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SOUTH TAHOE PUBLIC UTILITY DISTRICT COMMENTS ON THE PROPOSED STATE MANDATED WATER REDUCTIONS

The South Tahoe Public Utility District (District) has a number of comments on the methodology, applicability, and resulting value of the proposed State mandated water reductions. As defined, the regulations ignore the actual customer base served by the District and they do not take into consideration:

- The unique environmental and regulatory constraints that exist in the Tahoe Basin
- The recent efforts and results of the water conservation program already in place at the District
- Weigh the benefits of further water conservation efforts versus the resulting impacts to the community of those efforts.

Lake Tahoe is a tourist based economy with a visiting population in both winter and summer that swells the number of people served multiple times more than the permanent resident population. The vast number of hotels, motels, restaurants, camp grounds, parks, and vacation rentals all serve this expansive customer base and are customers of the District. The local ski area is also a prime draw for visitors from all over the world during the winter and is also a customer of the District. In fact, they are the largest water customer, due to their snow making operation, much of it being supplied by the District. The local economy is a service based economy for all of these visitors, and is actually a disadvantaged community per California income standards, having a median income of less than 80% of the State median income. The formula used to promulgate the proposed reductions uses total water production divided by the permanent resident population to arrive at a gallon per capita per day figure (189) for the Districts' service area. The entire tourist population is ignored. As a result, the District has been placed in the highest group of water users, which results in a reduction requirement of 35%.

Lake Tahoe's environmental setting is unique in many respects and at the same time fragile; therefore, a number of environmental regulations have been put into place for its protection. To protect lake quality, an extensive array of erosion control measures has been established by the Tahoe Regional Planning Agency such as the 50% vegetative cover requirement for properties. Most of these measures are vegetation based and depend upon irrigation to establish and maintain the health of the vegetation that is holding the soil in place, filtering sediment from surface flow. The State of California is utilizing vegetated infiltration basins to minimize pollutant carrying runoff along its highways in Tahoe. In order to reduce nutrient loading on the Lake, all recycled water has been required by the State of California to be exported out of the basin, thus making recycled water unavailable to replace potable water for irrigation. One hundred percent of this recycled water is used for agricultural operations in Alpine County supporting cattle ranching operations.

Lake Tahoe is located within pine forests, which requires the community to live with the ever present danger of forest fires. As part of this fire danger culture, many property owners have designed landscaping as a green zone of lowered flammability for protection. A sudden and dramatic reduction in water available for maintaining these landscapes, without providing the time to properly redesign them, would greatly increase the susceptibility of these structures to fire danger at the same time as the danger of a forest fire is increasing due to the drought.

Lake Tahoe sits in the middle of a drainage basin with surface runoff, surface tributaries, and ground water basins flowing into it. Outflow is the Truckee River, over a dam when the lake level is high enough, with the flow going east into Nevada. The current drought has lowered the lake level by more than five feet impairing things like boat launching activities and expanded greatly the size of beaches. Correspondingly, ground water elevations have lowered at a rate of 1.5 feet per year of the drought. The reduction in water supply available has been very minimal (the District relies on ground water for 100% of its supply) and the ground water basins is not in an overdraft condition.

Current water conservation programs that were put into effect in 2007 have lowered water production since then by over 27%. The formal goal under the Sustainable Ground Water Management Act (the District has organized a stakeholders advisory group, has updated its Ground Water Management Plan, and will be stepping forward as the Ground Water Sustainability Agency (GSA) for the Tahoe Valley South Ground Water Basin) is to manage the state's ground water resources in a sustainable manner. As a GSA, the District will also be working to ensure this goal will be met.

The currently proposed reduction of 35% may slow the rate ground water elevation decline resulting from the current drought. However, as the Tahoe Basin is part of the Truckee River Watershed which drains into Nevada, no benefit to the Sacramento Delta or Central Valley farming is available. Even downstream users along the Truckee River in Nevada will not benefit from a slight reduction in the rate of ground water elevations decline in the Tahoe Valley South Basin. Thus, the rationale for imposing extreme water supply reduction requirements that may have severe negative impacts on the local economy, fire protection efforts along the wildland urban interface, and environment, while ignoring the ongoing water conservation efforts of the District and the reality of the actual customer base served, is questioned.

Sincerely,

Richard Solbrig

Richard Solbrig
General Manager/Engineer