



October 15, 2018

Submitted via email to: waterfixcert@deltacouncil.ca.gov (WaterFix-C20185)

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Mr. Randy Fiorini
Chair, Delta Stewardship Council
980 Ninth Street 1500
Sacramento, CA 95814

Subject: The Municipal Water District of Orange County Letter of Support for California Department of Water Resources Certification (C20185) that the California WaterFix is consistent with the Delta Plan

Dear Chair Fiorini:

On behalf of the Municipal Water District of Orange County (MWDOC), we urge the Delta Stewardship Council to support the Certification of Consistency submitted by the Department of Water Resources (Department) regarding the California WaterFix, Certification Number C21085. We support the Department's certification that the California WaterFix is consistent with the Delta Plan, and encourage you to deny the appeals alleging the project is inconsistent with the Delta Plan.

The substantial evidence in the Department's administrative record, including the Final Environmental Impact Report, supports the Department's Certification of Consistency with the Delta Plan to provide a more reliable water supply for California and will protect, restore, and enhance the Delta ecosystem.

As a member agency of the Metropolitan Water District of Southern California (Metropolitan), MWDOC relies on the State Water Project to deliver a portion of our water supply from Northern California through the Delta. Our comments reflect our ongoing concerns with the reliability of these supplies over the time and the important role of the California WaterFix in conjunction with EcoRestore.

In 2009, MWDOC, along with Metropolitan, supported the creation of the Delta Stewardship Council as a governance structure with the authority to determine the consistency of the Delta Plan with the perspective that restoring the Delta is equally important as providing a reliable water supply for our state, and that these coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place.

The Delta Plan has helped to inform the WaterFix process and shape a final project that advances water policy for California, and will modernize the State Water Project in a manner consistent with the Delta Reform Act. Upgrading our aging water delivery

infrastructure, while helping improve the Delta ecosystem, is the most cost-effective way to secure reliable water supplies.

MWDOC has identified the following areas found within Department's Certification of Consistency and administrative record that we would like to highlight in this letter:

California's Reliable Water Supply

Within the Delta Reform Act and the Delta Plan Conveyance, Storage, and Operations amendments, new water conveyance infrastructure in the Delta has been acknowledged as critical to achieve the coequal goals. The Sierra Nevada is the state's largest water source and no reliability strategy can be successful without the infrastructure necessary to capture wet-period supplies. The water that Southern California relies on for drought and emergency-needs is dependent on imported supplies. The WaterFix, in combination with Metropolitan's and its member agencies' past and continued efforts, provides flexibility to deal with droughts and climate change, and guard against disruptions from earthquakes or levee failures in the Delta.

Projections of availability of water in wet years from the operations of the WaterFix, combined with the potential for earlier season snow melt in California, will require conveyance and additional storage on a statewide basis to help capture water when it is available. The earlier snowpack melt has been analyzed as a potential loss of 14 million acre-feet of storage from having the snow remain in the mountains longer.

Increased Regional Self-Sufficiency

Orange County has complied with the Delta Reform Act's call for all regions that rely on supplies from the Delta watershed to expand regional self-reliance to help meet future demands. Development of additional local supplies improves both local and regional reliability as well as emergency reliability.

In 2016, and again in 2018, MWDOC completed its own water supply reliability modeling. The MWDOC reliability modeling was a comprehensive assessment of water supply reliability for Orange County, that examined a range of potential water supply gaps between future water demands and near-term planned water supplies.

The MWDOC reliability modeling revealed a number of important findings that have implications for Orange County water reliability.

- The WaterFix offers the most cost-effective solution for achieving regional supply reliability.
- The WaterFix would result in shortages occurring no more often than three in 10 years in 2040, and we fully acknowledge that additional investments are needed to improve reliability further.
- Adaptive management is key; the reliability of supplies is never "static" in California.

The modeling indicates that WaterFix is the single largest cost-effective solution towards achieving water supply reliability in Southern California and Orange County. However, the WaterFix alone is not sufficient as additional investments are needed by Metropolitan, the Metropolitan member agencies, and in Orange County to meet our reliability goals. Taking this next step in the consistency determination is the right step.

Imported water provided by Metropolitan from Northern California and the Colorado River meets approximately half of Orange County's water needs. However, this dependence of 50 percent imported water does not apply evenly over the entire service area. South Orange County relies on imported water to meet approximately 95 percent of its potable water demand. The remaining five percent is provided by

surface water, limited groundwater, and water recycling. Alternatively, the Orange County Groundwater Basin which underlies North and Central Orange County, provides approximately 60 percent of the water needed in those areas; with imported water meeting the remaining balance of the water demand.

MWDOC is a leader in water conservation programs and water loss auditing. MWDOC has worked closely with its retail agencies to decrease dependence on imported water and increase supply reliability by expanding local supply source opportunities and implementing water use efficiency measures.

MWDOC supports, encourages and partners in recycled water, groundwater, and stormwater efforts within our service area. As imported water supplies have become more challenged, along with our local agencies, we have continued working to identify opportunities for the use of recycled water for irrigation purposes, groundwater recharge and even non-irrigation applications. To advance local groundwater and recycling projects, we need reliable, high-quality water to replenish basins and support new projects.

We continue to invest in local and regional self-reliance, as demonstrated in our 2015 Urban Water Management Plan which supports Department's Certification. Nonetheless, State Water projects will continue to be an essential and cost-effective source for our region and communities.

Economic Benefits

With more than 30 percent of Southern California's water supply coming from the Sierra Nevada, the improved reliability the WaterFix will provide is vital for economy, job creation, and quality of life. Even with the WaterFix major financial investment, State Water Project supplies remains one of the most affordable supply sources of water for families, businesses, and industry in Orange County.

Science-based Solutions

Restoring the Delta is equally important as providing reliable water supplies. As a Metropolitan member agency, we fully support the investments provided by Metropolitan in Delta Science as well as the investments in ecosystem restoration in the Delta and the Delta watershed. Further, the WaterFix may be the most thoroughly studied public works project in our nation's history. The WaterFix has been the subject of detailed analysis and extensive environmental review for decades.

Conclusions

We urge the Delta Stewardship Council to support the Certification of Consistency submitted by the Department of Water Resources regarding the California WaterFix, Certification Number C21085. The Certification of Consistency and substantial evidence in the record before you show that California WaterFix is crucial to meeting both coequal goals and consistent with the applicable Delta Plan policies. A modernized dual-conveyance water system that can re-establish more natural flow patterns in the Delta is critical for the state's water future. As a member agency of Metropolitan, the primary investor in the California WaterFix, we look forward to the WaterFix moving one step closer to construction.

Sincerely,



Robert J. Hunter
General Manager