



City of Arts & Innovation

April 22, 2015

Ms. Felicia Marcus
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100
Via email: Jessica.Bean@waterboards.ca.gov

RE: SWRCB Draft Regulations for Mandatory Conservation Measures (Published April 18, 2015)

Dear Ms. Marcus,

City of Riverside Public Utilities appreciates this opportunity to respond to the Proposed Text of the Emergency Regulations published on April 18, 2015. We recognize that most of the state is experiencing an extreme drought and that many agencies throughout the state are facing a curtailment of their water supplies that has led to Governor Brown's issuing of an Emergency Order. Furthermore, we understand that the State Water Resources Control Board (Board) is seeking to implement this Emergency Order while protecting the State's economy, preserving health and safety, and protecting landscape features such as mature trees. To this end, we understand the Board is seeking water conservation primarily by reducing water usage for ornamental landscape and increasing indoor water use efficiency. The City of Riverside intends to support the Governor and the Board's call for conservation to the fullest extent possible.

In general we concur with the proposed language. Following our meeting with Board staff at the ACWA offices this week, we have a few recommendations that we believe will enhance the applicability of the regulations associated with Emergency Order as clarified in discussions with the Board staff. In general, the Board staff has expressed the need to protect trees so that they do not become potential health and safety hazards. The Board staff has also suggested that the continued use of recreational water features, such as "Splash Pad" type facilities, are to be left to the discretion of the agencies. Our suggestions for revised regulatory text for Section 864 are given in Items 1 and 2, below.

In addition to these modifications, we recommend that the Board's conservation goals provided in Section 865, take into account the conservation efforts of the various water agencies after the emergency regulations were issued in 2014. These regulations were finalized in June, agencies took action in July and conservation under the prior mandate began in August. For this reason, we recommend that the Board utilize the period of August to October 2014 in order to establish conservation goals for each agency. Item 3 contains our recommended changes to account for these conservation efforts.

In summary, the recommended changes are as follows:

1. Revise Section 864 (a) (4) The use of potable water in a fountain or other decorative water feature, except where the water is part of a recirculating system *with the understanding that recreational water features such as splash pads are not necessarily considered decorative*;
2. Revise Section 864 (a) (7) The irrigation with potable water of ornamental turf on public street medians, *except when doing so will jeopardize established trees, in which case all reasonable effort will be made to establish independent watering for said trees*; and
3. Revise Section 865 (c) such that all "July-September 2014 R-GPCD" are changed to "Aug-Oct 2014 R-GPCD".

The City of Riverside takes its obligation to conserve our vital and limited water resources very seriously. Over the past five years our customers have conserved over 70,000 acre feet when compared to our 20x2020 baseline. We will continue our efforts to conserve over the next 270 days and beyond as we instill a new water ethic and comply with the Board's regulations.

Respectfully, 



Girish Balachandran
Utilities General Manager

cc: Mayor Rusty Bailey & City Council
Riverside Board of Public Utilities