



April 29, 2015

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comments regarding Allowing Water Suppliers Whose Supplies Include Groundwater to Apply for Inclusion into the 4% Reserve Tier

The proposed emergency drought regulation includes an exception that allows certain urban water suppliers to be placed into a lower conservation tier if they have a reserve supply of surface water that could last at least four years. Suppliers that also rely on groundwater are currently excluded.

The Lake Arrowhead Community Services District relies mostly on surface water from Lake Arrowhead for its water supply. The District has recently developed groundwater to supplement its total water portfolio which reduces the need to purchase state water. These wells are located in an isolated basin in fractured rock. They recharge naturally and are hydrologically independent from any other water supply.

We would encourage the board to consider allowing suppliers with at least four years of their own surface water supply to be eligible for the 4% tier if their groundwater production is independent from other suppliers and recharges naturally. All sources of water must be utilized in an efficient and responsible manner, especially during drought. Groundwater can provide an additional source of supply that reduces dependence on state water supplies.

Your consideration is appreciated,

A handwritten signature in black ink that reads "Leo Havener".

Leo Havener

General Manager
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