



LATE COMMENT CITY OF ORANGE

(5/5-6/15) Board Meeting- Item 6
Emergency Conservation Regulation
Deadline: 5/4/15 by 10:00 am



PUBLIC WORKS DEPARTMENT

www.cityoforange.org

ENGINEERING DIVISION
(714) 744-5544
FAX: (714) 744-5573

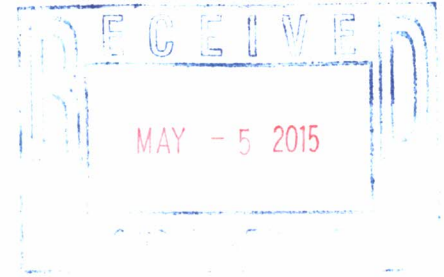
MAINTENANCE DIVISION
(714) 532-6480
FAX: (714) 532-6444

TRAFFIC DIVISION
(714) 744-5540
FAX: (714) 744-5573

WATER DIVISION
(714) 288-2475
FAX: (714) 744-2973

April 30, 2015

Ms. Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter-Emergency Conservation Regulation.

Dear Ms. Marcus:

The City of Orange appreciated the opportunity to provide input to the State Water Resources Control Board (SWRCB) on the implementation of the Governor's Executive Order B-29-15. Our comments are intended to address modifications that can make immediate improvements to the proposed framework. The City of Orange provides the following comments for your consideration and are intended to improve the path we are all on:

1. Recognition of Indirect Potable Reuse (IPR). Expanding the use of recycled water is a priority for the State of California. Not recognizing IPR undermines the State policy to encourage expanded use of recycled water. The SWRCB should adjust gpcd for agencies receiving IPR through the Ground Water Replenishment System (GWRS) to promote equity and expanded use of recycled water.
2. Recognition of Wild land/Urban Interface (WUI). The City of Orange has experienced very real and sobering property losses due to wild land fires. One, lay of the land; two, weather, and three, fuel, dictate fire behavior. Southern California experiences some of the fiercest wild land fires in the nation largely due to the chaparral native to the region and to the Santa Ana winds. Taking all of these factors into account, the State of California has made a final recommendation to the City of Orange with reference to modifying the very high fire hazard severity zone in the City. Construction of buildings within this zone must be able to withstand Wild land fires. Additionally, vegetation must be thinned and irrigated within certain distances to homes to slow a fire should one approach the building. The SWRCB should adjust gpcd for agencies with Wild land/Urban interface that are mandated by the State to be irrigated.

3. Recognition of inmate population. The City of Orange is home to three correctional facilities; Theo Lacy, Juvenile Hall, and the Youth Leadership Academy. These three facilities house a combined total of approximately 4,500 inmates and correctional officers and as such, they are the City's largest water users, yet this population is unaccounted for. The SWRCB should adjust gpcd for agencies with large correctional facilities to account for the inmate population.

Again, we appreciate the opportunity to provide input on the implementation of the Governor's Executive order B-29-15. Should you have any question regarding these comments, please contact me at (714) 744-5545.

Sincerely,



Joe DeFrancesco
Public Works Director

Copy: R. Otto, Interim City Manager
F. Sun, City Engineer
J. Diaz, Water Manager