



**Rancho  
Water**

January 6, 2016

Kathy Frevert  
State Water Resources Control Board  
1001 I Street, 24th floor  
Sacramento, CA 95814

Sent via Email to: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

**SUBJECT: Comments on Proposed Regulatory Framework**

Dear Chair Marcus and Members of the State Water Resources Control Board:

Rancho California Water District (RCWD/District) appreciates the opportunity to provide input to the State Water Resources Control Board (State Board) on the framework for Extended Emergency Regulation for Statewide Urban Water Conservation. RCWD would also like to thank you for taking the time to meet with us and discuss the issues facing the state and our District.

The conservation mandated included in Governor Brown's April 2015 Executive Order reflected the severity of California's four-year drought and record low snowpack in the Sierra Nevada Mountains. As we enter year 2016, forecasters are providing positive news of potential above-average precipitation for California due to strong El Nino conditions this winter. Uncertainties still remain regarding the levels of precipitation statewide, whether it will fall primarily as rain or snow and ultimately how the conditions will influence California's current drought. In addition, it is unknown whether after one wet-year, the state could head into another drought. Based on these uncertainties, we understand the need for continued diligence in our extraordinary conservation efforts, but if the Emergency Regulation is extended beyond February 2016, there must be a nexus between the mandated reduction levels and current supply conditions, taking into account potential winter storms and storage levels. Because the potential wet conditions this winter could impact supply conditions differently throughout the state, it will also be important for the State Water Board to consider the supply situation of each urban water supplier and whether they are experiencing shortages and have adequate storage supplies.

State Water Board members should take into account any changed supply conditions due to winter storms, when considering an extension of Emergency Regulation in January 2016. In addition, unlike the situation at the adoption of the original Emergency Regulation in May 2015, State Water Board members will not know the resulting 2016 water year supply conditions prior to taking action to potentially extend the Emergency Regulation. At a minimum, it will be important to include in the Emergency Regulation specific dates or trigger points where the State Water Board will be required to evaluate supply conditions to ensure that is a nexus between the reduction mandate and supply availability.

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RCWD appreciates the proposed changes in the framework that move away from the current “one size fits all” methodology and recognizes the vastly different water supply, demographic and climate conditions that exist throughout our state. RCWD would like to be able to use the California Irrigation Management Information System (CIMIS) station from our service area, however due to our station being stolen in September 2011 the District does not have a continued period of record of at least five years. The station has been online since November 2012 and we also have information from the previous station from 2007 through 2010. RCWD urges the State Board to allow the District to use the CIMIS station data due to this unusual circumstance.

RCWD also appreciates the mechanism to adjust urban water supplier conservation standards to account for growth since 2013. The framework proposes to calculate the growth adjustment using residential landscaped area served by connections since 2013. Many District’s don’t have the capability to know the actual landscape area, therefore the District would like to recommend using the lot size in the calculation used to account for growth.

RCWD serves a large agricultural community in the Temecula Valley. The District’s agricultural customers have had water budgets since 2007 and the budgets are specific to the crop that is being grown. In order to be an agricultural customer, an application and certification form must be filled out that proves agriculture resale. Also to be considered an agricultural customer the property must have one acre planted and the District verifies the planted crops. The District believes the staff recommendation on the elimination of Commercial Agriculture Exclusion should be changed to allow District’s that already have a sound policy certifying agricultural customers to be exempt. For RCWD to change our already strict certification to meet this emergency regulation would be extremely difficult and time consuming.

For the June through December period, since the Emergency Conservation regulations were adopted, Rancho California Water District has responded emphatically to the Governor’s Executive Order by saving 29.7 percent. RCWD has also provided tools for our customers to manage their water usage and understand the importance of reducing water usage.

RCWD looks forward to working with you and on the Emergency Regulations prior to potential adoption in January 2016.

Thank you for your time and consideration,

**RANCHO CALIFORNIA WATER DISTRICT**



Jeffrey D. Armstrong  
General Manager

