



Jane F. Anderson, President
Chad Blais, Vice President
Kenneth J. McLaughlin, Director
Robert "Bob" Craig, Director
Betty A. Anderson, Director

April 22, 2015

Jessica Bean
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100

Sent via Email to: Jessica.Bean@waterboards.ca.gov

Re: Concerns and Challenges with Proposed Mandatory Restrictions to Achieve a 25% Statewide Reduction in Potable Water Use (as released April 18, 2015)

Dear Ms. Bean:

Thank you for the opportunity to comment on the Draft Mandatory Restrictions as released on April 18, 2015. Jurupa Community Services District (JCSD) understands the challenges that face our state and appreciates the difficulty in implementation of the Governor's most recent Executive Order (B-29-15). We support the Governor's continued commitment to addressing current water challenges in our state and are currently laying the framework that will enable JCSD to meet our conservation target.

JCSD has reviewed the latest version of the proposed regulations and respectfully requests the State Water Resources Control Board (SWRCB) incorporate the following into the final regulatory framework:

1. Recalculate the "tiers" to ensure the most accurate information is utilized. In the most recent draft, JCSD's R-GPCD for July – September 2014 is 198.6. We recently submitted updated monthly drought reports due to a population update and an error in the utility billing system which occurred during a billing system software conversion in 2014 that overstated the residential percentage. These changes can be verified and will reduce JCSD's R-GPCD to 155.5. This will accurately reflect JCSD's conservation target.
2. The SWRCB Fact Sheet dated 04/18/2015 describes a situation where an urban water supplier could request a modification of its conservation target based on "reserve supply" that could last multiple years. It seems to have been omitted from the final draft Emergency Regulation. Currently, JCSD has over 13,000 AF in storage which based on average production estimates and current hydrologic conditions would provide an additional six years of water supplies. This quantity

State Water Resources Control Board
April 22, 2015
Page 2

will be further extended once more aggressive conservation measures are implemented. We respectfully request that this source be taken into consideration when determining our conservation target and this option be reinstated into the final regulations.

A conservation target for JCSD that factors in the requested adjustments coupled with our aggressive conservation, expansion of recycled water deliveries and use of local stored water will meet our demands under the proposed regulations.

Sincerely,



Todd M. Corbin
General Manager