

## Grizzly Flats Community Services District

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April 13, 2015

Dear Ms. Bean,

I am writing on behalf of our District in regard to the water conservation framework presented by the State Water Resources Control Board.

Our District is located in the Sierra Nevada, about 30 miles south-east of Placerville. We supply water to our community of about 1100 people with about 585 active service connections. Our customers are very water wise and use very little water even prior to this current drought. We do not have any commercial or agricultural customers or parks that use our potable water. We are in the forest so we have very few lawns or extensive outdoor landscaping and only one in-ground pool.

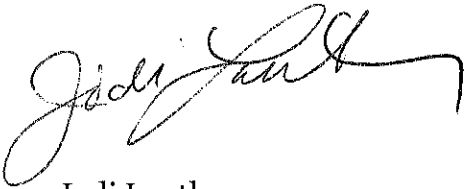
Under the framework, we would be required to meet the 25% conservation rate for small agencies. We have several comments that we would like the SWRCB to take under consideration:

1. Our per person water usage between June 2014 and September 2014 was 109 gallons per person per day. Compare that to the average state usage of 131 gallons per day per person or the Sacramento area usage of 190 gallons per person per day (as reported in the Sacramento Bee). Our residents already conserve and use very little water. It will be very difficult for them to reduce their usage by 25%.
2. Would the State consider an exemption for water used for system maintenance? Flushing hydrants and water lines is necessary to resolve water quality issues in our system.
3. Would the State consider an exemption for water used for fire protection? We are in a very rural location and provide water in the event of fires in and around our District. The water used for one fire could offset any conservation efforts our customers make.
4. According to the Framework, Urban Water Suppliers get an adjusted conservation rate based on per capita water use because "conservation standards are intended to be equitable". We feel asking for a 25% conservation rate from our District is not equitable or feasible and we ask that a similar adjusted conservation rate be considered for small districts. Our average usage (measured between June 2014 – March 2015) is 88 gallons per day per person. A 25% conservation rate puts our District at 66 gallons per day per person. Is that equitable? Are you asking residents in southern California or larger urban areas to live on 66 gallons per day per person?

5. What is the minimum water usage for health and safety? Has that been determined? I believe we would have customers below what is considered safe if we were to ask them to conserve 25%.
  
6. What about conservation efforts that aren't realized in the production numbers? In 2012, we spent over \$300,000 to install a liner in our raw water reservoir. Prior to 2012, it was estimated that we lost over 30 acre feet of water to seepage each year. Now that our reservoir is lined, more water flows down to our neighbors below us (San Joaquin watersheds). This savings in raw water will not be shown in our production numbers but resulted in a huge amount of water being conserved and passed on to our neighbors.

Thank you for the opportunity to submit these comments. We realize we are in the minority as a District which has always had a low average water usage. We would hate for our customers to feel penalized for the good work they have always done to use their water wisely.

Respectfully,

A handwritten signature in black ink, appearing to read "Jodi Lauther", with a long, sweeping underline that extends to the right.

Jodi Lauther  
General Manager  
Grizzly Flats Community Services District