



AB32 Scoping Plan Comments Second Phase

Understanding California's water-energy-climate relationships – where, why, and how much greenhouse gases (GHGs) are emitted – helps to identify high potential strategies and actions that can be taken now to significantly reduce GHG emissions in California. This is particularly important today, as California faces a perfect storm of water infrastructure challenges in the north, electric resource constraints in the south and aggressive state-wide GHG emissions reduction goals.

Hundreds of millions of dollars are invested every year by California's water and wastewater agencies in system repairs, replacements and improvements that can, in part, help to reduce GHG emissions. Although a substantial investment, this funding has not been enough to do all the things that are needed to ensure sustainable water resources into the future or comprehensively address the GHG impacts of the water use cycle in California.

A low carbon water future is instrumental to the future of California. Consistent benchmarking of the energy and associated GHG impacts of water sector actions is important to building awareness about opportunities to reduce the water sector's carbon footprint. Quantifying and tracking a water agency's GHG emissions footprint additionally aids in evaluating the effectiveness of resource and environmental policies, and the investments made to achieve them.

The Climate Registry is the pre-eminent GHG reporting program in North America, created and governed by the State of California and more than sixty other state, provincial and tribal jurisdictions. We thank you for considering our previous comments submitted in the first comment period and offer the following additional recommendations:

1. Support The Climate Registry to develop GHG accounting guidance specifically for water agencies that addresses the entire water use cycle, from procurement to treatment and discharge. The guidance would ensure consistent and comparable measurement of carbon footprints and would define metrics that would assist in benchmarking agency and regional performance.
2. Support and endorse The Climate Registry as the single energy and GHG calculation and reporting registry for water agencies, in order to establish a central repository for water agency data. The registry would allow agencies to report out to stakeholders and to compare and analyze data and impacts over time.
3. Fund The Climate Registry's development of training resources for water agencies and periodic regional and state-level reports that demonstrate collective energy and climate impacts.
4. Support the creation of incentives for agency participation in The Climate Registry, such as credit for funding by state water bonds. These financial incentives will serve to support and drive activities that reduce water use, energy demand, and resource costs.

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