



Willow Springs
Water Bank

October 14, 2015

Sent via ELECTRONIC MAIL to cwc@water.ca.gov

The Honorable Joseph Byrne, Chair
California Water Commission
1416 9th Street
Sacramento, CA 95814

Re: Comments on the Water Supply Investment Program Draft Regulation

Dear Chairman Byrne:

This letter provides comments on the draft Regulation for the Water Storage Investment Program.

The Willow Springs Water Bank (WSWB) is a groundwater bank 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 approved recharge capacity is 350 cubic feet per second. The approved extraction capacity is 250 cubic feet per second

WSWB is shovel ready. A portion of the bank's capacity has already been built out. It is our intention to use water bond funding to help build out the remaining capacity rapidly. We expect to have the full capacity online roughly two years after we start construction.

With the potential for wet winters, flood management may become as crucial as drought management. Time is of the essence in getting new storage operational. Both the draft Regulation and the guidance currently being developed can be crafted to accelerate the online dates of new storage projects.

We have reviewed the draft Regulation and have the following comments on ways to encourage rapid implementation of new storage projects:

1. Storage projects that are shovel ready should be recognized and encouraged. In particular, the current progress of a project (environmental review status, project online date, etc.) should be incorporated into the evaluation criteria used to determine project eligibility and allocation of funds.
2. It is in the best interest of the State to encourage "shovel ready" projects through reimbursement of costs spent after November 4, 2014. Your current draft of the Regulation already enables this in Section 6003 (e) (6). We encourage you to leave this provision of the draft as is. This can help accelerate the online date of storage projects.
3. Priority should be called out for projects that already leverage private, federal or local funding per Section 79707 (b) of Proposition 1. Funds already expended represent a stronger commitment than planned future expenditures. Clarification that storage

projects already using leverage will be given priority would be helpful.

We appreciate this opportunity to provide our comments to the Draft Regulation.

Sincerely,

A handwritten signature in blue ink that reads "mark Beuhler". The signature is written in a cursive style with a long horizontal flourish at the end.

Mark Beuhler
General Manager, Willow Springs Water Bank