



FARM BUREAU SAN DIEGO COUNTY

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December 1, 2015



Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

Thank you for the opportunity to comment on potential changes to the Emergency Regulation for Statewide Urban Water Conservation. The State Water Resources Control Board is to be commended on the water conservation savings achieved under the Emergency Regulation. But now a change is due.

The San Diego County Farm Bureau is a non-profit organization that provides a voice for the more than 5000 farmers in San Diego County. For many years we have supported the efforts by the San Diego County Water Authority and our retail water districts as they have worked to secure our water supply through diversified sources. Key to that diversity has been the several sustainable water supply projects developed locally.

As currently applied, the Emergency Regulation looks entirely to conservation in a one-size fits all strategy. The ability for local agencies to take full advantage of their investments in supply reliability is missing.

For our local farm community the price of water is a critical issue. We have experienced a tripling of water prices in just over a decade. Even after large investments in water efficiency thousands of acres of productive farms have been lost due to water costs eliminating profitability. We recognize that much of that rate increase is due to the local investments in sustainable supplies necessary to protect the region from drought or supply interruption. Now many farmers are facing new rate increases as local water agencies are forced to cover their operating expenses on mandated reductions in sales. We hope you can see that this is an absurd situation when water is available from locally developed supplies.

Under this scenario there will be reluctance to support future local water supply investments that, in fact, benefit the entire state through enhanced supplies. We urge the adoption of amendments that allow for full use of existing and future supply developments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Larson'.

Eric Larson
Executive Director