



May 13, 2025

VIA EMAIL AND FIRST-CLASS MAIL

Fern Steiner, Chair
California Water Commission
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Sacramento, California 94236-0001
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RE: Water Storage Investment Program: Chino Basin Program Continuing Eligibility and Feasibility Determination

Dear Chair Steiner,

As the California Water Commission continues to appropriate funds and monitor progress of Inland Empire Utility Agency's (the "IEUA") Chino Basin Program (the "CBP", "Program", or "Project"), we urge the Commission to reconsider the perspectives of local agencies within the IEUA service area. To reiterate a letter submitted on November 10, 2021 (enclosed), the cities of Chino, Montclair, and Ontario, and Monte Vista Water District (the "Respective Agencies") do not support the Project given the potential financial and water resource impacts on the communities. In support of this position, we appreciate the opportunity to provide written comments concerning this matter.

The Respective Agencies provide retail wastewater and/or water services within the IEUA service area. The financial commitment of no less than 75 percent of the non-public benefit cost share is no more defined now by IEUA than three years ago. The Respective Agencies are concerned that IEUA is making a financial commitment on behalf of its collective members (the "Retail Agencies") since not one of the nine Retail Agencies within the IEUA service area has made a firm commitment towards the local matching investment.

Previously, IEUA identified future IEUA wastewater rates as an additional funding source for the Project. IEUA has stated the Project's long-term funding and cost allocation will be addressed through a 5-year rate study; however, this study was recently postponed in favor of a 2-year rate study. Per IEUA, neither the existing IEUA rates nor the approved rates for the next two years, include this Program. IEUA cites the reallocation of property tax reserves as a sufficient revenue

supply for continued evaluation of the Program. The nexus and ability to allocate the Program's cost to the Retail Agencies via existing rate programs has yet to be demonstrated.

On March 25, 2025, Chino Basin Watermaster revealed a projected momentous decline in Safe Yield of approximately 14,000 acre-feet, the largest decline in the basin's history. This decline in groundwater availability will negatively impact future developments' ability to secure water, increase the reliance on imported State Water Project water to meet existing and future demands, and warrant prioritizing local solutions rather than diverting supplies. Notably, one of the significant components of the CBP is to, "transfer water to the State to provide the WSIP ecosystem public benefit."¹ However, rather than developing local resources for local needs such as housing and groundwater sustainability, IEUA is prioritizing the transfer of local water supplies at a time of uncertain groundwater availability.

Because IEUA unjustifiably contends that the Project will not adversely impact Retail Agencies, the Respective Agencies remain opposed to the Project and will continue to protect the communities we serve. We welcome a meeting with the Commission to further discuss our concerns.

Sincerely,

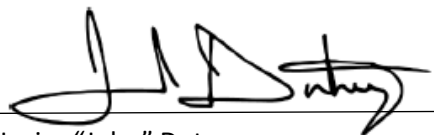
¹ March 13, 2025, IEUA Letter to California Water Commission titled "Request for Reallocation of Los Vaqueros Expansion Funds and Proposition 4 Funds for Proposition 1 Water Storage Investment Program (WSIP) Projects"



Curtis Burton
City of Chino
Mayor Pro Tem



Debra Porada
City of Ontario
Councilmember



Javier "John" Dutrey
City of Montclair
Mayor



Sandra S. Rose
Monte Vista Water District
President

cc: Inland Empire Utility Agency Board of Directors
Chino Basin Watermaster Board of Directors
Deven Upadhyay, Metropolitan Water District General Manager

Enclosed: November 10, 2021 Letter "RE: Water Storage Investment Program: Chino Basin Program
Continuing Eligibility and Feasibility Determination"