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**ORANGE COUNTY WATER DISTRICT**  
*Orange County's Groundwater Authority*

February 14, 2008

Tam M. Doduc, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Subject: Draft Strategic Plan Update 2008-2012

Dear Ms. Doduc:

The Orange County Water District (OCWD) submits the following comments on the State Water Resources Control Board and Regional Water Quality Control Board Draft Strategic Plan Update, 2008-2012.

Comment Number 1

Priority 2 addresses the protection of groundwater. OCWD recommends the addition of a new objective aimed at ensuring the continued viability of groundwater basins as high quality drinking water supplies through regulation of waste discharge requirements and the clean up of contamination.

This objective would focus on remediating contamination plumes from industrial sites not covered under the Underground Storage Tank fund. OCWD's experience has been that contaminant plumes of primarily chlorinated solvents (e.g., TCE and PCE) originating from industrial sites are not covered by funding from the Underground Storage Tank fund and are not being adequately addressed in terms of plume delineation and remediation. These sites are overseen by the Regional Water Quality Control Boards (RWQCB) or the Department of Toxic Substances Control (DTSC), but it appears that these agencies are understaffed to properly oversee and pursue the responsible parties. More regulatory support from the RWQCB and DTSC is needed for enforcement actions, investigations, and cleanup efforts before contamination spreads and drinking water wells become impacted. This issue has been identified in the past, but little progress has been made in addressing the problem.

While other objectives, such as Objective 2.2 and 2.3 cover aspects of this problem, OCWD considers this to be such a serious problem that it warrants additional attention. The SWRCB needs to develop a plan to provide additional resources to ensure proper investigation, enforcement, and cleanup of contaminant plumes.

Comment Number 2

Priority 6, Action Item 6.2.2 identifies the need to advance implementation of the Groundwater Quality Monitoring Act of 2001 (AB 599) through the development of online public reports and query tools. Another stated goal of the AB 599 program is to "increase coordination among agencies involved in groundwater management. To the extent that multiple agencies continue to monitor groundwater quality, efforts should be made to coordinate their roles and share data."

We support the inclusion of this goal in the strategic plan; however, successful implementation of this program is currently constrained. Based on feedback we have received at GAMA public forums and Public Advisory Committee meetings, local stakeholder involvement needs to be significantly improved in terms of: (1) sharing of the data collected from the program and (2) making draft versions of the Data Assessment Reports available for review and stakeholder comments.

SWRCB's policy has been that only the specific well owners are allowed to receive the laboratory analytical results from individual wells sampled due to "privacy" issues. This contradicts the very purpose of the program, which is to provide the public access to water quality data, particularly data collected at public expense, for their local area. Apparently in part due to difficulty in addressing local agency feedback on the draft San Diego area Data Assessment Report, SWRCB and the USGS have stated that the scope and content of the Data Assessment reports are being reevaluated. There has been no assurance that local groundwater management agencies would be allowed to review and provide comments on draft reports prior to finalization.

Acknowledging that the State will make the final determination of the content of the Data Assessment reports, the review and consideration of stakeholder comment on draft versions of the reports is in keeping with AB 599's stated goal of increased coordination among agencies. Successful implementation of proposed Action 6.2.2 will require a new approach to data sharing and communication between stakeholders.

Sincerely,



Craig D. Miller, P.E.  
Assistant General Manager

cc: Orange County Water District Board of Directors  
Krista Clark, Director of Regulatory Affairs, Association of California Water Agencies