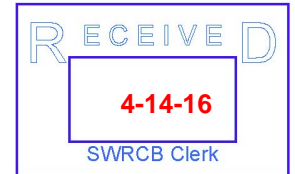


City of Arts & Innovation



Sent via email: commentletters@waterboards.ca.gov

April 14, 2016

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

Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus,

The City of Riverside, through its Public Utilities Department, hereby submits the following comments in advance of the April 20 public workshop by the State Water Board on the extended emergency urban water conservation regulations.

Since 2008, Riverside has met 100% of the water demands for its service area 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 Bunker Hill, Rialto-Colton, and Riverside basins were adjudicated in 1969, in Western Municipal Water District of Riverside County et al., vs. East San Bernardino County Water District et al., Riverside County Superior Court Case No. 78426 (available online at <http://www.sbvmd.com/Home/ShowDocument?id=1494>). The 1969 Western-San Bernardino Judgment was adopted after the 1950's drought to prevent the overdraft of these basins. The 1969 Judgment establishes a safe yield for the Bunker Hill Basin, which is independent of imported water supplies.

The groundwater basins that Riverside draws from are managed by the court-appointed Watermaster and oversight is provided by the court to ensure the provisions of the Judgment are met. For more than 45 years, the Judgment has protected the vast water resources in these basins. Water levels have remained relatively stable over the past 8-years. Collectively these basins have more than 10 Million Acre Feet of water storage, which is equal to the combined capacity of Lake Shasta, Lake Oroville and the San Luis Reservoir, three of the five largest reservoirs in California and exceeds California's annual urban water usage. The Bunker Hill Basin alone has a capacity of about 6 million acre feet and Riverside is only entitled to extract about 1% of that capacity in any given year. All users, including Riverside, are entitled to extract about 4% of the basin's capacity in any given year.

Furthermore, the Watermaster along with partnering agencies like Riverside continue to collaborate on groundwater management strategies, projects that enhance surface water capture and recharge, and developing dry-year yield programs. These investments have helped protect the basins against single-year and multi-year drought conditions in our area.

As has been explained in letters and testimony to the State Water Board, Riverside is uniquely situated with a robust source of groundwater with many years' worth of reserves due to existing local control and investments in regional programs and projects.

Some have questioned Riverside's claim to being independent of imported water since the Bunker Hill Basin has received imported water in the past. This imported water is not associated with Riverside or its annual extractions from the basin, and was not accounted for when the safe yield was established during the adjudication process. Imported water deliveries to the basin have been discretionary and are primarily used for enhanced basin management by overlying water agencies.

Regarding the State Water Board's three questions:

What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

An unintended consequence of the emergency urban water conservation regulations has been the significant loss of revenue to retail urban water agencies. In fiscal year 2015-16 (July through March), Riverside has lost \$8.4M as compared to 2013. It is a challenging task to balance reduced revenues with ongoing fixed expenses and planned future investments. Riverside has had to utilize reserves to offset lost revenue. This is a short-term fix that is not sustainable on a move forward basis. Furthermore, the involuntary loss of revenue has reduced Riverside's ability to invest in the very water supply and basin management projects that have allowed us to remain imported water independent over the past 8 years.

The State Water Board should consider eliminating the mandatory urban water conservation regulations for agencies with sustainable water supplies that are independent of imported water. At a minimum, the 4% tier set forth in Section 865 (c)(2) of the extended emergency regulations should be amended to include qualifying sources of surface water and groundwater. Riverside's water supply has 25 years' worth of reserves, calculated at zero recharge and zero conservation. Riverside does not rely on water imported from outside the hydrologic region.

How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

The State Water Board should account for regional differences in precipitation and lingering drought impacts. However, as the precipitation data is evaluated greater emphasis should be placed on long term averages (in excess of 10 to 15 years) and less weight should be given to short term or single year precipitation data. Agencies that produce from groundwater basins have the opportunity to capture storm water runoff whenever precipitation occurs (e.g. year 1, year 2, etc. . .).

Riverside has begun taking steps to adapt to the changing climate conditions. We are investing in regional storm water capture projects such as the Riverside North Aquifer Storage and Recover Project, Enhanced Recharge Project, Active Recharge Project, and are evaluating local storm water capture projects within our service area. These projects will increase the

recharge capacity to the groundwater basins and provide Riverside and others with the ability to capture and recharge greater volumes of storm water in wet years. These stored reserves, will then be available during extended dry periods.

To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

To date, the State Water Board has used water efficiency to rank and compare one water supplier to another. However, that is only one part of understanding an agencies resiliency to drought. The State Water Board should also evaluate the quantity and reliability of each agencies' water supply. Collecting and analyzing this information would allow the State Water Board to evaluate which agencies have immediate or near-term water needs and which have healthy reserves. Furthermore, this information in aggregate may allow the State Water Board to better gage the overall impact by agencies on the water resources and conveyance facilities managed by the State.

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

Sincerely,



Girish Balachandran
General Manager
Riverside Public Utilities