

commentletters

From: Eduardo Espinoza <EduardoE@cvwdwater.com>
Sent: Monday, May 04, 2015 9:53 AM
To: commentletters
Cc: Martin Zvirbulis; John Bosler; Jo Lynne Russo-Pereyra; Carrie Corder; Emmerson, Mark@Waterboards; Cindy Cisneros; Eric Grubb; Bradeny@cvwdwater.com; Bean, Jessica@Waterboards
Subject: Comment Letter – Emergency Conservation Regulation
Attachments: Comments to Proposed Regulatory Framework for Mandatory Conservation (as released April 18, 2015); Ltr_CVWD to Water Boards_04-13-15.pdf; Ltr_CVWD to WaterBoards-Townsend_05-04-15.pdf

Importance: High



May 4, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via E-mail May 4, 2015 to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Emergency Conservation Regulation

Dear Ms. Townsend:

On behalf of the Cucamonga Valley Water District, please accept these comments on the Proposed Regulatory Framework for Mandatory Conservation (as released April 28, 2015). Attached to this email is a scanned letter of these comments signed by John Bosler, CVWD Assistant General Manager/Chief Operating Officer.

The purpose of this letter is to provide feedback regarding the Draft Regulatory Framework for Mandatory Conservation established by the State Water Resources Control Board (hereon referred to as "State Board") on April 28, 2015. We understand the water challenges that face our state and appreciate the various constraints under which the State Board is operating in order to comply with the Governor's Executive Order B-29-15. The latest draft framework still creates serious equity and feasibility issues that will result in unintended and unnecessary legal, financial, environmental and operational consequences for us and our customers. We are writing to provide our perspective and offer reasonable solutions to these issues that would satisfy the intent of the Governor's Order and maintain equitable implementation among water purveyors.

We want to reemphasize that there are still many concerns and inequities in the State Board's approach to implementing conservation standards to the water purveyors, which we have noted in previous correspondence. For reference, please see attached letters for previous comments. However, based on the latest framework, we have the following observations and comments.

1. CVWD noted the State Board's consideration to restructure the conservation tiers by doubling the number of tiers and using two percent increments (Fact Sheet issued April 28 2015, page 2). CVWD is open to this revision because the current tier bandwidths are still very wide. CVWD is at 180 R-GPCD for the July-September 2014 period, falling into the lower quarter percentile of Tier 8 (170 – 214.9 GPCD). That places CVWD in the 32% Conservation Standard. If the State Board expanded the tiers, CVWD would likely fall into the 30% conservation tier and around the 50th percentile of that respective R-GPCD range. The adjustment would not move any water purveyor up in the conservation standard, but rather would move those purveyors that are closer to the lower end of the current tier into a new lower tier and thereby lowering their conservation standard by 2%. An adjustment like this would likely achieve the same conservation goal for the state and in a small way improve equity among all water purveyors. Therefore, CVWD is in favor of revising the tier structure in this manner.

2. CVWD also noted the State Board's consideration of a 4% reserve tier if a water purveyor could demonstrate that it had access to 4 years of water supply that did not include imported water (Fact Sheet issued April 28 2015, page 4). It seems that the State is willing to recognize a water purveyor's capabilities to decrease imported water for this duration. We further request that the State consider expanding the reserve tier to recognize purveyors that can drastically reduce their reliance on imported water. For example, over the past decades CVWD has wisely invested and developed local water supplies that can allow us to drastically reduce our reliance on imported water (State Water Project) for reasons like drought. During calendar year 2013 CVWD imported and treated 25,764 acre-feet of imported water, which accounted for 49% of total production that year. To-date CVWD has developed a wide and reliable portfolio of local water sources, including 70,000 acre-feet of groundwater storage in local basins and infrastructure to capture and treat on average 2,000 acre-feet per year of local mountain surface water. CVWD has the pumping rights and operational capacity to produce groundwater that could allow us to reduce imported water by 50% while only requiring the need to conserve 25% of 2013 production. Although CVWD does not have the local supplies to completely decline imported water, we do have the ability to reduce by more than 50% during the drought with conservation. We ask that the State Board consider intermediate tiers that recognize a water purveyor's local supply capacities and ability to drastically reduce imported water. In our case, we ask for a 2% reserve tier adjustment of our final conservation standard determination. CVWD can provide the supporting information upon request.

Our hope is that the State Board will recognize the two above comments that would place us at a tier of 28% conservation standard. By considering both comments, the State would improve equity and reward strategic planning of local supplies, respectively, not just for CVWD but also for everyone.

No one is more committed to water reliability, safety and affordability than the Cucamonga Valley Water District. CVWD and our region have been extremely proactive in implementing demand management programs to exceed the SBx7-7 requirements. The State Board must recognize the effort and resources that have been expended to reduce demands prior to the Governor's declaration. As such, we respectfully urge strong consideration of our suggestions as we work together to address the challenges we face as a state.

Thank you for your consideration and for the open dialogue.

Best regards,

Eduardo

Eduardo Espinoza, PE
Design and Construction Manager
Cucamonga Valley Water District
(909) 987-2591
EduardoE@cvwdwater.com

commentletters

From: Eduardo Espinoza <EduardoE@cvwdwater.com>
Sent: Wednesday, April 22, 2015 11:15 PM
To: Bean, Jessica@Waterboards; Bean, Jessica@Waterboards
Cc: Martin Zvirbulis; John Bosler; Jo Lynne Russo-Pereyra; Carrie Corder; Emmerson, Mark@Waterboards; Cindy Cisneros
Subject: Comments to Proposed Regulatory Framework for Mandatory Conservation (as released April 18, 2015)

April 22, 2015

Ms. Jessica Bean
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100

Sent via E-mail to: Jessica.Bean@waterboards.ca.gov

Subject: Concerns and Challenges with Proposed Regulatory Framework for Mandatory Conservation (as released April 18, 2015)

Dear Ms. Bean:

On behalf of the Cucamonga Valley Water District, please accept these comments on the Proposed Regulatory Framework for Mandatory Conservation (as released April 18, 2015). A signed letter with this same language will follow via email tomorrow.

The purpose of this email is to provide feedback regarding the Draft Regulatory Framework for Mandatory Conservation established by the State Water Resources Control Board (hereon referred to as "State Board") on April 18, 2015. We understand the water challenges that face our state and appreciate the various constraints under which the State Board is operating in order to comply with the Governor's Executive Order B-29-15. With that said, we would like to reiterate the comments that were previously submitted in our letter to you dated April 13, 2015 and provide new comments. The current draft framework creates serious equity and feasibility issues that will result in unintended and unnecessary legal, financial, environmental and operational consequences for us and our customers. We are writing to provide our perspective and request clarifications, and offer reasonable solutions to these issues that would satisfy the intent of the Governor's Order and maintain equitable implementation among water purveyors.

The Cucamonga Valley Water District (CVWD) has been reshaping the water use patterns and practices of our customers through a variety of outreach efforts, education programs, rebates, water efficient landscape workshops, and other programs. As a result of these efforts between the period of 2007 and 2013 CVWD customers have reduced their water use by nearly 18%, nearly achieving the State Board's "20 by 20" conservation initiative well ahead of schedule. However, to apply a 32% reduction of consumption based on 2013 numbers is inequitably and drastically compounding our efforts. CVWD understands the severity of the drought and we will continue to work with customers to implement the new provisions included in the Governor's new order to achieve the conservation goals. However, we would like the State Board to recognize our efforts to-date in the "20 by 20" initiative and consider extending the proposed conservation mandates to our ongoing effort by applying the 32% percent reduction to our 2007 consumption. Additionally, since August 2014 CVWD has been operating under a Stage 2 Drought Alert and we have seen even more conservation in overall consumption, R-GPCD, and total production by the order of 8.2%, 7.2%, and 10%, respectively, from August 2014 to January 2015 compared to the same period of the previous year (August 2013 to January 2014). This illustrates that our residents have heard the call for conservation based on our Stage 2 implementation. However, the State Board's arbitrary choice of July to September 2014 for establishing the mandatory conservation tier structure is not recognizing our efforts and the delayed reaction by our customers since then. This same phenomenon likely affects other water purveyors. Therefore, we ask that the State Board spend more time to develop a more thoughtful approach, work with the water purveyors on a case-by-case or regional basis, or allow each purveyor to develop their own plan based on their own factors and needs and provide that to the State Board for approval.

The conservation achieved by CVWD has occurred as a result of careful planning, investment into projects that diversify our water portfolio, development of local production supplies, and landscape transformation programs. In addition to the above mentioned projects, CVWD has been proactive and ahead of most of the state in other areas of conservation with the utilization of technology such as the installation of "smart" water meters which includes a sophisticated leak detection component.

If the State Board truly intends 32% reduction of 2013 numbers, then the State Board must understand that CVWD and their fellow water purveyors need time to implement these drastic conservation measures. CVWD is currently in the process of developing and passing ordinances, rules, and new rate structures that will take us to the next stage(s) of conservation and that will encourage and/or enforce the State Board's proposed level of conservation. It takes time to ensure that our rules are equitable and fair to our customers. In addition, a drastic effort like this is a great financial burden to CVWD and our customers. With very few incentive programs in place and potential losses in revenue, agencies like ours need more time to financially plan for these types of programs and we also look to the State Board to provide grants and/or relief directly to us and our water customers alike.

We find the Urban Water Management Reporting Tool and methodology to be confusing, inconsistent and inequitable. The following are our observations of the reports:

1. The calculated R-GPCD based on production data unfairly penalizes our residential customers for non-revenue water (i.e. water loss, water theft, etc.), something that our customers have no control over, much less our residential customers only as calculated in the R-GPCD. There is a field in the reporting tool that requests non-revenue water, yet it does not factor into any calculation. That said, it is CVWD's responsibility to manage non-revenue water to as little as practical, something we already take very seriously, we take pride on an annual average 6% which is better than the industry standard, and that we will strive to further reduce in light of the drought. Therefore, please provide reasoning and clarification for the request of non-revenue water and what does the State Board intend to do with this information?
2. The reporting process deadline of the 15th of each month is problematic for our agency due to the fact that we have a bi-monthly billing system. CVWD has very complete and accurate consumption data from metering of all water users; however because of the nature of bi-monthly billing the data is not available immediately. Production is more readily available but the data is highly estimated. Please consider different reporting data and methodologies that would allow water purveyors to report on a basis that works best and most accurate for them. If the current data collection method is continued we would request that our data be reconciled once all of our billing is accounted for the reporting month to ensure its accuracy.
3. There are optional fields in the reporting tool for reporting recycled water. It is not clear how recycled water works into the methodology. In other words, it is not clear if there is a reward or penalty for use of recycled water. CVWD takes pride in converting drinking water users to recycled water, thereby conserving our precious fresh water resources. We ask that the State Board clarify this confusion and reward the use of direct recycled water use, recharge, and other beneficial uses.
4. Each water purveyor has different customer types, distributions of those customer types, demographics, climate, topography, etc. A blanket tier structure for the entire state based on R-GPCD without consideration for these factors is inequitable for us, our residents, and other water purveyors. We ask that the State Board consider other factors to more fairly distribute the burden of conservation across the state and within our own District.

To address the challenges that our region will face in implementation if the regulations are developed from the current framework as proposed, we respectfully and strongly suggest that the State Board to consider the following:

1. A more thoughtful approach to the implementation of the emergency drought regulations. Given time and consultation, the State Board would avoid the multitude of unintended legal, economic, environmental and operational consequences that will cascade from the current proposed framework. We would allow reasonable time for consultation with water managers and other stakeholders, who can help foresee full implications of various implementation pathways and head off unintended consequences.
2. A no-more-than 25-percent reduction from all California water suppliers, as noted in the Governor's Executive Order. Any requirement above 25% mandated reduction creates disparate, negative impacts to disadvantaged communities through the inland valleys of California and other non-coastal communities.
3. Using the existing 5-year base period thresholds established, adopted, and submitted to the State Board by water agencies in compliance with existing state law (SBx7-7), to account for climatological variations in water needs and pre-2013 conservation activities. Use of gallons per capita per day for a single snapshot in time is bad science, not a best management practice, and results in inequitable treatment and punishment of responsible stewards implementing pre-2013 conservation measures and in punishing customers whose water needs are

greater due to living in a hotter, drier climate. In addition, the 5-year base period threshold data is readily available, and would alleviate some of the administrative burden on State Board staff.

No one is more committed to water reliability, safety and affordability than the Cucamonga Valley Water District. CVWD and our region have been extremely proactive in implementing demand management programs to exceed the SBx7-7 requirements. The State Board must recognize the effort and resources that have been expended to reduce demands prior to the Governor's declaration. As such, we respectfully urge strong consideration of our suggestions as we work together to address the challenges we face as a state.

Thank you for your consideration and for the open dialogue.

Best regards,

Eduardo Espinoza

Eduardo Espinoza, PE
Design and Construction Manager
Cucamonga Valley Water District
(909) 987-2591
EduardoE@cvwdwater.com



10440 Ashford Street, Rancho Cucamonga, CA 91730-2799
P.O. Box 638, Rancho Cucamonga, CA 91729-0638
(909) 987-2591 Fax (909) 476-8032

Martin E. Zvirbulis
Secretary / General Manager/CEO

April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100

Sent via U.S. Mail and E-mail to: Jessica.Bean@waterboards.ca.gov

Subject: Concerns and Challenges with Proposed Regulatory Framework for Mandatory Conservation (as released April 7, 2015)

Dear Ms. Bean:

The purpose of this letter is to provide feedback regarding the Draft Regulatory Framework for Mandatory Conservation established by the State Water Resources Control Board (State Board) on April 7, 2015. We understand the water challenges that face our state and appreciate the various constraints under which the State Board is operating in order to comply with the Governor's Executive Order B-29-15. With that said, the current draft framework creates serious equity and feasibility issues that will result in unintended and unnecessary legal, economic, environmental and operational consequences. We are writing to offer reasonable solutions to these issues that would satisfy the intent of the Governor's Order and maintain equitable implementation among water purveyors.

The Cucamonga Valley Water District (CVWD) has been reshaping the water use patterns and practices of our customers through a variety of outreach efforts, education programs, rebates, water efficient landscape workshops, and other programs. Since last year the District has been operating under a Stage 2 Drought Alert. As a result of these efforts between the period of 2007 and 2013 CVWD customers have reduced their water use by nearly 18%. We will continue to work with customers implementing some of the new provisions included in the Governor's new order.

The conservation achieved by CVWD has occurred as a result of careful planning, investment into projects that diversify our water portfolio, development of local production supplies, and landscape transformation programs. In addition to the above mentioned projects, CVWD has been proactive and ahead of most of the state in other areas of conservation with the utilization of technology such as the installation of "smart" water meters which includes a sophisticated leak detection component.

James V. Curatalo, Jr.
President

Luis Cetina
Vice President

Oscar Gonzalez
Director

Randall Reed
Director

Kathleen J. Tieg
Director

To address the challenges that our region will face in implementation if the regulations are developed from the current framework as proposed, we respectfully and strongly suggest that the State Board consider the following:

- A more thoughtful approach to the implementation of the emergency drought regulations. Given time and consultation, the State Board would avoid the multitude of unintended legal, economic, environmental and operational consequences that will cascade from the current proposed framework. We would allow reasonable time for consultation with water managers and other stakeholders, who can help foresee full implications of various implementation pathways and head off unintended consequences.
- A no-more-than 25-percent reduction from all California water suppliers, as noted in the Governor's Executive Order. Any requirement above 25% mandated reduction creates disparate, negative impacts to disadvantaged communities through the inland valleys of California and other non-coastal communities.
- Using the existing 5-year base period thresholds established, adopted, and submitted to the State by water agencies in compliance with existing state law (SBx7-7), to account for climatological variations in water needs and pre-2013 conservation activities. Use of gallons per capita per day for a single snapshot in time is bad science, not a best management practice, and results in inequitable treatment and punishment of responsible stewards implementing pre-2013 conservation measures and in punishing customers who's water needs are greater due to living in a hotter, drier climate. In addition, the 5-year base period threshold data is readily available, and would alleviate some of the administrative burden on State Board staff.

In response to the information that was distributed to water agencies we have reviewed the data we provided to the State Board through our reporting. We are auditing our numbers and submitting information for your consideration. The reporting process deadline of the 15th of each month is problematic for our agency due to the fact that we have a bi-monthly billing system. Therefore our consumption data that we have provided is based on estimation rather than actual consumption data. Attached to this letter we have included our data from 2013 through 2014. If the current data collection method is continued we would request that our data be reconciled once all of our billing is accounted for the reporting month to ensure its accuracy.

No one is more committed to water reliability, safety and affordability than the Cucamonga Valley Water District. CVWD and our region have been extremely proactive in implementing demand management programs to exceed the SBx7-7 requirements. The State Board must recognize the effort and resources that have been expended to reduce demands prior to the Governor's declaration. As such, we respectfully urge strong consideration of our suggestions as we work together to address the challenges we face as a state.

Thank you for your consideration and for the open dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Martin E. Zvirbulis', written in a cursive style.

Martin E. Zvirbulis
General Manager/CEO

Attachment: CVWD 2013-2014 Consumption data

cc: Cucamonga Valley Water District, Board of Directors
City of Rancho Cucamonga
City of Fontana
City of Ontario
City of Upland
County of San Bernardino
Inland Empire Utilities Agency
Association of California Water Agencies.

Urban Water Supplier Reporting Tool Data

Public Water Systems: Monitoring Report

		Cucamonga Valley Water District (719)											
		Stage 1			Stage 1			Stage 2			Stage 2		
		No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes
1	Urban Water Supplier												
2	Stage Invoked												
3	Mandatory Restrictions												
4	Reporting Month	Jan 2014	Feb 2014	Mar 2014	Apr 2014	May 2014	Jun 2014	Jul 2014	Aug 2014	Sep 2014	Oct 2014	Nov 2014	Dec 2014
5	Days in each month	31	28	31	30	31	30	31	31	30	31	30	31
5	Total Monthly Potable Water Production												
	This year's monthly production	3,815.5	2,972.3	3,360.4	4,393.6	5,751.7	5,390.5	6,121.8	5,579.6	5,212.2	4,724.8	3,585.9	2,229.2
	Average system water losses	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%
	This year's monthly production minus water losses	3,585.4	2,793.1	3,157.8	4,128.6	5,404.9	5,065.4	5,752.6	5,243.1	4,897.9	4,439.9	3,369.6	2,094.8
	2013 monthly production (for the same month as above)	2,677.0	2,571.1	3,622.9	4,263.8	5,023.5	5,450.0	5,952.6	5,922.6	5,527.9	4,586.4	3,644.7	3,305.5
	Units	AF	AF	AF	AF	AF	AF	AF	AF	AF	AF	AF	AF
6	Percentage Residential Use	68.7%	66.8%	62.0%	60.4%	60.1%	62.7%	66.4%	65.3%	63.3%	63.9%	65.5%	67.4%
<p>The ratio of residential water use over total use is seasonal and varies by month. This data was based on consumption data gathered from water meter reads. The sample size was all accounts, therefore CVWD has a high confidence in the data. January 2014 through October 2014 residential ratio is based on actual data. November 2014 thru February 2015 residential ratio is based on previous year. Population numbers are based on CVWD's 2010 Urban Water Management Plan and were interpolated by month. Water losses were assumed at 6% based on the 2010 UWMMP and other actual data.</p>													
7	Qualification	<p>BradenY@CVWDwater.com, EduardodeE@CVWDwater.com</p>											
7	Total Population Served	203,149	203,231	203,313	203,395	203,477	203,559	203,641	203,723	203,805	203,887	203,969	204,051
8	Residential Gallons per-Capita-Day (R-GPCD)	127	107	101	133	168	169	197	177	165	146	117	73
9	Optional - Enforcement Actions												
10	Optional - Implementation												
11	Optional - Recycled Water Units												
12	Email	<p>BradenY@CVWDwater.com, EduardodeE@CVWDwater.com</p>											

Urban Water Supplier Reporting Tool Data

Public Water Systems: Monitoring Report

1	Urban Water Supplier	Stage 2	Stage 2																	
2	Stage Invoked	Yes	Yes																	
3	Mandatory Restrictions	Jan 2015	Feb 2015	Mar 2015	Apr 2015	May 2015	Jun 2015	Jul 2015	Aug 2015	Sep 2015	Oct 2015	Nov 2015	Dec 2015							
4	Reporting Month	31	28 31	30	31	30	31	31	30	31	30	31								
5	Total Monthly Potable Water Production																			
	This year's monthly production	2,898.6	2,765.5																	
	Average system water losses	6.0%	6.0%																	
	This year's monthly production minus water losses	2,724.7	2,599.6																	
	2013 monthly production (for the same month as above)																			
	Units	AF	AF																	
6	Percentage Residential Use	68.7%	66.8%																	
7	Qualification	The ratio of residential water use over total use is seasonal and varies by month. This data was based on consumption data gathered from water meter reads. The sample size was all accounts, therefore CVWD has a high confidence in the data. January 2014 through October 2014 residential ratio is based on actual data. November 2014 thru February 2015 residential ratio is based on previous year. Population numbers are based on CVWD's 2010 Urban Water Management Plan and were interpolated by month. Water losses were assumed at 6% based on the 2010 UWMNP and other actual data.																		
7	Total Population Served	204,133	204,215																	
8	Residential Gallons-per-Capita-Day (R-GPCD)	96	99																	
9	Optional - Enforcement Actions																			
10	Optional - Implementation																			
11	Optional - Recycled Water																			
12	Units																			
12	Email																			



10440 Ashford Street, Rancho Cucamonga, CA 91730-2799
P.O. Box 638, Rancho Cucamonga, CA 91729-0638
(909) 987-2591 Fax (909) 476-8032

Martin E. Zvirbulis
Secretary / General Manager/CEO

May 4, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via E-mail May 4, 2015 to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Emergency Conservation Regulation

Dear Ms. Townsend:

On behalf of the Cucamonga Valley Water District, please accept these comments on the Proposed Regulatory Framework for Mandatory Conservation (as released April 28, 2015).

The purpose of this letter is to provide feedback regarding the Draft Regulatory Framework for Mandatory Conservation established by the State Water Resources Control Board (hereon referred to as “State Board”) on April 28, 2015. We understand the water challenges that face our state and appreciate the various constraints under which the State Board is operating in order to comply with the Governor’s Executive Order B-29-15. The latest draft framework still creates serious equity and feasibility issues that will result in unintended and unnecessary legal, financial, environmental and operational consequences for us and our customers. We are writing to provide our perspective and offer reasonable solutions to these issues that would satisfy the intent of the Governor’s Order and maintain equitable implementation among water purveyors.

We want to reemphasize that there are still many concerns and inequities in the State Board’s approach to implementing conservation standards to the water purveyors, which we have noted in previous correspondence. For reference, please see attached letters for previous comments. However, based on the latest framework, we have the following observations and comments.

1. CVWD noted the State Board’s consideration to restructure the conservation tiers by doubling the number of tiers and using two percent increments (Fact Sheet issued April 28 2015, page 2). CVWD is open to this revision because the current tier bandwidths are still very wide. CVWD is at 180 R-GPCD for the July-September 2014 period, falling into the lower quarter percentile of Tier 8 (170 – 214.9 GPCD). That places CVWD in the 32% Conservation Standard. If the State Board expanded the tiers, CVWD would likely fall into the 30% conservation tier and around the 50th percentile of that respective R-GPCD range. The adjustment would not move any water purveyor up in the conservation standard, but rather would move those purveyors that are closer to the lower end of the current tier into a new lower tier and thereby lowering their conservation standard by 2%. An adjustment like this would likely achieve the same conservation goal for the state and in a small

James V. Curatalo, Jr.
President

Luis Cetina
Vice President

Oscar Gonzalez
Director

Randall Reed
Director

Kathleen J. Tiegs
Director

way improve equity among all water purveyors. Therefore, CVWD is in favor of revising the tier structure in this manner.

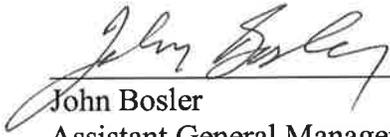
2. CVWD also noted the State Board's consideration of a 4% reserve tier if a water purveyor could demonstrate that it had access to 4 years of water supply that did not include imported water (Fact Sheet issued April 28 2015, page 4). It seems that the State is willing to recognize a water purveyor's capabilities to decrease imported water for this duration. We further request that the State consider expanding the reserve tier to recognize purveyors that can drastically reduce their reliance on imported water. For example, over the past decades CVWD has wisely invested and developed local water supplies that can allow us to drastically reduce our reliance on imported water (State Water Project) for reasons like drought. During calendar year 2013 CVWD imported and treated 25,764 acre-feet of imported water, which accounted for 49% of total production that year. To-date CVWD has developed a wide and reliable portfolio of local water sources, including 70,000 acre-feet of groundwater storage in local basins and infrastructure to capture and treat on average 2,000 acre-feet per year of local mountain surface water. CVWD has the pumping rights and operational capacity to produce groundwater that could allow us to reduce imported water by 50% while only requiring the need to conserve 25% of 2013 production. Although CVWD does not have the local supplies to completely decline imported water, we do have the ability to reduce by more than 50% during the drought with conservation. We ask that the State Board consider intermediate tiers that recognize a water purveyor's local supply capacities and ability to drastically reduce imported water. In our case, we ask for a 2% reserve tier adjustment of our final conservation standard determination. CVWD can provide the supporting information upon request.

Our hope is that the State Board will recognize the two above comments that would place us at a tier of 28% conservation standard. By considering both comments, the State would improve equity and reward strategic planning of local supplies, respectively, not just for CVWD but also for everyone.

No one is more committed to water reliability, safety and affordability than the Cucamonga Valley Water District. CVWD and our region have been extremely proactive in implementing demand management programs to exceed the SBx7-7 requirements. The State Board must recognize the effort and resources that have been expended to reduce demands prior to the Governor's declaration. As such, we respectfully urge strong consideration of our suggestions as we work together to address the challenges we face as a state.

Thank you for your consideration and for the open dialogue.

Sincerely,



John Bosler
Assistant General Manager/Chief Operating Officer

Attachments:

Letter dated April 13, 2015
Email dated April 22, 2015

cc: Cucamonga Valley Water District, Board of Directors
City of Rancho Cucamonga
City of Fontana
City of Ontario
City of Upland
County of San Bernardino
Inland Empire Utilities Agency
Association of California Water Agencies.