



March 14, 2016

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

Transmit Via Email: WSIPComments@cwca.gov

RE: Draft Water Storage Investment Program Regulations

Dear Chair Byrne:

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.

RCRC is an association of thirty-five rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties cover approximately half of California's total 100 million acre land mass and encompass the northern border with Oregon to the southeast border with Mexico, from the Central Valley to the Eastern Sierra, and from the coast to California's wine country. RCRC represents local governments that have land use and public trust responsibilities over much of this rich landscape that benefits all of California.

First, RCRC is most appreciative of all the time and effort of the CWC, CWC staff and the stakeholder advisory committee as well as the various state department and agency staff over the last year developing the draft regulations in an open and transparent process. This effort is evident in the current draft.

The following comments on the WSIP address several broad areas of concern to RCRC. The areas of concern are primarily related to project costs and project review process that would not maximize the expenditure and benefit of the Proposition 1 dollars. RCRC believes the regulations can be implemented in a manner that maximizes the utilization of Proposition 1 dollars while also achieving the State's policy to achieve coequal goals for management of the Delta.

1215 K Street, Suite 1650, Sacramento, CA 95814 | www.rcrcnet.org | 916.447.4806 | Fax: 916.448.3154

Pages 17 & 18, Section 6002. General Selection Process. The regulations state that the technical review period shall not exceed 18 months and there is no timeframe delineated for the independent peer review. RCRC believes that attracting and securing financing commitments for an indefinite period of time for a project that may not even be approved will at best be prohibitively costly and again diminish the utilization of the Proposition 1 dollars and their intended benefits for water supply and the ecosystem.

Pages 20 & 21, Section 6003. Funding Commitments. The regulations state that funds will not be made available to an applicant until such time as the provisions of the regulations have been satisfied including that a project applicant has secured all known permits. There are a number of permits such as the Stormwater Pollution Prevention Plan that is typically prepared after the design is complete. This step is neither efficient nor cost effective and will only lead to increase project costs and diminishing the return on investment for both water supply and ecosystem benefits. RCRC would encourage a review of Section 6003 by the CWC and create a regulatory framework for the funding commitments that fosters a partnership between the project applicant and the CWC to maximize the expenditure and benefit of the Proposition 1 dollars for the WSIP.

In closing, RCRC recognizes the need for additional supply-enhancing projects and the role they play in providing multiple benefits. However, we would urge caution in adopting regulations that are so prescriptive they may prove to inhibit the ability of the CWC and potential applicants in the development and approval of projects that will 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,



MARY ANN WARMERDAM
Legislative Advocate

cc: Paula Landis, Executive Officer, California Water Commission