

CRESTLINE-LAKE ARROWHEAD WATER AGENCY

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Via Mail and E-mail to "commentletters@waterboards.ca.gov"

State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Re: Proposed Emergency Regulations Regarding Prohibition of Activities and
Mandatory Actions During Drought Emergency

Ladies and Gentlemen:

Thank you for this opportunity to comment on the proposed emergency regulations to add new sections to Title 23 of the California Code of Regulations to prohibit certain activities and to impose mandatory actions during the current drought emergency.

The Crestline-Lake Arrowhead Water Agency is located in the San Bernardino Mountains, where customer demand fluctuates significantly from one holiday weekend to the next, between seasons and from one year to the next. As a resort community, the Agency has no way of knowing the number of people in a property on a daily, weekly, monthly or yearly basis; many residences are rental properties and second homes. The Agency provides water service on a retail basis to only a small portion of its service area (fewer than 1,225 customers).


Most of the water provided by the Agency is delivered on a wholesale basis to other retail purveyors, to supplement their own local water supplies. The Agency is not in a position to monitor or regulate water supplied by other retail purveyors to their retail customers. Therefore, the Agency requests that the regulations make it clear that:

1. The water use reporting requirements will not apply to those areas within the Agency that receive water service from another retail service provider, as such reporting would duplicate and potentially could conflict with the reports that those retail purveyors themselves will be providing.
2. The Agency will not be responsible for implementing water use restrictions within the retail service area of another retail service provider, in order to prevent potentially conflicting restrictions and requirements, and because the Agency has no effective way of controlling the behavior of another purveyor's customers.

The Agency employs a very small workforce in an effort to keep the cost of water service as low as possible. We are extremely concerned about the additional burden created by the proposed requirements and would like them to be reduced as much as possible as well, by limiting reporting and not duplicating the activities that other retail purveyors will undertake themselves within their own retail service areas.

We hope that the proposed regulations may be modified to accommodate the above concerns. Thanks very much for your attention.

Yours very truly,



Roxanne M. Holmes,
General Manager