



**CITRUS
HEIGHTS
WATER
DISTRICT**

6230 Sylvan Road
P.O. Box 286
Citrus Heights
California
95611-0286

phone
916/ 725-6873

fax
916/ 725-0345

website
www.chwd.org

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Delivered by e-mail to: commentletters@waterboards.ca.gov

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

Subject: 7/15/14 Board Meeting (Emergency Regulations for Water Conservation)

Dear Ms. Marcus and Members of the Board:

Citrus Heights Water District (CHWD) appreciates the efforts made by the State Water Resources Control Board to ensure the State of California is using water in the most efficient manner. With the District's reliance on Folsom Lake, the District is acutely aware of the severity of the continued drought conditions in California and strongly supports decisive action by the State to address this drought emergency. CHWD has implemented its Drought Contingency Plan and declared a Stage 3 Water Warning on January 24, 2014 asking customers for a 20% reduction in water use. CHWD customers have shown significant reduction in water use as a result not only this year but over time.

We appreciate the opportunity to respond to the proposed rulemaking and recommend consideration on these matters:

1. Calculating monthly GPCD

CHWD strongly supports monthly reporting of total water production as the most equitable, consistent, and accurate way to monitor and limit outdoor irrigation and other wasteful practices. CHWD would be confident with aggregate monthly production data on a month by month basis as the main indicator of compliance with these proposed Emergency Regulations. However, the District strongly suggests the elimination of the monthly GPCD reporting requirement.

The method to calculate monthly GPCD in the proposed Emergency Regulation varies from the existing GPCD calculation already required by SB x7-7. The use of yet another calculation may lead to several unintended

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consequences associated with inconsistent or inaccurate population data resulting from seasonal populations and non-municipal water district boundaries. Further confusion may occur by the potential use of estimated (GPCD) versus actual (production) data to evaluate current and future drought actions and the use of an inclusive figure (industrial, institutional, residential, and commercial use) to evaluate response to actions that target residential water use.


Again, CHWD suggests the implementation of aggregate monthly production data on a month by month basis as the compliance indicator for these Emergency Regulations and the elimination of the proposed requirement for monthly GPCD reporting.

2. Recognize Existing Enforcement and Fines

CHWD's preference would be that The State Board intends that the fine authority be implemented at the local level. CHWD would like The State Board to recognize that many water suppliers have existing administrative fine programs that are commonly enforced progressively - starting with warnings and then fines are added and increased - and that this emergency regulation is intended to complement such programs

CHWD has a gained great momentum in reducing water use and supports strengthening the State's ability to respond to ongoing drought conditions. We ask that you consider our recommendations and amend the proposed emergency water conservation regulations to incorporate the recommended changes.

Sincerely,



Robert A. Churchill
General Manager
Citrus Heights Water District