

Dear Ms. Bean-

Thank you for the opportunity to comment on the draft water regulation framework. No one disputes that California is experiencing a horrendous drought and the Town of Truckee supports appropriate statewide action to conserve water. However, it is important to note that the "per capita water use" methodology that results in the required water conservation amount is fundamentally flawed and needs to be swapped for a metric that makes sense and is legally supportable.

Within the 34 square mile city limits of the Town of Truckee there exists approximately 13,000 housing units. Of these, slightly more than ½ are owned as second homes or vacation homes. These homes tend to be heavily occupied in the summer months and during winter weekend and holiday periods and the visitors to these homes use water when they are here. However, the people that occupy these homes are not residents of our community as they actually "reside" somewhere else- most of them in the greater Bay Area and Sacramento Valley region. Since they are not counted as Truckee "residents" they are not calculated in your formula for per capita water use. According to the State Department of Finance, Truckee has 16,000 residents that live in just under 50% of our 13,000 housing units. In terms of water use, during high visitation periods (summer, winter weekends, winter holiday periods) Truckee has a water using population of 35,000 to 40,000 people and not the 16,000 residents that your estimate of our per capita water usage is based upon. This factor is supported by other information like sewer flows which are measured by the Truckee Sanitary District whose data corroborates the 2 to 2.5 increase in sewer flows during periods of heavy visitation from our second home owners.

A small change to your methodology would address our concern. Simply swapping water used per capita for water used per housing unit would wash out the anomaly that exists in Truckee and in many other second home communities in California and get to a fair and appropriate measure of water use per person. This simple change to the calculation would likely move Truckee from a 35% mandatory conservation area to a 25% conservation area which appears reasonable based upon the significant conservation that our purveyor, the Truckee Donner Public Utility District, working collaboratively with the Town and others has achieved over the last 10 years.

Thank you for considering my comments. Should you have any questions, please contact me.

Tony Lashbrook
Truckee Town Manager

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