



IRVINE RANCH WATER DISTRICT

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December 9, 2013

Mr. Eric Oppenheimer
Director, Office of Research, Planning and Performance
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: Discussion Draft Groundwater Workplan Concept Paper

Dear Mr. Oppenheimer:

Irvine Ranch Water District (IRWD) appreciates the opportunity to comment on the Discussion Draft Groundwater Workplan Concept Paper (Concept Paper) that was recently distributed for public review by the State Water Resources Control Board (SWRCB). Following is an overview of IRWD and its dependence on groundwater basins in both Orange and Kern Counties. Also provided are general and specific comments related to the Concept Paper.

Overview of IRWD:

Irvine Ranch Water District (IRWD) is an independent special district serving Central Orange County, California. IRWD provides high-quality drinking water, reliable sewage collection and treatment, ground-breaking recycled water programs, and environmentally sound urban runoff treatment to more than 330,000 residents. IRWD's primary mission is to provide a safe and reliable water supply to its customers. Along with the implementation of numerous water use efficiency programs, IRWD has developed and continues to develop a diverse mix of local and non-local supplies including the use of high quality groundwater, impaired groundwater, recycled water and water stored in water banking projects outside of its service area in Kern County.

Orange County Basin:

Approximately 50 percent of IRWD's overall supply comes from local groundwater wells in the Orange County Groundwater Basin (OC Basin). The OC Basin is managed by Orange County Water District (OCWD) which provides groundwater replenishment to maintain a basin yield that is sufficient to supply water to more than 20 cities and water districts that combined serve 2.3 million people. Replenishment supplies are primarily from the Santa Ana River, indirect potable recharge of advanced treated recycled water and purchases of water from Metropolitan Water District of Southern California (MWD). OCWD's management of the OC Basin could serve as a model for the management of other areas within the state.

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Banking in Kern County:

IRWD owns and operates groundwater banking projects in the Kern Fan area of Kern County that will provide supplemental water during major drought conditions and/or supply interruptions. The water banking projects provide 50,000 AF of storage and include 761 acres of recharge ponds and 7 production wells. These projects will be expanded in the future to include an additional wells and storage capacity. IRWD has developed partnerships with water agencies in the Kern County area that provide shared benefits of the IRWD's water banking projects.

There is not a single agency with direct management responsibility of the groundwater basin in the Kern Fan area. The numerous groundwater banking projects within the area are operated under a series of agreements that are used to manage the groundwater resources of the area. These agreements provide a means for protecting water quality, avoiding overdraft conditions and minimizing drawdown impacts.

IRWD has reviewed the Concept paper relative to its dependence on groundwater and offers the following general and specific comments:

General Comments:

1. The SWRCB should not take actions that would hinder or place burdens on the efforts of agencies that are already providing effective management of groundwater basins such as the OC Basin and the Kern Fan area.
2. The SWRCB should focus its actions on areas of the state that do not currently have groundwater management programs in place and where water quality problems and/or overdraft conditions are prevalent and increasing through time.
3. The SWRCB should take actions that encourage the recharge of water and use of unused storage capacity in areas that are currently unmanaged.
4. The SWRCB should support the California Department of Public Health in completing its rulemaking on recharge of recycled water and should encourage state participation in funding applied research for new indirect potable reuse programs.
5. The SWRCB should focus on providing incentives for effective local groundwater management rather than taking regulatory actions that result in unfunded mandates and burdensome requirements.
6. The SWRCB should take actions that facilitate exchanges (both balanced and unbalanced) of water through consolidated places of use. Such actions would assist in providing water banking storage capabilities to entities with excess water during wet periods. This additional storage would regulate supplies for use during dry years and would reduce dependency on mining of groundwater.
7. The SWRCB should encourage coordination between water agencies to develop cooperative frameworks for the management of groundwater resources in areas that are currently unmanaged.

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Specific Comments:

Section 3.1.2 (2) - Any state legislation to require entities to establish thresholds for sustainable groundwater management should be focused on facilitating the development of groundwater management plans and resulting thresholds that are sensitive to existing and expected local social and economic conditions.

Section 3.2.2 (1) - Any searchable electronic database of volunteered well completion reports to be prepared by the California Department of Water Resources (DWR) should also include (where available) lithological and water quality zone testing data. All such data is important to the development of groundwater management plans.

Section 3.2.2 (5) - Development of a tracking database of storm water capture and recharge potential across the state will likely not be technically feasible. The hydrogeologic and hydrologic aspects of making such estimates would be very complex and expensive on a large scale.

Section 3.3.2 (2) & (3) - State efforts should be focused on areas that currently do not have groundwater management programs rather than focused on evaluating existing local groundwater management plans in areas that are already actively managed.

Section 3.4.2 (1) - The State should be an active participant in establishing a funding source for cleanup of contaminated groundwater sites where responsible parties are unavailable, unable or unwilling to pay for cleanup.

Section 3.5.1 (2) - The formation of an interagency task force to improve the integration of agency authorities should include substantially the local agencies involved in the overdraft areas. Participation of the local agencies will be critical to the implementation of actions necessary to halt or correct overdraft conditions.

IRWD greatly appreciates the opportunity to comment on the Concept Paper. If you have any questions related to the comments provided above, please contact me at (949)-453-5590 or Paul Weghorst at (949) 453-5632.

Sincerely,



Paul Cook
General Manager