



# FARM BUREAU SAN DIEGO COUNTY

1670 East Valley Parkway, Escondido CA 92027-2409  
Phone: (760) 745-3023 • Fax: (760) 489-6348  
E-mail: [sdcfb@sdfarmbureau.org](mailto:sdcfb@sdfarmbureau.org) • Website: [www.sdfarmbureau.org](http://www.sdfarmbureau.org)

April 22, 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: Draft Emergency Regulation for Urban Water Conservation

Dear Chair Marcus:

We were extremely pleased to learn that the State Water Resources Control Board heard our plea that the Draft Emergency Regulation for Urban Water Conservation should include the capacity for urban suppliers to remove commercial agricultural use from their water productions totals. However, we must ask that the proposed 20 percent threshold for agricultural deliveries those urban water suppliers must meet be set aside.

It continues to be our belief that Governor Brown's call for urban water use reductions were not directed at commercial agriculture. While the 20 percent threshold does remove the majority of farmers in our region from the urban water use calculations, many commercial farms meeting the definition of Government Code Section 51201(a) operate within water districts where less than 20 percent of the water production flows to commercial farms.

Decades ago much of the San Diego region was agricultural. As urbanization spread many farms were lost, but many others decided to remain. These farms include some that have been multi-generational. The water districts that serve these farms have seen a dramatic change within their boundaries as their customer base became urbanized. Through no fault of their own these remaining farms now find themselves in urban-serving water districts. To now minimize their existence with the arbitrary 20 percent threshold is unfair and contrary to the governor's words.

It is our request that Section 865(e) of the Proposed Text of Emergency Regulation be amended to give all urban water suppliers the opportunity to certify that the agricultural uses they serve meet the definition of Government Code Section 51201(a) and be allowed to subtract the amount

of water supplied to the qualifying commercial agricultural uses from their water production totals.

Thank you for consideration of our concerns. We hope you agree that all farms in our state should be recognized as equals and not dismissed because the water district in which they reside fails to meet an arbitrary delivery threshold.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Larson", written in a cursive style.

Eric Larson  
Executive Director