

September 29, 2008

Ms. Mary Nichols
Chair
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Subject: Comments on Draft AB 32 Scoping Plan Document—Water

Dear Ms. Nichols:

Weston Solutions, Inc. (WESTON®) appreciates the opportunity to submit comments on the Draft AB 32 Scoping Plan Document. Climate Change is a serious global problem that poses significant challenges in the coming years. The Draft AB 32 Scoping Plan Document provides a road map for the state of California and the Air Resources Board to comply with AB 32 greenhouse gas (GHG) emissions reductions goals.

WESTON offers the following comments regarding the Draft AB 32 Scoping Plan Document's strategy to address GHG emissions through water treatment and use measures and kindly request that they be incorporated into the Proposed Scoping Plan Document.

- A changing climate will negatively impact source water quality and impaired water quality ultimately raises water treatment costs, energy use, and GHG emissions. Facing this potentially intensifying feedback loop, prioritizing investment in plant upgrades is essential. Targeting plants by volume and energy intensity of process should be considered as an explicit strategy.
- Residential level stormwater management and rainwater reuse will help minimize pollutant transport to local waterways and reduce water treatment costs. We support use of funds from the public goods charge to encourage better stormwater practices as well as water conservation through public education for residents, local governments and businesses.
- Water efficiency and water re-use measures reduce GHG emissions by reducing energy use for water treatment and distribution. We support approaches which encourage re-use of treated wastewater for major water consumers like agriculture and thermoelectric power generation.

Thank you for your consideration of our comments.

Sincerely,

Susan E. Lorenz
Project Scientist
Sustainability Team
Weston Solutions, Inc.