

March 14, 2016

Ms. Jennifer Marr
California Water Commission
901 P Street, Room 314
Sacramento, California 94236-0001
Jennifer.Marr@water.ca.gov

Dear Ms. Marr:

Subject: Comments on Proposed Regulations for the Water Storage Investment Program

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to comment on the Water Storage Investment Program (WSIP) Draft Regulation being considered by the California Water Commission (Commission) at their March 16, 2016, meeting. The \$2.7 billion provided in Proposition 1, Chapter 8, is an important source of funding for groundwater storage and conjunctive use projects that could improve water reliability both locally and across the state.

In April 2015, Mayor Eric Garcetti released Los Angeles' Sustainable City pLAN, which includes a commitment to "Local Water" by reducing the purchase of imported water by at least 50 percent by 2025, and sourcing 50 percent of Los Angeles' water locally by 2035. LADWP is currently working to transform the water supply for the City of Los Angeles (City) through remediating local groundwater basins and developing local water resources.

The City has water rights in eight different groundwater basins, which provide about 11 percent of its water supply in an average year, and additional storage rights in four of the basins. This includes the San Fernando Groundwater Basin, which is critical to LADWP's efforts to increase local supplies because it provides much needed local storage for captured stormwater and advanced treated recycled water. As our water resource development efforts expand, local groundwater storage needs will also increase. Funding from WSIP could help LADWP and other Southern California water agencies further expand local supplies, thereby reducing reliance on imported water, including water from the State Water Project.

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However, the proposed regulations contain restrictive requirements related to the demonstration of ecosystem improvements and measurable benefits to the Sacramento-San Joaquin Delta and its tributaries that would restrict the ability of water agencies in Southern California to fund local groundwater storage projects. As the development of WSIP regulations continues, LADWP encourages Commission to consider how WSIP funding of these important projects might be accomplished. LADWP hopes that the Commission will consider the importance of the WSIP regulations providing a pathway for Southern California water agencies to compete on equal footing with proponents of large, surface storage projects.

Again, on behalf of LADWP, I thank you and your staff for your work on this important funding program. Please contact Mr. David R. Pettijohn, Director of Water Resources, at (213) 367-0899 if you have any questions or comments.

Sincerely,



Martin L. Adams
Senior Assistant General Manager – Water System

KO:yrq
By e-mail
c: Mr. David R. Pettijohn