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ORANGE COUNTY WATER DISTRICT
Orange County's Groundwater Authority

January 5, 2016

Sent via Electronic Mail: Kathy.Frevert@waterboards.ca.gov

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

RE: Comments on Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation

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 inviting the District to participate in the stakeholder workshops to solicit input on elements of the existing Emergency Regulation that should be modified.

The District appreciates the work that the State Board and its staff have done and continue to do in addressing drought-related challenges. We commend the State Board for allowing public input on the emergency drought regulations and for listening to other perspectives during the process of implementing regulations for urban water conservation.

California water agencies have invested billions of dollars in drought sustainable water supplies and OCWD appreciates the State Board's consideration to give agencies that have developed sustainable supplies credit for their investments. Without those supplies, the current conditions would be much more severe. Incentivizing the building of sustainable water supply projects will help mitigate the severity of future droughts.

As mentioned during the workgroup discussions, the District strongly supports 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 agency's reduction target, effectively adjusting its conservation savings. We thank the State Boards' staff for including in their recommendation an acknowledgment of sustainable water supplies.

OCWD has always worked in a proactive manner to plan far in advance to help reduce our region's dependence on imported water sources and will continue to do so in the future. The District is currently exploring purchasing up to 56,000 acre-feet per year (afy) of desalinated seawater from the proposed Huntington Beach Desalination Project and expanding its

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Groundwater Replenishment System (GWRS) to provide an additional 31,000 afy as a way to increase local water supplies. 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.

Thank you, again, for allowing our participation and input on the emergency drought regulations. We would also greatly appreciate participating in any future workshops on this or similar topics. Please do not hesitate to contact Alicia Dunkin, Legislative Affairs Liaison with the 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,

A handwritten signature in blue ink, appearing to read 'M. Markus', with a long horizontal flourish extending to the right.

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,