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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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February 3, 2017

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

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: Consideration of a Proposed Resolution Amending and Readopting Drought-related
Emergency Regulations for Urban Water Conservation to Implement Executive Order B-
29-15, B-36-15, and B-37-16

Dear Chair Marcus:

The Orange County Water District (OCWD; the District) appreciates this opportunity to comment on the proposed resolution amending and readopting drought-related emergency regulations for urban water conservation (Emergency Regulation). The Emergency Regulation was first adopted by the State Water Resources Control Board (State Water Board) in May 2015 and then extended in February 2016, and then amended and again extended in May 2016 to implement executive orders B-29-15, B-36-15 and B-37-16. This current version of the Emergency Regulation is scheduled to expire on February 28, 2017 if the Board does not act to extend it. OCWD believes that the State Water Board should let the Emergency Regulation expire.

OCWD developed the Groundwater Replenishment System (GWRS) the world's largest advanced water purification system for indirect potable reuse. The GWRS produces 103,000 acre-feet per year (afy) of recycled water, which is enough water for 850,000 people, is drought-proof sustainable water supplies, and offsets water imported from the State Water Project. The District is in the final stages of expanding the project up to 130,000 afy, which will be completed in 2022.

In addition to developing sustainable water supplies like the GWRS, Californians have continued a long-established trend in adopting water use efficiency measures that are continuing to contribute to permanent reductions in water use. Also, demonstrations of water supply security and future drought contingency planning are part of the long term water use efficiency conservation policy of "Making Water Conservation a California Way of Life", which is expected to become the focus of implementation in coming months and years. B-37-16 directs the State Board to replace the elements of the Emergency Regulation with permanent regulations that will require on-going reporting and water use data collection, and extend the water waste prohibitions.

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We acknowledge that a portion of the State is still under drought conditions, but not the extreme drought conditions that have existed in previous years. With above average rainfall, snowpack and reservoir storage we believe that the emergency regulations should be lifted.

Even though the proposed resolution amending and readopting drought-related emergency regulations implies that a sudden end to the winter precipitation or snowfall could threaten water supplies this summer, the Orange County Groundwater Basin is refilling and will be above levels that would trigger a pumping reduction.

Thank you for considering our position to allow the Emergency Regulation to expire on February 28, 2017. Please do not hesitate to Alicia Dunkin, Legislative Affairs Liaison with Orange County Water District at (714) 378-8232 or adunkin@ocwd.com or me 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: The Honorable Frances Spivy-Weber, Vice Chair, State Water Board
The Honorable Dorene D'Adamo, Member, State Water Board
The Honorable Steven Moore, Member, State Water Board
The Honorable Tam Doduc, Member, State Water Board
Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Mr. Tom Howard, Executive Director, State Water Board
Mr. Eric Oppenheimer, Chief Deputy Director, State Water Board
Mr. Erik Ekdahl, Director, Office of Research, Planning and Performance, State Water Board
Mr. Max Gomberg, Climate Change Mitigation Strategist, State Water Board