

SOUTH TAHOE PUBLIC UTILITY DISTRICT COMMENTS  
ON THE  
PROPOSED TEXT OF EMERGENCY REGULATION  
DROUGHT EMERGENCY WATER CONSERVATION  
May 4, 2015



As indicated in our April 13th and April 22nd comments and for the reasons stated in those comments, the mandated water conservation measures, if applied to the South Tahoe Public Utility District (District), will have no effect on water shortages felt in this or any other community or industry. Conservation measures should be deployed to urban water suppliers where the measures will have the desired effect of reducing water shortages. Even though the District's supply is 100% groundwater, the groundwater basin has not been over-drafted despite the current or past droughts.

The District supports meaningful conservation measures and appreciates the Board allowing us to correct our previous calculations of R-GPCD. The District's water conservation program has been in place since 2007 and includes outside watering restrictions and an ongoing turf buyback program. This program will continue even after the current drought is over. While these conservation measures are appropriate for our community and to protect our water supply, the mandated water production reduction of 28% will not benefit anyone, but rather cause unnecessary economic and other hardships, all as explained in our previous comment letters.

We strongly encourage you to incorporate language in the regulations which will allow urban water suppliers, that are supplied by a verifiably stable ground water source(s), to apply to the Executive Director for an "in lieu" reduction similar as currently provided in Section 865 (c)(2). We suggest you consider two alternatives to accomplish this approach. In Section 865 (c)(2), we suggest deleting the word "groundwater or" in lines 9 and 10. We recognize, however, that this deletion may have broader implications than may be intended to address the District's situation. As an alternative, we suggest adding a new section similar to Section 865 (c)(2) that reads as follows:

"Each urban water supplier whose only source of supply is from groundwater in which the urban water supplier is located, and that has a minimum of four years' reserved supply available within the total groundwater in storage and the projected total water production is within the basin's sustainable yield may, submit to the Executive Director for approval a request that, in lieu of the reduction that would otherwise be required under paragraphs (3) through (10), the urban water supplier shall reduce its total potable water production by 4% for each month as compared to the amount used in the same month in 2013. Any such request shall be accompanied by information showing that the supplier's groundwater supply has a minimum of four years' reserved supply available within the total groundwater in storage and the projected total water production is within the basin's sustainable yield. "

Thank you for your consideration of our comments, 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