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ORANGE COUNTY WATER DISTRICT

ORANGE COUNTY'S GROUNDWATER AUTHORITY

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February 6, 2020

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SUBJECT: Comments on Draft 2020 Water Resilience Portfolio – Constituents of Emerging Concern and Forecast Informed Reservoir Operations

Dear Secretaries Crowfoot, Blumenfeld, Ross, and Directors Bosler and Vogel:

The Orange County Water District (OCWD; the District) applauds the Governor's leadership and efforts to provide reliable and secure water supplies for California's approximately 40 million residents via the development of the 2020 Water Resilience Portfolio. California is a large state with many of its regions facing a variety of water challenges including water contamination, depleted groundwater basins, uncertain water reliability and unpredictable weather patterns.

The District is pleased to see the Portfolio acknowledges there is no one solution for the water needs for the different regions of the state. Each region and watershed in the state has different needs, hydrologic cycles, local water supplies, opportunities and obstacles in developing a resilient water supply. The state should avoid dictating one

size fits all solutions. The District respectfully requests that the Portfolio also address new topics and expand on research opportunities such as constituents of emerging concern (CECs) and Forecast Informed Reservoir Operations (FIRO).

Comments Regarding Constituents of Emerging Concern (CECs)

We respectfully recommend inclusion of the following within Item # 8 Protect and restore water quality by driving pollution reduction from a range of sources:

Add Item # 8.8 Increase financial capacity to support projects to treat water supplies affected by constituents of emerging concern with Response Levels and/or Maximum Contaminant Levels.

Financial support is needed to maintain existing water supplies that are affected by constituents of emerging concern with Response Levels and/or Maximum Contaminant Levels. In Orange County and many other parts of southern California, if existing groundwater supplies are shut down due to new water quality requirements, water retailers will have to switch from local groundwater supplies to imported water supplies. Imported water has a much higher greenhouse gas footprint compared to local groundwater supplies. For example, the newly established Response Levels for PFOA and perfluorooctane sulfonate will shut off approximately 71 groundwater supply wells in Orange County. The increased demand on imported water supplies to replace this groundwater will increase annual energy consumption by 210,000 megawatt-hours with a corresponding annual increase of 48,000 metric tons of carbon dioxide emissions.

Implementation of these recommendations also support sections (1, 3, 8, 23, 29).

Comments Regarding Forecast Informed Reservoir Operations (FIRO)

We appreciate the inclusion of section 27.3--Implementation of Forecast Informed Reservoir Operations (FIRO), as a critical step forward to ensure improved flood control capabilities and water supply management.

We respectfully recommend addition the following language to section 27.3:

Fund multi-year implementation (\$9.25m/year) of the California Department of Water Resources Atmospheric Rivers Research Program to improve storm observations, precipitation, snow-level and post-wildfire landslide forecasts, climate models, and decision support, addressing critical water management and hazard mitigation forecast information needs from short-term (0-14 days lead time), to subseasonal-to-seasonal (2 weeks to seasons), and climate (years to decades ahead).

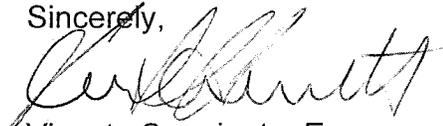
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Utilizing improved forecasting and prediction capabilities for storms to inform FIRO based water management processes will improve our state's water supply and reduce the risk to life and property from dangerous floods and post-wildfire debris flows. These methods and tools can help the state meet the long-term needs of its citizens and the environment.

Implementation of this recommendation also supports sections (1, 3, 9, 20, 22-27).

Again, we commend the Portfolio's recognition of the unique differences between the regions of the state and we look forward to continuing to work with you to build more resilient water supplies and improve our water operations. Please do not hesitate to contact Jason Dadakis, Executive Director of Water Quality & Technical Resources, at jdadakis@ocwd.com or (714) 378-3364 or me at mmarkus@ocwd.com or (714) 378-3305 if you have any questions and/or if you or your staff would like any additional information on water-related topics.

Sincerely,



Vicente Sarmiento, Esq.
President

cc: OCWD Board of Directors