



February 2, 2009

Joe Dion, Chair
Paul Selsky, Vice Chair

State Assemblyman Kevin Jeffries
State Capitol – Room 5128
Sacramento, CA 95814

Members

- California American Water
- Carmichael Water District
- Citrus Heights Water District
- Del Paso Manor Water District
- El Dorado Irrigation District
- Fair Oaks Water District
- Folsom, City of
- Fruitridge Vista Water Company
- Golden State Water Company
- Lincoln, City of
- Orange Vale Water Company
- Placer County Water Agency
- Rancho Murieta Community Services District
- Roseville, City of
- Rio Linda / Elverta Community Water District
- Sacramento, City of
- Sacramento Suburban Water District
- San Juan Water District
- West Sacramento, City of

Dear Assemblyman Jeffries,

I am writing in response to your letter requesting support for AB 28, which would prohibit air quality management districts and air pollution control districts from adopting regulations that restrict the use of natural gas powered backup pumping equipment by water districts and other public agencies. I understand the importance of this issue to your constituents who face the threat of catastrophic fires, earthquakes and other natural disasters.

Although the equipment addressed in the bill is not widely used in the greater Sacramento Region, we appreciate and fully support your efforts to ensure that water agencies are able to provide services in the event of an emergency. Broader legislation that extends the proposal to any emergency equipment, regardless of fuel type (i.e. diesel, natural gas, gasoline, propane, E85, Bio-diesel, etc.) would benefit members of the Regional Water Authority (RWA). This equipment represents an important part of the infrastructure necessary to respond during an emergency in our region.

The Regional Water Authority represents 22 water purveyors and affiliated agency members in Sacramento, Placer, El Dorado, and Yolo Counties. These members strongly support taking steps to reduce emissions from their operations, but there are more effective ways to accomplish this than restricting the use of emergency equipment. Aside from operational checks and load tests requiring only a few hours of run time a year, the backup equipment in question is only needed in true emergency situations.

Most of the emergency generators utilized in the Sacramento area are powered by engines corresponding in size to those used by heavy construction machinery or long haul highway trucks. Presently, thousands of these type vehicles operate in the state on a daily basis with far less oversight. The cost of replacing serviceable equipment to respond to emissions restrictions would far outweigh the minimal benefit to air quality. Premature replacement may actually represent a greater environmental impact when the manufacture and transport of new equipment is considered.

Associates


- El Dorado County Water Agency
- Sacramento Municipal Utility District
- Sacramento Regional County Sanitation District

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We have an additional concern over the coverage of the bill. The current language does not include investor owned utilities in the list of water providers that would be covered by the legislation. We urge you to include all water purveyors in the proposed legislation.

Thank you for your consideration of our comments. RWA looks forward to working with you to craft effective legislation on this matter. If you, or your staff, have any questions, please contact me at (916) 967-7692.

Sincerely,



John Woodling
Executive Director
Regional Water Authority

Cc:

Senator Darrel Steinberg
Senator Dave Cox
Senator Lois Wolk
Senator Sam Aanestad
Assemblymember Ted Gaines
Assemblymember Dave Jones
Assemblymember Roger Niello
Assemblymember Alyson Huber
Assemblymember Dan Logue
Assemblymember Mariko Yamada
Ron Davis, Association of California Water Agencies