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November 30, 2015



Delivered by email to: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
1001 I Street
Sacramento, CA 95814

RE: Public Comment for December 7, 2015, Public Workshop on Urban Water Conservation

Dear Chair Marcus and Members of the Board:

The Placer County Water Agency (PCWA) thanks you for your leadership during the ongoing drought and the opportunity to contribute to the discussion on the current urban water conservation standards. As 2016 approaches, we appreciate the foresight shown by the State Water Resources Control Board (State Water Board) to address this critical issue in a way that includes input from local water providers who share your desire to ensure adequate water supplies throughout the State.

The citizens of Placer County and the Sacramento region are fortunate to live near the source of much of California's water. We live with the weather that results in drought; it affects our lives; we know when there is no snow for skiing and when our reservoirs are critically low. Because of this awareness, like many of our partners in the Sacramento region, PCWA customers achieved some of the highest summer conservation levels in the State in 2014 and 2015. But while our customers are willing to do their part for the greater good of California, the emergency regulations instituted in 2015 created disparate impacts to our region and the inequity of the current rules threatens to erode our customers' goodwill.

With a summer conservation target of 32 percent, PCWA's customers suffered significant financial and quality of life losses in terms of dead and dying landscapes and stress on our urban forest, in obvious contrast to regions of the State with significantly lower conservation requirements.

The Honorable Felicia Marcus, Chair

Page two

November 30, 2015

Continuing these higher-level conservation requirements on our region into the winter, when landscape irrigation is normally minimal, imposes further disproportionate adverse impacts on our citizens. It results in interior conservation requirements in our communities that are double those of other communities with essentially the same normal level of use.

As you look to 2016 we urge the State Water Board to consider that the weather awareness of our region's customers has two very different sides. That awareness resulted in swift and strong conservation in 2014 and 2015; but if we get an EL Nino driven wet winter the skiing will be good, Folsom lake will be full, and, in the minds of our customers, the drought will be behind us. As water managers, we know that a single wet winter will not relieve the stress that the Central Valley Project (CVP) and State Water Project (SWP) will have meeting environmental requirements in the Sacramento River and the Delta while exporting water to the San Joaquin Valley and southern California and refilling Shasta and Oroville. However, customers who know that they have locally sufficient water supplies are not going to understand why they are being asked to continue to conserve.

Should the regulations be extended into 2016, modifications need to be made that reduce the inequity among regions of the State. PCWA recommends the State Water Board consider the following:

- An adjustment that recognizes differences in climate and land use density to equalize impacts.
- A seasonal adjustment that recognizes purveyor specific variations in peak summer use but widely similar winter use.
- Conservation requirements should not limit the use of local drought resilient water supplies such as recycled water, non-CVP/SWP surface storage, groundwater from non-overdrafted basins and desalination, especially if foregoing use of those supplies would not result in an increase in water supply for other uses.
- Flexibility and responsiveness to developing hydrologic conditions through the winter and spring of 2016.

The Honorable Felicia Marcus, Chair

Page three

November 30, 2015

When the emergency regulations were developed and adopted last spring, time was of the essence. With nearly six months of mandated conservation behind us and the State surpassing the 25 percent reduction ordered by the Governor, now is the time to revisit not only the formulas, but the assumptions used in devising the urban water conservation standards.

We appreciate the State Water Board's commitment to taking the time necessary to improve the emergency regulations, should they be extended.

Per the State Water Board's request, detailed responses to the three questions in the Notice of Public Workshop dated November 6, 2015, are attached. Thank you for the opportunity to comment and your consideration.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read 'Einar Maisch', written over the typed name below.

Einar Maisch, General Manager

1. What elements of the existing Emergency Regulation, if any, should be modified in an extended Emergency Regulation?

Climate Adjustment - Any extended Emergency Regulation should be modified to recognize the effects of climate on water use by adjusting water agency conservation standards based on their relative evapotranspiration (ET) rates as compared to a statewide average ET rate. Water agencies with higher ET rates compared to the State average ET require more water to provide the same standard of living. More water in a hotter and drier climate zone does not correspond to waste.

Density Adjustment - Any extended Emergency Regulation should be modified to recognize how density affects water use. Inland areas of California have traditionally had cheaper land than coastal areas. The result is a history of more single-family development, with more landscaped area and higher water use per household. Water agencies serving lower density populations require more water per capita (but not necessarily per acre) to provide the same standard of living. More water per household in less densely developed areas does not correspond to waste.

Climate and density adjustments will mean that Californians that make comparable commitments to water conservation will have comparable impacts to the value of their property and the quality of their lives. Inland residents shouldn't be expected to replace dead landscapes and lose trees, while those on the coast aren't expected to stress their landscapes beyond recovery.

Seasonal Adjustment - Any extended Emergency Regulation should be modified to recognize how the opportunity for conservation changes seasonally as outside water use peaks in the summer and bottoms in the winter. The existing regulation applies a single uniform conservation standard year-round based on peak summer water use.

The attached charts for the Cities of Sacramento and Los Angeles show similar (indoor) winter per capita use but the need for more water in the Sacramento region to maintain landscaping at comparable levels in the summer.

We recommend that the individual water agency R-GPCD figures that serve as the basis for assigning conservation standards either be recalculated based on annual water use, or be adjusted seasonally.

2. What additional data, if any, should the State Water Board be collecting through the Emergency Regulation and how would it be used?

PCWA supports the State Water Board's current reporting efforts during this drought. The transparency and depth of the current available data is useful for both water agencies and policy-focused organizations. The monthly data collection allows for a steady stream of information on the State's conservation progress. The availability of this data also allows media outlets to continue to report on the drought. This increase in coverage keeps the need to conserve in the spotlight for the State's residents and businesses.

Regarding additional data collection, the State Water Board should first identify objectives to be achieved through data collection and then identify what supplementary data is available to achieve those goals.

3. How should the State Water Board account for precipitation after January 2016 in its implementation of any extension of the Emergency Regulation?

PCWA appreciates the challenge that the State Water Board will face in 2016 if we have above average precipitation. The need to refill major northern California CVP and SWP reservoirs to protect against the next drought while meeting the needs of the environment in the export delivery system, agriculture and urban areas means that one wet year is not likely to solve all of the State's water supply problems.

However, we believe that recognizing the regional differences of water supplies in an above average year will be key to successfully managing the issues and maintaining credibility.

Under these conditions, one size regulation will not fit all. To the extent practical we advise that the Board rely on the water rights priority system to allocate shortages and dictate water conservation requirements.

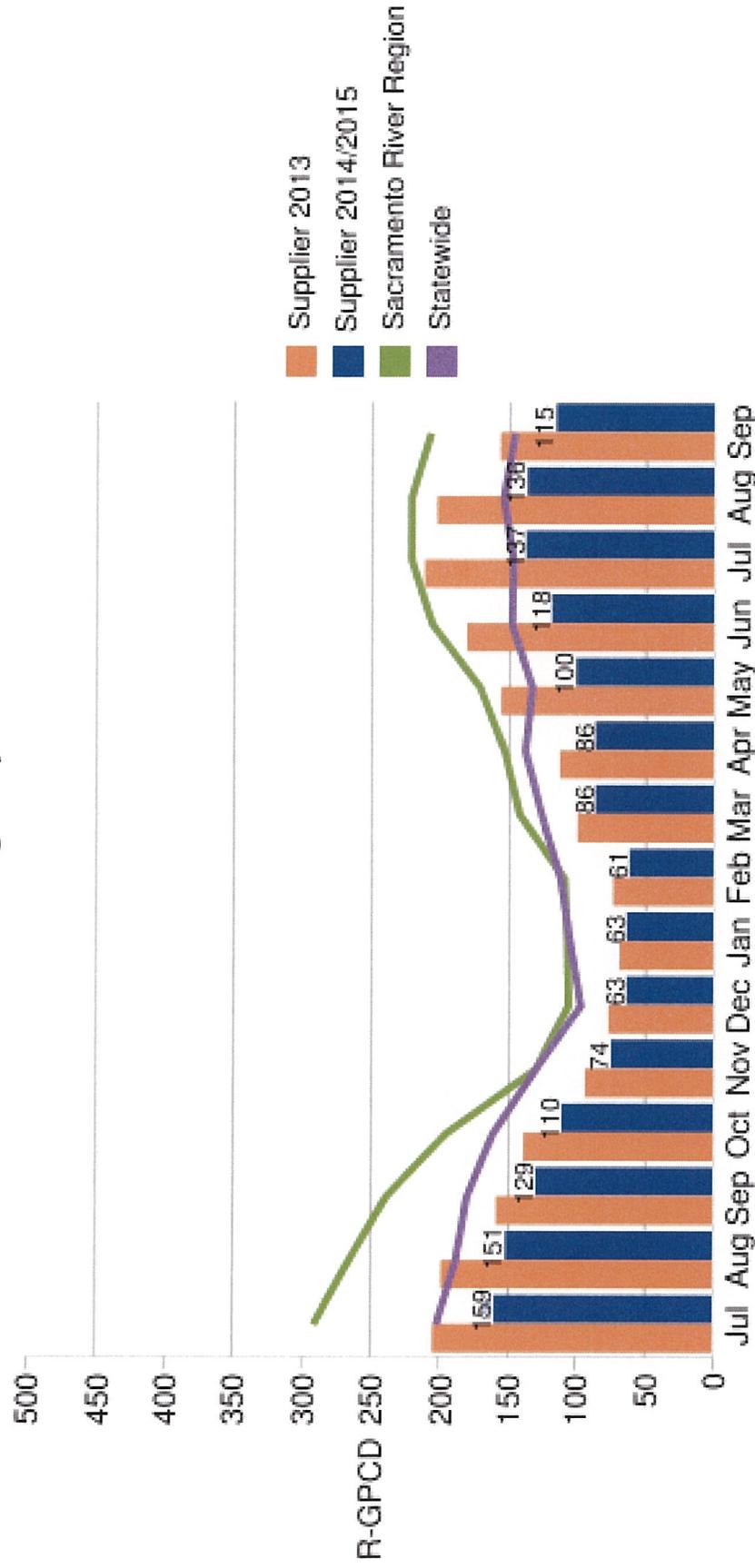
It is not possible to know in January just how wet conditions will be by April. Even in 1997, a strong El Nino year, a very wet fall turned into a very dry spring. But urban water use is low in January, so without the loss of opportunity the State Water Board has time to consider what the 2016 requirements should be even as it gains more information on actual water supplies in the months that follow. PCWA advises the State Water Board to retain its flexibility to make adjustments as long as possible.

In our region with the absence of direct evidence of an extreme ongoing drought it will be very difficult to drive customer behavior to continue to achieve high water conservation targets. Loss of the good faith of our residents will have a negative impact on both short and long-term water efficiency improvements.

The State Water Board in partnership with the California Department of Water Resources, the United States Bureau of Reclamation and a statewide representation of water agencies should evaluate snowpack, reservoir levels, groundwater conditions, projected runoff, and available local supplies on April 1, 2016, to guide implementation of emergency regulations for the remainder of 2016. If conditions have improved from 2015, either statewide or regionally, the State Water Board should be prepared to modify the emergency regulations to adjust the State and individual water agency conservation standards.

The goals should be to accurately signal customers as to the strength and reliability of their water supply and the need for conservation, and equalize the burden on customers with similar supply reliability.

Sacramento City of (471) Population: 480155
 Calculated Residential Gallons-per-Capita-Day (R-GPCD)
 and Other Averages by Month

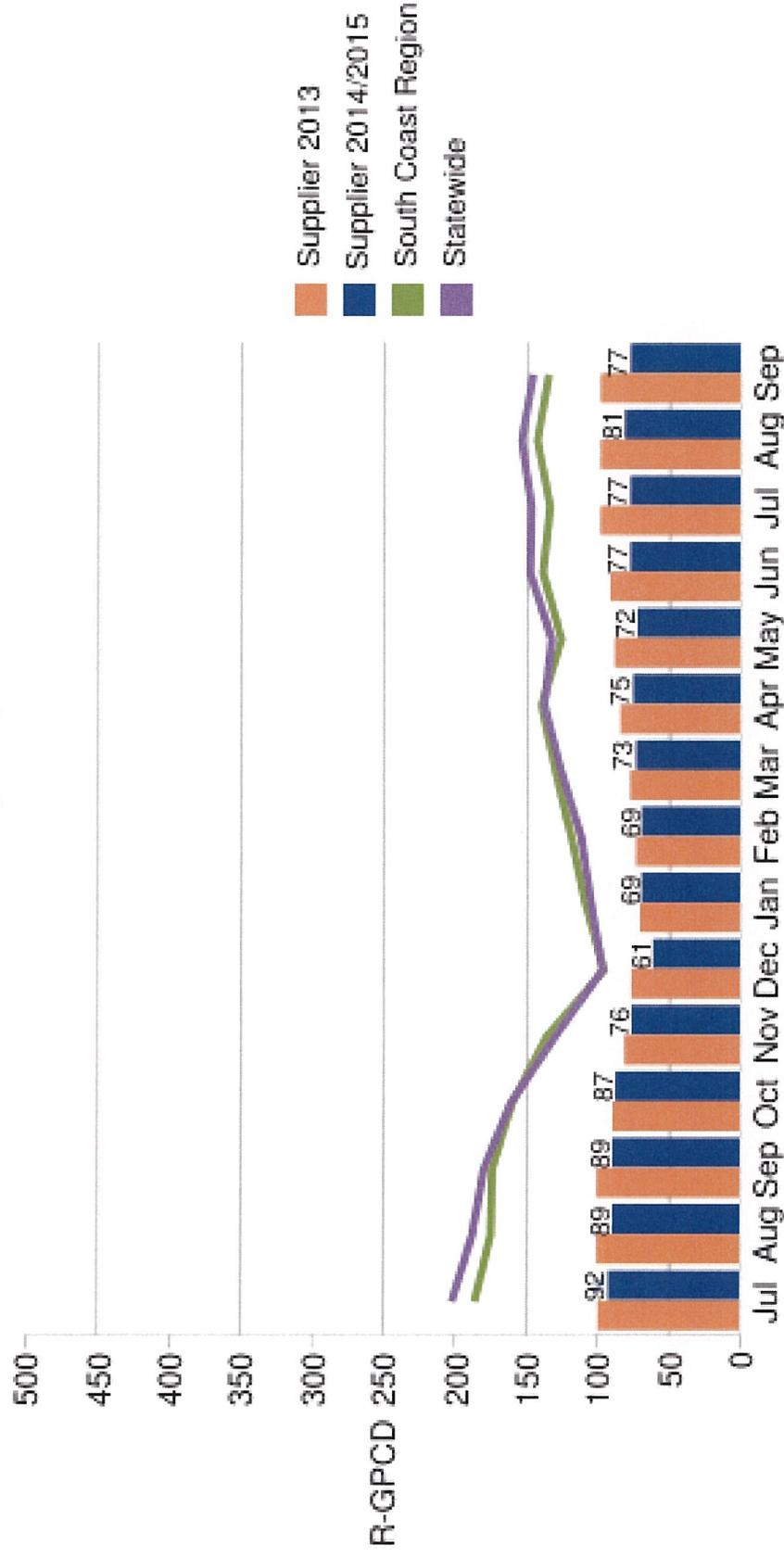


Source: DRINC Portal (drinc.ca.gov) Urban Water Supplier Monitoring Reports (Nov 2015)

Los Angeles Department of Water and Power (309) Population: 4019619

Calculated Residential Gallons-per-Capita-Day (R-GPCD)

and Other Averages by Month



Source: DRINC Portal (drinc.ca.gov) Urban Water Supplier Monitoring Reports (Nov 2015)