



PLACER COUNTY WATER AGENCY
SINCE 1957

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January 10, 2017

VIA EMAIL TO: commentletters@waterboards.ca.gov



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

SUBJECT: Comment Letter – Urban Water Conservation Workshop

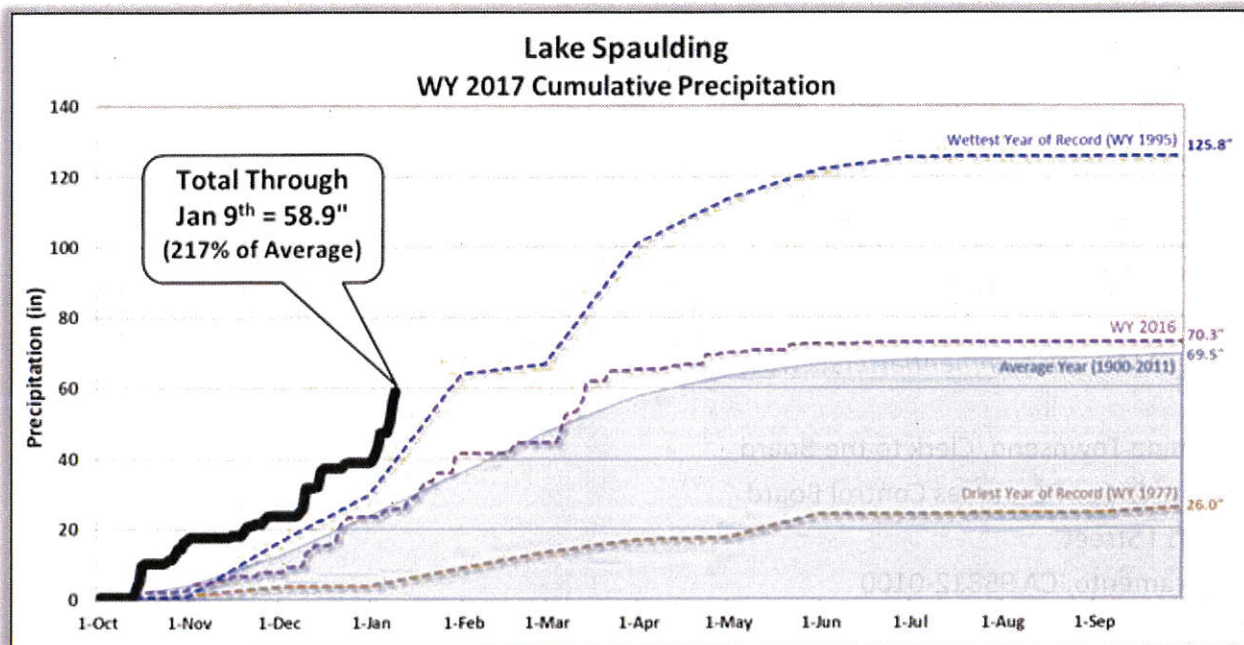
Dear Chair Marcus and Members of the Board:

The Placer County Water Agency (PCWA) appreciates the opportunity to comment on the Notice of Public Workshop regarding the Emergency Regulation for Statewide Urban Water Conservation dated January 6, 2017. PCWA is the primary water supplier in Placer County, serving retail and wholesale customers in Placer and Sacramento Counties.

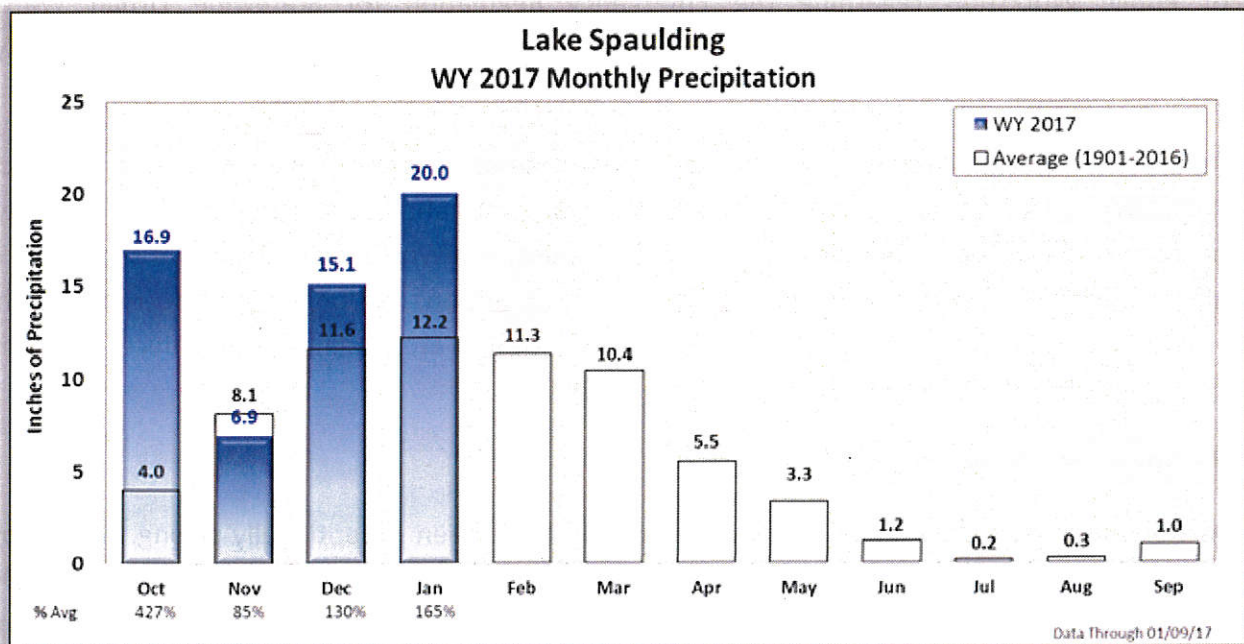
As you are aware, water supply conditions have dramatically improved since the Emergency Regulation was first adopted in May 2015. In the watersheds that source PCWA's supply, precipitation levels are above average historical levels, reservoirs are spilling, and snowpack is above historical averages. For our region, current conditions no longer constitute a drought emergency that warrants state intervention in local water management decisions. The Emergency Regulation should expire in February 2017.

Precipitation Levels

As noted above, precipitation levels in the region have been exceptionally strong. The graph below shows recorded precipitation at Lake Spaulding, which accounts for approximately 90 percent of PCWA's supply. As of January 9, 2017, cumulative precipitation totals are 217 percent of normal. In fact, current precipitation is trending above water year 1995, the wettest year of record.

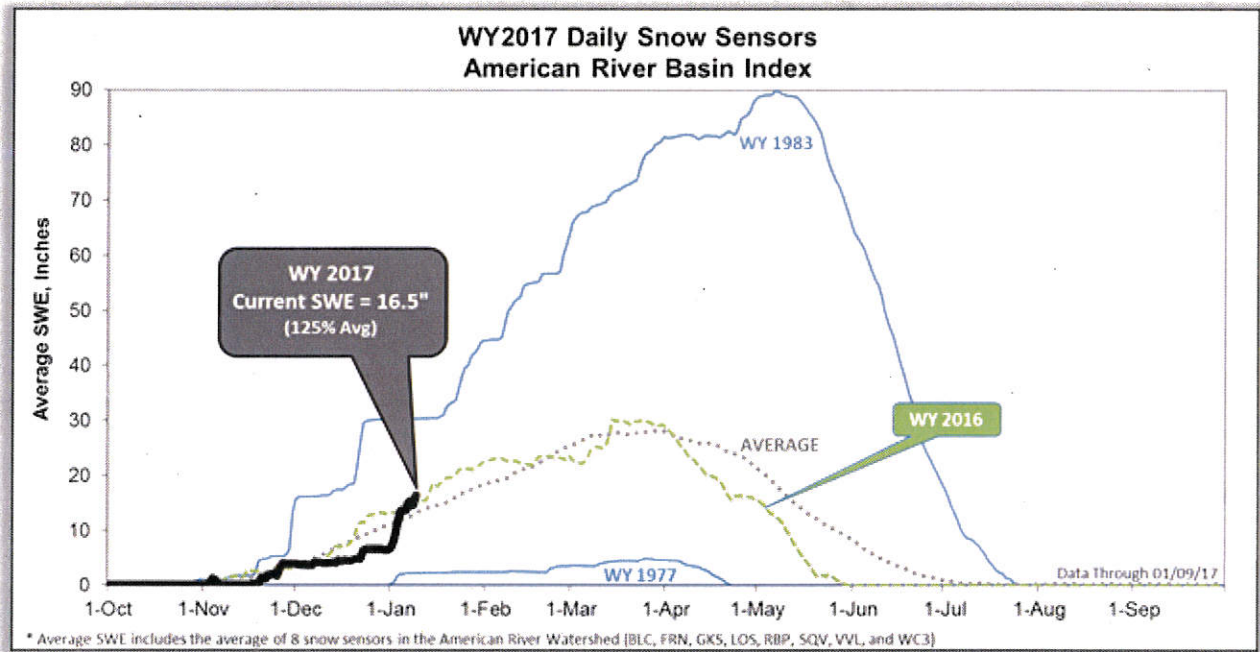


Similar to cumulative precipitation totals, monthly precipitation has been astounding. Of the first four months of the 2017 water year, three months have experienced above average precipitation of no less than 130 percent.



Snowpack

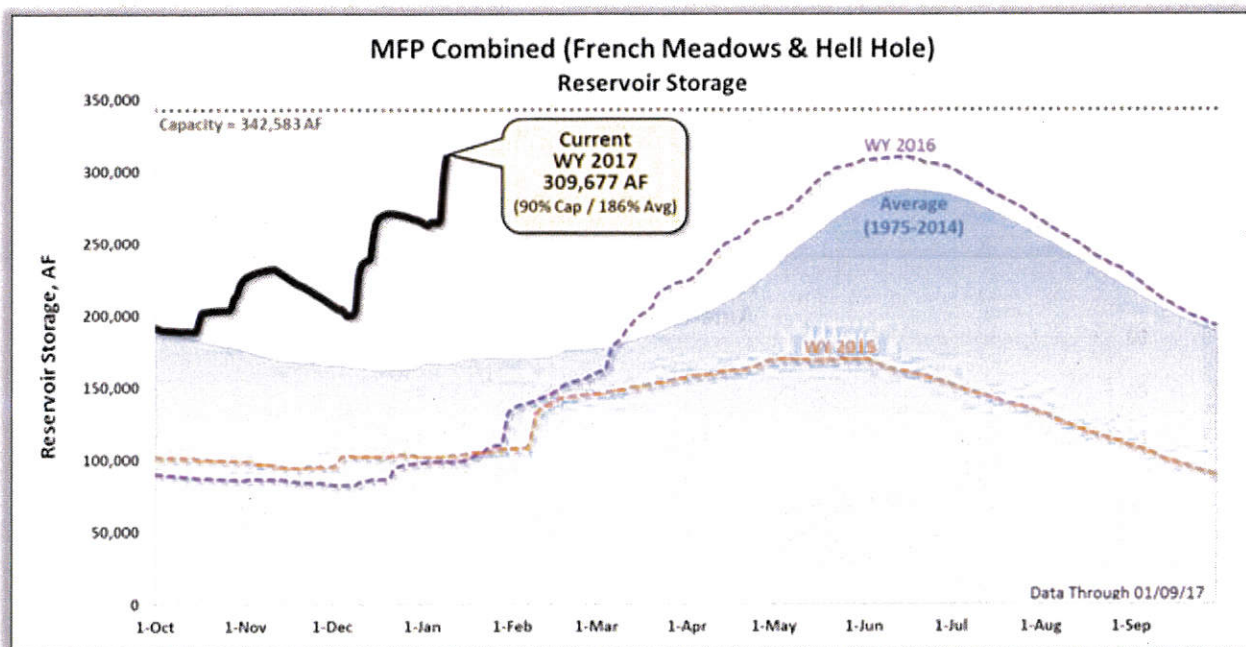
Closely related to precipitation is the water content found in the snowpack. Statewide, the measured snowpack is 135 percent of average. Similarly, the American River Basin boasts a snowpack of 125 percent of average.



Reservoir Levels

Within the Middle Fork American River Project, which PCWA owns and operates, are French Meadows Reservoir and Hell Hole Reservoir. Combined, the reservoirs can store just upwards of 340,000 acre-feet of water. As of January 10, 2017, combined storage in French Meadows and Hell Hole is 186 percent of average, or 309,677 acre-feet.

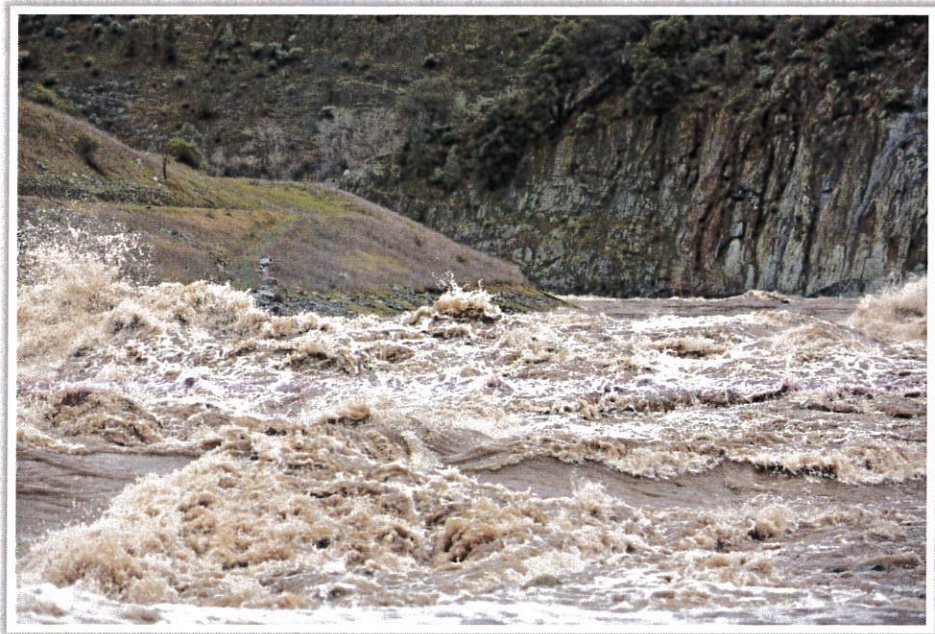
Furthermore, French Meadows Reservoir has begun to spill. At the time of this writing, Hell Hole is 7 feet from spilling.



Visuals



Ralston Afterbay dam with all five gates open



Raging waters of the American River



Ralston Afterbay pre-storm

Ralston Afterbay post-storm

Summary

Although regulators felt compelled in 2015 to institute an Emergency Regulation for mandatory water conservation, there is no benefit in extending state-mandated reductions in potable water use for our region. Not only have conditions dramatically improved, but PCWA has demonstrated the ability to meet demands, over multiple years, whether conditions are wet or dry. Additionally, despite sufficient local supplies to meet customer demand in 2014, 2015, and 2016, our customers cut back water use when needed, and continue to practice efficient water use in 2017.

Milton Freidman once remarked, “Nothing is so permanent as a temporary government program.” The State Water Resources Control Board should now acknowledge that conditions have changed and no emergency exists. PCWA requests that the temporary, Emergency Regulation expire in February 2017.

Thank you for your consideration.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read "Einar Maisch". The signature is fluid and cursive, with a large initial "E" and "M".

Einar Maisch
General Manager

- c: PCWA Board of Directors
- Senator Jim Nielsen
- Senator Ted Gaines
- Assemblyman Brian Dahle
- Assemblyman Frank Bigelow
- Assemblyman Kevin Kiley
- John Woodling, Executive Director, Regional Water Authority
- John Kingsbury, Mountain Counties Water Resources Association