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Santa Margarita Water District

February 17, 2017

Submitted via e-mail
commentletters@waterboards.ca.gov

Honorable Felicia Marcus, Chair
C/O Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Staff Proposal for Climate Change Resolution

Dear Ms. Marcus,

Santa Margarita Water District (District), appreciates the State Water Resources Control Board's (Water Board) leadership in responding to climate change and its potential impacts to California's water supplies, natural resources, and quality of life. The updated Climate Change Resolution (Resolution) reflects the broad range of plans, policies and technology available to help the people of California conserve and use water efficiently.

The Resolution references the California Water Action Plan and the suite of actions developed within the plan to build resiliency into California's water supplies through coordinated efforts at all levels, federal, state, regional and local water agencies as Santa Margarita Water District. Our District is engaged with other agencies and the state in several projects to conserve water and to use water more efficiently through local water reliability projects tying together storm-water capture and recharge, expanded water shortage, ecosystem protection, and water use efficiency. As the details of this Resolution are fleshed out, it is critical that the Water Board support and provide a balance to conservation that includes incentives for local and regional water resource projects consistent with the California Water Action Plan's comprehensive vision to protect and expand the supply of water for a wide variety of beneficial uses. How the Water Board establishes permitting, reporting, and funding mechanisms will significantly influence the viability and efficacy of projects that buffer the state from the impacts of climate change at the local level. We respectfully request your Board to consider changes in the resolution that will foster adaptive management, and not constrain local and regional managers in their efforts to conserve water while extending supply through water use efficiency.

The District has three specific comments on the proposed Resolution:

Comment 1: Section I.B.2 Water Conservation & Efficiency.

The District is committed to cost-effective long-term water efficiency on both the demand and supply side. Both are important and critical to ensuring adaptability and resiliency in the face of climate change and impacts to water resources. The District is

engaged, and will continue to work enthusiastically with the various state agencies tasked with implementing Executive Order B-37-16. We know preventing waste of water is of fundamental importance. Our record of limited water loss and leak prevention meets the highest industry standards. An equally important component of conservation is water use efficiency. This includes water reuse, storage and desalination projects along with water transfers that can be accomplished on a local and regional basis.

Comment 2: Section III.13 Permitting of Projects.

The District supports efforts that will expedite permitting for projects that develop new water resources, expand surface water and groundwater storage, and add operational flexibility to enhance resilience to the impacts of climate change. While not specifically mentioned, Indirect Potable Reuse (IPR) and Direct Potable Reuse (DPR) projects are significantly influenced by permitting and review and efforts to allow new water supplies via these advanced methods are critical and necessary.

Comment 3: Section V.20 Funding through State Revolving Fund.

The District supports the use of the State Revolving Fund (SRF) to support projects that contribute to climate change mitigation and adaptive management that will result in a sustainable supply of water

With more than 155,000 customers and more people seeking homes in southeastern Orange County all the time, SMWD is supportive of efforts to maintain California's high quality of life by incorporating a practical, cost-effective approach to climate change. Please do not hesitate to contact me if you have any questions,

Very Truly Yours,

SANTA MARGARITA WATER DISTRICT



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