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Legislative Advocates

Chris Frahm
Rosanna Carvacho
Brownstein Hyatt Farber Schreck

March 14, 2016

Mr. Joseph Byrne, Chair
California Water Commission
P.O. Box 942836
Sacramento, CA 94236-0001
Submitted via email: WSIPComments@cwca.gov

RE: Water Storage Investment Program Quantification Regulations

Dear Chairman Byrne:

On behalf of the California Groundwater Coalition (CGC), I write to provide comments on the California Water Commission's (CWC) Water Storage Investment Program (WSIP) Quantification Regulations that were published in the California Notice Register on January 29, 2016.

The CGC was formed at the urging of California State and local officials who believed that increased efforts were needed to educate and inform policy makers and the public about California groundwater resources. CGC members include public and private groundwater management entities located throughout California and consist of experts with technical, legal, and professional groundwater and related expertise.

The CGC has reviewed the draft regulations for the WSIP and appreciates the opportunity to review and provide comments on the draft regulations. Assembly Bill 1471 (Rendon), the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Act), specifies that funding from the WSIP will not be provided to a project unless the project provides measurable improvements to the Delta ecosystem or to tributaries to the Delta.

For many of CGC's members, this is a difficult requirement to satisfy. For example, for CGC agencies in southern California, projects such as conjunctive use and reservoir reoperation can reduce water demands on the Delta given an increase in local water supplies which will in turn reduce the need to import water through the State Water Project. However, it would be difficult, if not impossible, to quantify how the reduced water demands on the Delta translate to ecosystem benefits in the Delta or tributaries to the Delta in a manner that would be competitive with other proposed projects that are in the Delta or areas tributary to the Delta.

Conjunctive use and reservoir reoperations projects in southern California can provide significant water supply benefits, and these benefits in many cases provide value to the entire state. However, the requirement in the Act to provide measurable improvements to the Delta ecosystem or to tributaries to the Delta, perhaps unknowingly at the time of drafting, places water storage projects using groundwater basins at a disadvantage relative to other types of projects. This is particularly the case for smaller projects, since these projects would need to expend considerable effort to prepare an application for funding and the cost of the application for a smaller project is greater on a percentage basis than a larger project.

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CGC's interest in making these comments is to request that we work together among the interested parties to develop a future program that provides funding opportunities for conjunctive use, water banking, and related groundwater storage projects in California.

If you have any questions regarding our position on this measure, please do not hesitate to contact me or our Legislative Advocates Chris Frahm or Rosanna Carvacho at 916-594-9700.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Manning', with a stylized flourish at the end.

Kenneth Manning

President, California Groundwater Coalition