January 11, 2017
Chair Felicia Marcus
Attention: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Sent via Email to: commentletters@waterboards.ca.gov

SUBJECT: COMMENTS ON PROPOSED EMERGENCY REGULATION

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 proposed Extended Emergency Regulation for Statewide Urban Water Conservation.

RCWD has been in a leader in water efficiency for many years. We have provided water education programs for kindergarten through twelfth grade students for over 30 years and a major component of the program was water use efficiency. The District has worked with other local agencies to provide rebate programs for our customers and have offered many programs to our customers at no cost, landscape evaluations and smart irrigation controller installations. The District continues to research new technology and offer customer’s incentives to be efficient.

In 2010, every residential and landscape customer in RCWD’s service area was assigned a customized, daily water budget. Customer water budgets are based on household population and irrigable area and real-time weather data using site-specific evapotranspiration rates. The daily water budgets are rolled up into monthly billing periods giving the customers a regular pricing signal based on efficiency standards. Due to the District’s investment in automatic meters for all customers, RCWD is able to give customers real time daily budget information. Customers are able to login to their account and view MyWaterTracker which gives the customer daily water budget versus usage. If a customer is close to or going over budget they can receive alerts. RCWD has created this technology to give customers the tools to be efficient all the time. Through the water budgets and customer programs, RCWD reduced its water demand by 19% from June 2016 to November 2016 compared to 2013.
RCWD serves a large agricultural community in the Temecula Valley. The District has been strict about ensuring only commercial agriculture are in this classification. Additionally, the District has been very innovative to ensure agricultural water use in our service area is done efficiently. Our efforts and requirements for agricultural accounts include:

- Each account must have a water meter.
- Each account has a water budget for that property.
  - The District’s agricultural customers have had water budgets since 2007.
  - The budgets are specific to the crop that is being grown.
  - The budget is for only the amount of acreage that is being farmed.
  - The budget considers Evapotranspiration for the type of crop being farmed.
- In order to be an agricultural customer, an application and certification form must be filled out that proves agriculture resale.
- To be considered an agricultural customer the property must have at minimum one acre planted.
- The District verifies the planted crops and acreage through site visits/audits and areal imagery.

RCWD believes the State Water Board should not make changes to the existing Emergency Regulations at this time. The District continues to be actively involved with the process of permanent conservation regulations as well.

RCWD looks forward to working with you and on the Regulations.

Thank you for your time,

RANCHO CALIFORNIA WATER DISTRICT

Jeff D. Armstrong
General Manager