



May 13, 2016

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

Subject: Comment Letter – Extended Emergency Regulations

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. We have reviewed the draft regulations that were released on the SWRCB website on May 9, 2016. We fully support the supply-based self-certification approach outlined in the draft regulations as we feel that this process will ensure that the right conservation measures are adopted in each region based on actual supply conditions. Many agencies, such as those of us in San Diego County, have made large investments in drought resilient supplies and supply diversity and the current version of the regulations discourages such investments while the proposed regulations will encourage further investments in drought resiliency.

The San Diego County Water Authority and our member agencies have worked closely together for decades to manage supply reliability and have an integrated system of controls that links us all together as a region. We have standardized our drought ordinances and work together as a region in public messaging, conservation programs, and supply reliability investments. While the self-certification of supply by individual agencies is appreciated, we would also recommend allowing regional wholesale agencies such as the San Diego County Water Authority to be able to certify supplies for the entire region. This would not only streamline the reporting for all of the agencies in San Diego County, but would also reduce the reporting workload of SWRCB staff.

We also recommend that the SWRCB allow retail agencies to account for recycled water conversions when calculating their baseline flows. Nearly every agency in San Diego County is hard at work developing or increasing the reclamation of wastewater to serve for irrigation. As a primarily agricultural agency, Rainbow is working to develop recycled water supplies to serve commercial nurseries and groves, thus reducing our demands for imported water. We plan to reduce potable water by 1500 AF within a few years but we would like to be able to

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subtract this converted water from our baseline demands when we calculate what our required supply needs. The goals of these recycled water projects are perfectly aligned with the Governor's Water Action Plan in that each of them reduces dependence on imported water, and as such they should be recognized by the SWRCB in the regulations.

Finally, we feel that the establishment of an arbitrary minimum conservation "floor" is inappropriate. While we fully support mandatory conservation during times of shortage, and here in San Diego County we have a detailed program to put these into effect, to set some arbitrary floor that is inconsistent with supply conditions sends the wrong message. We have worked hard to encourage conservation through a long term, and very successful, campaign to educate our customers about conservation as a way of life. Arbitrary numerical standard distract from the overall goal of conservation being part of the community mores or norms, rather than what would be seen as an arbitrary government mandate that is disassociated with real world conditions.

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

Sincerely,

RAINBOW MUNICIPAL WATER DISTRICT

A handwritten signature in black ink, appearing to read "Tom Kennedy", with a long horizontal flourish extending to the right.

Tom Kennedy
General Manager

cc: RMWD Board of Directors
RMWD General Counsel