



PLACER COUNTY WATER AGENCY  
SINCE 1957

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January 27, 2016

VIA EMAIL TO: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

State Water Resources Control Board  
c/o Jeanine Townsend, Clerk to the Board  
1001 I Street  
Sacramento, CA 95812-0100



**SUBJECT: 2/2/2016 Board Meeting – Item 7 (Conservation Extended Emergency Regulation)**

Dear Chair Marcus and Members of the Board:

The Placer County Water Agency appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board) proposed *Conservation Extended Emergency Regulation*.

While the proposed changes to the conservation regulation are certainly a step in the right direction, the resulting regulation still:

- Fails to acknowledge the water needs of established, low-density Central Valley suburban development.
- Fails to acknowledge how higher and compounding conservation requirements disproportionately affect inland communities, whose higher water use is legitimate and beneficial.
- Fails to acknowledge the value of local, drought-resilient supplies developed prior to the year 2013.

We understand that the majority of the state is dependent upon the State Water Project (SWP) and Central Valley Project (CVP) water supplies, and that Shasta and Oroville reservoirs are not likely to fully recover even if 2016 is as wet as predicted. However, your insistence on treating everyone in the state the same, regardless of their local water supply situation, is patently unfair to many non-SWP and non-CVP customers.

Felecia Marcus  
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We understand that the reason it was necessary to implement mandatory conservation requirements in 2015 is that voluntary conservation did not work in 2014. That may have been true for regions of the state that live isolated from their water supplies, but in Placer County and the Sacramento region it is not true; we met the 20 percent conservation requested in 2014, even though we had ample supply in locally-owned surface and groundwater reservoirs.

The reason that our customers met the challenge in 2014, before the State Water Board instituted mandatory requirements, is because our customers knew the drought was real and wanted to be good stewards of our water resources and be conscientious citizens.

These same citizens that conserved in 2014 and 2015 are now waking up to wet streets, sending their children to school in raincoats, and are enjoying good skiing for the first time in three years. The reservoirs they own are filling quickly and they know that for them, the drought is over. If you tell them that their eyes deceive them, that the drought persists, and you order continued conservation, you will destroy not only your credibility, but that of local water agencies as well. Our customers will not respond well to state-mandated rationing in the face of robust local water conditions.

Treating everyone the same is easy, but it is not always equitable. It is unfortunate that treating everyone fairly based on local water supply conditions is hard work, but it is exactly the charge of the State Water Board to understand and adapt regulations to varying circumstances throughout the state.

Thank you for consideration of our comments.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read "E. Maisch", written in a cursive style.

Einar Maisch  
General Manager

c: PCWA Board of Directors  
Senator Jim Nielsen  
Senator Ted Gaines  
Assemblywoman Beth Gaines  
John Woodling, Executive Director, Regional Water Authority