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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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December 1, 2015

Sent via Electronic Mail: commentletters@waterboards.ca.gov

(12/7/15) Public Workshop
Urban Water Conservation
Deadline: 12/2/15 by 12:00 noon

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Comments on the Emergency Drought Regulations

Dear Chair Marcus and Members of the Board:

The Orange County Water District (OCWD; the District) and its groundwater producers, representing 19 retail water agencies serving 2.4 million people, want to thank the State Water Resources Control Board (State Board) for allowing public input on potential changes to the emergency regulations to conserve urban water supplies. We also appreciate the work that the State Board and its staff have done and continue to do in addressing the challenges that exist within the State regarding water issues.

As previously discussed in the workgroup discussions, we strongly support the proposed modifications to the State Board's regulations that would allow Drought-Sustainable Water Supplies, which would be defined as potable reuse and desalination supplies, to be allowed a credit from a retail water agencies reduction target, effectively adjusting its conservation savings. The proposal also suggested that a floor of an 8% conservation savings would exist so that no one would be excluded from having to conserve water.

California water agencies have invested billions of dollars in drought sustainable water supplies and yet those agencies that have developed sustainable supplies are not receiving credit for their investments. Without those supplies the current conditions would be much more severe. By incentivizing the building of sustainable water supply projects, it will help mitigate the severity of future droughts.

OCWD developed and operates the Groundwater Replenishment System (GWRS), which currently produces 103,000 acre-feet per year (afy) of recycled water that offsets the need to import that amount of water into Orange County. Currently, because this is potable reused water, the District's water producers do not get credit for this Drought-Sustainable Water Supply under the current regulations, but if it were a non-potable reuse application it would result in a credit. We would advocate that all recycled water should be treated the same because it serves the same purpose, that purpose being a reduction in the need for imported potable water supplies.

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OCWD has always worked in a proactive manner to plan far in advance to help reduce our region's dependence on imported water sources. The District is currently exploring purchasing up to 56,000 afy of desalinated seawater from the proposed Huntington Beach Desalination Project as a way to increase local water supplies as well as expanding our GWRS to provide an additional 31,000 afy. These new sources of sustainable water supply would reduce the region's dependence on imported water sources from Northern California and the Colorado River that are vulnerable to drought, natural disasters and regulatory restrictions. We ask that the State Board recognize investments in new sustainable water supplies by modifying the emergency drought regulations to incorporate the proposal regarding Drought-Sustainable Water Supplies submitted during the workshop process.

We also believe that our position is supported in the Governor's Executive Order issued on November 13, 2015, where he states, "The Water Board shall consider modifying its existing restrictions to address uses of potable and non-potable water, as well as to incorporate insights gained from existing restrictions."

Thank you, again, for considering our comments on the emergency drought regulations. Please do not hesitate to contact us or Alicia Dunkin, Legislative Affairs Liaison with the Orange County Water District at (714) 378-8232 or adunkin@ocwd.com if we may be of assistance to you or your staff.

Sincerely,

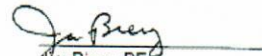


Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager

CC: Mr. Wade Crowfoot, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Mr. Tom Howard, Executive Director, State Water Board
Mr. Eric Oppenheimer, Director of the State Water Board's Office of Research, Planning and Performance, State Water Board
Mr. Max Gomberg, Climate Change Mitigation Strategist, State Water Board



Michael Moore
Acting Assistant General Manager
City of Anaheim


Jim Biery, PE
Director of Public Works

Jim Biery, P.E.
Director of Public Works
City of Buena Park



Lisa Ohlund
General Manager
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Fountain Valley

Mark Lewis
Director of Public Works/City Engineer
City of Fountain Valley



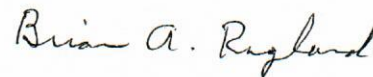
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