



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

October 15, 2015

Ms. Paula Landis, P.E.
Executive Officer
California Water Commission
P.O. Box 942836
Sacramento, CA 94236-0001
Transmit Via Email: cwc@water.ca.gov

RE: Water Storage Investment Program Draft Regulations

Dear Ms Landis:

On behalf of the Rural County Representatives of California (RCRC), we welcome the opportunity to provide a few brief comments on the California Water Commission (CWC) Water Storage Investment Program (WSIP) Draft Regulations during this informal comment period. RCRC is an association of thirty-four rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties.

First, RCRC is most appreciative of all the time and effort by the CWC, CWC staff, stakeholder advisory committee, as well as the various department and agency staff over the last six months in developing the draft regulations.

Section 6005. Priorities. Page 25, (b), (9). RCRC supports the concept of 'Similarly Situated Communities' by the State Water Board, but would recommend the use of the term 'Economically Distressed Areas' using the definition specified under the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1). The term is in statute which will provide clarity and we believe is consistent with the intent of the State Water Board.

In closing, RCRC would urge caution in developing regulations that are so prescriptive that they may prove to inhibit the ability of CWC and potential applicants in the development and approval of projects. It is imperative that CWC have the flexibility to produce real and measurable public benefits and help address the long-term water needs for California families, farms, communities, and the environment.

Sincerely,

NICK KONOVALOFF
Legislative Analyst

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