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December 17, 2014



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Members of the Board:

Placer County Water Agency (PCWA) would like to thank the Board for the opportunity to provide comments on potential next steps and future actions related to urban water conservation if drought conditions persist.

PCWA uses a weather forecasting service and the prediction is for an average or wetter than average winter, and thus far December is living up to the promise. While we recognize that average conditions may leave much of the State in a continuing water supply deficit, the public perception on this issue can be very difficult to manage. If “the government” tells people one thing and their eyes appear to tell them something else, we risk losing the public’s trust. We note an opinion piece just this week in the Los Angeles Times chiding the government for not recognizing that it is raining.

The Sacramento region was faced with extremely critical drought circumstances in early 2014. The citizens of the region responded by reducing their water use under the guidelines adopted by individual water purveyors. PCWA believes it was the clear recognition of drought conditions combined with the public outreach of local government, the State, and the media that resulted in our citizens’ generous efforts.

PCWA strongly recommends that the Water Board defer any further regulatory action involving urban water conservation until we are further into the winter season and have a better assessment of water conditions for the next year.

In response to questions asked by the Water Board in its public notice, we offer the following:

1. What more should be done at the local and/or State level in the near-term to increase water conservation?

PCWA does not recommend any additional water conservation actions at this time. Winter water use is very low and we risk very little by waiting to see how the winter weather conditions develop.

2. What additional conservation requirements, if any, should the State Water Board consider adopting if dry conditions persist into the new year?

If drought conditions persist, we should remember that our greatest asset as water purveyors is credibility with our customers.

Rather than increased regulation, PCWA recommends statewide financial support and tools for local governments to increase messaging of regional water supply conditions and necessary requirements. This would allow expectations of our customers to be commensurate with local water supply circumstances in addition to overall statewide support, in which it is recognized that we are all in this together. The State's "Save Our Water" campaign has been very effective in supporting this effort during 2014.

3. What can be done to compel poorer performing areas to increase conservation?

Achievement of conservation goals is ultimately the result of the individual actions of customers given each customer's suite of opportunities to reduce their water use. PCWA does not view the different levels of conservation throughout the State to be a result of different levels of effort. Regions with lower volumes of landscape water use and/or hardened demands due to many years of imperative conservation practices did what they could, just as our customers did. And every water purveyor must ultimately live within its "water" means.

Further regulation will not be effective at reaching out to customers, rather, broad and consistent public messaging of statewide drought conditions and how citizens can help will result in better performance.

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4. What additional data should the State Water Board be collecting and how would it be used?

The State began collecting data on gallons per capita per day (GPCD) following legislation passed in 2009, in which results were first presented in our 2010 Urban Water Management Plans. The results demonstrated significant regional variability from cooler to warmer climates and from urban to suburban housing densities. As an example, the Los Angeles region has a cooler climate, a nominal urban density of 7,500 persons per square mile and a GPCD of approximately 150, whereas the Sacramento region has a hotter climate, a nominal urban density of 3,500 persons per square mile and a GPCD approaching 300. In response to the 2014 drought, the State Water Board began collecting data on residential GPCD, known as R-GPCD, on a monthly basis. Publishing these monthly data resulted in confusion with the media and our citizens when trying to compare values between regions.

The value of evaluating GPCD or R-GPCD in response to drought is to recognize that the potential for conservation in a densely urban area, such as Los Angeles, is less than in other areas due to the fact that they are starting with a much lower GPCD. However, these values are not necessary to evaluate the overall effectiveness of the conservation efforts of a particular region or water purveyor in response to the drought. If the State wishes to continue collecting this type of information in response to the drought, it would be best to align its calculation with that of Urban Water Management Plans to minimize confusion on the part of our citizens.

Thank you for the opportunity to comment on this important matter and participate in the workshop being held Wednesday, December 17, 2014. If we have further comments following the workshop, we will submit them separately. Please do not hesitate to contact me at (530) 823-4860 if there are any questions about these comments or if we can be of assistance.

Sincerely,

PLACER COUNTY WATER AGENCY



David A. Breninger
General Manager

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