



Eric;

I wanted to follow up on the phone call with some additional comments on the proposed updated regulations.

First of all I want to compliment you all on the very measured and reasonable way you all have approached a very tough problem. In the eyes of the water agencies, you are being over-bearing and too stringent. In eyes of the environmental community you are being too lenient and “missing and opportunity for real water savings.”

As a former member of the SD RWQCB, I understand you position, having been there a number of times.

Given these conflicting views and pressures, I think you all have done a great job.

As far as your new regulations, I think they are reasonable, necessary and mostly practical, given the worsening situation. The regulations involving food/drink establishments and hotel/motels, those are no brainers and will be actually welcomed by most of these businesses, if not already implemented on their own initiative.

Concerning “days of the week watering for landscape,” for those who don’t have them, we now have an opportunity to revisit/update our drought response ordinances and blame it on the State.

There is one item, however, with which I have concerns, and that is no watering for 48 hours after “measurable rain.” While I understand the spirit and logic, from an “on the ground enforcement perspective,” this will be problematic.

This basic question comes to mind with this proposal is: **Who Measures and Where Do We Measure?**

We don’t have an “official” rain station in Valley Center. The media always reports the rain totals at Lindberg Field, in downtown San Diego, which is 40 miles south of Valley Center. An enforcement action up to an including a \$500 fine, should be based upon some official, verifiable measurement.

We also have micro-climates within our 100 square mile territory and the amount of rainfall will vary across our service area. Fining people for watering within 48 hours of rain which occurred 40 miles south of us, or in one part of our service area and not the other, is not going to work.

Finally, with most of our water use (60% to 70%) which is agricultural, I can tell you that no commercial farmer buys any more of our water at \$1400/AF than they have and after a 1/2” or 1” of rain, our water demand drops dramatically, sometime literally to “0” in terms of inflow to our water system.

As stated above, while I understand the logic and spirit of what you are after here, I see some real issues with practical and thus effective implementation.

I would be more than happy to discuss this with you or other members of your staff at your convenience.

Gary Arant
General Manager
760-735-4515