



PLACER COUNTY WATER AGENCY  
SINCE 1857

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	WWW.PCWA.NET

January 6, 2016

VIA EMAIL TO: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

Ms. Kathy Frevert  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95812-0100

**SUBJECT: Comments on Proposed Regulatory Framework**

Dear Ms. Frevert:

The Placer County Water Agency (PCWA) is pleased to comment on the State Water Resources Control Board (State Water Board) staff's *Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation*. PCWA provided a number of thoughtful proposals prior to the December 7 workshop on the urban water conservation standard, and we appreciate staff's recognition of climate as a significant factor in determining regional water needs.

While PCWA supports the adoption of a climate adjustment to the emergency regulation, we remain concerned about the inequity of the current policy. We assume that the goal of the conservation requirement was to equally impact the lives and property of water customers throughout the State. The methodology used, however, which relied solely on residential GPCD data, required PCWA customers to reduce water use by 32 percent, or 210 GPCD for a typical residence, and City of Los Angeles customers to reduce their water use by 16 percent, or 43 GPCD for a typical residence. Because staff failed to consider climate coupled with population density, the average household in the City of Rocklin had to cut their water use by nearly five times as much as one in Los Angeles. As a result, PCWA customers suffered significantly higher financial and quality of life losses. In addition to climate, staff should consider the different densities of the existing housing stock built in communities with vastly different land values.

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PCWA also urges the State Water Board and staff to recognize that not all communities are experiencing this drought similarly. Many communities have invested in infrastructure and water management techniques, as recommended in the Governor's Water Action Plan, for the explicit purpose of providing reliable water for customers, especially during times of drought. Conservation should focus on non-sustainable or highly variable supplies. Simply because it would be a difficult logistical task for State Water Board staff to consider each purveyor's circumstances individually, is an insufficient reason to impose arbitrary requirements. Equity is not treating everyone the same; it is treating everyone fairly.

Lastly, PCWA encourages staff and the State Water Board to explicitly address the need to reconsider the extended emergency regulations in April 2016 based on local hydrologic conditions. Because local conditions differ across regions of the State, local factors must be taken into consideration in determining what constitutes a drought "emergency." Continuing to expect customer sacrifice without clear and ongoing evidence of a water shortage emergency threatens the goodwill of our customers, and public trust in State and local agencies.

Thank you for consideration of our comments.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read "Einar Maisch", written over a light blue horizontal line.

Einar Maisch

General Manager

c: PCWA Board of Directors  
Senator Jim Nielsen  
Senator Ted Gaines  
Assemblywoman Beth Gaines  
John Woodling, Executive Director, Regional Water Authority