



Yorba Linda Water District

*Independent, Reliable and Trusted
Service for More Than 100 Years*

May 4, 2015

Honorable Felicia Marcus, Chair
C/O Jeanine Townsend, Clerk of the Board commentletters@waterboards.ca.gov
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Submitted via e-mail

Subject: Comment Letter – Emergency Conservation Regulations

Dear Chair Marcus and Board Members,

The purpose of this letter is to inform you of a specific problem with the draft Emergency Conservation Regulation frame that, if not rectified, will result in YLWD having to choose between achieving our conservation goal, protecting public health, or protecting public safety.

YLWD's R-GPCD goal is artificially high because the draft method of calculation includes water critical in preventing wildfires. YLWD shares a border with Chino Hills State Park, and because the State does not have a fire break on State property, the tragic 2008 Freeway Complex Fire roared through State property and destroyed 314 homes, wasted in excess of 34,000,000 gallons of YLWD water for wildfire fighting, and resulted in YLWD being held liable in excess of \$69 million dollars because we could not provide enough water to stop the fire.

The risk of wildfire in Chino Hills State Park is higher than ever due to this historic drought and hotter weather. Since 2008 we have heavily invested in infrastructure to pump and store additional water for wildfires, and we have followed Orange County Fire Authority requirements to create and irrigate fuel modification zones. Despite annual occurrences of area wildfires, our efforts have worked. Penalizing our R-GPCD conservation goal as a result of public health and safety measures related to wildfire prevention is simply unreasonable.

The economic side must also be considered. This Freeway Complex Fire nearly bankrupted our 106 year old water district. YLWD's inflated conservation goal requires us to take a 36% cut in annual revenue (\$9 million). Homeowners that border wildfire zones willingly pay to irrigate their land to prevent wildfire. Reducing this irrigation to meet our R-GPCD goal not only puts public health and safety at risk, but also creates a financial hardship to all our residents to replace this revenue.

We offer a simple solution to this problem that accomplishes the economic and public health and safety goals of the emergency regulation, and allows YLWD to continue to build upon our many voluntary short and long term conservation investments and achievements.

Water agencies that border (and can document) a wildland-urban interface may quantify *gallons used to support wildfire prevention*. This number shall be subtracted from the total production used to calculate R-GPCD.

With the problem of wildfires in our District it is impossible to achieve our conservation goal without recognizing that irrigation of critical Fuel Modification Zones (as mandated by Orange County Fire Authority) is necessary, and is not a waste of water. We have provided your staff with a PowerPoint presentation that clearly supports our position, and we hope you take time to review and consider this.

We also support a credit for **Indirect Potable Reuse** equal to that given to recycled water. Our public has heavily invested in technology that converts wastewater to potable water. The calculation of R-GPCD allows credit for recycled water which is not as useful as potable water. IPR may be considered by some as a new source of potable water, but it is recycled, and is conserved many times over. Not recognizing this conversion of wastewater to potable water sends the wrong message to our community, who voluntarily made the investment in this world-leading IPR source.

Lastly, we believe water agencies throughout Orange County should be measured as a group in reaching a collective conservation standard. The group as a whole would achieve the same amount of water savings as they would individually, and would benefit greatly by uniform messaging and implementation of water conservation programs across the broader geographic area. We support this as detailed in MWDOC's letter to the Board.

Thank you for your consideration.



Marc Marcantonio
General Manager

CC: YLWD Ratepayers
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