



City of Arts & Innovation



Sent via email: commentletters@waterboards.ca.gov

May 13, 2016

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814
Attn: Jeanine Townsend, Clerk of the Board

Re: Proposed Emergency Regulation in Response to Executive Order B-37-16

Dear Chair Marcus,

Thank you for providing the City of Riverside (Riverside), through its Public Utilities Department, an opportunity to comment on the State Water Resources Control Board's (State Board) draft Proposed Emergency Regulation in response to the Governor's Executive Order B-37-16, that extends the emergency regulations for urban water conservation through the end of January 2017.

Riverside supports the proposed text of the emergency regulation and Section 864.5. "Self-Certification of Supply Reliability for Three Additional Years of Drought," as currently written. We believe that this approach recognizes the efforts taken by Riverside and others to protect and augment existing water supplies to anticipate future growth and prepare for possible water shortages.

As to the very recent issue of whether or not there should be a conservation "floor", Riverside believes that a much more effective floor has been set in motion by SB X7-7 2009 (SBX7-7) which stipulated that all utilities should reduce consumption by 20% by the year 2020, with an interim goal for 2015. Water suppliers have acted to meet those goals, and had made significant progress by 2013. If the State Board arbitrarily sets the baseline at 2013, the early conservation action taken by Riverside and other water suppliers in response to SBX7-7 will be lost, in effect punishing those agencies that were early adopters of water conservation. Thus a simple 2013 baseline conflicts with legislative action, and the subsequent early actions by responsible agencies. Riverside does not support a prospective

conservation floor set by the State Board. The State Board and stakeholders should continue forward under the SBX7-7 framework.

Riverside recognizes that water is a precious resource and is generally supportive of the State Board's efforts to promote conservation. However, water conservation is only one part of the water supply portfolio of a well-managed water utility. Riverside's other water resources include storm water capture and recycled water. All told, Riverside has spent over \$100 Million since 2005 on water supply reliability and expects to spend another \$100 Million over the next 10 years to protect and enhance such reliability even further. Some of the proposed projects include (New Supply):

- Regional storm water capture and recharge (3,300 Acre Feet/Year [AFY])
- Recycled water projects (2,000 AFY)
- Local storm water capture and recharge projects (1,500 AFY)

In addition to these new supplies, Riverside will continue to promote water conservation measures as it anticipates that water conservation will supplant the need to develop additional new water supply.

Again, Riverside welcomes and supports the State Board's proposed changes to the emergency mandate to include self-certification of supply reliability. This process rewards agencies for their proactive approach to water security and sustainability all the while preventing wastefulness.

Riverside appreciates the State Board's willingness to revisit its extended regulation and for considering Riverside's comments. If you should have any further questions, please contact Todd Jorgenson, Assistant General Manager at tjorgenson@riversideca.gov.

Sincerely,



for Girish Balachandran
General Manager
Riverside Public Utilities