

Dear Ms. Bean,

The Big Bear City Community Services District (BBCCSD) has completed our review of the "Mandatory Conservation Proposed Regulatory Framework" dated April 7, 2015 and would like to make the following comments. The BBCCSD respectfully requests that the State Water Resources Control Board consider BBCCSD's "Alternative Plan" in lieu of the proposed additional regulations.

The BBCCSD service area and its roughly 6000 customers is located in the mountains of Southern California at an elevation of 6700 feet in the Bear Valley Basin (8-9). All water supplied by the agency, and that of the only other water purveyor in the basins, the City of Big Bear Lake Department of Water and Power, deliver water pumped from local water wells. No source other than rainfall and snowmelt within the watershed provide recharge to local aquifers. No outside source of water from any state, regional or local water project is imported to the basin. Water resources development in the basin does not have any impact or affect on water supplies elsewhere in the state.

This is not the first time that the water purveyors in the basin have had to respond to a drought in our basin. In fact, the local drought during the period 1999 to 2004 was worse than the area is experiencing now. During the last drought the BBCCSD implemented a four stage water conservation ordinance that was effective in assuring that the District's customers had sufficient water. Figure 1 is a comparison of precipitation during the 1999-2004 drought and the period 2009 to the end of calendar year 2014. The BBCCSD's conservation ordinance uses the average ground water levels in our West Baldwin Sub-basin as thresholds for moving from less restrictive to more restrictive stages. The last and the most recent drought periods are shown on Figure 2 and 3 respectively. Based on the current state of our West Baldwin Sub-basin it is likely that the next threshold of 50 feet, requiring a move from Stage 1, which was implemented last year, to Stage 2 might be reached in September. Stage 1 water mandatory water conservation measures include:

- Landscape watering prohibited between 9:00 AM and 6:00 PM
- No landscape water runoff into streets
- Washing of sidewalks, driveways, buildings and windows with hoses is prohibited
- Vehicles, boats, trailers etc. cannot be washed with a hose unless it is equipped with an automatic shutoff nozzle
- All water leaks must be repaired immediately

Stage 2 conservation measures include all of those in Stage 1 with the addition of the following:

- New landscaping installations are limited to 25% of the available landscape area and turf cannot exceed 1000 square feet
- Irrigation can only occur on designated days (odd even dates based on house street numbers was used during the last drought)
- No potable water can be used for dust control or construction purposes

Subsequent conservation stages require more stringent conservation measures.

Operating the domestic water system in accordance with the Conservation Ordinance described above has resulted in a 25% drop in water production in the BBCCSD service area since 2000 as shown on Figure 4. And, 4% of the BBCCSD water production is discharged directly into a refugium for the ESA Three Spined Unarmored Stickleback fish. The BBCCSD collaborates with the other water purveyor in the basin, the City of Big Bear Lake Department of Water and Power (BBLDWP) to respond to drought conditions. The two agencies are part of the Upper Santa Ana River Regional Water Management Plan, both have approved urban Water Management Plans, and both collaborate in reporting water levels as

part of the Department of Water Resources CASGEM project. Along with the BBLDWP and the local regional wastewater treatment plant, the Big Bear Area Regional Wastewater Agency the agencies are working towards making reclaimed wastewater available for construction use this summer. Additionally, as you undoubtedly have seen in a recent email message from the BBLDWP, the local water related agencies are all working on the Bear Valley Water Sustainability Project, which if completed will make the Big Bear Basin water self sufficient for the foreseeable future.

Last year when the State issued conservation requirements the BBCCSD Board of Directors declared a Threatened Water Shortage at a public hearing and imposed Stage 1, Threatened Water Shortage imposing mandatory water conservation measures. The BBCCSD has a proven and effective conservation plan in place based on real conditions in the local ground water basin. Water use in the Bear Valley basin has no impact on any state, regional or local water supply project. Water reuse to offset domestic water for dust control and construction will begin this summer, and a local water reuse project is being planned that will develop additional water for our service area.

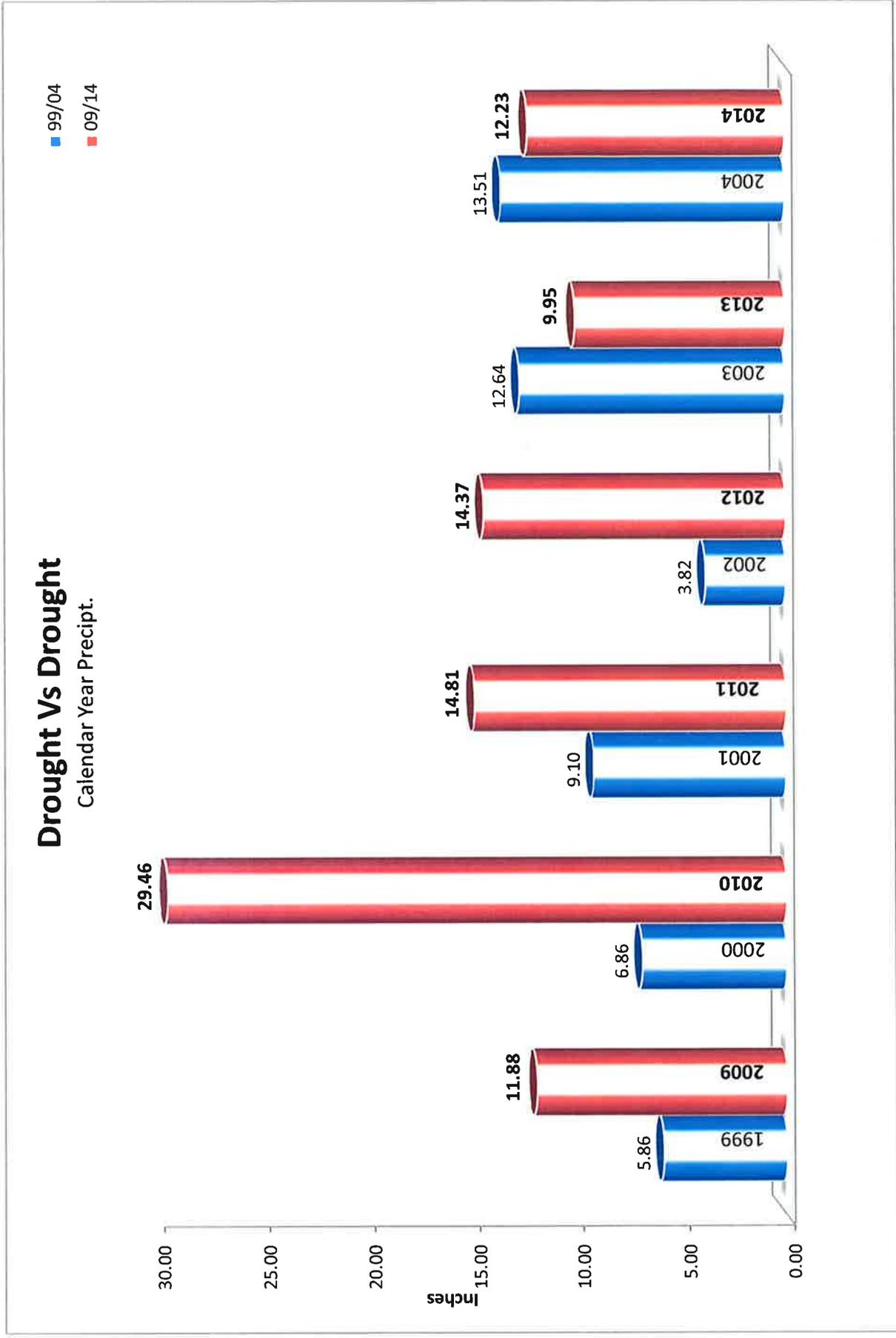
The BBCCSD respectfully requests that the State Water Resources Control Board consider and approve our "Alternative Plan" in lieu of the proposed regulations in Executive Order B-29-15.

Thank you for your consideration,

Sincerely,

Scott Heule  
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Figure 1



# 2002-2005 West Baldwin Sub-Basin Average Water Level (Comparison)

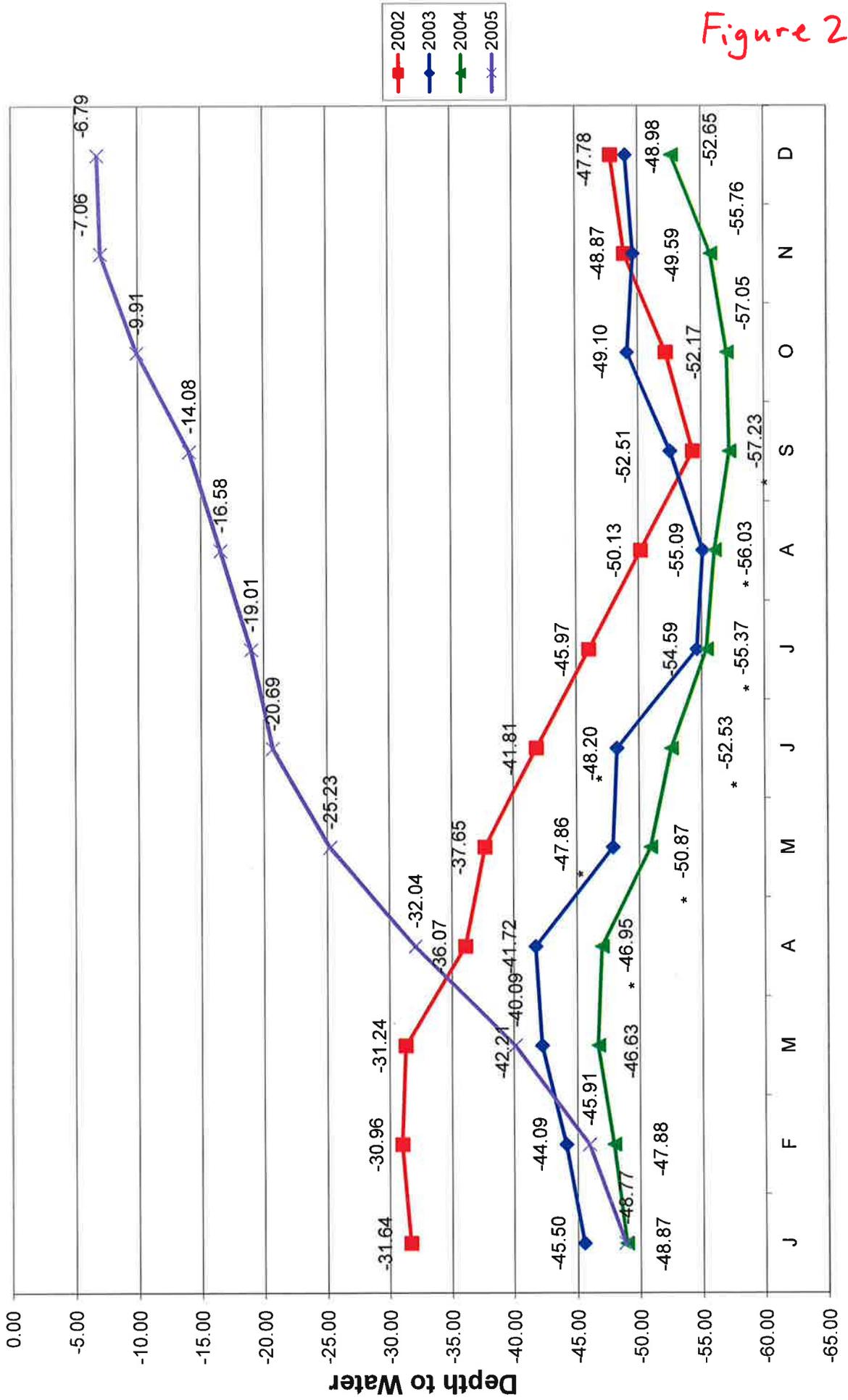


Figure 2

Figure 3

2011-2015 West Baldwin Sub-Basin Average Water Level

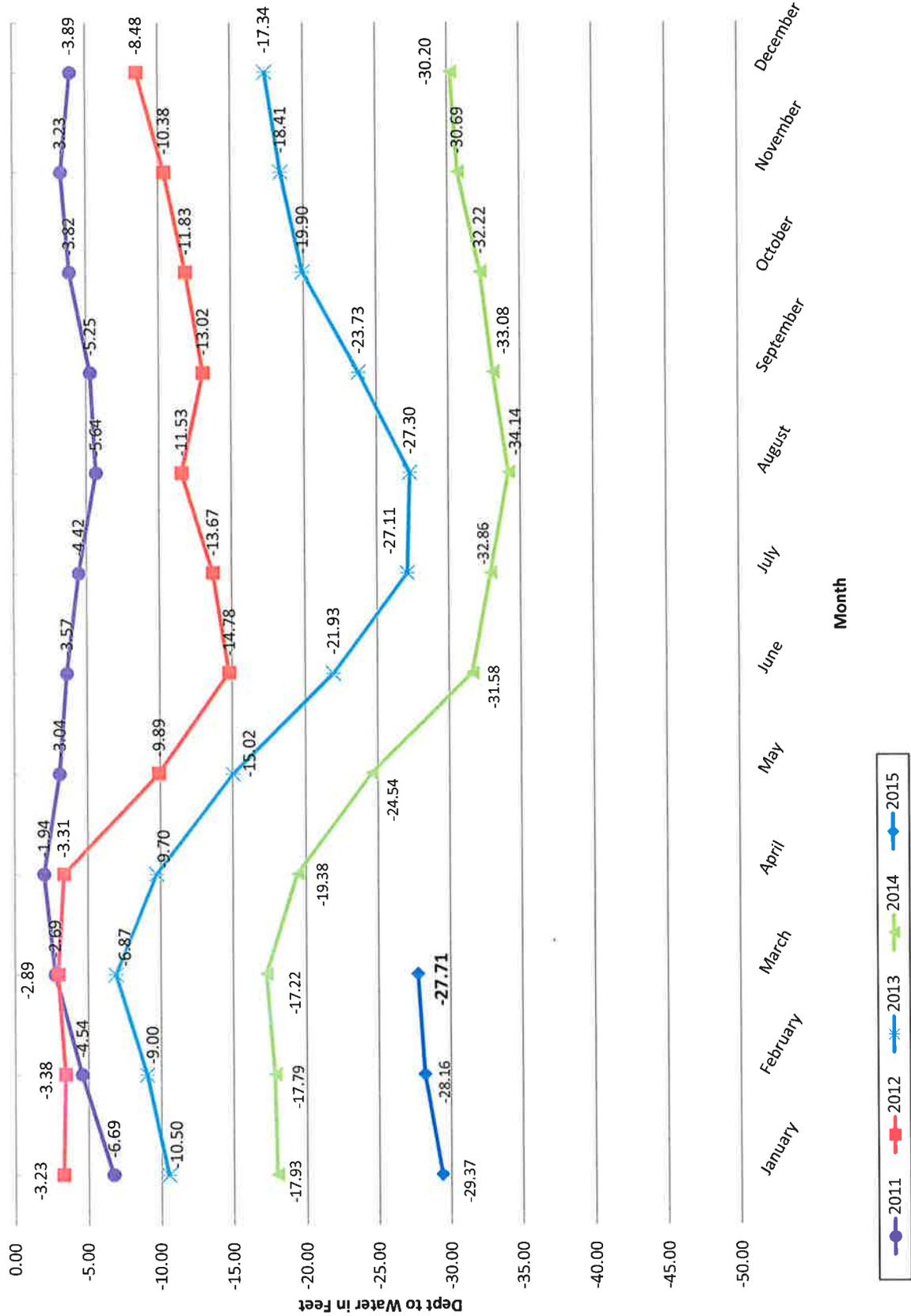


Figure 4

