



South Tahoe Public Utility District

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May 13, 2016

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814-2828

Subject: Proposed Changes to Emergency Conservation Regulations

Dear Chair Marcus:

The South Tahoe Public Utility District (STPUD) appreciates the opportunity to comment on the May 2016 Proposed Changes of the Emergency Water Conservation Regulations.

South Tahoe Public Utility District thanks the State Water Resources Control Board (SWRCB) for its actions to address what was a statewide emergency, and its recognition that the drought conditions have improved for significant portions of the state. Put succinctly, STPUD believes that hydrologic and hydrogeologic conditions in the Tahoe Basin support the rescission of the emergency regulations for local water purveyors that rely on this watershed. However, understanding the varying conditions across the state and the complexity of a statewide regulation, the proposed self-certification process, as proposed by SWRCB staff, is a reasonable compromise and appropriate action that we support.

South Tahoe Public Utility District is a California Special District that serves retail and wholesale treated water to customers in El Dorado County in the Lake Tahoe Basin, including the City of South Lake Tahoe. 100% of STPUD's water is extracted from the Tahoe Valley South basin. The community's water demand and the condition of the groundwater basin are such that there are decades of stored water supply available; and therefore, we expect that STPUD will not have any conservation requirement once the calculations and analysis are complete under the proposed regulation changes.

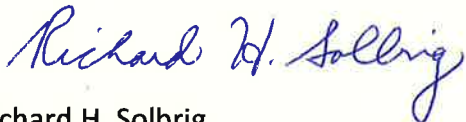
However, we have heard that some entities are proposing that a minimum conservation requirement be established for all Urban Water Suppliers. South Tahoe Public Utility District strongly opposes this position as we believe that water management is a matter of supply and demand. Water should be managed at the local level and not by arbitrarily set targets.

South Tahoe Public Utility District reflects the values of our community, and conservation and preservation of the environment are at the top of those values. Before the mandatory conservation requirements, STPUD's customers cut their water consumption by 27% between 2007 and 2014. STPUD's ongoing water conservation program includes limiting landscape watering to three days per week, a turf buyback program, water efficient appliance rebates, irrigation efficiency evaluation and rebates, leak notification and detection assistance, and community education programs. These programs were in place before the Emergency Water Conservation Regulations, and they will be in place after the drought is over and the regulations are rescinded. Establishing an arbitrary conservation target is unnecessary and it sends the message to the Urban Water Suppliers and to our communities that the SWRCB knows better and does not trust us to manage our local resources.

South Tahoe Public Utility District thanks the SWRCB for its actions to address what was a statewide emergency. I trust STPUD customers will continue their efforts to be as efficient with their water use as possible, and I know many have made permanent changes in their water use, which will help the District achieve its long-term water conservation goals. We request that you approve the changes to the regulations proposed on May 9th, and reject requests for establishing a minimum conservation requirement.

Sincerely,

SOUTH TAHOE PUBLIC UTILITY DISTRICT



Richard H. Solbrig
General Manager/Engineer

c: STPUD Board of Directors
John Kingsbury, Mountain County Water Resources Association
Ken Payne, El Dorado County Water Association