



July 21, 2017

The Honorable Robert M. Hertzberg
 Chairman, Senate Committee on Natural Resources and Water
 State Capitol, Room 5046
 Sacramento, CA 95814

Re: Comments on Legislation Necessary to Help Make Water Conservation a California Way of Life

Dear Chairman Hertzberg,

The undersigned agencies appreciate this opportunity to respond to your request at the July 11, 2017, hearing of the Senate Committee on Natural Resources and Water that stakeholders submit their written comments and perspectives on the Committee’s stated intent to “enact legislation necessary to help make water conservation a California way of life.”

Water resource management in California faces unprecedented challenges from climate change and a growing population. The Chino Groundwater Basin region, located primarily in the western end of San Bernardino County, is at the cutting edge of these challenges, as our region lies in the interior hotter area of southern California and is one of the fastest growing areas of the State.

Collectively, our agencies have worked hard to develop a robust portfolio of local, drought-resilient water supplies that also help us reduce our dependence on imported water. Over the past 15 years, we have invested nearly five hundred million dollars in ratepayer and state/federal funding to develop over 100,000 acre-feet of new water supplies from recycled water, groundwater desalination, storm water capture and recharge, and improved water efficiency. We also did our part to achieve the Governor’s mandated reductions in residential water use during the drought. The success of our collective work is underscored by the fact that the Chino Basin is one of the only regions in the State in which groundwater supplies increased between 2013 and 2016.

Since December 2016, we supported and offered suggestions for inclusion in the Governor’s framework for “Making Water Conservation a California Way of Life” and subsequent legislative proposals to implement the framework. Many of our recommendations were incorporated into the final framework and proposed legislative language.

Consistent with our previous comments, we request that each of the following elements be included in legislation to help make water conservation a California way of life:

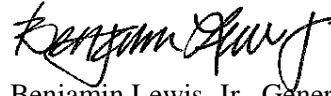
1. **Explicitly recognize the value of all locally developed, drought resilient, and hydrologically independent water supplies in the water shortage contingency plans.** Development of local water supplies that are not impacted by droughts should be deemed fully reliable under all historical drought hydrology and plausible climate change impacts. These supplies include not only recycled water, potable reuse, and ocean desalination, but also treatment/reuse of contaminated groundwater and designated storage accounts in sustainably managed groundwater basins. Suppliers that have developed these types of supplies should be recognized for their advanced planning and investments, and these water supplies should not be subject to reductions under shortage conditions. We appreciate your staff's recognition in its July 3, 2017, analysis that all hydrologically independent supplies are deserving of this recognition.
2. **Build upon existing long-term water efficiency standards set under the authorized regulatory processes and supported by the Legislature.** Use of landscape budgets with efficiency standards to establish outdoor targets has been authorized by the Legislature since 1992, and these requirements have been updated twice (as recently as 2015) through Department of Water Resources regulatory proceedings on the state's Model Water Efficiency Landscape Ordinance. Similarly, the Legislature in 2015 directed the State Water Resources Control Board to adopt performance standards for reducing urban water losses due to leaks (SB 555). Any proposed legislation should use these existing efficiency standards as the starting point for setting and/or updating future statewide water efficiency standards.
3. **Avoid overlap between existing and future compliance targets.** Proposed legislation should maintain the requirement under SB X7-7 for water suppliers to meet the existing statutory 20 percent urban water use reduction goal by 2020, and require compliance with newly adopted urban water use targets in 2025. This avoids the confusion of overlapping regulatory requirements.
4. **Ensure compliance requirements recognize variations in local conditions.** Compliance with water use efficiency requirements must recognize the diversity of water supply conditions and uses across the State. We support customized water efficiency targets based on statewide standards and local water supplier control over their actions to achieve the efficiency targets. We also support regional collaboration in assisting individual agencies' efforts in achieving compliance.
5. **Ensure that appropriate considerations be given to water supplier targets based upon unique local conditions.** An adjustment process for unique circumstances such as seasonal increases in the population served, use of swamp coolers, and provision of water for horses and other livestock in areas served by water suppliers, is appropriate to customize efficiency-based targets to local conditions.
6. **Clearly affirm that water rights under the framework are protected consistent with existing law.** Legislation should include explicit language that maintains protection of rights to conserved water.

We appreciate this opportunity to provide comments as you develop this important legislation. Please do not hesitate to let us know if you require any additional information from our agencies.

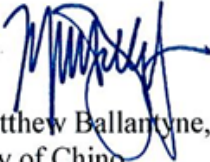
Sincerely,



Eunice Ulloa, Executive Director
Chino Basin Water Conservation District



Benjamin Lewis, Jr., General Manager Foothill Dist.
Golden State Water Company



Matthew Ballantyne, City Manager
City of Chino



P. Joseph Grindstaff, General Manager
Inland Empire Utilities Agency



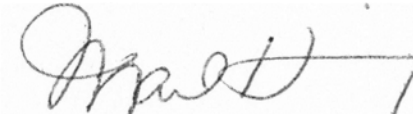
Rad Bartlam, City Manager
City of Chino Hills



Todd Corbin, General Manager
Jurupa Community Services District



Chad Blais, Public Works Director
City of Norco



Mark Kinsey, General Manager
Monte Vista Water District



Linda Lowry, City Manager
City of Pomona



Scott Burton, Utilities General Manager
Ontario Municipal Utilities Company



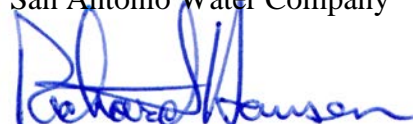
Martin Thouvenell, Interim City Manager
City of Upland



Charles Moorrees, General Manager
San Antonio Water Company



Martin Zvirbulis, General Manager
Cucamonga Valley Water District



Richard Hansen, General Manager
Three Valleys Municipal Water District



Josh Swift, General Manager
Fontana Water Company



John Rossi, General Manager
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