



# South Tahoe Public Utility District

anager  
Public Comment Solbrig  
Intended Use Plan (IUP)  
Deadline: 03/09/12 by 12:00 PM

Directors  
Chris Cefalu  
James R. Jones  
Randy Vogelgesang  
Kelly Sheehan  
Eric Schafer

1275 Meadow C  
Phone 530



CA 96150-7401  
www.stpud.us

March 8, 2012

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: 2011/2012 Intended Use Plan (IUP) for the Clean Water State Revolving Fund (CWSRF) Program**

Dear Ms. Townsend:

Thank you for the opportunity to comment on the 2011/2012 Intended Use Plan (IUP) for the Clean Water State Revolving Fund (CWSRF). The CWSRF is a valuable tool that allows critical wastewater infrastructure projects to be constructed in communities such as ours. Without funding provided by the CWSRF to construct much needed wastewater projects, the Lake's legendary clarity might suffer.

Currently, the South Tahoe Public Utility District (District) would be eligible for fifty percent principal forgiveness as more than fifty percent of our service area is, by SWQCB definition, a disadvantaged area and our projects would directly serve this area. While many might assume South Lake Tahoe to be an affluent area, the core year round and seasonal local population work primarily in the service industry (restaurant, hotel, etc.) and median income is well below state average median household income (MHI).

Of specific concern is proposed language that states, "at least fifty percent of the dwellings or dwelling units must be the primary dwelling of permanent residents for a community or community area to qualify for PF/Grants. Seasonal, migrant laborers can also be counted as permanent residents."

While South Lake Tahoe has a high percentage of out-of-town home ownership (approximately 60%) many of these homes are full-time rentals for the local residents. It is impossible to actually define that percentage as the District bills owners-of-record for water and wastewater service, not tenants. In a community with high proportion of service industry jobs, primary residence rentals are very common and represent a large percentage of the out-of-town ownership. It seems arbitrary to disallow the District to be eligible for SRF funding on the basis of a high percentage of out-of-town homeownership alone.

Further, due to the seasonal nature of the local economy (summer and winter tourist seasons), South Tahoe also has a significant number of seasonal employees that must find local homes to rent on a seasonal basis. This fact also pushes the percentage of primary dwelling units well past the fifty percent threshold.

Ms. Jeanine Townsend  
Page Two

Finally, the District's annual metered water usage data indicates less than 8% of all metered dwellings with zero water consumption which would be indicative a vacant or near vacant dwellings. This data supports the District's contention that a significant percentage of out-of-town ownership homes are, in fact, full-time rental homes for permanent South Tahoe residents.

On the basis of the unique nature of home ownership within the Tahoe Basin, the District respectfully requests the language be eliminated or additional language that would allow exemption for tourist based economies similar to the Lake Tahoe Basin.

I would welcome the opportunity to discuss the unique challenges of tourist-based resort economies with the Board if that might better clarify the District's concerns.

Respectfully,

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

Eric Schafer  
President, Board of Directors