



January 6, 2016

State Water Resources Control Board
Felicia Marcus, Board Chair
1001 I Street, 24th floor
Sacramento CA 95814

Sent: Via email January 6, 2016

Subject: State Emergency Regulations

Dear Chair Marcus:

Once again, the Tahoe/Truckee Urban Water Suppliers are submitting joint comments to strongly request your consideration of the unique circumstances that challenge our agencies and our customers with the current emergency regulations and the proposed revisions. We sincerely appreciate you and your staffs' outreach efforts, yet have struggled to feel heard through the process. While our water use is of very limited impact on the State, our agencies' reputations and our customers reputations are extremely important to each of us. We ask again for your consideration of the unique circumstances that dramatically affect water use in our region.

Climate Adjustment – The Draft Framework contains a proposed methodology for recognizing the diverse climate of the State. We are very appreciative that the Board is considering it and we fully support this adjustment. However, as communicated previously, our region has no outdoor irrigation for more than half the year and the proposed climate adjustments fall well short of realistic winter targets for our region.

Snowmaking Exception – We again request that water used for snowmaking at ski resorts be included in the agricultural exception using the same certification standards. The Emergency Regulations subtract water for use under Government Code Section 51201 Subdivision (b). The revised regulations continue to allow for this exception if there is a certification that the customers whose water use is subtracted produce a minimum of \$1,000 per year in revenue. The recreational use of land is recognized as beneficial in this same Government Code Section. Snowmaking is an absolutely critical component to our winter-time economy and is beneficial to both the environment and the State's water resources. Additionally, per the Truckee River Operating Agreement, 84 percent of the water used for snowmaking is returned to the watershed. Charging our agencies 100 percent for 16 percent use is unreasonable and arbitrary.

Extreme Fluctuations in Populations Served – Each residential water connection we serve pays water rates year-round, and has the ability to use their home as they choose. We appreciate the flexibility your staff has shown in working with us individually to establish reasonable population numbers, but none of these systems truly validate the tremendous variations in occupancy we experience.

As we expected, the number of visitors to our region during Thanksgiving and all the way through the New Year holiday were extraordinary this year. Snow conditions led to exceptional winter recreation conditions. Occupancy of homes that are generally vacant many months of the year far surpassed 2013 numbers for the same period and thus our conservation results may appear to be dismal. The truth is that none of us can definitively determine whether these are dismal results or are in fact tremendous conservation results without knowing the number of people staying in the homes served.

We urge you to continue to consider “per capita” in ways that don’t reflect negatively on the small areas of the State that experience such dramatic fluctuation in population, and water use, driven by weather and the economy.

We once again thank you for the opportunity to submit comments and sincerely hope that our efforts to document our situation will be considered as you deliberate appropriate revisions to the emergency regulations.

Sincerely,



Michael D. Holley
General Manager
Truckee Donner Public Utility District



Cindy Gustafson
General Manager
Tahoe City Public Utility District



Richard Solbrig
General Manager
South Tahoe Public Utility District



Duane Whitelaw
General Manager
North Tahoe Public Utility District

Cc: Dave Boland, ACWA
Danielle Blacet, CMUA
Max Gomberg, SWRCB
Eric Openheimer, SWRCB