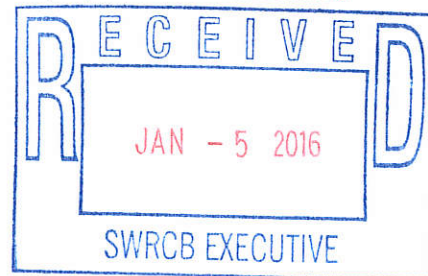


December 23, 2015

Jeannine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Proposed Framework for Modified Emergency Conservation Regulations

Dear Ms. Townsend:

The Orange County Taxpayers Association (OCTax) supports policies that are fair to the taxpayers of Orange County. While OCTax has noted the State Water Board's successful efforts to reduce water use through regulatory restraint, our organization believes the state has an equal obligation to recognize the local efforts that have taken place to add new drought proof and sustainable water supplies to the water portfolio. Every new drop of drinking water added in Orange County is one less drop of imported water that is needed. OCTax believes that it is only just to credit those local communities that have invested heavily in new water supplies.

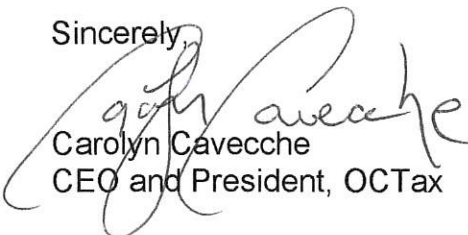
In Orange County, we have invested in the world's largest and most successful water recycling project, the Groundwater Replenishment System (GWRS). At the cost of hundreds of millions of dollars, the project today produces nearly 100 million gallons of clean drinking water from treated wastewater. **This investment in recycling and reuse has been minimized by the staff of the State Water Board that proposes to give Orange County a maximum of four percent worth of credit for a supply that provides nearly 20 percent of the water needs for the Orange County Water District member cities and water districts.**

Additionally, the Orange County Water District is exploring a public-private partnership to build the Huntington Beach Seawater Desalination Plant, which will provide an additional 11 percent of OCWD's customer's water supply.

Investments in local supplies should count on a one-for-one basis against additional conservation requirements by the state. OCTax believes the staff's proposed 4% recognition of local water supplies is arbitrary and insufficient.

Thank you for considering OCTax's comments on this matter.

Sincerely,



Carolyn Cavecche
CEO and President, OCTax