



City of Arts & Innovation

(11/4/15) Board Meeting- Item 6
Emergency Conservation Regulation
Deadline: 10/29/15 by 12:00 noon



October 26, 2015

The Honorable Felicia Marcus, Chair
The Honorable Frances Spivy-Weber, Vice Chair
The Honorable Tam Doduc, Member
The Honorable Steven Moore, Member
The Honorable Dorene D' Adamo, Member

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Continuing conservation and sustainability under California's drought

Dear Chair Marcus and Members of the State Water Resources Control Board,

Riverside Public Utilities (RPU), in the city of Riverside, California has been in existence for over 100 years and provides water to approximately 290,000 full time residents and an estimated 35,000 full time non-permanent college students at three university campuses within our community. RPU has a strong commitment to our water quality, water delivery, and affordable rates, and we have been a leader in preparing for drought through development of resilient local water resources. California's severe drought has caused water agencies throughout the state to re-examine their systems and caused individuals to rethink their water usage. Through our marketing efforts, Riverside has been communicating the drought's seriousness to our customers and we have been working to comply with the emergency drought regulations set forth by the State Board's Resolution (No. 2015-0032) to implement the Governor's Emergency Order issued April 1, 2015.

As this Board considers rules and regulations moving forward, it is of the utmost importance that we ensure that communities, like Riverside, are provided the tools to adopt a culture of resiliency and water use efficiency while simultaneously free to expand and thrive economically. We hope that this letter will serve as a platform for Riverside to participate in the ongoing conversation so that together we may develop workable solutions to combat this drought.

Recognition of Investments in Infrastructure and Drought Resiliency

Funding and opportunities for cities and agencies to invest in water projects to bolster water systems will be beneficial in the long run and allow communities to be better prepared for dry years, as was the case for Riverside. In 2005, the city began a 10 year, \$90,000,000 capital investment campaign to eliminate our reliance on imported State Water Project and Colorado River water and prepare the utility and the city 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. These efforts, coupled with our water efficiency work, have allowed Riverside to reduce its water use greatly over the past decade while completely eliminating our reliance on the State

Water Project supplies. The State should incentivize agencies to improve their systems and give credit for water investments and early action by forward thinkers instead of focusing on penalizing those who do not meet their conservation targets. As a state we need to tackle the immediate problems that we face with a depleting water supply, but we must also work to ensure that our end goal is water supply reliability and drought resiliency. The future of our State and regional economies is dependent on the long-term availability of reliable water supply.

Credit for Resilient Supply

We recommend that the State Board recognize resilient water supply and provide credits for any resilient supply an agency may have in their service territory. In early summer, when the Governor announced emergency conservation regulations, the city of Riverside went to work to identify best practices and meet our assigned 28% reduction target, because as a state we face the drought together. However, during this time, RPU also provided comments to this State Board concerning access to a 4% reserve tier, instead of the assigned 28% tier, as Riverside meets 100% of its annual water needs from local, well-managed, adjudicated groundwater basins, and locally produced recycled water. We do not rely on State Water Project supply. While this continues to be an ongoing conversation, agencies throughout the state have similar resilient water resources yet there is no mechanism by which we can receive credits towards our overall conservation goals. Considering this supply and allowing it to be counted towards a conservation goal would be incredibly helpful to many regions across the state.

Regulations and Going Beyond "One size fits all"

Relying primarily on extreme methods of water conservation is not sustainable for communities and cannot be a practice that is adopted long term. Moving forward, we should be focusing on improving upon current regulations while also examining longer term solutions and as previously mentioned, ways to support drought resilient infrastructure. Conservation should be viewed through unique, regional lenses recognizing climate, land use and population differences throughout the state.

Recognizing differences in climate is key. There is a significant difference between cooler coastal areas and the hotter, drier, inland areas of the State, as well as annual seasonal anomalies that occur in these areas. For example, June 2015 was much warmer compared to 2013, while July saw a reversal of that trend. Additionally, any regulation must provide the opportunity for economic development for agencies that have secured local water supply. The artificial cap on water production that results from the current conservation regulation formula hampers local cities from attracting new business and industry that create local jobs. As presently drafted, the per-capita water use formulas have the unintended consequence of encouraging residential development at the expense of commercial and industrial development, as allowable water production is tied directly to population.

Riverside has seen, firsthand, conservation and land use challenges that our community faces being located in the inland Southern California region, a historic citrus region. Our inland climate is typically warm but during the summer months, the heat can rise well past 100 degrees on a regular basis. The drought and implementation of regulations has been difficult for vulnerable areas of Riverside such as our Citrus State Historic Park and our agricultural greenbelt. The question of how to balance water conservation and not cause undue economic harm to growers and farmers has been a difficult one to answer and still there is no best solution. For this population, large conservation targets are simply not realistic.

We appreciate that the State Board had relatively little time to implement the Governor's order, and that the present Resolution reflects this quick development. However as we enter into the cooler fall months, there is time to examine current regulations and make thoughtful adjustments. Adjustments must be appropriately tailored to the unique supply-side and demand-side situation applicable to the water provider. As we focus on immediate reduction in water use,

conservation cannot be our state's only method to combat the drought. California must recognize supply resiliency and ready ourselves for the implementation of infrastructure that improves our water systems across the State.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Girish Balachandran', with a long, sweeping horizontal stroke extending to the left.

Girish Balachandran

Riverside Public Utilities, General Manager

C: John A. Russo, Riverside City Manager
Kevin S. Milligan, Deputy General Manager
Anthony Beaumon, Deputy City Attorney