



State Water Resources Control Board
Felicia Marcus, Board Chair
Thomas Howard, Executive Director
Jeanine Townsend, Clerk to the Board
1001 I Street, 24th floor
Sacramento CA 95814



Sent: Via email December 2, 2015

Subject: **Comment Letter – Urban Water Conservation Workshop December 7, 2015**

Dear Chair Marcus, Mr. Howard, and Ms. Townsend:

The **Tahoe City, South Tahoe, North Tahoe and Truckee Donner** Public Utility Districts (**Tahoe-Truckee Urban Water Suppliers**) formally submit these joint comments regarding the SWRCB's consideration of extension and modification of the existing Emergency Regulations for Statewide Urban Water Conservation (Emergency Regulations). These comments address a major inequity in the current regulations relating to sustainable groundwater supplies and suggest modifications to how targets are set for small communities whose use is dominated by weather and transient populations.

The Tahoe-Truckee Urban Water Suppliers comments are in response to the SWRCB's question: **What elements of the existing Emergency Regulations, if any, should be modified in an extended Emergency Regulation?** Our comments and requested actions are based on four key areas and apply to all signatories of this comment letter:

1. In the 2015 Emergency Regulations, water providers who were able to prove that they do not import water and have at least 4-years of surface water supply were allowed to reduce their conservation target to 4%. Water suppliers with sustainable ground water extraction should be treated the same. ***The SWRCB should give ground water supplies that are being extracted at a rate below the average annual recharge the same consideration as surface water supplies with more than 4 years in reserve (4% target);***
2. The Tahoe-Truckee region has adequate water supply as documented by numerous hydro-geologic studies, Urban Water Management Plans (UWMP's), and Ground Water Management Plans (GMP's). Furthermore, the TOTAL water usage in the Tahoe-Truckee Region is well below 20,000 acre-feet per year which is statistically insignificant compared to California's total water usage and which is spread out over a large number of small water systems (including the Tahoe-Truckee Urban Water Suppliers). ***The SWRCB should consider a default target of 4% for smaller water systems with sustainable water supplies;***

3. Residential gallons per capita per day (R-GPCD), as currently used by the SWRCB, overstates water use for communities who have large transient populations and who have zero outside irrigation during the late fall-winter-early spring (6+ months per year). Furthermore, using only June through September consumption to establish R-GPCD/Conservation Tiers unfairly penalizes regions with short irrigation periods. ***The SWRCB should consider setting winter targets based on in-door use only (8%, see previous letter emailed to SWRCB on October 23, 2015) and/or use a full 12-month period of usage to establish R-GPCD;*** and
4. Unlike other areas of the State with more permanent populations, water usage in the Tahoe-Truckee region is highly variable and dominated by climate, occupancy of homes, visitor days, and the economy. A winter of heavy snow and cold temperatures will increase the transient population, encourage snowmaking, and grow the economy; all of which would cause indoor water use to rise and the ability to hit the conservation targets unrealistic. ***The SWRCB should consider a regions climate when setting conservation targets and provide a mechanism to account for growth when evaluating performance.***

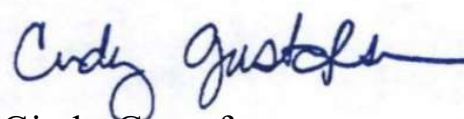
Please consider these comments and requests for the entire Tahoe-Truckee region, including the many smaller water agencies, who have adequate water supplies and whose water usage is dominated by climate and transient populations. We respectfully ask that you continue to consider the unique factors of our region as you consider future regulations.

Please do not hesitate to contact any of us should you have any questions or if you require additional information. We greatly appreciate your attention to the issues brought up by the Tahoe-Truckee Urban Water Suppliers.

Regards,



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Truckee Donner Public Utility District



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