

City of Arts & Innovation

(7/15-16/14) Board Meeting- Item 10  
Urban Water Drought Emergency Regulations  
Deadline: 7/14/14 by 12:00 noon



July 14, 2014

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-2000  
Delivered via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**SUBJECT: Comment Letter on Proposed Drought Emergency Regulations  
(July 15-16, 2014 Board Meeting)**

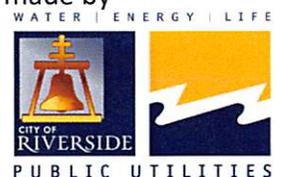
Dear Ms. Townsend:

The City of Riverside Public Utilities provides potable, non-potable and recycled water services to approximately 300,000 residents in inland southern California. We thank you for the opportunity to comment on the draft emergency regulations for urban water agencies.

The draft regulations require urban water agencies to “implement all requirements and actions of the stage of its water shortage contingency plan that imposes mandatory restrictions on outdoor irrigation.” The regulations also require each urban water supplier to prepare and submit a monthly monitoring report on the amount of potable water the urban water supplier produces and an estimate of the gallons of water per person per day used by the persons it serves.

In general, we commend the State Water Resources Control Board (SWRCB) for recognizing in its draft regulations that local water agencies should be allowed to implement their existing water shortage contingency plans as the primary mechanism for local drought response. Water shortage contingency plans have been prepared to reflect each community’s local priorities and preferences for restricting potable water use during a water shortage. Riverside agrees with this approach, however, we believe a number of changes are needed to reflect local conditions and the state of water supply facing some communities.

Triggers within Riverside’s Water Shortage Contingency Plan are based on local findings of actual water shortages. Given the work to prepare for drought conditions and the investments made by



our local community over the past ten years, Riverside is not facing a real threat of water shortage. The specific adjudication of groundwater rights that Riverside operates under are “use-it or lose-it” rights, so banking water for another year is not a permissible option. A more viable solution for Riverside is conserve and transfer those rights to a neighboring agency that relies on imported water. While this is certainly permissible under the draft State regulations, the reporting mechanism for these wholesale activities is not clear. Furthermore, local agencies have other options to reduce water use to the same level as outdoor water use restrictions which would not be available under the draft regulations.

**We recommend the Board include the following language from Section X.2(c) “...or shall implement another mandatory conservation measure or measures intended to achieve a comparable reduction in water consumption by the persons it serves relative to the amount consumed in 2013” into Section X.2(b) to provide the most appropriate tools for urban water suppliers to conserve water supplies.**

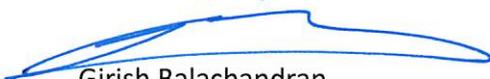
Section X.2 Mandatory Actions by Water Suppliers, part (d) requires monthly reporting of the amount of potable water the urban water supplier produced and an estimate of the gallons of water per person per day (GPCD) used and an initial statement of the number of persons served.

Riverside supports monthly reporting of total water production as the most equitable, consistent and accurate way to monitor the water waste and outdoor irrigation actions. However the method to calculate monthly GPCD in this Emergency Regulation is *different* from the existing GPCD calculation required in Urban Water Management Plans and the use of this different GPCD for this purpose may lead to several unintended outcomes. Foremost is the opportunity Riverside has to produce and transfer conserved water from its adjudicated basins to other agencies that rely on imported water. The proposed reporting metric does not incentivize Riverside to take that action, in part because it would appear from the metric that our customers are not conserving. Secondly, the proposed metric is burdensome for agencies like Riverside that serve large seasonal populations (three major universities) and our non-municipal water service boundary. The potential use of estimated (GPCD) versus actual (production) data to evaluate current and future drought actions and the use of an inclusive figure (industrial, institutional, residential and commercial use) to evaluate response to actions that target residential water use could lead to further unnecessary regulations.

**We recommend the Board eliminate the requirement for monthly GPCD reporting requirement and rely on aggregate monthly production data, less wholesale or transfer volumes, on a year to year basis as the key indicator of compliance with these Emergency Regulations.**

Thank you for your consideration of these comments.

Respectfully,



Girish Balachandran  
Public Utilities General Manager