

SOUTH TAHOE PUBLIC UTILITY DISTRICT COMMENTS
ON THE
PROPOSED TEXT OF EMERGENCY REGULATION
DROUGHT EMERGENCY WATER CONSERVATION

April 22, 2015

The South Tahoe Public Utility District (District) is a strong supporter of meaningful water conservation efforts. The mandated water conservation measures, if applied to the District, will have no quantifiable effect on water shortages felt in any California community. In fact, if the District were to completely stop water production, it would still have no effect on water shortages in other communities. Establishing mandated water conservation measures for all urban water suppliers without first determining that the conservation will achieve the goal of relieving water shortages in the greater South Lake Tahoe area or other communities is just poor governance. One size does not fill all. Conservation measures should be deployed to urban water suppliers so the measures can be tailored to the needs of each geographic area and actually achieve desired effect of reducing water shortages. South Lake Tahoe is not in a water shortage condition as is much of California. Below is a description of the conditions within the District followed by a requested change to the Proposed Text of Emergency Regulation for Drought Emergency Conservation.

The District's Past Conservation Measures Have Maintained
a Healthy and Well-Managed Ground Water Basin

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 Tahoe water level by approximately five feet, impairing things like boat launching activities and expanded greatly the size of beaches. Except for evaporation, Lake Tahoe's water level cannot be further reduced once it has reached the outlet rim. Ground water elevations in the Tahoe Valley South groundwater basin have lowered at an approximate rate of 1.5 feet per year during the drought. The reduction in available water supply from this decline has been negligible. Even though the District relies on ground water for 100% of its supply, the ground water basin is not remotely near an overdraft condition. This is largely due to the District's current aggressive water conservation programs that were put into effect in 2007, which have lowered water production since then by more than 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 for the Tahoe Valley South Groundwater Basin) is to continue to balance demand with recharge for the basin. The District's decreased water production trend since 2007 indicates that this goal has been achieved.

Further Water Conservation Will Not Provide Any Tangible Benefits

The currently proposed water production reduction of 36% for the District will only produce a marginal slowing of the rate ground water elevation drop. Since the Tahoe Basin is not in the California water shed there is no benefit to the Delta, Central Valley nor, for that matter, any other part of California. Even downstream users along the Truckee River in Nevada will not benefit from a slight increase in the ground water elevations in the basin. With the water supply of the District coming from ground water

wells that are hundreds of feet deep, ground water elevation monitoring has shown that the District's water supply is essentially immune to the significant impacts from the current drought that are being experienced in other parts of California. Thus, the rationale for imposing extreme water supply reduction requirements that will have severe negative impacts on the local economy and environment, while ignoring the ongoing water conservation efforts of the District, is unnecessary and unsupportable.

Revisions to the Proposed Regulations

The District requests that the proposed regulation be revised to take into account the conditions described above. We propose that the following language be added to Section 865 "each urban water supplier whose source of supply is exclusively groundwater and whose source groundwater basins are not in an overdraft condition and who have reduced their total water production by more than 25% since 2007, submit for Executive Director approval a request to reduce its total water usage to 8% for each month as compared to the amount used in the same month in 2013. Any such request shall be accompanied by information showing the supplier's sources of supply, that the basin is not in overdraft, and the amount of total water production compared to 2007. "

Conclusion

Thank you for your consideration of our comments, and should the Board or staff have any questions, please do not hesitate to contact me at (530) 543-6201.

Sincerely,



Richard Solbrig
General Manager/Engineer
South Tahoe Public Utility District