



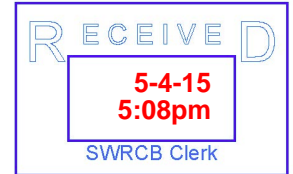
# LATE COMMENT

(5/5-6/15) Board Meeting- Item 6  
Emergency Conservation Regulation  
Deadline: 5/4/15 by 10:00 am

City of Corona  
Department of Water and Power  
"Protecting Public Health"

Office: 951.736.2234  
Fax: 951.735.3786

755 Public Safety Way  
Corona, CA 92880 – [www.CoronaDWP.org](http://www.CoronaDWP.org)



May 4, 2015

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

**RE: Comment Letter – Emergency Conservation Regulation**

Dear Ms. Bean:

The City of Corona would like to thank you for the opportunity to comment on the Proposed Emergency Conservation Regulations as released on April 28, 2015. We understand that the State of California faces many challenges ahead during this drought, and we support the Governor's continued commitment to addressing these challenges.

Before addressing the two items noted in the Fact Sheet on the Notice of Proposed Emergency Regulation, the City of Corona would like to reiterate several points that we believe the State Water Resources Control Board (SWRCB) needs to consider for implementing conservation rules and assessing compliance with R-GPCD targets:

- 1) There are many landscape areas within the City of Corona that must be irrigated in order to maintain a fire break zone to protect life and property. Reducing watering to only two days per week for these areas, combined with the current dry conditions in the State, creates a severe hazard and liability that the City of Corona cannot be responsible for. Failure to maintain these areas with sufficient irrigation is irresponsible and criminal. Failing to take that into account in compliance is unjust. This is extremely important considering the recent 2015 USFS Fire Season Report, coupled with the lack of available water sources for wild fire control.
- 2) The City of Corona has two significant regional transportation projects occurring in its borders, the expansion of the California State Route 91 and the Foothill Parkway Westerly Extension. Both of these projects consume significant amounts of construction water. It is unfair to count this regional construction water use against the targets needed to be achieved by Corona residents.

- 3) Require Caltrans to immediately cease watering of landscaping along all highways and freeways within its jurisdiction.

The City of Corona is in agreement with doubling the number of tiers and using two percent increments instead of four percent. Anything that the SWRCB can do to provide more flexibility for agencies and the targets that they must achieve, the better.

The City of Corona is in agreement regarding allowing 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 groundwater supplies recharge naturally. The City of Corona requests similar consideration of our water supplies from the SWRCB when assessing compliance with achieving reduction targets. Corona supplies 56% of our potable water supplies from groundwater that is reliable and naturally recharged. Corona would like to apply this same water source standard to our tier percentage of reduction. After corrections for our population are applied to 2014 R-GPCD, Corona will be in Tier 7 with a 28% reduction required. If we apply the 56% groundwater source to the 28% reduction, Corona should only be required to reduce water use by 12.3% from 2013 production numbers.

The City of Corona has been working responsibly over the past 10 years to reduce our potable water use, prior to the State's SBx7-7 20% x 2020 water reduction goal we began developing our local water supplies, working to integrate local regional water supplies, adopted budget based tiered rates, enacted Stage 2 of our water conservation ordinance in 2009, encouraged water conservation and built a reclaimed water system. Now we are being asked to start all over again, with no consideration given to these past efforts. We are not asking to be exempt from conservation targets, but we are asking for consideration of these past proactive efforts when the SWRCB assesses compliance.

The City of Corona understands both the Governor's and the SWRCB's position; we know that action must be taken to safeguard the State's water supplies. However, the City of Corona has to protect our residents from negative economic impacts, such as reduction in property values that will occur if landscaping is allowed to die. We have developed our community responsibly and have planned for water supplies to meet those needs. We ask the SWRCB to consider these factors as it works with agencies in the state to meet the required water use reductions.

We thank you for your time and consideration in this matter. Should you have any questions, please feel free to contact me at (951) 736-2477 or by e-mail at [Jonathan.Daly@ci.corona.ca.us](mailto:Jonathan.Daly@ci.corona.ca.us).

Sincerely,



Jonathan Daly  
General Manager