



PLACER COUNTY WATER AGENCY

SINCE 1957

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May 13, 2016

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

Felicia Marcus, Chair  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

SUBJECT: May 18, 2016, BOARD MEETING (Conservation Extended Emergency Regulation)

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to comment on the Conservation Extended Emergency Regulations (Proposed Emergency Regulation) proposed by State Water Resources Control Board (State Water Board) staff. Placer County Water Agency (PCWA) appreciates the State Water Board's recognition of improved hydrologic conditions in water year 2016, and the value of local water supply reliability. PCWA supports the transition from a strict demand reduction-based approach to a self-certify approach, in which urban water suppliers self-certify the level of available water supplies and implement commensurate levels of conservation to ensure adequate local water supplies during periods of extended drought.

In recent notices, State Water Board staff requested that comments address the question of whether there should be a "conservation floor" (e.g., a minimum conservation level). PCWA strongly opposes any imposition of a "floor" as it undermines the purpose of the self-certification analysis and discounts the significant capital investments that PCWA has made to develop locally resilient supplies for its customers.

As an agency that takes resource stewardship seriously, PCWA will continue to promote excellence in water use efficiency at the local and regional level. Past efforts put forth by PCWA to implement water saving practices have been distinguished as some of the best in the state during the drought. PCWA customers responded to the call for conservation, and there is no doubt that PCWA's customer base will continue to maintain generally lower water demand levels going forward, even as PCWA's self-certification demonstrates adequate water supply reliability in the face of drought.

Felicia Marcus, Chair  
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Thank you for consideration of our comments.

Sincerely,

PLACER COUNTY WATER AGENCY

A handwritten signature in black ink, appearing to read "Einar Maisch".

Einar Maisch  
General Manager

c: PCWA Board of Directors  
John Woodling, Regional Water Authority  
John Kingsbury, Mountain Counties Water Resources Association