



Willow Springs
Water Bank

November 10, 2025

Members of the California Water Commission
1001 I Street, 17th Floor
Sacramento, CA 95814

Subject: Proposed Emergency Regulations

Dear Chair Steiner and Commissioners,

The Willow Springs Water Bank (WSWB) respectfully submits the following comments with respect to the proposed emergency regulations for Proposition 1 and Proposition 4 Water Storage Investment Program (WSIP) as a key step toward advancing the State's water storage and climate-resilience goals. The voters approved Proposition 1 to support storage investment for all of California- northern, central, and southern California.

More recently, on October 1, 2025, Governor Newsom signed SB 72 (Caballero) to identify nine million acre-feet of additional water supply by 2040 in California's Water Plan to sustainably manage the state's water resources.

1. Context: The Emergency Regulations

On November 7, 2025, the Commission promulgated emergency regulations under its Water Storage Investment Program (WSIP) authority to revise Article 6 ("Uncommitted Funds") of Chapter 1, clarify project-eligibility criteria, and expedite deployment of unallocated WSIP funds. These actions signal the State's determination to accelerate investment in multi-benefit water storage and groundwater-recharge infrastructure—a critical need given the volatility of California's hydrologic conditions and increasing climate-related extremes.

2. Why Willow Spring Water Bank Merits Support

- The Willow Spring Water Bank is precisely the kind of project envisioned by California's voters when they approved WSIP and supports the State's long-range planning documents, including the California Water Plan (CWP) and [State Water Project Adaption Strategy \(August 2025\)](#).
- Alignment with California's storage goals: CWP identifies a clear need for new groundwater-banking capacity south of the Delta to improve water-supply reliability, operational flexibility, emergency supply, and drought preparedness. WSWB directly contributes to meeting that goal, offering scalable storage that supports statewide conveyance and delivery systems.
- Groundwater recharge and recovery: The project enables managed aquifer recharge to maximize storage and yield potential while enhancing downstream ecosystem benefits through pulse flows.
- Water storage and community resilience: The project supports multi-agency and multi-region sustainable water supplies.
- Efficient use of emergency WSIP funds: Willow Spring's advanced readiness ensures that uncommitted funds can produce measurable outcomes consistent with the Commission's emergency objectives.

3. Alignment with Emergency Regulation Objectives

Willow Spring supports the Commission's emergency-regulation framework by:

- Delivering implementable storage within the timelines contemplated for uncommitted WSIP funds.
- Demonstrating innovation and efficiency through public-private partnerships that reduces cost and delivery time.

We respectfully request that the Commission designate Willow Spring Water Bank equitably for uncommitted-fund allocation separate and apart from the Commission's August decision on allocating Proposition 1 pro-rata funds to WSWB. WSWB is making additional progress and believe allocating the pro-rata funds due to the withdrawal of the Los Vaqueros Reservoir Expansion Project would help address inflationary increase. WSWB has faced the same inflationary increases as the other important WSIP projects, as evidenced with our updated project budget in the latest quarterly report. WSWB remains committed to the timeline of a formal project update to the commission early in 2026. WSWB, coupled with the other WSIP projects are important to realizing California much needed water storage to achieve the CWP's groundwater-banking through collaboration and innovation.

California's future water security depends on accelerating sustainable storage solutions. The Commission's emergency regulations are a step to invest in the Willow Spring Water Bank as we work to contribute to tangible statewide benefits—enhancing supply reliability and advancing the California Water Plan's storage objectives and offset climate related challenges ahead.

We commend the Commission for its leadership and urge full support for this vital project. We stand ready to assist through coordination, stakeholder collaboration, and continue to make meaningful progress on implementation to help realize the promise of this investment.

Thank you for your continued leadership and consideration.

Respectfully,

A handwritten signature in blue ink, consisting of several overlapping loops and a trailing line.

Anjanette Shadley
General Manager
Willow Springs Water Bank