

April 13, 2016

Ms. Felicia Marcus, Chair, and
Honorable Members of the State Water Resources Control Board
c/o Jeanning Townsend, Clerk of the Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop 4/20/16

Dear Ms. Marcus and Honorable Members of the State Water Resources Control Board:

On behalf of the Board of Directors of the Rainbow Municipal Water District, we thank you for the opportunity to comment on possible revisions to the Extended Regulations for Urban Water Conservation. It has been a challenging year for all water purveyors in California – some due to drought and some due to new regulatory regimes that contradicted decades old planning for drought periods. Working together in regional cooperation, the water agencies of San Diego County have invested billions of dollars over the last few decades to prepare ourselves for water supply conditions just like the ones we experienced in water years 2011 to 2014. As a result, even though there have been several years of exceptionally poor hydrological conditions, San Diego County had full supplies for all of our users. Once the State issued mandatory cutbacks, we were challenged to find places to store all the extra water that was made available as a result.

Based on the reality that water agencies across the State have very different supply conditions, we urge the SWRCB to end the "one size fits all" statewide mandates to conservation. Through the process of developing our Urban Water Management Plans (and in our case an Agricultural Water Management Plan as well), we have accurate forecasts for both supply and demand. As a region, we have detailed conservation mechanisms that will ensure that supplies will always meet demands. These mechanisms include regional enforcement policies to ensure that member agencies meet their conservation targets.

We recommend that the SWRCB implement a supply based approach rather than a conservation mandate approach. In such a program, individual agencies, or regional groups of agencies would certify that the supply conditions for that agency or region are adequate to meet demands. In areas where supply could be an issue, the agency or region would develop regionally specific conservation mandates in order to balance supply and demand. Certification of supplies would require agencies or regions to demonstrate that they have supply reserves adequate to meet future droughts. Further, agencies or regions adopting this

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approach would need to have clearly defined demand management plans in place in order to effectively reduce demand should it be necessary.

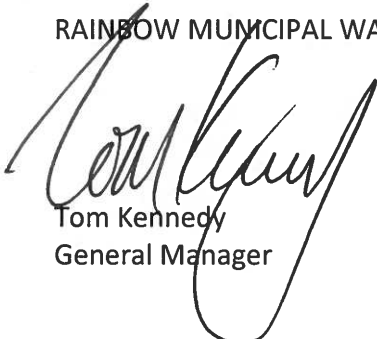
As it turns out, the member agencies of the San Diego County Water Authority have practiced this exact form of water supply and demand management for many years and were in the process of ramping up our regional water conservation standards when the Emergency Regulations went into effect last year. With our long term conservation efforts having reduced our water consumption while our population nearly doubled, the San Diego region is a model of how water agencies should plan and prepare for water shortages.

We urge the SWRCB to adopt a reasonable, regional process of balancing supply and demand rather than a statewide conservation mandate.

Thank you again for the opportunity to provide input on this important topic.

Sincerely,

RAINBOW MUNICIPAL WATER DISTRICT



Tom Kennedy
General Manager

cc: RMWD Board of Directors
RMWD General Counsel