

**From:** [Tony St. Amant](#)  
**To:** [CWC Water Storage Investment Program](#)  
**Subject:** Draft Regulation: Water Storage Investment Program  
**Date:** Thursday, February 11, 2016 8:59:47 AM

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Dear Mr. Byrne,

Differences in climate models and modeling assumptions among Prop 1 grant competitors could make an “even playing field” comparison of water storage proposals impossible. Given the freedom to do so, applicants can be expected to choose the climate model and select the modeling assumptions that will show their proposals in the best light. Regulatory generalizations about wetter, drier, and hotter are insufficient to establish a uniform standard for evaluating expected changes in precipitation patterns and timing and snow pack water content and location.

The optimum solution would be for the Water Commission to specify a climate model to be used by all applicants and to specify values for any discretionary variables. At the very least, the Commission should specify a climate projection profile, or combination of profiles, that every proposal must address. One approach or the other, explicit and well-defined, is the only way to ensure comparable results among proposed water storage projects.

Sincerely,

Tony St. Amant  
Chico