

July 13, 2018

Ron W. Sullivan, Convener  
OWOW Steering Committee  
SAWPA  
11615 Sterling Avenue  
Riverside, CA 02503

Dear Commissioner Sullivan,

The North and Central Orange County stakeholders have spent a number of months developing an update of the Integrated Regional Water Management Plan for North and Central Orange County (The OC Plan), which comprehensively reflects the water management needs of this highly urbanized area of Orange County. For the reasons discussed below, we ask that The OC Plan be incorporated into the OWOW Plan Update 2018 in the following manner:

- 38% of total available future grant funds be allocated to priority projects identified in The OC Plan;
- The OC Plan be incorporated as a separate chapter within the OWOW Plan; and
- Projects within the North and Central Orange County Watershed Management Areas (WMAs) be ranked and prioritized for Proposition 1 IRWM funding through the process developed in The OC Plan.

The proposed funding allocation percentage for Orange County is based on the land area and population methodology used by the San Diego IRWM Funding Area to allocate funds between its San Diego, Riverside and Orange County Regions, which in turn was based on the statewide allocation of funds under prior funding propositions. We will present a full overview of this request and our reasoning discussed below at the July 26 OWOW Steering Committee meeting.

*Orange County is Largely Hydrologically Distinct from Santa Ana River Watershed*

The hydrology of the Santa Ana River watershed presents unique challenges with respect to Orange County. Less than 20% of the North and Central Orange County WMAs are hydrologically connected to the watershed of the Santa Ana River, and Prado Dam physically separates the upper and lower watershed. Although issues and programs focused on the Santa Ana River and its tributaries are important to OCWD, they do not engage the majority of the stakeholders and watershed areas within Orange County.

Mr. Ron Sullivan  
July 13, 2018  
Page 2 of 3

*Water Resource Priorities and Needs in Orange County are Unique Within the Funding Area*

Issues, projects and programs focused on Orange County sub-watersheds are difficult to link to Santa Ana River-related benefits and concerns. Water resource priorities, such as beach water quality, seawater intrusion control, marine protected areas, and ecological health of Upper Newport Bay, are unique to this area and have little in common with the rest of the Santa Ana River watershed.

Since 2005 Orange County has maintained IRWM plans for its North, Central and South watershed management areas. Responding to requests from Orange County stakeholders, OC Environmental Resources began in early 2017 to update the existing North and Central Orange County IRWM plans. The intention of this effort was to:

- provide a forum to engage local stakeholders in the IRWM process,
- strengthen collaborative project efforts in the North and Central watershed management areas,
- identify and focus on the unique water resource issues within Orange County,
- develop a project portfolio that addresses the identified issues, and
- continue to maintain the option to become a region within the Santa Ana Funding Area.

The combined and updated plan was completed in March 2018, was adopted by the Orange County Water District and Orange County Sanitation District, and is undergoing final approval by the County of Orange.

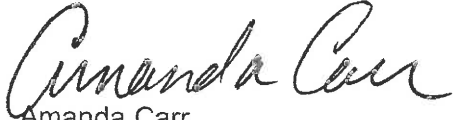
*Orange County Stakeholders Set Goals and Objectives that Diverge from those in the OWOW Plan Goals*

Water resource management priorities, challenges and issues within Orange County are highly integrated, reflective of the long-standing collaboration that predates the state's IRWM program. Water supply, water quality, flood risk, drought preparedness, wastewater treatment, recycled water, stormwater, and groundwater are cooperatively managed regionally within Orange County, and have been for decades. For example, the Orange County Flood Control District and the Orange County Water District began joint operations to manage flood risk while increasing groundwater recharge in the 1930s and Newport Bay stakeholders, with support from the County of Orange, have been working together to manage water quality impairments since the 1970s. We believe that these natural and long-standing integrated, regional water management efforts would be served best with grant funding decisions for Orange County projects determined through a local process.

With the changes requested above, we believe the OWOW process will be strengthened through increased local stakeholder participation and be more reflective of the needs identified by Orange County stakeholders. We hope that through our joint efforts we will improve the management of water resources in the Santa Ana Funding Area and foster collaboration and innovation in solving complex challenges in the watershed. We ask that a response to these requests be provided by August 27 as we have scheduled a meeting of the Regional Water Management Group on August 29 to review your response.

Mr. Ron Sullivan  
July 13, 2018  
Page 3 of 3

Sincerely,



Amanda Carr  
Deputy Director, OC Environmental Resources  
OC Public Works



Michael R. Markus, P.E.  
General Manager  
Orange County Water District



Jim Herberg, P.E.  
General Manager  
Orange County Sanitation District

cc: OWOW Steering Committee members  
SAWPA Commissioners  
SAWPA General Managers  
OCWD Board of Directors  
OCSD Board of Directors