

City of Arts & Innovation



May 4, 2015

Delivered via email: commentletters@waterboards.ca.gov

Felicia Marcus, Chair
California State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

REF: ADMIN 15-011

Subject: Comments on Final Draft Regulations to implement Governor Brown's Executive Order for Water Conservation

Chair Marcus:

The City of Riverside appreciates the opportunity to make comments on the final draft regulations to implement the 25% conservation standards identified in Executive Order B-29-15. We reiterate the comments from our April 22, 2015 letter wherein we recommended the Board provide clarity on irrigation of mature trees in street medians where those trees are co-planted with turf, and the use of children's recreational "splash-pad" features in public parks during the hot summer months.

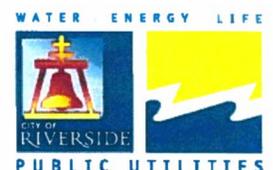
The fact sheet that accompanied the release of the draft regulations on April 28 seeks specific feedback on whether the regulation should allow water suppliers whose supplies include groundwater to apply for inclusion in the 4% reserve tier, if they can demonstrate 4 years of supply, no reliance on imported water, and natural recharge of those basins.

The City of Riverside heartily endorses this regulatory addition as an economic necessity. The City of Riverside Public Utilities serves approximately 290,000 full time residents and an estimated 35,000 full time non-permanent college students at three university campuses within our community. In 2005, the City of Riverside began a 10 year \$90,000,000 capital investment campaign to eliminate our reliance on imported State Project and Colorado River water and prepare our Utility for a multiple dry year water supply program. An additional \$10,000,000 has been invested over the same period in local water recycling projects to offset drinking water previously applied for landscape irrigation.

Since 2008, Riverside has met 100% of its annual water needs from local, well managed, adjudicated groundwater basins, and locally produced recycled water. Presently, Riverside produces water from three local groundwater basins that recharge naturally within the Santa Ana River watershed. The basins from which we produce groundwater all recharge from natural, local precipitation and in spite of the drought, the water table depth has been stable over the past several years. Our prior capital expenses along with ongoing investments in groundwater management and dry-year yield programs would become significant stranded investments under arbitrary regulations to reduce water use. Our well managed groundwater basins are capable of meeting current and future demands, for at least the next four years, because of these significant local investments.

Riverside Public Utilities • Administration

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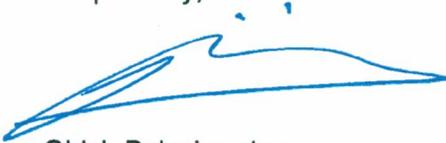


The City of Riverside has taken all necessary steps to implement the Board's regulations from July 2014, March 2015, and the Governor's recent executive order. We will continue with our enhanced customer education and outreach programs, near-term expansion of our water recycling programs, enforcement of our mandated outdoor watering cycles, enforcement of our median turf irrigations bans, and promotion of our turf removal and replacement programs and rebates. Our regional Drought Action Task Force is meeting regularly to develop programs and responses to the Board's ongoing regulations.

We strongly encourage the Board to adopt regulations that are fair, equitable, and recognize Riverside's and other water agencies' prior actions to prepare for local and statewide drought conditions. **Specifically, we recommend the Board revise Section 865 (c) (2)** to allow water suppliers whose supplies include groundwater to apply for inclusion in the 4% reserve tier if it can be demonstrated that they have a minimum of 4 years of supply, do not rely on imported water, and their groundwater supplies recharge naturally.

The City of Riverside appreciates the Board and staff's time and consideration in reviewing our comments. If you have any questions, please call me directly at (951) 826-8912.

Respectfully,



Girish Balachandran
Public Utilities General Manager

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cc: Riverside Mayor Rusty Bailey and City Council
Riverside Board of Public Utilities