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Martin E. Zvirbulis
Secretary / General Manager/CEO

January 6, 2016

Ms. Kathy Frevert
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100

Sent via U.S. Mail and E-mail to: Kathy.Frevert@waterboards.ca.gov

Subject: Comments on Proposed Regulatory Framework

Dear Ms. Frevert:

The purpose of this letter is to provide feedback on the State Water Resources Control Board (State Board) proposal to extend the 2015 emergency regulation and established regulatory framework for mandatory conservation by urban water suppliers through October 2016.

As noted in our prior comment letters, the Cucamonga Valley Water District ("CVWD") has been dedicated to conservation and water use efficiency for many years, long before conservation became a State mandated regulatory requirement. Over the past decade, CVWD has made significant investments on behalf of ratepayers including direct reuse recycled water facilities, recycled water recharge basins and associated infrastructure and we have purchased surplus supplies and banked groundwater for nearly 10 years in the Chino Groundwater Basin. These actions were taken and continue in an effort to prepare for and endure extended drought situations like the very one we are presently experiencing throughout the State. In fact, if you cumulatively add the recent reductions in response to the conservation mandate, 30% since June 1, 2015, with savings achieved before the mandate, our customers have reduced their water use by approximately 50%.

Although we appreciate the State Board proposing adjustments to the existing regulatory framework, the proposed adjustments offer very little, if any relief to CVWD and its customers. Although adjustment for climate and arid conditions are important, overlooking and ignoring local and regional investments in groundwater banking and recycled water recharge is counterintuitive.

James V. Curatalo, Jr.
President

Luis Cetina
Vice President

Oscar Gonzalez
Director

Randall Reed
Director

Kathleen J. Tiegs
Director

We appreciate the opportunity to share our thoughts and concerns with the Board and look forward to working together to develop sound and justifiable revisions to the regulations that are equitable and sustainable for all agencies throughout the State.

Should you have any question or need additional information, please contact me or my staff at (909) 987-2591.

Yours truly,

A handwritten signature in black ink, appearing to read 'Martin E. Zvirbulis', written in a cursive style.

Martin E. Zvirbulis
General Manager/CEO

cc: Board of Directors, Cucamonga Valley Water District