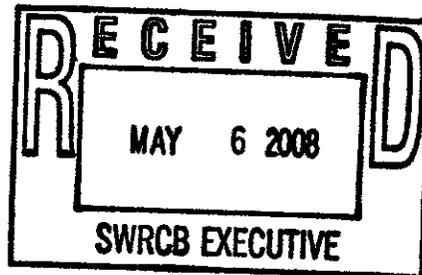


May 6, 2008

VIA E-MAIL AND U.S. MAIL

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Bradley J. Herrema
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RE: DRAFT ORDER CONDITIONALLY APPROVING WASTEWATER CHANGE PETITION WW-0045 - CITY OF RIVERSIDE, SANTA ANA RIVER, RIVERSIDE COUNTY

Dear Ms. Townsend:

The Chino Basin Watermaster ("Watermaster") appreciates the opportunity to comment on the State Water Board's Draft Order Conditionally Approving the City of Riverside's Wastewater Change Petition, WW-0045 ("Draft Order"). Generally, Watermaster believes the Draft Order to be an appropriate disposition of the City's petition.

Watermaster's lone concern with the Draft Order is that it does not address the existing water management structures within the Santa Ana River watershed. The City, in its Closing Brief in the Santa Ana River Hearing, asked for certain findings regarding existing integrated water management structures within the Santa Ana River watershed - namely, that the State Water Board acknowledge that the rights and priorities of the applicants are defined in certain judgments and stipulations, that those judgments and stipulations underlie a system of integrated regional management of the applicants' rights, and that the State Water Board can most effectively fulfill its duties in the watershed by deferring to those existing management structures. Watermaster understands that these findings may not be essential in the context of the approval of a wastewater change petition, and may be more appropriately considered in regard to the water rights applications also at issue in the Hearing.

Watermaster hopes that the Board, in its permitting of the water rights applications, will acknowledge and defer to those integrated water management structures already in place in the watershed. For the Board's reference, Watermaster outlined these issues on pp. 20-24 of its June 6, 2007 Closing Brief in the Hearing proceedings, a copy of which can be found on the Board's website at http://www.waterrights.ca.gov/Hearings/docs/santa_anariver/closingbrief_chinobasin.pdf.

Sincerely,


Bradley J. Herrema

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