RAINBOW
MUNICIPAL WATER DISTRICT
Committed to Excellence

April 13, 2015

Jessica Bean
California State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-100

Subject: Additional Comments on Proposed Regulatory Framework for the April 1, 2015
             Executive Order

Dear Jessica:

On behalf of the Board of Directors of the Rainbow Municipal Water District I offer the following additional comments regarding the proposed regulatory framework that was released last week.

The Rainbow Municipal Water District is an agricultural district with nearly 70% of our water sales devoted to agriculture.   Much of the remaining water sales also go to families who manage small farm plots on a part time basis.   The massive increases in the cost of water (now nearing $1500/AF) plus the series of droughts have compelled our agricultural users to use water more effectively.   Since 2007, water consumption within the Rainbow service area has dropped by over a third, from over 33,000 AF/Yr to a projected 20,000 AF for FY15. Our growers have taken water conservation seriously and have implemented a variety of strategies to conserve water.   Some properties that could not make the transition to lower water use have been taken out of production permanently or switched to lower water consumption crops.

In addition, the San Diego region has invested in water reliability so that we could better manage droughts just like this one.   We have a pre-defined plan to balance the needs of agriculture and urban needs that we are implementing now.   This plan calls for agricultural customers to cut demands based on our available supply in the region.

The Governor's plan ignores the work that the agricultural community in San Diego County has done to become more water efficient and prepare for shortages.   Using much too broad a brush, the Governor's plan lumps our agricultural water use with urban water use – while carving out exceptions for Central Valley agricultural water use. Our agricultural users are being asked to cut an additional 35% off of the already reduced consumption, while farmers in other areas of the State have no restrictions.   Simply stated, this is unfair at its core – why should the State pick winners and losers as we manage this water supply crisis? ***The eventual regulations should exempt all agricultural water, regardless of location.***

When crafting your regulations, you cannot simply point to a two year period when measuring whether a region has been serious about conservation. The agricultural community in the Rainbow service area have heeded our calls to action related to water consumption and cut our demands by over a third well in advance of the current situation while other regions are just now starting to actively embrace conservation. We were following the requirements of the Water Action Plan even before it was released and our water consumption numbers demonstrate this.

To force our region to endure these draconian water cutbacks will cause massive economic disruption. All of the conservation mechanisms that can reduce water demand in the short term have already been undertaken – the only way to reduce water demand now is to cut down productive groves. Most of our
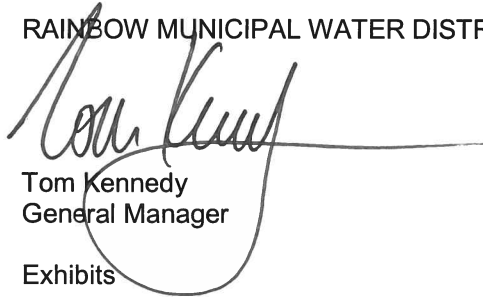
agricultural output is from avocado and citrus which are not seasonal plantings but mature groves that are decades old.   This order will cause a permanent loss of productive agricultural lands.

This can be avoided. Both the San Diego County Water Authority and the Metropolitan Water District have drought management plans that can assure a carefully allocated supply of water to our region without the illogical cuts contemplated in the proposed regulations.   We ask that you allow the San Diego region, who have shown their commitment to conservation for decades, to be allowed to weather this drought using the plans that we have in place already.

Sincerely,

RAINBOW MUNICIPAL WATER DISTRICT

Tom Kennedy
General Manager

Exhibits

cc: Dennis Sanford, President, RMWD Board of Directors
        Adriana Ochoa, RMWD General Counsel
        Maureen Stapleton, General Manager San Diego County Water Authority