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ORANGE COUNTY WATER DISTRICT
ORANGE COUNTY'S GROUNDWATER AUTHORITY

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(5/5-6/15) Board Meeting- Item 6
Emergency Conservation Regulation
Deadline: 5/4/15 by 10:00 am

May 1, 2015

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

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



RE: Input on Draft Emergency Regulations to Implement the Governor's Executive Order B-29-15

Dear Ms. Townsend:

On behalf of the Orange County Water District (OCWD, the District) and the 19 water producers we serve (which include City of Anaheim, City of Buena Park, East Orange County Water District, City of Fountain Valley, City of Fullerton, City of Garden Grove, Golden State Water Company, City of Huntington Beach, Irvine Ranch Water District, City of La Palma, Mesa Water District, City of Newport Beach, City of Orange, City of Santa Ana, City of Seal Beach, Serrano Water District, City of Tustin, City of Westminster, and Yorba Linda Water District), we want to thank the State Water Resources Control Board (State Board) for its quick response to Governor Brown's Executive Order, B-29-15. In doing so, the State Board and its staff have provided California with clear direction--water conservation must become a way of life for Californians. However, the State Board's draft guidelines fail to exclude potable recycled water supplies from the amount of water subject to the conservation standard. We request the State Board reconsider its position, and recognize indirect potable recycled water supplies as 100 percent conservation.

OCWD developed the Groundwater Replenishment System that produces 72,000 acre-feet of recycled water per year, which directly reduces demand on the Bay-Delta. The District is in the final stages of expanding the project up to 100,000 acre-feet per year. Currently, because the recycled water is indirect potable reuse water (IPR), the District's water producers do not get credit for this water production under the State Board's draft guidelines.

The State Board's emergency regulations policies and definitions should be consistent with the established language in SBx7-7. As proposed, the draft regulations do not treat all recycled water and reuse projects equally. The guidelines remove "purple pipe" non-

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potable recycled water when calculating "Total Water Production." When calculating the 25% mandatory reduction framework under the draft guidelines, only water from non-potable recycled water production has the benefit of exemption from the amount of potable water produced/used by urban water agencies. In SBx7-7, water production from IPR projects are treated in the same manner as water produced from non-potable recycled water projects.

Water Suppliers throughout California have long advocated for the right recycled water for the proper purpose. This effort has required extensive outreach to educate the public on the value of recycled water as a safe and healthy way to augment California's water supply. Through this effort, the use of recycled water for groundwater recharge and reservoir augmentation is now a reality and publicly supported by communities and leaders throughout the State.

Governor Brown has incorporated recycled water, both potable and non-potable, into his long-term water strategy, and made his position on this matter clear. In the Governor's Water Action Plan, he directed the State Board to develop uniform regulations for the indirect potable use of recycled water and to work with an expert panel to evaluate the feasibility of direct-potable reuse, as required by SB 322. Further, in signing this bill, Governor Brown noted that, "California needs more high-quality water and recycling is key to getting there."

As leaders in the recycled water industry, we support the Governor's mandate for a 25 percent reduction in potable urban water demand. To meet these targets, we urge the State Board to promote and encourage California water suppliers to utilize diverse water management tools, including conservation and recycled water, to the greatest extent possible.

Thank you, again, for considering our comments on the proposed emergency regulations. Please do not hesitate to contact us or Alicia Dunkin, Legislative Affairs Liaison with Orange County Water District at (714) 378-8232 or adunkin@ocwd.com if we may be of assistance to you or your staff.

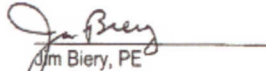
Sincerely,



Michael R. Markus, P.E.,
D.WRE, BCEE, F.ASCE
General Manager
Orange County Water District



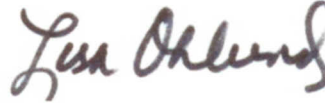
Michael Moore
Acting Assistant General Manager
City of Anaheim



Jim Biery, PE
Director of Public Works



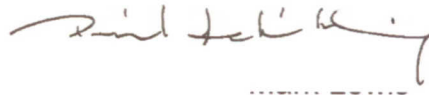
Jim Biery, P.E.
Director of Public Works
City of Buena Park



Lisa Ohlund
General Manager
East Orange County Water District



Mark Lewis
Director of Public Works/City Engineer
City of Fountain Valley



David Schickling
Water Systems Manager
City of Fullerton



Bill Murray
Water Services Manager
City of Garden Grove



Golden State
Water Company
A Subsidiary of American States Water Company

Ken Vecchiarelli
General Manager
Golden State Water Company



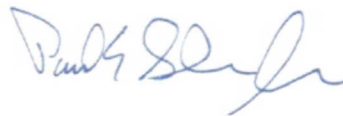
Brian A. Ragland
Utilities Manager
City of Huntington Beach



Paul A. Cook
General Manager
Irvine Ranch Water District



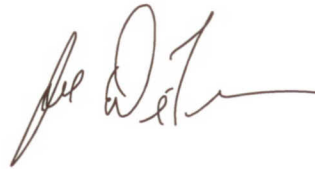
James Tsumura
Water Supervisor
City of La Palma



Paul Shoenberger
General Manager
Mesa Water District



George Murdoch
Utilities General Manager
City of Newport Beach



Joe DeFrancesco
Public Works Director
City of Orange



Nabil Saba, P.E.
Water Resources Manager
City of Santa Ana



Sean Crumby
Director of Public Works
City of Seal Beach



Jerry Vilander
General Manager
Serrano Water District



Art Valenzuela
Water Services Manager
City of Tustin



Scott Miller
Water Superintendent
City of Westminster



Marc Marcantonio
General Manager
Yorba Linda Water District

cc: State Water Resources Control Board