



CITY OF ORANGE

PUBLIC WORKS DEPARTMENT

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December 1, 2015



Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment on Emergency Conservation Regulation

Dear Ms. Townsend:

The City of Orange appreciated the opportunity to provide input to the State Water Resources Control Board (SWRCB) on the implementation of the emergency drought regulations. Our comments are intended to address modifications that can make immediate improvements to the proposed framework. The City of Orange provides the following comments for your consideration that are intended to improve the path we are all on:

1. **Recognition of Indirect Potable Reuse (IPR).** Expanding the use of recycled water is a priority for the State of California. Not recognizing IPR undermines the State policy to encourage expanded use of recycled water. The SWRCB should adjust gpcd for agencies receiving IPR through the Ground Water Replenishment (GWRS) to promote equity and expanded use of recycled water.
2. **Recognition of Wildland-Urban Interface (WUI).** The City of Orange, has experienced very real and sobering property losses due to wildland fires. Fire behavior is dictated by three factors: 1) the lay of the land, 2) weather, and 3) fuel. Southern California experiences some of the fiercest wildland fires in the nation largely due to the chaparral native to the region and to the Santa Ana winds. Taking all of these factors into account, the State of California has made a final recommendation to the City of Orange with reference to modifying the very high fire hazard severity zone in the City. Buildings within this zone must be constructed especially to withstand wildland fires. Additionally, vegetation within certain distances to the homes must be thinned and irrigated to slow a fire should one approach the building. The SWRCB should adjust gpcd for agencies with WUI that are mandated by the State to be irrigated.

- 3. Recognition of inmate population.** The City of Orange is home to three correctional facilities: Theo Lacy, Juvenile Hall, and the Youth Leadership Academy. These three facilities house a combined total of approximately 4,500 inmates and correctional officers. This contributes to them being the City's largest water users, yet this population is not accounted for. The SWRCB should adjust gpcd for agencies with large correctional facilities to account for the inmate population.

Thank you, again, for considering our comments on the emergency drought regulations. Should you have any questions regarding these comments, please contact me at (714) 744-5545.

Sincerely,



Joe DeFrancesco
Public Works Director

Copy: Rick Otto, City Manager
Frank Sun, Deputy Director/City Engineer
Jose Diaz, Water Manager