



Mayor L. DENNIS MICHAEL • Mayor Pro Tem SAM SPAGNOLO
Council Members WILLIAM J. ALEXANDER, LYNNE B. KENNEDY, DIANE WILLIAMS
City Manager JOHN R. GILLISON

THE CITY OF RANCHO CUCAMONGA

April 13, 2015

State Water Resources Control Board
P.O. Box 2815
Sacramento, CA 95812-2815

Sent via Email to: Jessica.Bean@waterboards.ca.gov

SUBJECT: Comments Submitted for Proposed Regulatory Framework for Mandatory Conservation (as released April 7, 2015)

On behalf of the City of Rancho Cucamonga, I want to thank you for providing an opportunity to submit comments on the Draft Regulatory Framework for Mandatory Conservation that was released on April 7, 2015. We appreciate the enormity of the task before the State Water Resources Control Board (Board) and the City of Rancho Cucamonga is ready to be a partner in water conservation.

Over the last several years, the City has made extraordinary efforts to lower its water consumption by transitioning street medians to drought-tolerant landscaping and decommissioning substantial portions of turf area in our local parks. To date, more than 120,000 square feet of turf has been replaced with mulch or drought tolerant landscaping. We have, to the largest extent possible, utilized reclaimed water for irrigation at a number of city sites. Some facilities were plumbed for reclaimed water 20 years ago, even though the supply never reached the level we had hoped for and they continue to use potable water for landscaping. We have also utilized advanced technology such as master irrigation controllers to regulate water usage and we require our landscape contractors to dedicate a water manager to ensure proper irrigation levels.

We want to take this opportunity to submit the following comments for the Board's consideration:

Water Conservation Rebates: Providing adequate funding for turf removal and installing low flow/water efficient fixtures will be critical in reducing the State's water consumption. In particular, these rebate programs should be structured so that residential, commercial, and industrial water consumers do not compete against each other for rebate dollars. In order to ensure maximum effectiveness, priority should be given for large water consumers as well as for the hotter, drier parts of the state. Eliminating 100 square feet of turf in the Inland Empire will yield greater water savings than eliminating that same amount in a cooler, coastal community.

Practical Approach: In order to ensure that the emergency drought regulations don't result in unintended legal, economic, environmental and operational consequences, we urge the Board to ensure a thoughtful, practical approach to implementing the regulations. For example, the proposed reporting period identified in the Draft Regulatory Framework already begins in June 2015, a mere 6 weeks away. However, it takes a considerable amount of time for any local government to develop specifications, go out to bid (in compliance with existing state law requirement on public works projects), and issue a contract for landscape conversions before the work could even begin. This process will be even more challenging as the demand for landscape contractors exponentially surges. A more reasonable start

date would be July of 2015, or additional relief from CEQA and the normal public works bid requirements to facilitate emergency implementation of the necessary improvements should be considered.

Use 5-Year Base Period Data: Using gallons per capita per day for a single snapshot in time unfairly punishes communities who have implemented conservation measures before the 2013 baseline period. Through the efforts of our local water purveyor, Cucamonga Valley Water District, the Rancho Cucamonga community has a conservation track record that spans several years prior to 2013. Utilizing the existing 5-year base period data that water agencies are already submitting in compliance with existing state law (SBx7-7), data which is readily available, provides for a fairer, and more accurate baseline.

We sincerely appreciate the opportunity to submit comments in anticipation of the Board's final adoption of the Regulatory Framework. The City of Rancho Cucamonga is committed to doing its part to conserve water and to work together to address the challenges we face. We respectfully urge strong consideration of our suggestions.

Sincerely,

A handwritten signature in blue ink that reads "L. Dennis Michael". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

L. Dennis Michael
Mayor

CC: Cucamonga Valley Water District