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STATE WATER RESOURCES  
CONTROL BOARD

2015 JUN 24 AM 10:44

CITY OF WATER RIGHTS  
SACRAMENTO

June 17, 2015

Jessica Bean  
Engineering Geologist  
State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-0100

Subject: Revised GPCD Calculations / Agricultural Water Use Exclusion Certification

Dear Jessica:

Thank you for your call today - it was helpful to get your perspective. Since August of 2014, the Rainbow Municipal Water District (RMWD) has been submitting its Residential Gallons Per Capita Per Day (RGPCD) information to the State Water Resources Control Board (SWRCB) in accordance with the directives given by the Governor in July 2014. In order to compile the data, we used information from our utility billing system to report out on the various customer classifications. For your information, RMWD is a rural agricultural district that covers over 80 square miles of Northern San Diego County. Our water consumption is approximately 80% agricultural.

On April 1, 2015 the Governor proposed more stringent requirements with certain components of the regulations adopted by the SWRCB on May 5, 2014 being based in RGPCD levels. The revised regulations also clarified how agricultural water was to be considered under these new regulations. We appreciate the consideration that our important agricultural economy was given in the SWRCB regulations.

Prior to this month's GPCD report, RMWD had been using data from our utility billing system that records consumption based on our in-house customer classifications. These classifications were established to manage our customer classes for purposes that are unrelated to the RGPCD calculation system used by the SWRCB. Specifically, while the vast majority of our water demand is agricultural in nature, there were many agricultural customers who were classified in our domestic or commercial classes. We did not have any regulations that forced agricultural customers to be in an agricultural class and until these new regulations took effect there was no pressing reason for RMWD to rework our user database.

Once the draft of the new regulations was released, RMWD undertook a comprehensive study of our domestic and commercial customer classes, with a focus on properties that are over 1 acre (our average lot size is 4 acres). We studied aerial photos of the District and followed up with site inspections and found that a significant amount of the water supply in our domestic user class was actually agricultural water where over an acre of farmland was under irrigation for commercial uses. Our commercial class of customers showed that about 75% of those customers were actually agricultural with most being commercial nurseries.

We have created a conversion database to recalculate our RGPCD using the SWRCB customer classes. We are currently in the middle of a software vendor change that will restructure our entire utility billing system. Once complete in late 2015 we will be able to report from the billing system directly and will have customer classes that will more neatly fit into the SWRCB reporting structure. Until that time we will use our conversion database to correlate our existing customer classifications into the SWRCB classifications for reporting.

Jessica Bean  
SWRCB  
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I have attached a chart showing our revised RGPCD numbers. Under our revised RGPCD number, we should fall into a different conservation tier. Previously we were in the 36% conservation tier but these changes should put us into the 32%% tier based on the September 2014 RGCD of 206. I am not sure how we go about revising the previous numbers – perhaps you could provide some guidance in this regard.

We have nearly 3000 agricultural accounts with about 2/3rds of them already certified. The non-certified accounts were classified based on a thorough review of aerial photos using our GIS and selected site inspections – we are confident that these accounts meet the standards of GC 51201(b). We are in the process of sending out forms for each customer to certify their use directly and expect the vast majority to do so, but if some fail to respond to the request we will drop those accounts from the agricultural roll. There is also a possibility that a very small percentage of the accounts were reclassified erroneously and we will clean these up as we go forward.

I have attached the list of accounts that are receiving potable water for agricultural use. I have included the SWRCB category on each (A) and the current RMWD rate category. These categories are as follows:

D	Domestic
A	Full Price Agricultural
C	Commercial
SC/SD	Transitional Special Agricultural Water Rate

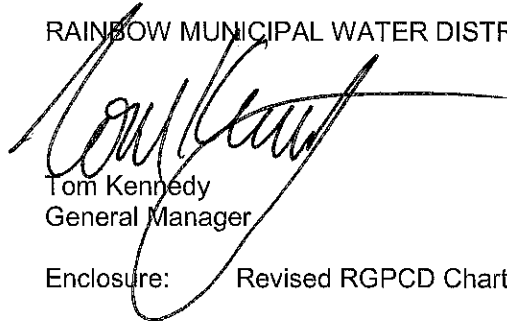
The D and C accounts are going through a formal certification process now but have been verified as agricultural using the methods described above.

I am sure that you share in the challenges of implementing these regulations in such a short time period. I can assure you that all of us at Rainbow are working diligently to follow both the spirit and letter of the law, but it may take a little time to get everything dialed in.

If you have any questions please feel free to contact me at your convenience.

Sincerely,

RAINBOW MUNICIPAL WATER DISTRICT



Tom Kennedy  
General Manager

Enclosure: Revised RGPCD Chart  
Agricultural Water Use Exclusion Certification  
Revised Customer List

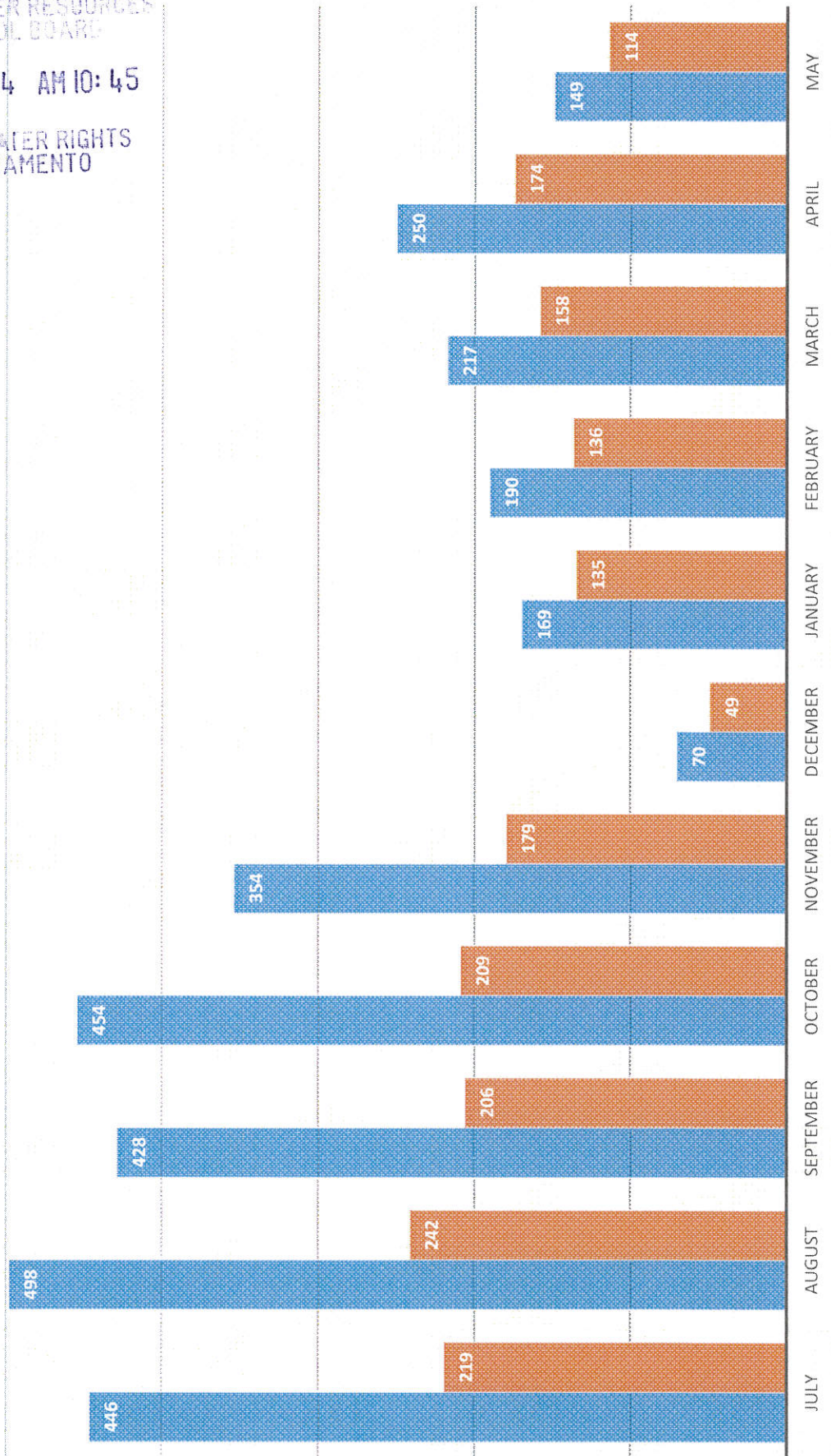
cc: Board of Directors

# Rainbow MWD Revised R-GPCD - July 2014-May 2015

STATE WATER RESOURCES CONTROL BOARD

2015 JUN 24 AM 10:45

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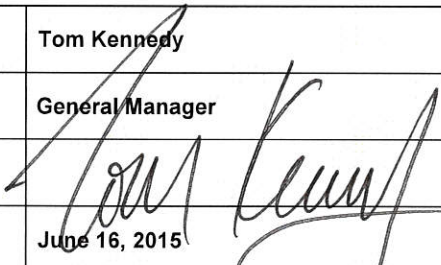




I hereby certify that **Rainbow Municipal Water District**  provides potable water to the attached list of customers, and that this water is used exclusively for irrigation of land, including but not limited to greenhouses, for the purpose of producing an agricultural commodity for commercial purposes. I further certify that:

1. I will oversee, review, and take full responsibility for the completeness and accuracy of all data submitted to the State Water Resources Control Board as part of the reporting required pursuant to California Code of Regulations, title 23, section 865, subdivisions (b)(2) and (e);
2. **Rainbow Municipal Water District**  will prepare and submit to the Department of Water Resources, no later than February 13, 2016, an Agricultural Water Management Plan that includes a detailed drought management plan describing the actions and measures the supplier will take to manage water demand during drought; and
3. **Rainbow Municipal Water District**  will impose reductions on water it delivers to its commercial agricultural users, as determined locally appropriate by the supplier taking into consideration its applicable urban water supplier conservation standard (tier) under California Code of Regulations, title 23, section 865; and
4. I have the authority to make the aforesaid certifications on behalf of **Rainbow Municipal Water District** .

I acknowledge that submitting any information pursuant to California Code of Regulations, title 23, section 865, subdivision (e)(1)(B) or (C), including this certification, that is found to be materially false by the State Water Resources Control Board is a violation of that section, punishable by civil liability of up to five hundred dollars (\$500) for each day in which the violation occurs. Every day that the error goes uncorrected constitutes a separate violation. Civil liability for the violation is in addition to, and does not supersede or limit, any other remedies, civil or criminal.

Printed Name	<b>Tom Kennedy</b>
Title <i>(General Manager or equivalent)</i>	<b>General Manager</b>
Signature	
Date	<b>June 16, 2015</b>

Please print, sign and submit completed form along with a list of each customer that receives potable water deliveries for commercial agriculture use to:

**Jessica Bean**  
**State Water Resources Control Board**  
**P.O. Box 100**  
**Sacramento, CA 95812-0100**