever possible.

Sections 6005. Priorities and 6006. Relative Environmental Value

We applaud incorporation and prioritization of ecosystem values and environmental values provided by the California Department of Fish and Wildlife State Water Board.

Thank you for the opportunity to participate in this important process. We look forward to working with you to ensure the success of the Water Storage Investment Program.

Regards,

A handwritten signature in blue ink that reads "Andrea Mackenzie". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Andrea Mackenzie
Santa Clara Valley
Open Space Authority