

April 21, 2015

To: Jessica Bean, State Water Resources Control Board
From: Colleen Platt, residential water customer of Calaveras County Water District
Re: Draft Emergency Drought Regulations Posted Saturday April 18, 2015
Sent via email to: Jessica.Bean@waterboards.ca.gov

Dear California State Water Resources Control Board,

Due to **inaccurate methodology** and reporting data for July 2014 water usage, I am protesting the draft emergency drought regulations released Saturday April 18, 2015. Specifically I **question the proposed Tier 8, 32% Conservation Standard for the Calaveras County Water District (CCWD)** in “Urban Water Suppliers and Proposed Regulatory Framework Tiers to Achieve 25% Use Reduction (Provisonal).”

CCWD customers have done a better job conserving water than the “July-September 2014 R-GPCD” column figure of 181.4 gallons represents. July 2014 water usage should not have been counted, for two reasons:

1) **CCWD customers are on a two-month billing cycle.** For many customers July and June water usage was combined in the reporting data. Customers were not conserving water seriously in June (which figures are averaged into July water data).

2) **CCWD customers learned gradually about mandatory water conservation measures.** Many did not start conserving seriously until later in July. The CCWD board of directors adopted a mandatory 35% conservation plan in mid-June, but many customers were unaware of the new rules. It took weeks for the media, word-of-mouth, neighborhood signs, and written notices to circulate. Some customers didn’t receive word until the end of July. As a result, **serious water conservation efforts weren’t fully realized until August.**

CCWD’s September R-GPCD usage was 161, down significantly from the July-September average of 181, and is a more accurate representation of the August-September water conservation efforts of its customers. Please omit the inaccurate July water usage from data used to determine CCWD’s R-GPCD, and base our conservation standard on the more accurate **September 2014 usage of 161 gallons. This usage would put CCWD in Tier 7, 28% Conservation Standard.**

Thank you.

Respectfully,

Colleen Platt, CCWD residential customer
4924 Treosti Place
Valley Springs, CA 95252

