



Big Bear City Community Services District

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April 30, 2015

California Water Boards



Subject: Comment Letter – Emergency Conservation Regulation

Dear State Water Board,

The Big Bear City Community Services District (BBCCSD) appreciates the opportunity to submit comments regarding the proposed Emergency Conservation Regulations. BBCCSD's service area is located in the Bear Valley (8-9) water basin, which is located in the San Bernardino Mountains. BBCCSD and City of Big Bear Lake, Department of Water and Power (BBLDWP) are the two urban water suppliers in the Bear Valley. There are scattered private wells within the Bear Valley but they are minor producers. BBCCSD and BBLDWP are not connected to the State Water Project and we do not import water from outside of our hydrologic region. One hundred percent of the recharge to our local aquifers is from rainfall and snowmelt within our watershed. ***Water resources planning and development in the Bear Valley Basin does not impact water supplies anywhere else in the State.***

In 2002, BBCCSD's and BBLDWP's annual production was 4,276 acre feet, which was approaching the estimated perennial yield of 5,500 acre feet per year. BBCCSD and BBLDWP evaluated imported water supply alternatives but they were cost prohibitive. So in 2002, BBCCSD and BBLDWP began aggressive water conservation programs. The community worked together with BBCCSD and BBLDWP and the water conservation programs have been very successful. BBCCSD's and BBLDWP's average water production over the last five years was 3,286 acre feet per year (see Attachment No. 1), which is a 23% reduction from our production in 2002 and is only 60% of our estimated perennial yield.

Even though the Bear Valley has received below average annual precipitation over the last four years, our ground water levels are stable. BBCCSD and BBLDWP have been closely monitoring ground water levels in our aquifers (see Attachment No. 2, Hydrographs), are part of the Department of Water Resources CASGEM project, and our ground water levels are stable, which is another indication that our water production is safely below the estimated perennial yield.

BBCCSD has reviewed the April 28, 2015, "Proposed Text of Emergency Regulation" and respectively submits the following comments:

Section 865 (c) (2):

BBCCSD requests the State Water Board consider revising Section 865 (c) (2) to allow water suppliers whose supplies include groundwater or surface water, supplies that are not imported from outside the water

supplier's hydrologic region, and can demonstrate that they have a minimum of four years' reserved supply available be allowed to submit a request to the Executive Director for approval to be placed in the 4% reserve tier.

Section 865 (c) (3-10)

BBCSD requests the State Water Board consider revising Section 865 (c) (3-10) to increase the number of tiers (2% per tier in lieu of 4% per tier) in the Conservation Standard table to provide further refinement in the water-use reduction obligations to urban water suppliers.

BBCSD appreciate the State Water Board's time and consideration in reviewing our comments. If you have any questions, please call Scott at (909) 585-2565.

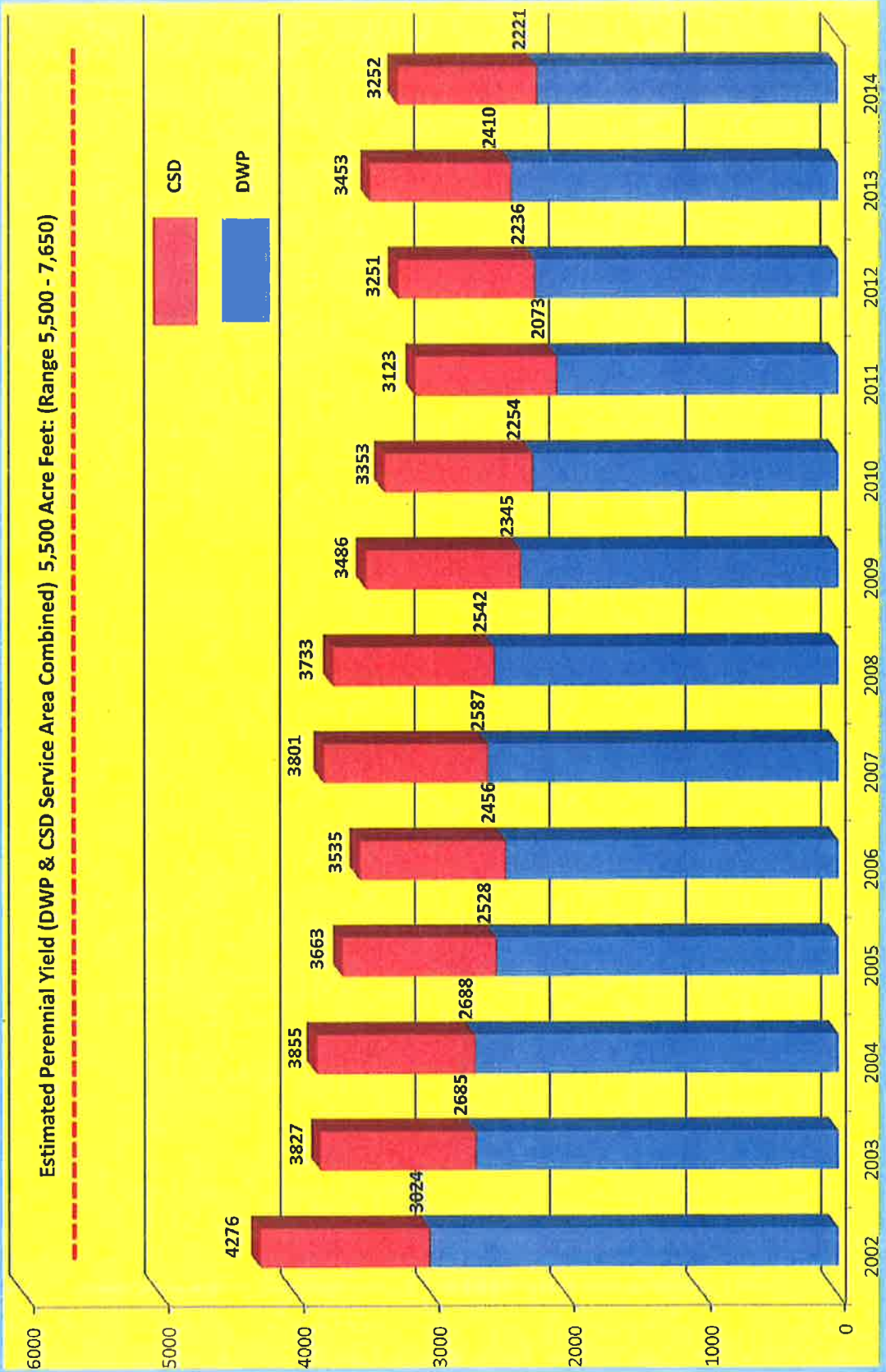
Thank You.

Sincerely,

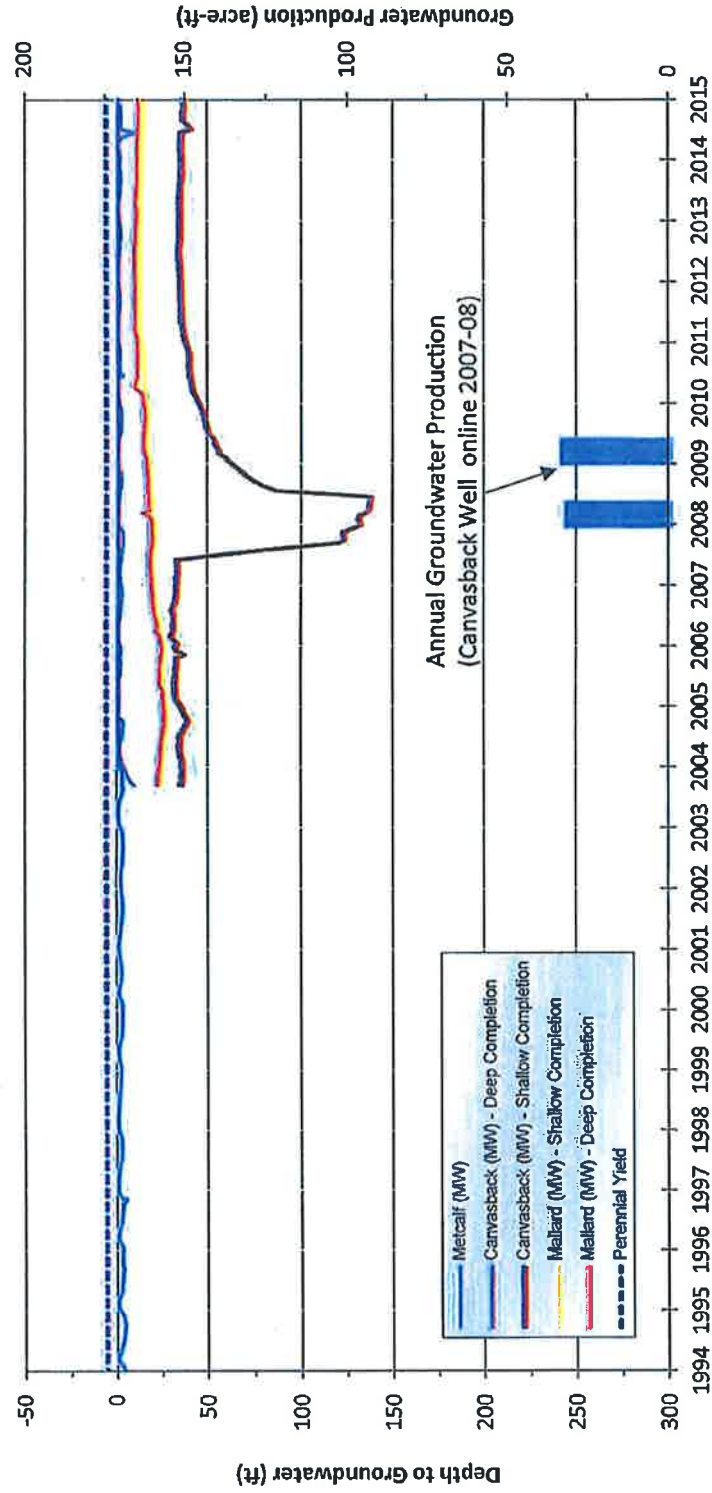
A handwritten signature in blue ink, appearing to read "Scott Heule", written in a cursive style.

Scott Heule
General Manager, Big Bear City Community Services District

DWP & CSD Annual Production Water Year (July 1 to June 30) Acre Feet



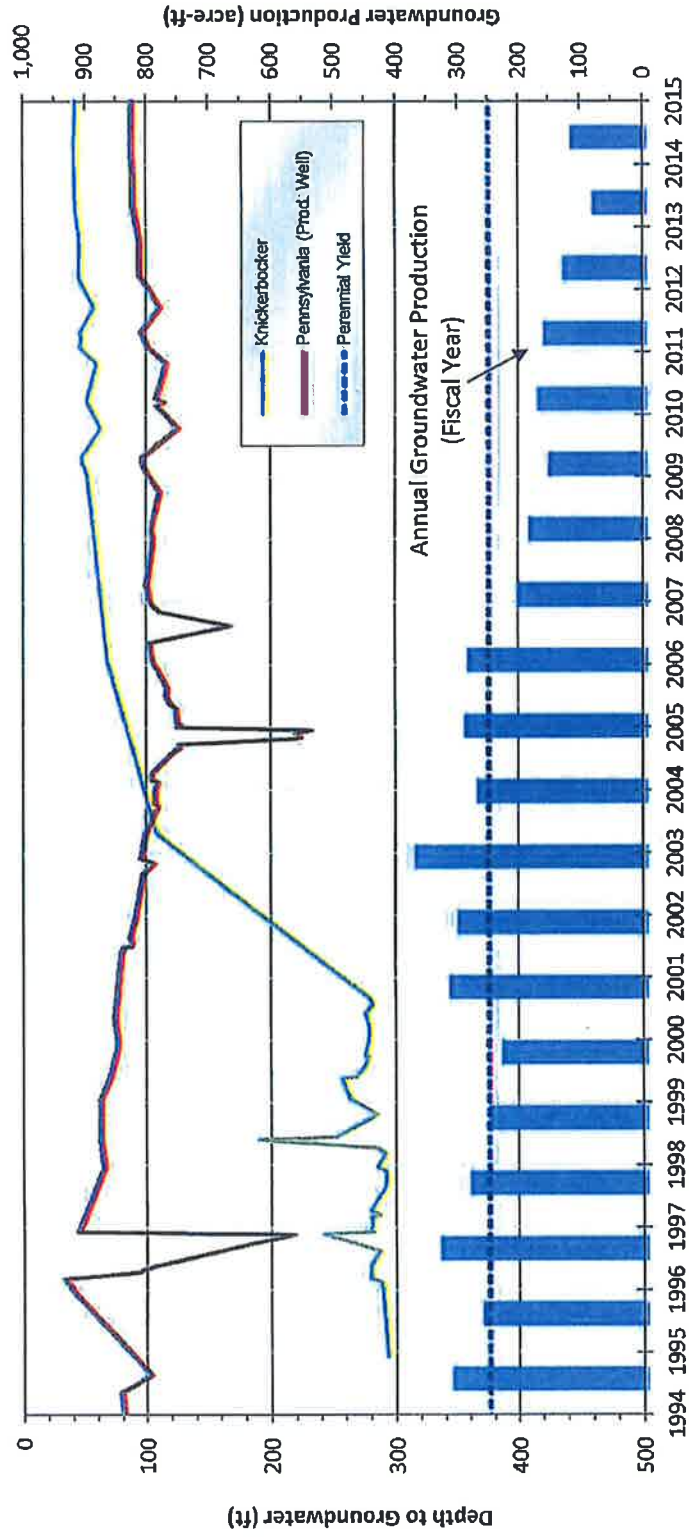
Mill Creek Hydrologic Subunit
 Depth to Groundwater vs. Groundwater Production



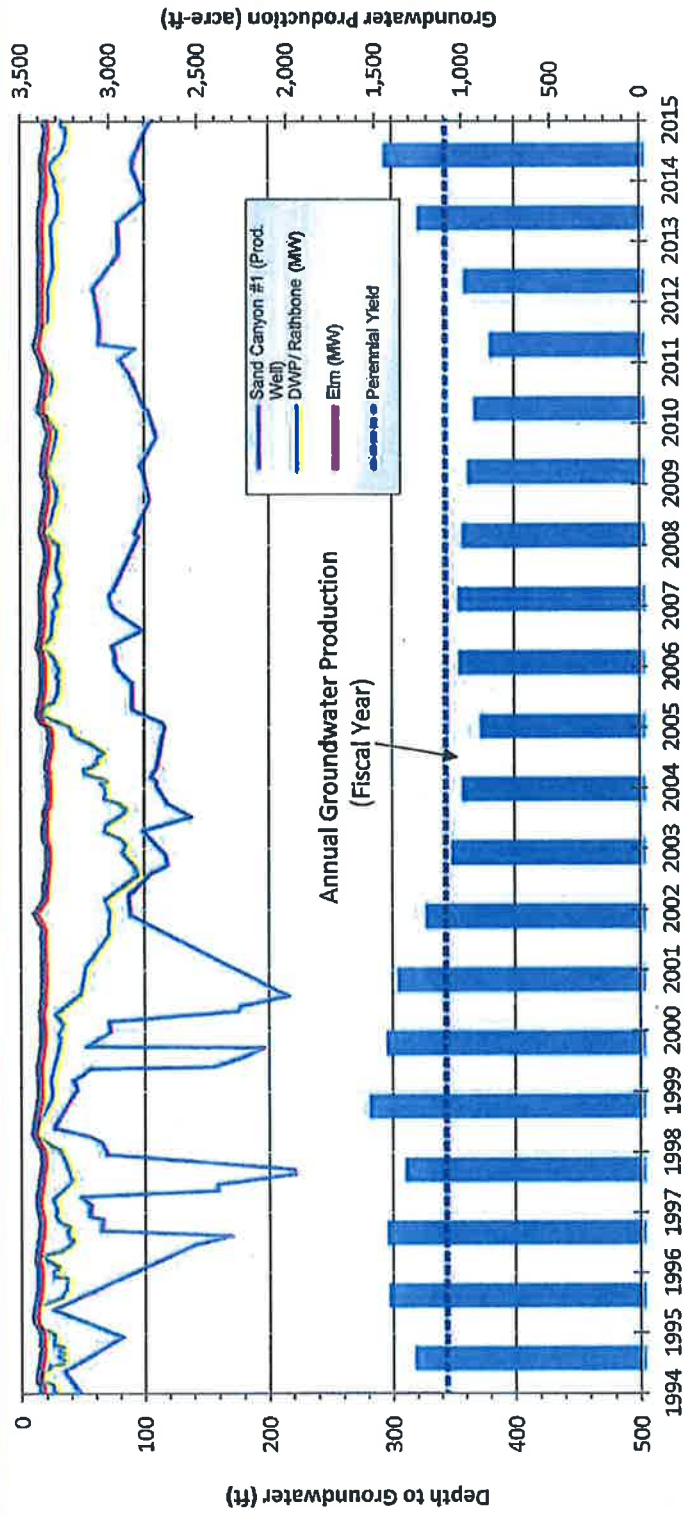
(ATTACHMENT NO. 2)

Village Hydrologic Subunit

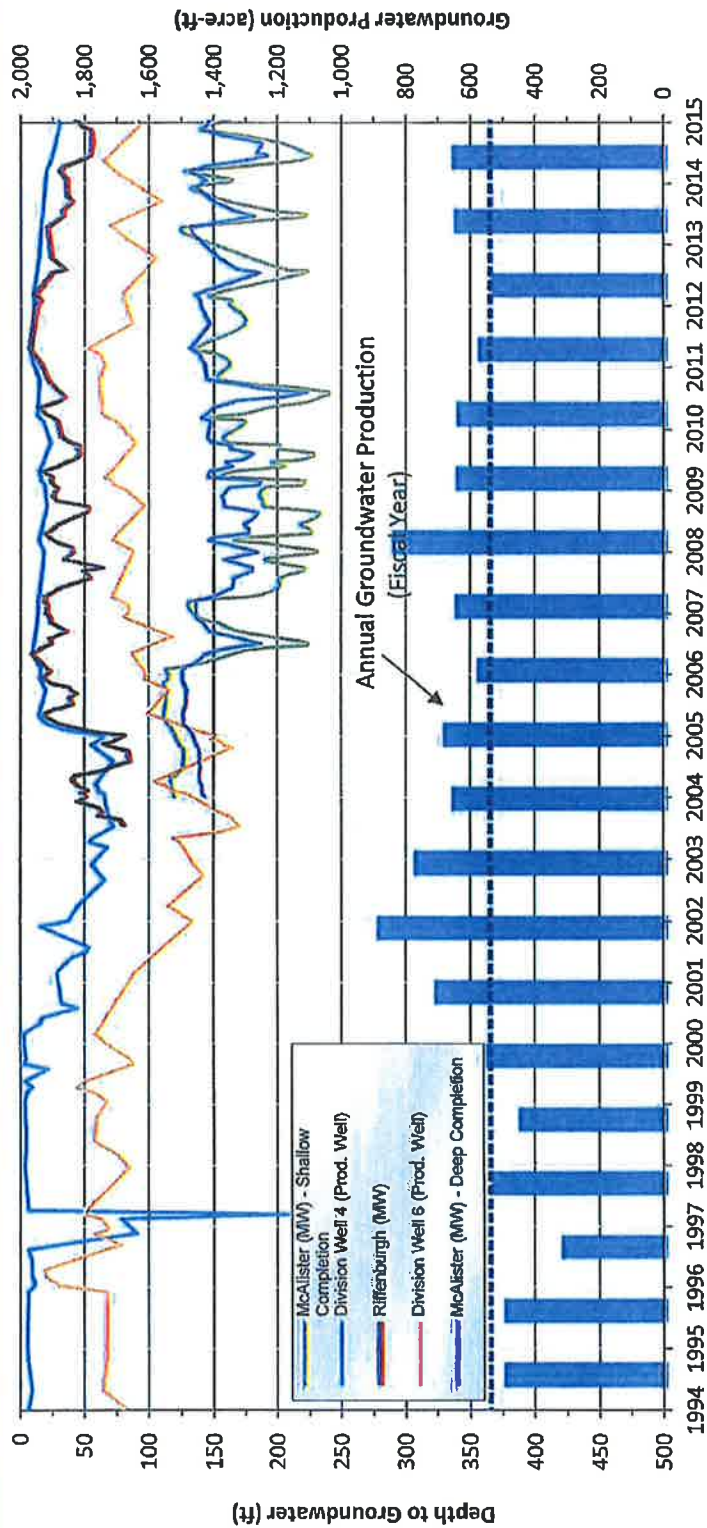
Depth to Groundwater vs. Groundwater Production



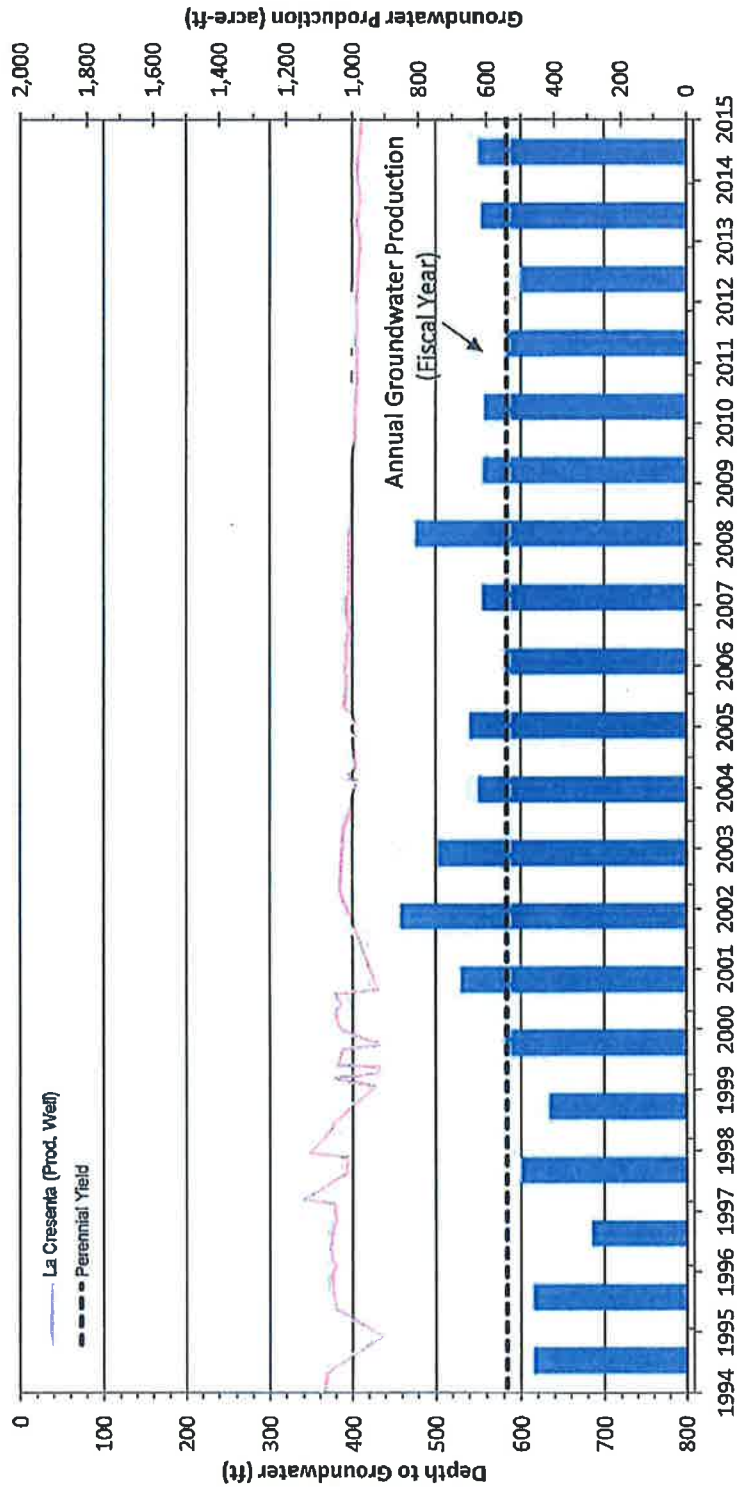
Rathbone Hydrologic Subunit
 Depth to Groundwater vs. Groundwater Production



Division North Hydrologic Subunit
 Depth to Groundwater vs. Groundwater Production

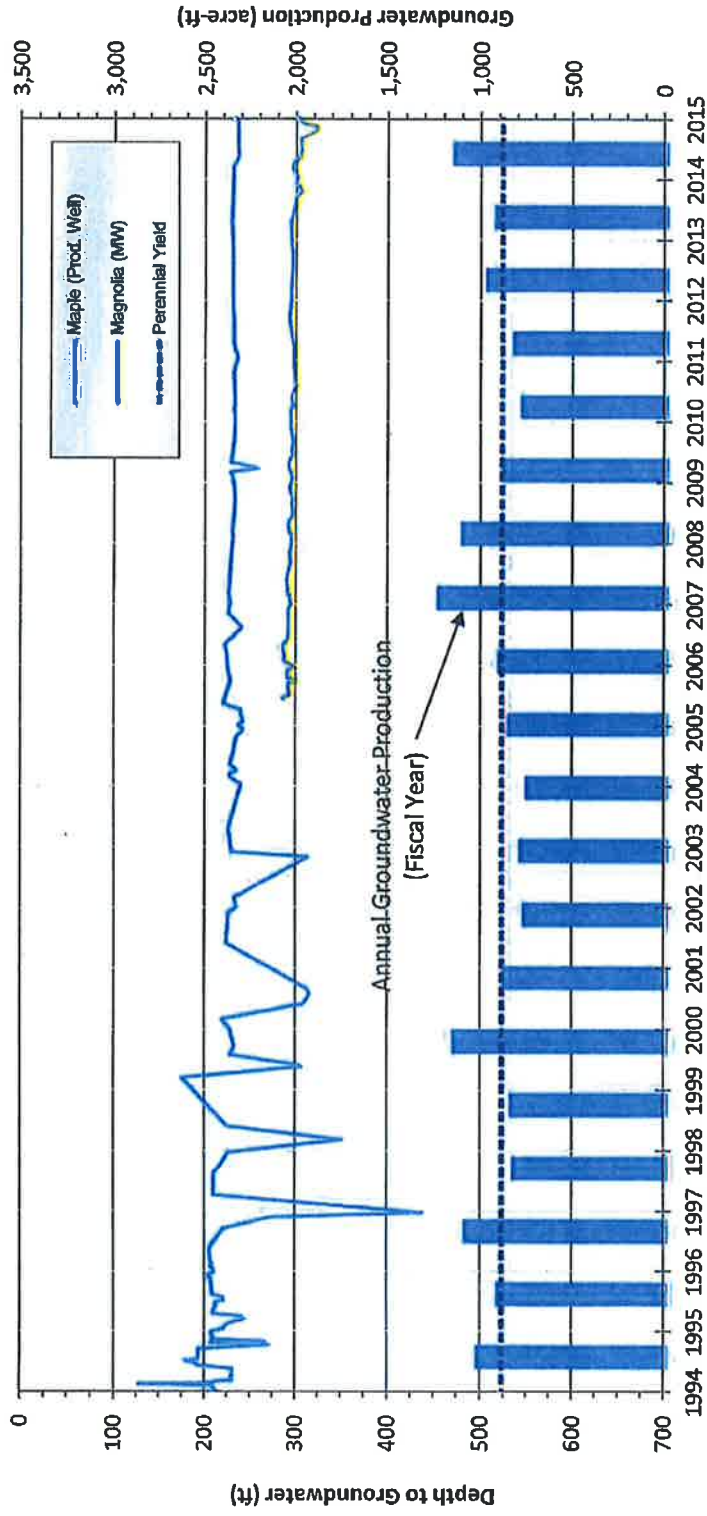


Division South Hydrologic Subunit
 Depth to Groundwater vs. Groundwater Production

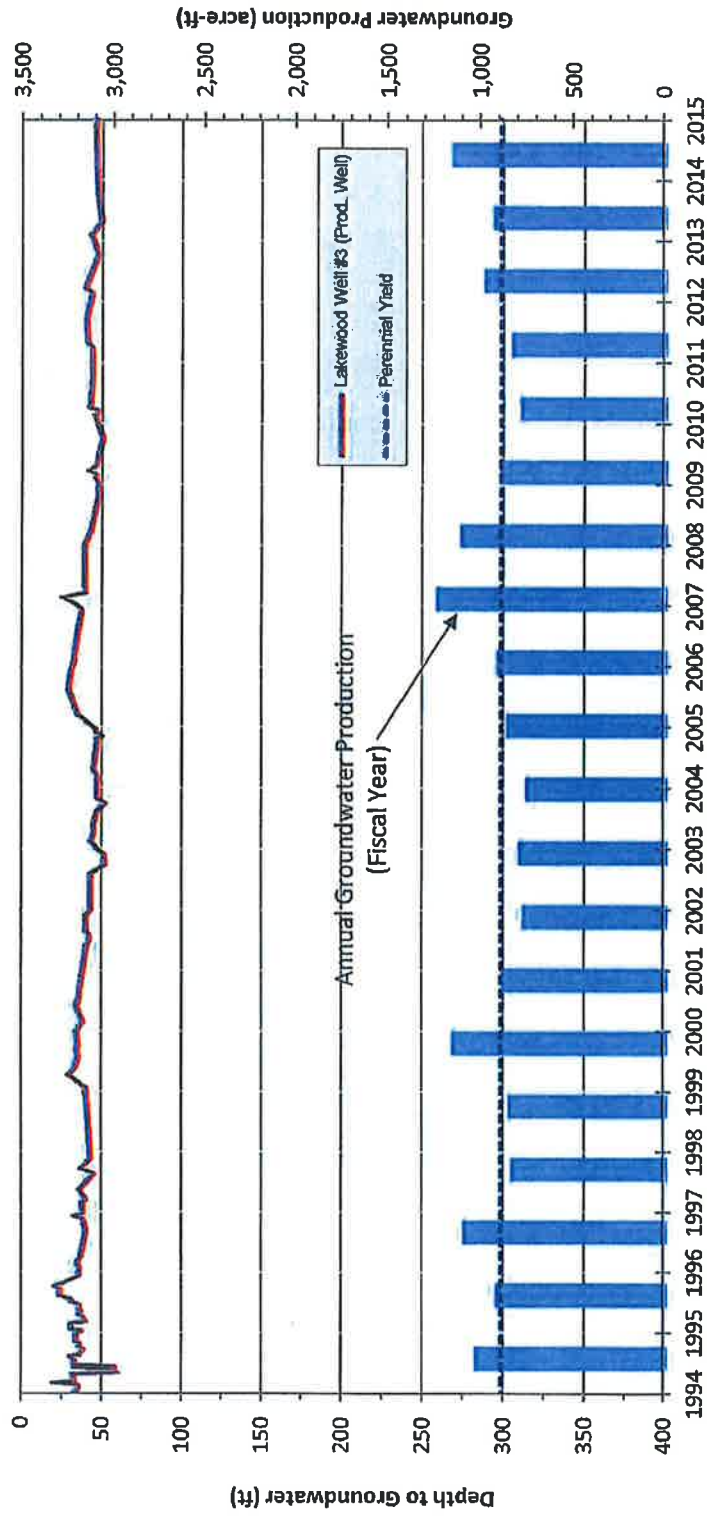


Erwin West Hydrologic Subunit

Depth to Groundwater vs. Groundwater Production



Erwin Central Hydrologic Subunit
Depth to Groundwater vs. Groundwater Production



Erwin East - Lake William Hydrologic Subunit Depth to Groundwater vs. Groundwater Production

