

# Basin Technical Advisory Committee

April 22, 2015

*via email and US Mail*

Bear Valley Mutual  
Water Company

City of Colton

East Valley Water District

City of Loma Linda

City of Redlands

City of Rialto

City of Riverside

San Bernardino County  
Flood Control District

San Bernardino Municipal  
Water Department

San Bernardino Valley  
Municipal Water District

San Bernardino Valley  
Water Conservation District

West Valley Water District

Western Municipal  
Water District

Yucaipa Valley  
Water District

Jessica Bean  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
Jessica.Bean@waterboards.ca.gov

Dear Mrs. Bean,

The Basin Technical Advisory Committee (BTAC) is comprised of retail water agencies, flood control, wholesale water agencies and other stakeholders that collectively represents nearly 1.5 million people. The BTAC works collaboratively on water-related issues and water resources management within the upper Santa Ana River Watershed.

The BTAC recently reviewed the latest version (4/18/15) of the State Water Resources Control Board (Water Board) proposed regulations to achieve a 25% statewide reduction in water use and respectfully asks the Water Board to incorporate the following suggestions into the final regulatory framework:

1. Regional compliance with the 25% reduction. The BTAC recommended the possibility of regional compliance on the Water Board's first draft of its regulations and was pleased to see the Water Board include it in the latest version of its draft regulations asking for further input on how compliance may be achieved collectively by a region. We would suggest that the Water Board allow one, or more, agencies that share (adopted) the same Integrated Regional Water Management Plan and/or Regional Urban Water Management Plan be given the option to comply collectively with their state reduction requirements. We continue to believe that this approach will encourage dialogue and exchange of ideas amongst agencies.
2. Replace "ornamental" with "non-functional". The draft regulations use the term "ornamental" to describe landscaped areas that are decorative. In our region, we have been distinguishing between decorative landscapes and landscaped areas that have a specific purpose (soccer fields, etc.) by using the terms "functional" and "non-functional". We request that the Water Board consider using the term "non-functional" in order to be more self-explanatory than the term ornamental.
3. Examples on Draft Regulations Fact Sheet. The examples provided on the Draft Regulations Fact Sheet in the blue shaded areas imply that industrial users are unable to reduce water use so it is up to residential water customers to achieve even greater reductions. This could result in resentment from residential customers and more finger pointing. The current drought is an emergency impacting all water users throughout California, and will require an unprecedented level of statewide unity and cooperation. We would recommend that you consider modifying the text

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to provide practical examples of changes customers will need to make in order to achieve a reduction of up to 36%.

This historical drought, combined with California's constantly increasing population have placed the state in a precarious position. We support and recognize the urgency of the situation and the need for the state to cut water use. We also appreciate the challenge before the Water Board to develop the regulatory framework to achieve this requirement. We also appreciate the Water Board accepting these, and other comments, as you work toward finalizing this framework.

Sincerely,



**Thomas J. Crowley, P.E.**

Chair

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