May 4, 2015

State Water Resources Control Board
Attention: Ms. Felicia Marcus
1001 I Street
P.O. Box 100
Sacramento, CA. 95812-0100

RE: Comment Letter – Emergency Conservation Regulation

Dear Ms. Marcus:

The City of Rio Vista ("City") is pleased to see that State Water Resources Control Board (SWRCB) is considering revisions to the Proposed Emergency Regulation as dated April 29, 2015. Specifically that you are considering including agencies such as Rio Vista that can demonstrate an adequate reserve supply of groundwater, as opposed to only surface water, to qualify for a lower conservation tier.

The City has taken measures to ensure that ground water will be available through prolonged droughts as part of on-going ground water monitoring programs, and well planned growth. The City monitors its wells daily through the use of a SCADA system and transducers that provide daily readings on ground water levels and the amount of ground water being pumped at each well. This allows us to detect a decline in our water resource long before it becomes critical so we can take proactive and effective measures if necessary. The City does not rely upon imported water, and the City's groundwater is recharged naturally from the Montezuma Hills formation, and the lower Sacramento Ground Water Basin.

Based on those concerns, the City supports modifying the proposed regulation so that it would allow water suppliers whose supplies include groundwater to apply for inclusion in the 4% reserve tier, if it can be demonstrated that they have a minimum of 4 years of supply, do not rely upon imported water, and their ground water supplies are recharged naturally per the April 29, 2015, Proposed Emergency Regulation. The City is confident that it can certify the above conditions and warrant its inclusion in the 4% reserve tier.

That said, the City plans to implement the new Order to the maximum amount possible, to reduce water usage by updating the City's Water Conservation Ordinance, and enforcing the new Order. The City has concluded that the water purveyors and other water agencies must take the lead to help demonstrate where water conservation measures can be implemented and enforced.
Furthermore, the City supports using the water tier billing system granting it can be legally implemented.

The City recommends the SWRCB adopt the revised Proposed Emergency Regulation allowing for ground water purveyors with adequate ground water reserves for more than four (4) years to be included into the 4% reserve tier.

Please contact me if you have any questions at 707-374-6451, or by e-mail tchapa@ci.rio-vista.ca.us.

Sincerely,

[Signature]

Tim Chapa
City Manager
City of Rio Vista