



October 15, 2015

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TO: Chairman Joseph Byrne
Members, California Water Commission

FROM: Colusa County Supervisor Kim Vann, Chair, CSAC Water Working Group
Tulare County Supervisor Allen Ishida, Vice-Chair, CSAC Water Working Group
Karen Keene, Senior Legislative Representative, CSAC

RE: CSAC Comments -- Water Storage Investment Program Draft Regulations

On behalf of the California State Association of Counties (CSAC) we want to thank you for providing us with the opportunity to comment on the California Water Commission's (Commission) proposed regulations for Chapter 1 of the Water Storage Investment Program. We also want to thank you for including a county representative on the WSIP Stakeholder Advisory Committee.

As you know, after March 2017 and before January 2022, the Commission will commit the \$2.7 billion in Proposition 1 Water Storage Investment Program funds to qualified water storage projects that will provide public benefits to California, improve the operation of the state water system, are cost effective, and provide measurable improvement to the Sacramento-San Joaquin Delta or the tributaries to the Delta. With this in mind there is a concern among our members that only the largest projects of the state will be able to compete adequately. To address this concern, we would ask that the Commission consider a set aside program (10% of the total) for small projects, those projects that have a total cost of \$10 million or less.

Additionally, we also ask that you consider minimizing the monitoring and reporting requirements per Section 6007 (a)(4) for small projects. As an alternative we would suggest that small projects be required to submit annual reports for 5 years, insuring that public money was well invested.

CSAC appreciates the Commission's consideration of these recommendations. You are welcome to direct any questions to Karen Keene at (916) 327-7500, Ext. 511.

cc: Paula Landis, Executive Officer
Rachel Ballanti, Assistant Executive Officer
Jennifer Marr, Supervising Engineer
Matt Machado, Director, Stanislaus County Public Works Department