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ORANGE COUNTY WATER DISTRICT

ORANGE COUNTY'S GROUNDWATER AUTHORITY

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December 22, 2016

The Honorable Mark Cowin, Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
via e-mail: wue@water.ca.gov

Subject: Comment on "Making Water Conservation a California Way of Life"

Dear Director Cowin and Chair Marcus:

The Orange County Water District (OCWD; the District) appreciates this opportunity to provide comments to the draft report titled "Making Water Conservation A California Way of Life," which addresses elements of the Governor's Executive Order B-37-16. We appreciate the work that the State has done and continues to do in addressing the challenges that exist within California regarding the drought. We also appreciate recognition and credit for sustainable water supplies, such as indirect potable reuse and desalinated water, in the emergency drought regulations.

Specifically, OCWD recommends that the "Updated Contents of the Urban Water Management Plans" section continue to acknowledge the benefit of developing indirect potable recycled (IPR) water and desalinated water projects. We would like to express our strong support that sustainable water supplies be considered fully reliable under all historical drought hydrology and potential climate change effects. Drought-resilient water supplies, such as these, should not be subject to reductions under shortage conditions to encourage development and investments in IPR and desalinated water projects.

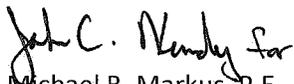
OCWD developed the Groundwater Replenishment System (GWRS), which produces 103,000 acre-feet per year (afy) of recycled water and off-sets water imported from the State Water Project. The District is in the final stages of expanding the project up to 130,000 afy. Once OCWD has expanded the GWRS up to 130 million gallons per day (mgd), it will have spent approximately \$900 million in capital costs alone creating 130,000 afy of new water supply, which is about 30 percent of the total water needs within OCWD's service area. Additionally, the District may purchase 50 mgd of desalinated ocean water at approximately \$700 million in capital costs that would create another 50,000 afy of new water supply. Combined, these two projects total \$1.5 billion and create 180,000 afy of new water supply, which is about 41% of the total water needs in our service area.

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OCWD is leading the way in water reuse for drinking water purposes. Communities who have invested hundreds of millions of dollars to sustain water supplies should not be subject to reductions during drought as to encourage and incentivize cities and agencies to continue to build sustainable water projects. 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.

Thank you for considering our comments and your agencies' efforts in completing the draft report, which will prepare California for and respond to future droughts. Please do not hesitate to contact Alicia Dunkin, Legislative Affairs Liaison, at (714) 378-8232 or adunkin@ocwd.com or me if we may be of assistance to you or your staff.

Sincerely,

A handwritten signature in black ink that reads "John C. Markus for". The signature is written in a cursive style.

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