May 1, 2015

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor Sacramento, CA 95814

RE: Comment Letter – Emergency Conservation Regulation

Dear Ms. Townsend,

On behalf of the Tahoe City Public Utility District customers, Board or Directors, and staff, I would like to thank the Water Board and Water Board staff for their tremendous efforts over the last several weeks. We certainly recognize and appreciate the required efforts in drafting revised regulations, providing critical outreach and response to stakeholders and reviewing and integrating comments into the latest draft. The Tahoe City Public Utility District (District) appreciates the opportunity to continue to provide feedback and comments on the latest draft revisions.

The Tahoe City Public Utility District provides both groundwater and Lake Tahoe surface water supplies to its customers. While groundwater is currently the primary supply, surface water from Lake Tahoe was the sole source of water supply for the District prior to 1993. Since the development of groundwater, many of the District's surface water intakes have remained idle, but operable, in the event of a natural disaster, groundwater depletion, or other unforeseen events. The use of the lake intakes in emergency situations is well documented in the District’s Water System Emergency Response Plan, which has been approved by the Division of Drinking Water. The District has also maintained all of its prior water rights in good standing with the Division of Water Rights. Even at the lowest recorded surface elevation in history, Lake Tahoe remains a long term and reliable source of water to water suppliers and users with access and adequate water rights.

With regards to Section 865 [c] (2), we encourage Water Board staff to revise the language to allow applications to be considered from suppliers whose sources include either groundwater, surface water or both types of supplies, whose supplies are not imported from outside the supplier's hydrologic region, and can demonstrate a minimum of four years of reserve supply.

The District remains committed to meeting the goals of the final adopted regulations and improving upon its conservation performance of a 41% reduction in overall production in both 2014 and 2011 as compared to 2002. Again, we appreciate the Water Board and staff's time and efforts during this critical time in California history. Should you have any questions, please contact Tony Laliotis, Director of Utilities at (530) 580-6053 or by email at: taliotis@tcpud.org.

Sincerely,

Cindy Gustafson  
General Manager