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April 14, 2016

Transmitted via email to the Clerk of the Board at [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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



**RE: Comment Letter – Urban Water Conservation Workshop**

Dear Chair Marcus and Board Members D’Adamo, Doduc, Moore and Spivey-Weber:

The Placer County Water Agency (PCWA) appreciates the opportunity to comment on potential adjustments to the February 2016 Emergency Regulation. Considering the increases in precipitation, snowpack, and corresponding water supply improvements, further action on this regulation cannot come too soon.

On March 17, 2016, PCWA sent a letter to the State Water Resources Control Board (State Water Board), which provided your staff with current hydrological conditions of the watersheds that supply PCWA’s service area. In short, the conditions showed the following:

- The South Yuba River watershed at 120 percent of average snowpack, with the Drum Spaulding Reservoir at 240 percent of average.
- The Middle Fork American River and Rubicon River watersheds at 110 percent of average snowpack, and PCWA’s reservoirs at 110 percent of average capacity.
- Folsom Reservoir storage at 685,000 acre feet (117 percent of normal) and encroaching the mandatory flood control reserve space for mid-March. This storage capacity did not include more than 390,000 acre feet already released from Folsom Reservoir prior to March 17.

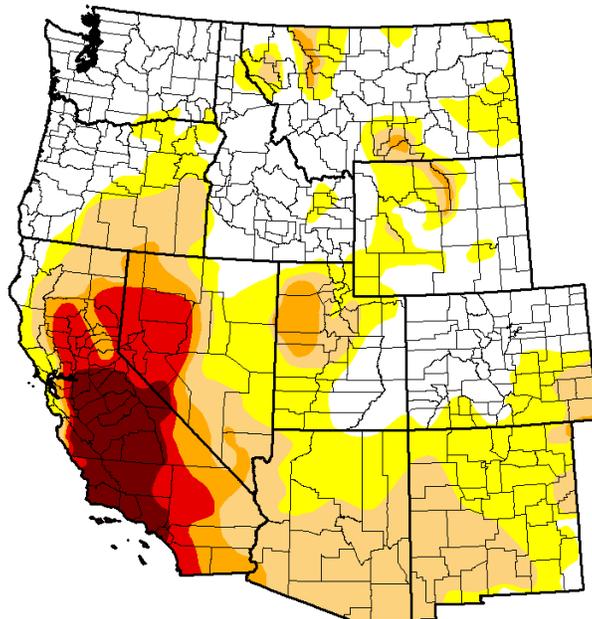
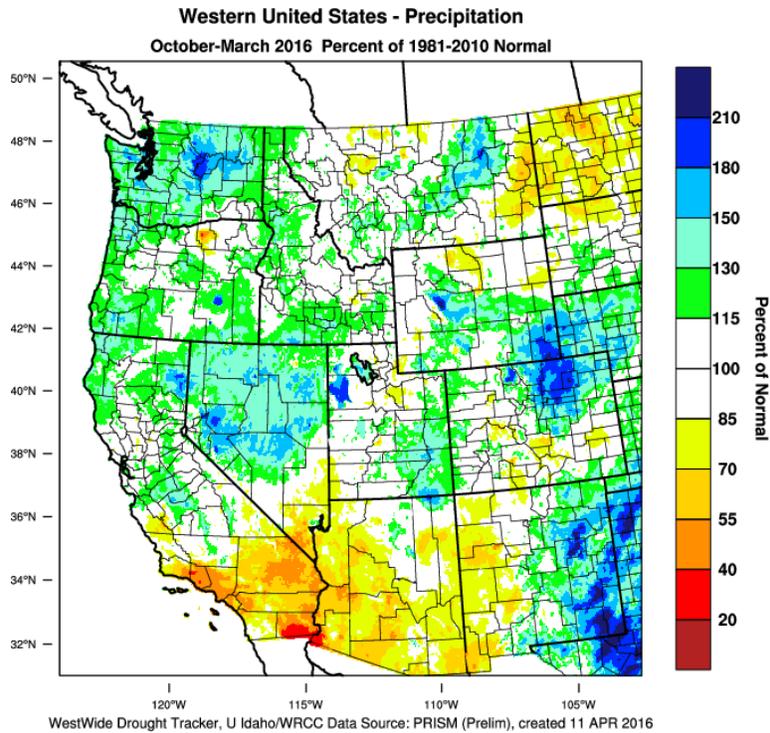
Since our March letter, conditions remain above average. Storage levels at PCWA’s Middle Fork Project reservoirs sit at 120 percent of normal, and Spaulding Reservoir still exceeds 200 percent. Based on hydrological conditions present since last month, PCWA will have enough supply for all its existing retail, wholesale, and agricultural customers in 2016, and enough carryover storage to meet demands in 2017. Accordingly, PCWA again requests that the State Water Board rescind the emergency regulations for local water purveyors relying on these watersheds.

Felicia Marcus, Chair

Page 2

April 14, 20165

To better understand our local hydrological conditions and corresponding water supply, please see the figure below, which contrasts precipitation measurements with the drought monitor. Responses to the specific questions posed in the Notice of Public Workshop follow:



Felicia Marcus, Chair

Page 3

April 14, 20165

*1) What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?*

The mandatory nature of the water conservation requirements should be rescinded in areas of the state that are experiencing relatively normal or better hydrologic conditions. The focus and resources, in these areas of the state, should shift from enforcement of mandatory water conservation to long-term improvements in water use efficiency.

*2) How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?*

The State Water Board should use available hydrologic data for each region to evaluate whether the drought still represents an “emergency” in a given region. This could be accomplished on a hydrologic region level as defined by the California Department of Water Resources (DWR). DWR publishes monthly water supply condition data in Bulletin 120 that is organized by hydrologic region and includes precipitation, snow water content, reservoir storage and current and forecasted runoff. The State Water Board can use this information to assess each hydrologic region and decide which regions are recovering and which regions are still experiencing severe drought conditions.

*3) To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?*

The reliability of our water supply portfolio is, and has always been, the fundamental element in operating our system. As such, it should be a fundamental element when considering mandatory water conservation. Unfortunately, supply was given little, to no, consideration under the emergency regulation. PCWA believes the proper role of the State Water Board is to trust and support local water suppliers who possess the expertise to manage supplies, and are directly answerable to their customers.

Thank you for the opportunity to provide our comments.

Sincerely,

PLACER COUNTY WATER AGENCY



Einar Maisch, P.E.  
General Manager

c: PCWA Board of Directors  
State Senator Jim Nielsen  
State Senator Ted Gaines  
Assemblywoman Beth Gaines  
John Woodling, Regional Water Authority  
John Kingsbury, Mountain County Water Resources Association