



For Your Review

Truckee Donner Public Utility District

Directors
Joseph R. Aguera
Jeff Bender
Bob Ellis
Tony Laliotis
Paul Warmerdam
General Manager
Michael D. Holley

April 13, 2015

Sent via e-mail to Jessica Bean at Jessica.bean@waterboards.ca.gov

RE Comments on the Proposed Drought Regulatory Framework in response to Governor Brown's Executive Order dated April 1, 2015

California State Water Resources Control Board:

Truckee Donner Public Utility District (TDPUD) requests that the SWRCB consider an alternate calculation for TDPUD's Residential Gallons Per Capita Daily (RGPCD). The calculation used in recent SWRCB regulatory reporting, and proposed in the framework for tiers, does not accurately reflect Truckee's residential water use per person. Truckee's full-time population is ~16,000 but over half of our housing units are 2nd homes and we have a large number of visitors year-round. The RGPCD listed for TDPUD is based only on our full-time population and dramatically over-states TDPUD's actual RGPCD.

TDPUD's service area includes the Town of Truckee as well as unincorporated areas of Nevada and Placer Counties. The actual population for the TDPUD service area on any given day is 2-3 times the State reported population and exceeds our full-time population year-round. Due to the transient nature of the TDPUD's service area population, determining population during any particular reporting month is a formidable task.

If it is determined that the proposed SWRCB RGPCD metric shall be incorporated into the final rule, TDPUD respectfully requests approval for a revised methodology to accurately calculate TDPUD RGPCD. The TDPUD request is based on the following information:

- Since the monthly GPCD reporting requirement began in October of 2014, the TDPUD has been reporting a population of 16,280 (California Department of Finance published population

adjusted to include estimated populations in unincorporated areas), as directed by the SWRCB reporting tool.

- The actual population for the TDPUD service area on any given day is 2-3 times the State reported population, depending on the time of year and weather conditions. Based on the California Department of Finance estimates the vacancy rate (proportion of permanent to 2nd home) at approximately 50.5%. As indicated below, local public data indicates that the percentage 2nd homes is actually higher:
 - TDPUD electric rate data shows that over 60% of our customers are not full time residences and are on the TDPUD secondary rate (S10); and
 - Truckee Sanitary District (TSD), the local sewer service provider, has been tracking flow data for years (See Attachment 1). This data clearly shows a base level of usage (i.e. full-time population) and then 52 peaks (i.e. population increases each weekend) along with larger usage during peak tourist seasons). The TSD data independently confirms the dramatic increase in population during due to our TDPUD's large number of 2nd homes and visitors.
- Current RGPCD has artificially inflated the TDPUD September 2014 GPCD to the high end of the scale (247 RGPCD) and into the SWRCB proposed Tier 4 (35% standard).
- TDPUD is not currently experiencing a water shortage but has reduced water production by over 30% since 2006. A very strong argument can be made that an extreme burden of conservation will be placed upon the TDPUD having been inaccurately categorized based on the SWRCB's current RGPCD metric.

As an alternative means to the California Department of Finance published population numbers, the TDPUD proposes to utilize 2010 Census Year Population to calculate "Persons per Residential Connection", in an effort to more accurately estimate the service area population. Based on the publicly available data, the following conservative revisions to the currently reported RGPCD are requested:

- Methodology for calculating current population be revised to utilize 2010 Census Year occupancy data:

Total Housing Units (12,803) x Persons Per Household (2.56) = 32,776 pop.

- The TDPUD September 2014 reported 247 GPCD be changed to 123 GPCD:

11570 Donner Pass Road, Truckee, CA 96161 – Phone 530-587-3896 – www.tdpud.org

$$\frac{\text{Total Monthly Water Production (151 MG)} \times \text{\% Residential Use (80\%)}}{\text{Population Served (32,776)}} = 123 \text{ GPCD}$$

The proposed revised methodology for conservatively calculating population within the TDPUD service area, based on the readily available data, clearly provides a more accurate representation of the monthly reported RGPCD. The TDPUD respectfully requests that SWRCB consider TDPUD's unique situation when adopting the new drought regulations. If the SWRCB requires any additional information to further clarify the above outlined request, please feel free to contact our office at any time.

Sincerely,

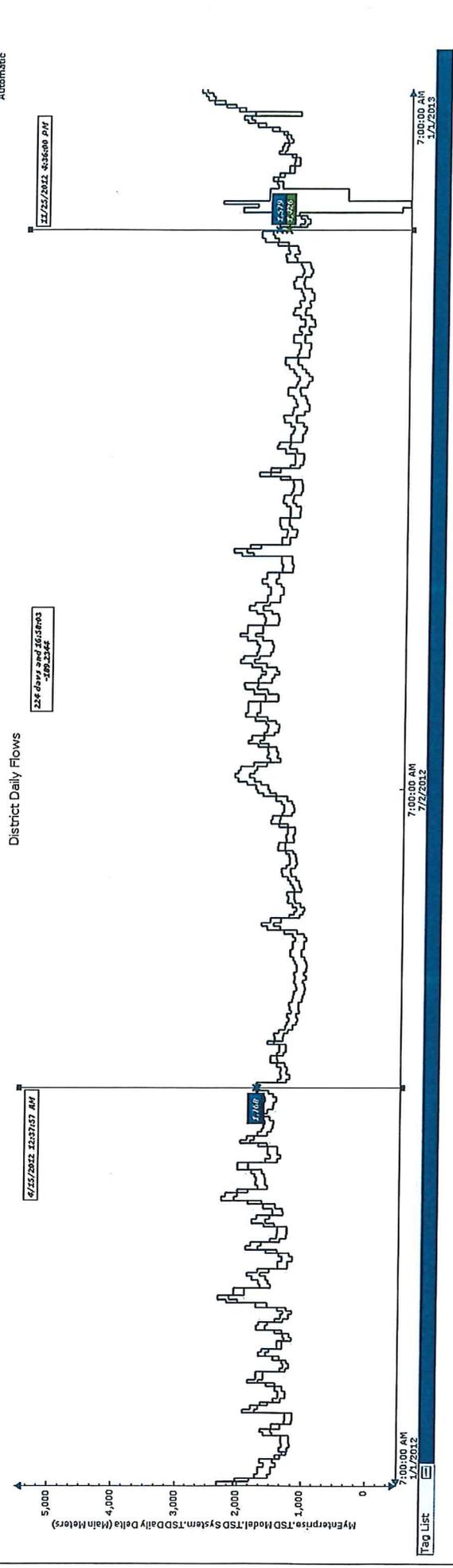


Michael D. Holley
General Manager

TSD Daily Flows 2012

Definition: District Daily Flows

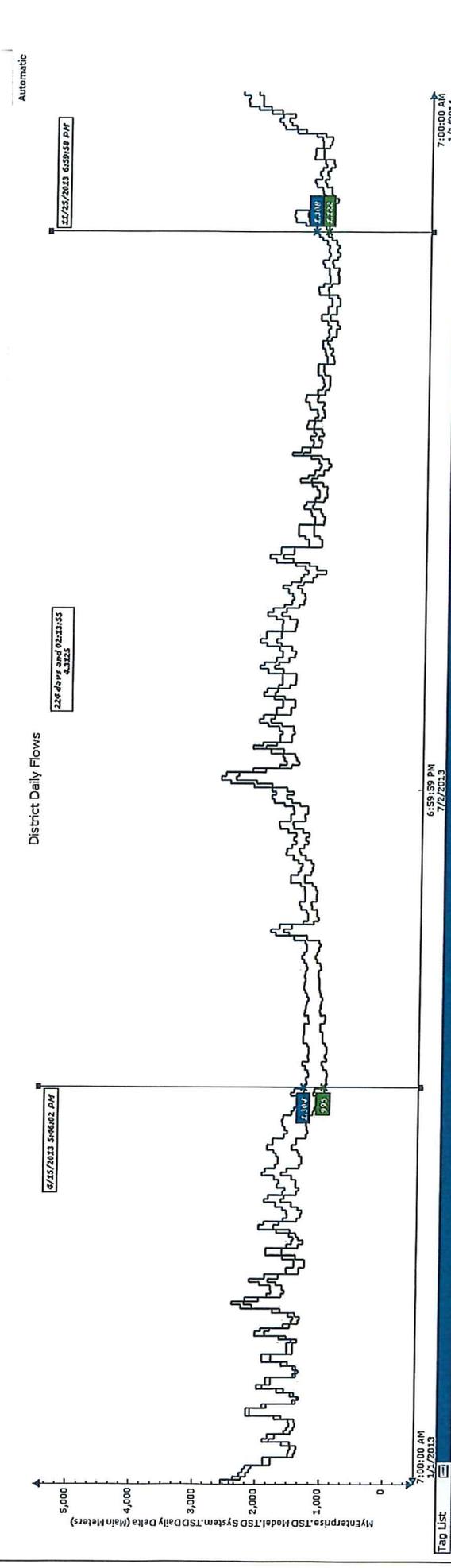
1-1-2012 7:00:00 AM 1-1-2013 7:00:00 AM 246 Days and 10:00:00



TSD Daily Flows 2013

District Daily Flow

Definition: District Daily Flows
 1-1-2013 7:00:00 AM 1-1-2014 7:00:00 AM 287 Days and 0:00:00
 Automatic



TSD Daily Flows 2014
 District Daily Flow
 Definition: District Daily Flows
 1-1-2014 7:00:00 AM 1-1-2015 7:00:00 AM 365 Days and 00:00:00
 Automatic

