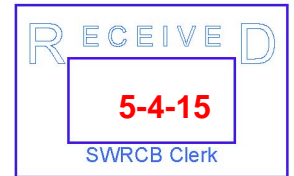




Jane F. Anderson, President
Chad Blais, Vice President
Kenneth J. McLaughlin, Director
Robert "Bob" Craig, Director
Betty A. Anderson, Director



May 4, 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 Emergency Regulations to Achieve a 25% Statewide Reduction in Potable Water Use (as released April 28, 2015)

Dear Ms. Bean:

Thank you for the opportunity to comment on the Proposed Emergency Regulations as released on April 28, 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 and are actively working toward our conservation goal.

JCSD has reviewed the Proposed Emergency Regulation dated 04/28/2015 and respectfully requests the State Water Resources Control Board (SWRCB) incorporate the following into the final regulations:

1. JCSD is a producer from the adjudicated Chino groundwater Basin and 100% of its supply is from groundwater, rather than imported water. SWRCB requested feedback on whether the regulation should allow water purveyors who are completely independent of imported water to be included in the 4% reserve tier if a 4 year reserve supply of groundwater exists. Local investments have been made by JCSD to rely on local groundwater including investment in desalter facilities to improve water quality and reliability of local supplies. Currently, JCSD has water in storage which based on average population estimates would provide an additional six years of water supply. Additionally, groundwater supplies will be further extended as more aggressive conservation measures are implemented.
2. The Chino Basin has an extensive peer reviewed water model which takes into account natural hydrology and long-term precipitation data. Imported water is not

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a determining factor in setting a annual safe yield and access to water in storage. Consequently, JCSD supports a regulation that includes this additional source be factored into our final conservation determination. At a minimum, it should reduce our mandatory commitment.

We respectfully request these comments be taken into consideration in determining the final regulations.

Sincerely,



Todd M. Corbin
General Manager