



September 15, 2015

Matthew Buffleben
State Water Resources Control Board

VIA EMAIL

Subject: Report on Activities Related to Conservation Order

Mr. Buffleben:

This document serves as our report to the SWRCB which will detail our efforts to comply with the Conservation Order dated August 31, 2015. Please note that the District is still considering whether to submit a petition for reconsideration to the SWRCB. The preparation of this report is not an indication that we do not intend to submit for reconsideration.

The SWRCB did not provide any format for this report, so please let me know if this meets your needs. I plan to simply respond to each of the action items in the order presented.

- A. The District is in the process of a Cost of Service study and is targeting initiating the public notice period on October 26, 2015. The current draft rate model includes tiered rates for our residential customers. Our agricultural customers will remain on flat rates.
- B. Our rate consultant, Raftelis Financial Consultants, is looking into the Drought Surcharge concept. As we deal with the massive loss of revenue based on the SWRCB mandated cuts, it is looking like we will need to have a small (2.6%) rate increase to deal with this short term demand reduction.
- C. Our outreach efforts have increased, including our regular newsletter, a direct mail piece, and two community workshops held on September 1st and 2nd.
- D. We are working on a strategy to contact our highest water users, but we have questions related to this item. Are we talking all of our users or just our residential users? As we have indicated repeatedly, over 80% of our water sales are agricultural, and consequently they are our largest users. Since they are exempt from the State's new conservation regulation, how do we go about addressing this item?
- E. We reported to the SWRCB in our letter of August 26, 2015 that a total of 6 audits had been conducted. We presume that no further action is required on this item.
- F. We have increased our outreach on water audits through our website and through our recent community meetings. Although our ordinances provide authority for us to inspect customers' properties for compliance with our rules, they do not require customers to agree to detailed water audits. We had a representative of the Mission Resource Conservation District speak at our latest community meeting. We are still unclear as to how we could compel additional audits if our customers do not do it voluntarily – if you could provide guidance in this regard it would be appreciated.
- G. The District is fully engaged in rebate programs of all types through the San Diego County Water Authority and the Metropolitan Water District. These rebate programs are heavily advertised regionally through TV, radio, and web marketing. I have contacted our electric service provider and requested that they effectively market their rebate programs.
- H. We are working on a labor re-allocation plan to provide for conservation patrolling. We do not have the budget to hire additional staff, but will re-allocate time from existing staff to this effort. We have also added a water waste reporting tool on our website and last week a regional smartphone app for reporting water waste was released.

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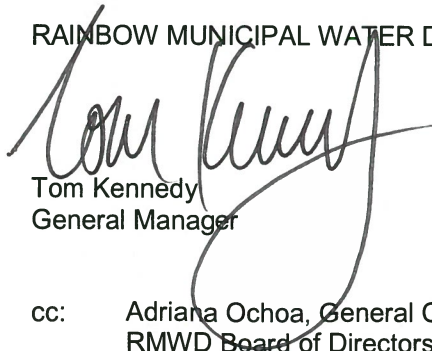
- I. We are in the process of collecting applications for the one position that was approved by the Board in June for an Administrative Analyst position which will have conservation and outreach as their primary job focus. We expect to be doing interviews during the week of October 6th with a hire date in late October.
- J. We are working on the item related to mulch application but are running into some conflicting regulations. As you may be aware, Rainbow MWD heads up the North Coast Irrigated Lands Group, a monitoring group that is working with the RWQCB to deal with commercial agriculture uses. Part of the stormwater regulations prohibit the use of mulch in areas where it would run off during rain events and get into the watershed. Specifically, mulch is not allowed on slopes where containment is difficult. I am not sure if you have ever been to north San Diego County but it is very hilly, with very little flat land. Most of our agriculture grows on the side of hills, so applying mulch to satisfy the Conservation Order could put my customers in violation of the stormwater regulations.

While we are open to pursuing the mulch outreach, we would like to do it in a way that makes sense for all parties. I had a detailed conversation on this matter with Barry Pulver, the RWQCB staff member who is in charge of this program. Perhaps we can engage Mr. Pulver so that we can create an outreach message that will work without unintended consequences. Mr. Pulver can be reached at 619-521-3381 or at barry.pulver@waterboards.ca.gov.

Please let me know if you have any questions related to this report.

Sincerely,

RAINBOW MUNICIPAL WATER DISTRICT



Tom Kennedy
General Manager

cc: Adriana Ochoa, General Counsel
RMWD Board of Directors