



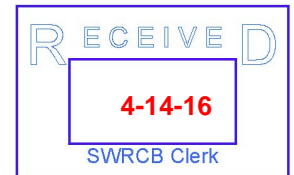
(4/20/16) Public Workshop  
 Urban Water Conservation  
 Deadline: 4/14/16 by 12 noon  
 Cucamonga Valley  
 Water District



April 14, 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)



**Comment Letter – Urban Water Conservation Workshop**

Dear Honorable Chairperson Marcus and Board Members,

The undersigned agencies appreciate 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 many of our agencies.

In the Notice of Public Workshop, you requested public input on three questions, for which we provide the following responses in reversed order to how they are posed in the notice:

**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.

Collectively, our agencies have invested hundreds of millions of ratepayer and state taxpayer 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 under unprecedented drought conditions.

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. Over the decades, Chino Basin producers have saved nearly 400,000 acre-feet of water stored in the groundwater basin which can be safely accessed during periods of extended drought.

Finally, local and regional agencies have provided leadership in implementing demand management and water use efficiency programs, including turf replacements, landscape irrigation survey and retrofits, efficient appliance rebates, and innovative rate structures.

**We respectfully request that the State Water Board revise the Emergency Regulation to adjust or eliminate conservation standards for agencies with reliable water supply portfolios.** The State Water Board can do so by requesting agencies report the quantity of water supply reliably available over the subsequent three (3) year period assuming that drought conditions continue. This quantity of reliable supply can then be compared to projected demands to determine the reliability of each agency's water supply portfolio.

**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, most southern California urban water agencies are 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, as described above.

Southern California urban 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.**

**1. What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?**

Consistent with our joint letter of January 28, 2016, we offer the following additional recommended modifications to the existing Emergency Regulation:

- **Use existing standards and baselines established by State legislation to measure conservation savings.** Our preference is either the Gallons Per Capita Per Day (GPCD) baseline established by SBX7-7 or the efficiency-based standards established by SBX7-7 and AB 1881.
- **Allow more flexibility in use of California Irrigation Management Information System (CIMIS) data for in-lieu climate adjustments.** For water suppliers that do not have a CIMIS station within their service area, allow the supplier to use either 1) a CIMIS station within a 25 mile radius of the supplier's service area as long as the CIMIS Station is in a similar climate, or 2) Spatial CIMIS data available on the Department of Water Resources' website.

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

Sincerely,



Peter Kavounas, CEO/General Manager  
Chino Basin Watermaster



Matthew Ballantyne, City Manager  
City of Chino



Rad Bartlam, City Manager  
City of Chino Hills



Chad Blais, Public Works Director  
City of Norco



Linda Lowry, City Manager  
City of Pomona



Rod Butler, City Manager  
City of Upland



Martin Zvirbulis, General Manager  
Cucamonga Valley Water District



Josh Swift, General Manager  
Fontana Water Company



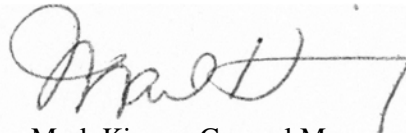
Benjamin Lewis, Jr., General Manager Foothill District  
Golden State Water Company



P. Joseph Grindstaff, General Manager  
Inland Empire Utilities Agency



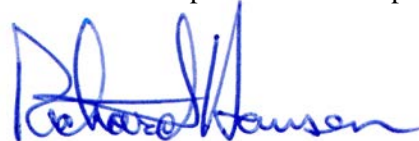
Todd Corbin, General Manager  
Jurupa Community Services District



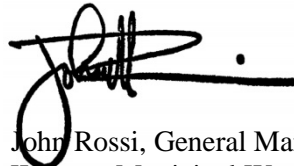
Mark Kinsey, General Manager  
Monte Vista Water District



Scott Burton, Utilities General Manager  
Ontario Municipal Utilities Company



Richard Hansen, General Manager  
Three Valleys Municipal Water District



John Rossi, General Manager  
Western Municipal Water District