

From: [Joyce Dillard](#)
To: [CWC Water Storage Investment Program](#)
Subject: Comments CWC Water Storage Investment Program Quantification due 3.14.2016
Date: Monday, March 14, 2016 4:42:02 PM

We question that adjudicated groundwater basins would qualify for this funding, if the storage is not underground and approved by the courts.

For instance, tanks are placed above ground on property. That would be outside the adjudication and would give the property owner more value. That value could be converted into a Cap and Trade scheme.

Is Cap and Trade being considered? There is no disclosure.

You state in DEFINITIONS:

“Adaptive management” means a framework and flexible decision-making process for ongoing knowledge acquisition, monitoring, and evaluation leading to continuous improvements in management planning and implementation of a project to achieve specified objectives, per Water Code section 85052.

COMMENTS:

Data and baselines are essential. Is modeling allowed, and if so, for what period covered?

You state in DEFINITIONS:

“Best available science” means the use of the high-value information and data, specific to the decision being made and the time frame available for making that decision, to inform and assist management and policy decisions.

COMMENTS:

The science should be applicable to the region and conditions.

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