

# DEPARTMENT OF WATER



Service, Quality, Community



April 30, 2015

California Water Boards

Subject: Comment Letter – Emergency Conservation Regulation

Dear State Water Board,

The City of Big Bear Lake, Department of Water and Power (BBLDWP) appreciate the opportunity to submit comments regarding the proposed Emergency Conservation Regulations. BBLDWP's service area is located in the Bear Valley (8-9) water basin, which is located in the San Bernardino Mountains. BBLDWP and the Big Bear City Community Services District (BBCCSD) 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, BBCCD'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.

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

**Section 865 (c) (2):**

BBLDWP 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

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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)**

BBLDWP 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.

## **Section 864 (c) (2)**

BBLDWP requests the State Water Board consider revising Section 864 (c) (2) to allow the Executive Director to impose an increasing penalty for noncompliance. For example, \$500 per day for the first month of violations, \$1,000 per day for the second month of violations, etc. BBLDWP feels that without a penalty that accelerates over time, some commercial, industrial or institutional customers will simply incorporate \$500 per day into their overhead and continue violating the letter and spirit of the Emergency Regulations.

BBLDWP appreciate the State Water Board's time and consideration in reviewing our comments. If you have any questions, please call Reggie at 760-559-8172.

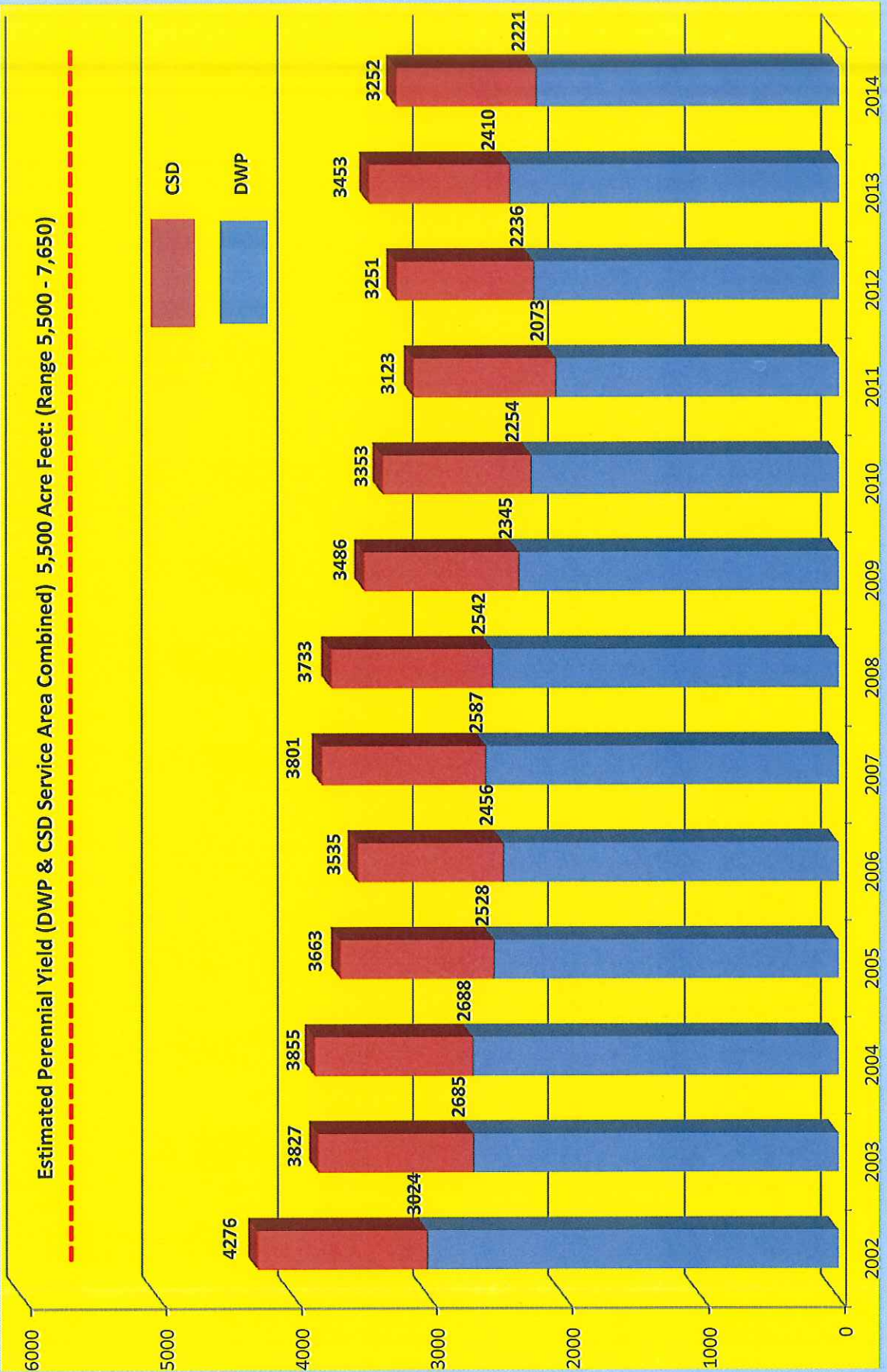
Thank You.

Sincerely,

Reginald A. Lamson, PE LS  
General Manager, DWP

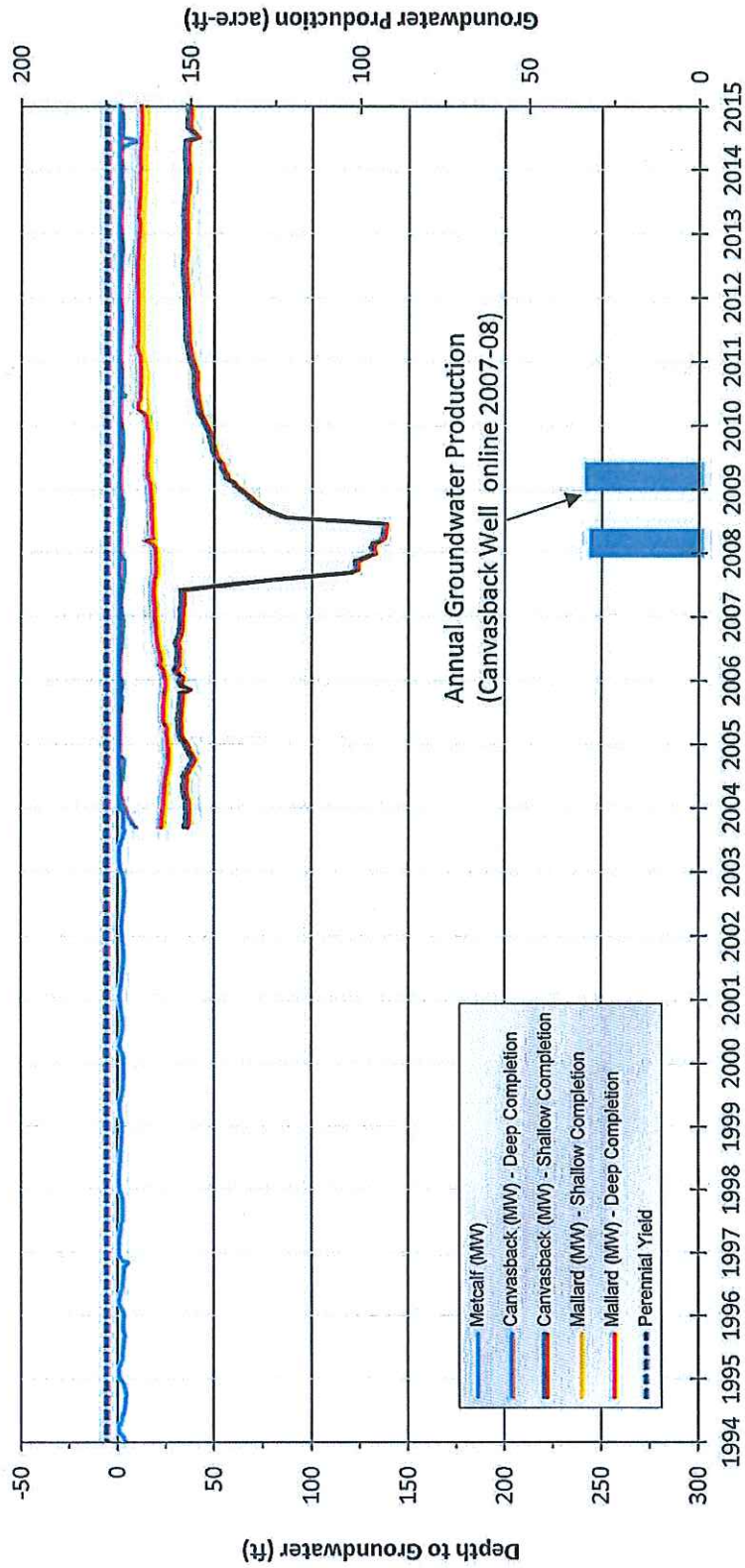
## DWP & CSD Annual Production Water Year (July 1 to June 30) Acre Feet

Estimated Perennial Yield (DWP & CSD Service Area Combined) 5,500 Acre Feet: (Range 5,500 - 7,650)

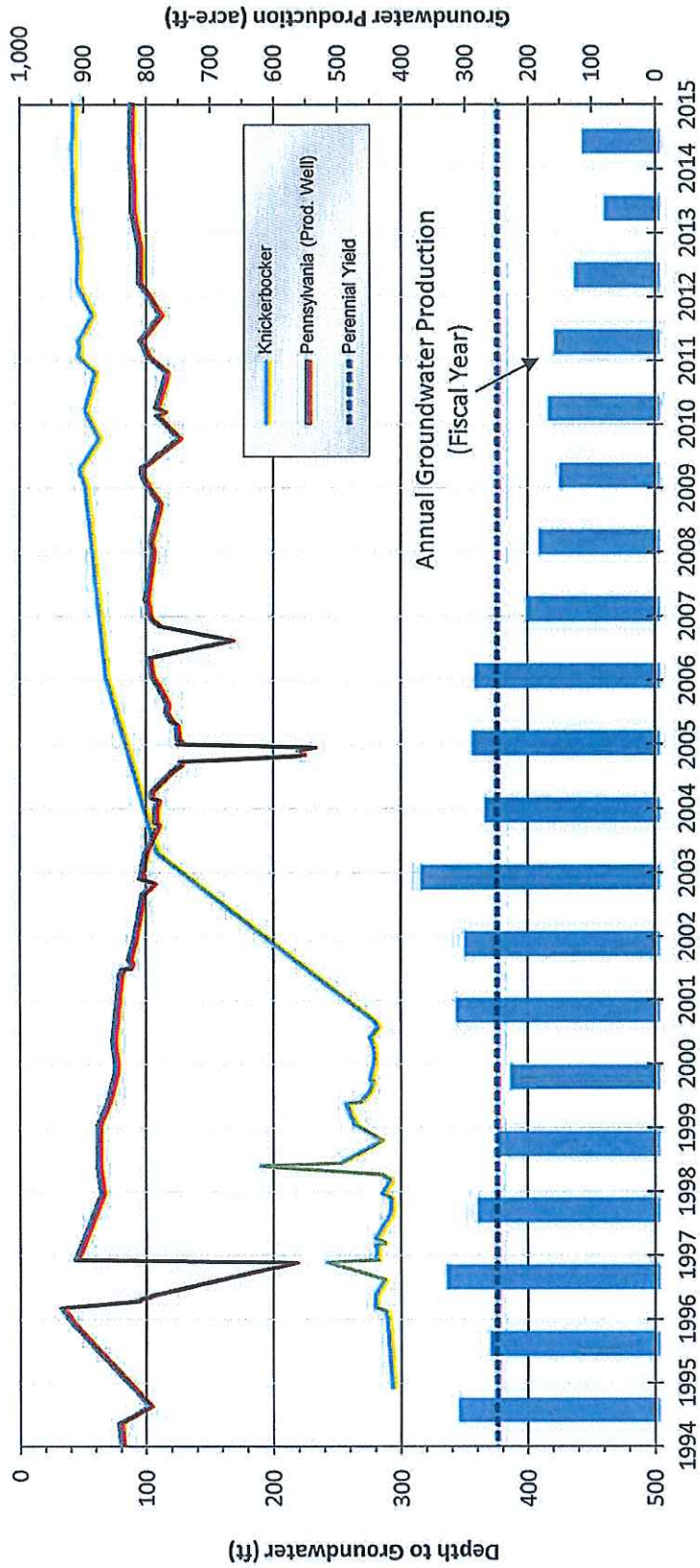


# Mill Creek Hydrologic Subunit

## Depth to Groundwater vs. Groundwater Production

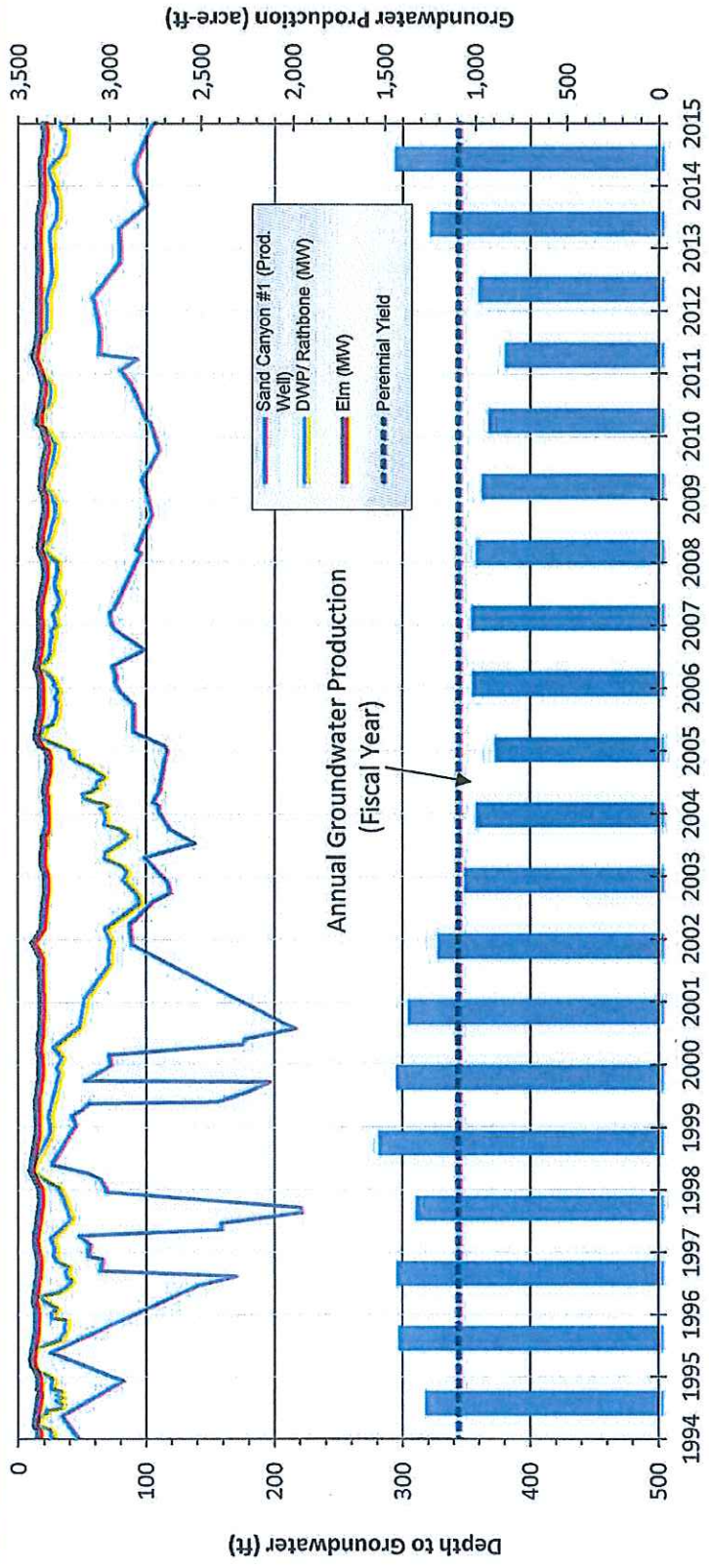


### Village Hydrologic Subunit Depth to Groundwater vs. Groundwater Production

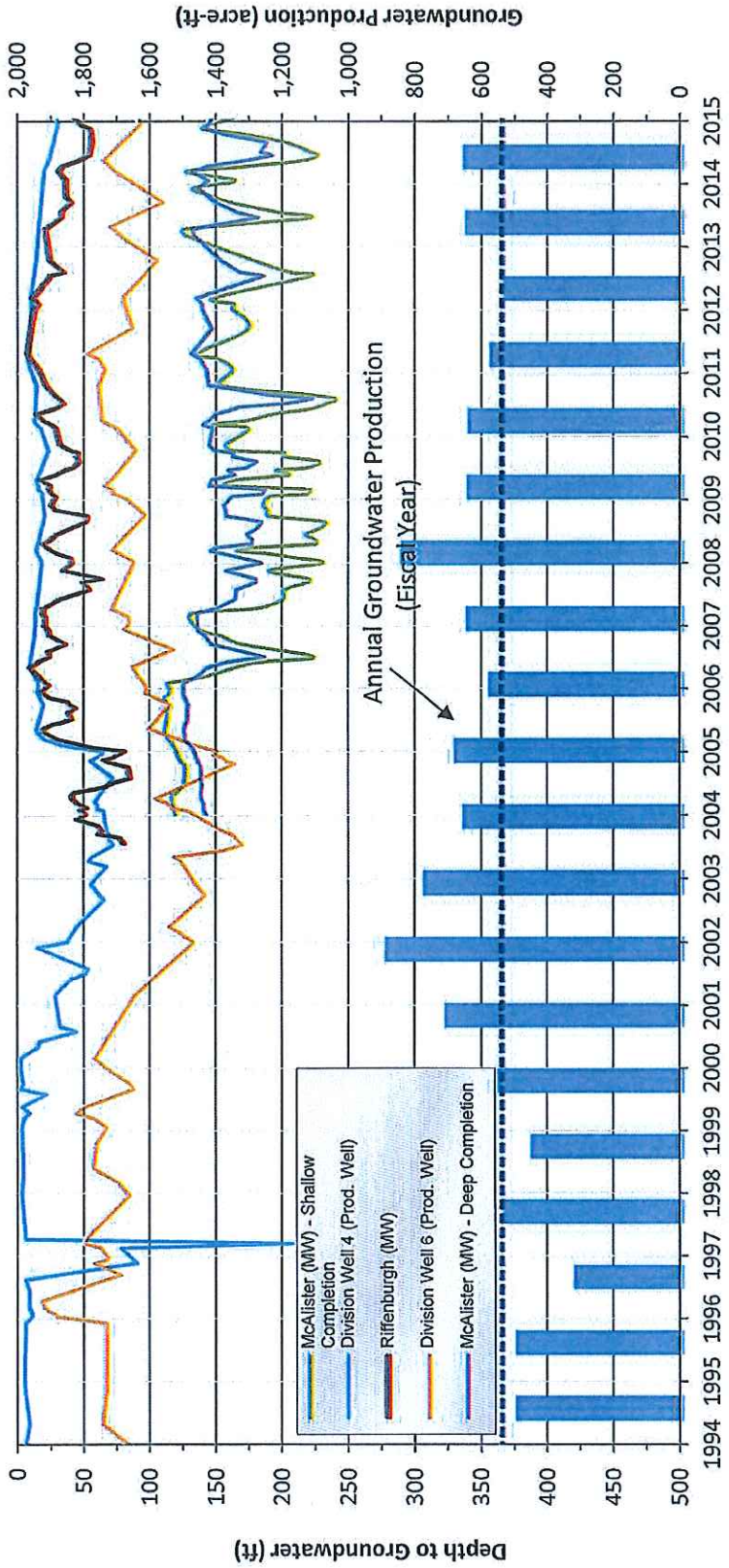


## Rathbone Hydrologic Subunit

Depth to Groundwater vs. Groundwater Production

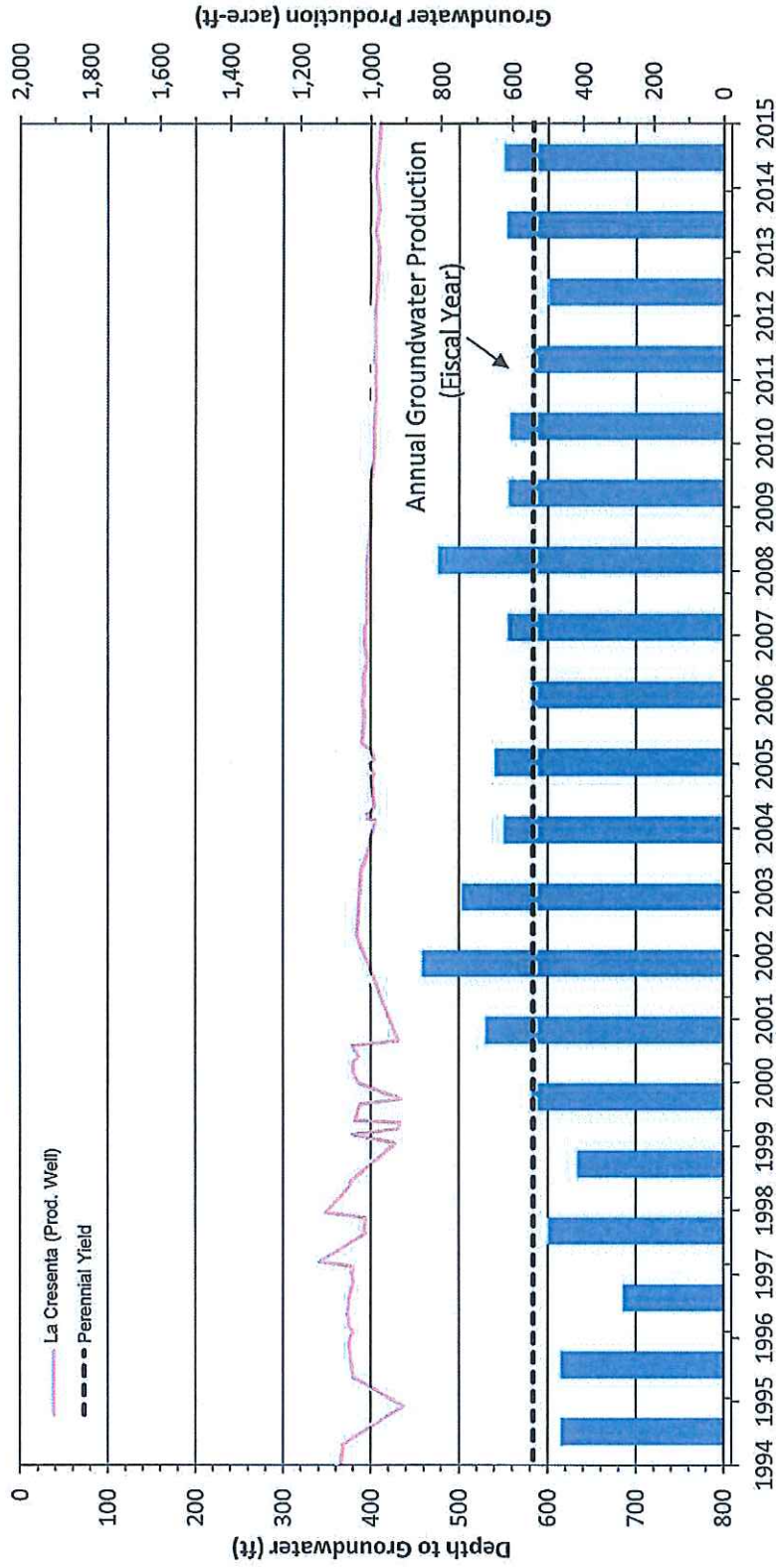


**Division North Hydrologic Subunit**  
 Depth to Groundwater vs. Groundwater Production



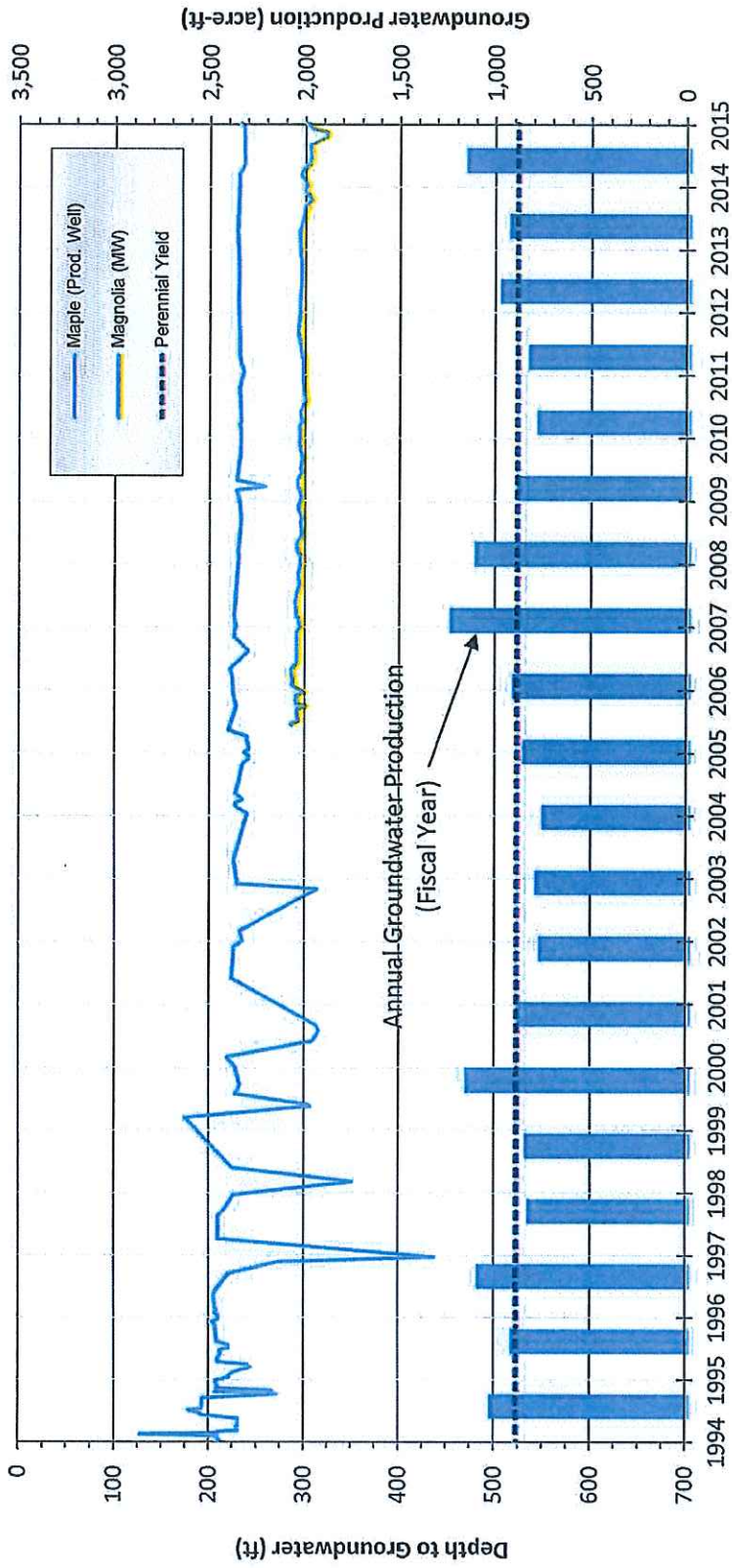
## Division South Hydrologic Subunit

### Depth to Groundwater vs. Groundwater Production

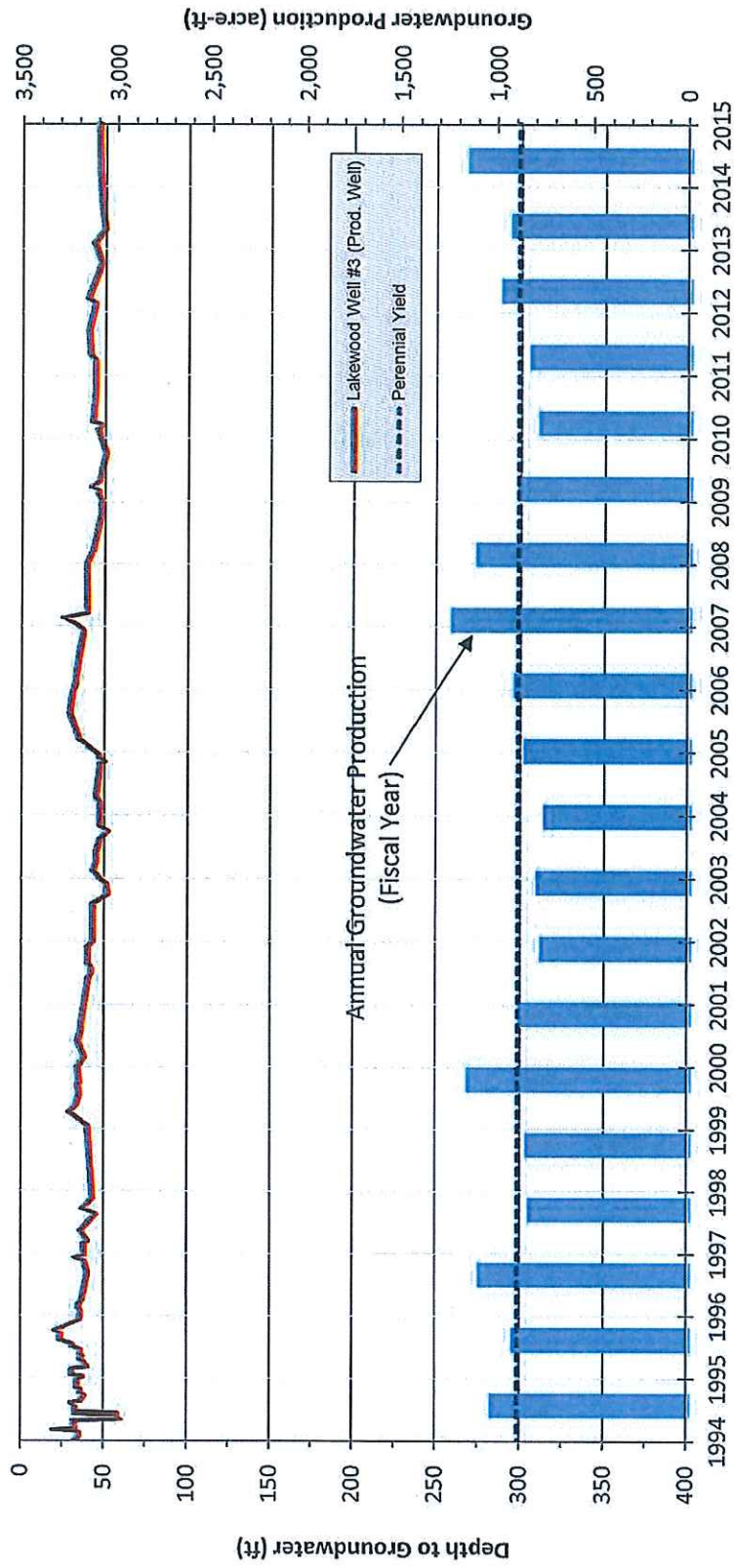




### Erwin West Hydrologic Subunit Depth to Groundwater vs. Groundwater Production



### Erwin Central Hydrologic Subunit Depth to Groundwater vs. Groundwater Production



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

