



IRVINE RANCH WATER DISTRICT

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March 14, 2016

Submitted via Electronic Mail to WSIPComments@cwcc.ca.gov & Jennifer.Marr@water.ca.gov

The Honorable Joseph Byrne
 Chairman, California Water Commission
 c/o Jennifer Marr
 901 P Street, Room 314
 P.O. Box 924836
 Sacramento, CA 94236

Re: Comments on the California Water Commission Draft Water Storage Investment Program Quantification Regulations

Dear Chairman Byrne:

Thank you for the opportunity to review and comment on the proposed Water Storage Investment Program regulations dated January 29, 2016 (“Draft Regulations”) before the California Water Commission (“CWC”) at its March 16, 2016, meeting.

The Irvine Ranch Water District (“IRWD”) is an urban water supplier serving Central Orange County. IRWD provides high-quality drinking water, reliable waste water collection and treatment, ground-breaking recycled water programs, and environmentally sound urban runoff treatment to more than 380,000 residents and a day-time population of 500,000. As part of its efforts to ensure a reliable water supply, the District has been engaged in water storage and banking for many years.

Given our involvement in water storage, IRWD advocated for the inclusion of Proposition 1’s storage funding and actively supported the \$2.7 billion funding level for water storage projects throughout California. As a result, we have a strong interest in the allocation of Chapter 8’s storage funding for the “public benefits associated with water storage projects that improve the operation of the state water system, are cost effective, and provide a net improvement in ecosystem and water quality conditions.” (Water Code §79750(b)).

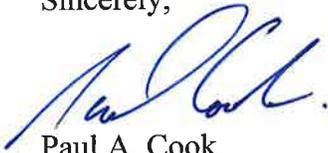
As the Commission moves forward with the adoption of the Water Storage Investment Program regulations, we urge it to continue to ensure compliance with the requirements of Proposition 1 and adopt the Association of California Water Agencies’ suggested amendments to the Draft Regulations. IRWD encourages the CWC to ensure that it is providing a workable framework for project proponents to utilize when presenting the public benefits of their projects to the CWC.

This framework should allow agencies from throughout the state to propose integrated storage projects and their public benefits for your consideration.

We would also urge the Commission to consider the public benefits for integrated projects as a whole. The public benefits for each piece of the project should be considered the benefits of the entire project. Consideration of integrated projects and looking at their public benefits as a whole will allow Chapter 8's funds to better strengthen water supply reliability for all California and could result in a more equitable, balanced and reasonable investment of the funds. The CWC should ensure that this approach is permitted under the Draft Regulations.

In closing, IRWD appreciates the efforts that the CWC and its staff have undertaken to develop the Draft Regulations and appreciate your consideration of our comments. We encourage the Commission to continue to work with water agencies to ensure that the Water Storage Investment Program can achieve its intended purpose of improving the operation of the state water system and providing net improvements in ecosystem and water quality conditions by allocating funding for the public benefits of water storage projects. Please do not hesitate to contact me at (949) 453-5590 or our Sacramento advocate, Maureen O'Haren, at (916) 498-1900 if you have questions regarding our comments.

Sincerely,



Paul A. Cook
General Manager