



# FARM BUREAU SAN DIEGO COUNTY

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April 13, 2015

Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Via e-mail to [Jessica.bean@waterboards.ca.gov](mailto:Jessica.bean@waterboards.ca.gov)

Subject: Mandatory Conservation Proposed Regulatory Framework

Dear Chair Marcus:

Thank you for this opportunity to comment on the Mandatory Conservation Proposed Regulatory Framework (Framework) that followed Governor Brown's April 1, 2015 Executive Order directing the State Water Board to achieve a statewide 25 percent reduction in potable urban water use.

The farm community of San Diego County is fully aware of the state's water crisis and there is no intent to avoid doing a fair share to protect California's water resources. To that end agricultural water use in San Diego County has had a dramatic 50 percent reduction in less than a decade. It should also be noted that farmers here are fully expecting use reductions to be declared this month that are commensurate with supplies that are actually available to the Metropolitan Water District of Southern California and the San Diego County Water Authority.

In reading the Framework section that applies to Urban Water Suppliers we noticed an absence of any mention on agricultural water use. It is also unavoidable to see that the Framework clearly states that the State Water Board is directed to achieve a 25 percent reduction in potable *urban* water use. Adding to that has been comments from Governor Brown on multiple dates stating that his Executive Order was not directed at the state's farmers.

Agriculture in San Diego County is a nearly \$2 billion industry ranking as the 11<sup>th</sup> largest farm economy in California with the largest number of small farms and the largest number of organic farmers of any county in the United States. We do not understand how such a robust agricultural presence is now being classified as urban water use and coming under the harshest restrictions dictated by the Framework. It appears that because farmers here purchase their water from municipal water districts they are no longer considered to be part of the greater California farm community.

Adding to this concern about the marginalization of farming in San Diego County is the fact that the state has invested heavily in forging a relationship between urban residents and farmers and promoted urban farming. Nowhere is that taking shape better than in San Diego County where more than 4,000 farmers and 3 million residents are creating links through more than 50 farmers' markets and a growing number of restaurants and stores that have found the public to have a great appetite for locally-grown products.

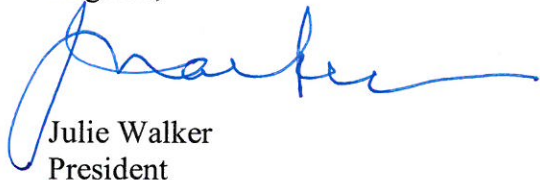
Here I would also like to mention that San Diego County is the number one county in the nation in the production of nursery plants. A large and growing portion of those plants are low water use varieties. Our nurseries will need to be at peak production in order to meet the expected demand for low water use plants as Californians change to a new landscape ethic.

Again, there is no expectation that farmers in San Diego County will be untouched by the drought. However, there is an expectation to be treated like all farmers, landscape.

A second area of concern comes from what appears to be disregard for the massive effort put in by the Metropolitan Water District of Southern California and the San Diego County Water Authority to diversify supplies following the 1987 – 1992 drought. Heavy investment has been made in storage, transfers, canal-lining, recycling, and most recently desalination. Governor Brown's own California Water Action Plan included calls for increased regional self-reliance, expand water storage, and manage and prepare for dry periods. Each goal has been pursued in Southern California at great expense long before the Water Action Plan was announced last year. That expense has been so high that thousands of acres of farmland now lay idle because the cost of water has eliminated profit margins for many farmers. To now say those investments cannot be fully taken advantage of because of a decision to place a uniform set of restrictions across the state will serve as a disincentive when future consideration is given to making investments in local water supplies.

Please know that we appreciate the effort that Governor Brown and the State Water Board are undertaking to steer California through this record drought. Please feel free to contact us if you have any questions or need additional information.

Regards,



Julie Walker  
President