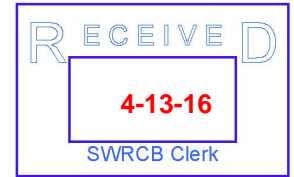




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**Martin E. Zvirbulis**  
Secretary / General Manager/CEO



April 12, 2016

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**Submitted via e-mail to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)**

**RE: Comment Letter – Urban Water Conservation Workshop**

Dear Honorable Chairperson Marcus and Board Members:

The Cucamonga Valley Water District (CVWD) appreciates this opportunity to submit comments to the State Water Resources Control Board (State Water Board) regarding potential adjustments to the February 2016 Emergency Regulation in response to precipitation amounts and other drought indicators across the state since February 2016, for consideration and possible action by the State Water Board in May 2016.

We appreciate the effort by the State Water Board and staff to facilitate the process in applying for conservation standard adjustments. We also appreciate the correction made to the default climate adjustment for our agency and others in our climate region. In the Notice of Public Workshop, you requested public input on three questions, for which we provide the following responses:

**1. What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?** We recommend the following modifications to the existing Emergency Regulation:

**Expand project eligibility for the drought-resilient supply credit and extend the application process.** The drought-resilient supply credit currently is limited to “new” supplies developed after 2013 that do not reduce downstream flows. This limitation does not recognize the significant investments made prior to 2013 in recycled water and stored groundwater resources, particularly in inland southern California. These investments are widely credited with keeping California’s economy intact throughout the current multi-year drought. **We respectfully request that these limitations be lifted and new applications accepted.**

**2. How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?**

This winter, southern California did not receive nearly as much precipitation as northern California. Nevertheless, CVWD is not experiencing water shortage conditions. This is due to the investment of billions of ratepayer dollars in local and regional water supplies, infrastructure, water use efficiency programs, and innovative rate structures over the past two decades. Southern California water agencies overall have successfully prepared for ongoing drought conditions. **We respectfully recommend that the Emergency Regulation focus less on regional or statewide precipitation levels and more on reliable water supplies.**

**3. To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?**

Agencies that have developed water supplies that are reliable under severe drought conditions should be recognized and rewarded for their advanced planning and investments. As part of our long term planning CVWD has invested ratepayer dollars to develop, manage, and maintain a robust portfolio of reliable water supplies. These include the Chino Groundwater Basin, one of the largest groundwater basins in southern California which has been sustainably managed for nearly 40 years, as well as a regional recycled water program which provides highly treated non-potable water for both direct use and groundwater recharge, and other local surface and groundwater resources.

Metropolitan Water District, our regional supplemental water provider, has invested billions of ratepayer dollars in local and imported water supply reliability, and as a result is able to meet 85 percent of requested deliveries during the current drought. Due to ongoing investments in reliable supplies, our agencies are able to reduce our use of imported water during times of drought, as well as store significant amounts of surplus water during wet years for use in dry years.

**We respectfully request that the State Water Board revise the Emergency Regulation to adjust conservation standards for agencies such as CVWD with reliable water supply portfolios.** The State Water Board can do so by requesting agencies report the quantity of water supply available that is not constrained by the current drought. This quantity of reliable supply can then be compared to projected demands to determine the reliability of each agency's water supply portfolio.

We appreciate your and your staff's time in considering our comments on the Emergency Regulation.

Sincerely,



Martin E. Zvirbulis P.E.  
General Manager/CEO