

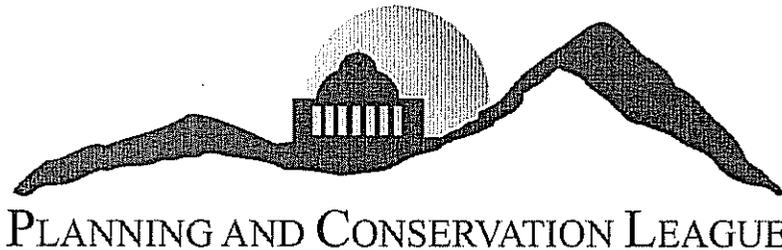
*President*  
John Van de Kamp

*President Emeritus*  
Sage Sweetwood

*First Vice President*  
Bill Yeates

*Senior Vice President*  
Kevin Johnson

*Secretary/Treasurer*  
Bill Center



*Regional Vice Presidents*  
Elisabeth Brown  
Jan Chatten-Brown  
Dorothy Green  
Phyllis Faber  
Rick Frank  
Rick Hawley  
Doug Linney  
David Mogavero  
Lynn Sadler  
Teresa Villegas

December 12, 2007

Dear Members of the AB 32 Economic and Technology Advancement Advisory Committee:

The Planning and Conservation League commends the Committee for its ambitious efforts to identify activities that will assist in the reduction of greenhouse gas emissions. We are pleased to have this opportunity to submit our recommendations for additional items to include in the ETAAC Draft Report. Although there are several areas that deserve greater attention in the Draft report, particularly concerning reforms to California's land use policies and land use incentive structures, due to limitations of time and resources, we have focused our recommendations on opportunities to reduce greenhouse gases through better management of California's water resources. We hope that the Committee incorporates these recommendations into its Final Report and advocates for their adoption during the AB 32 scoping process.

The use of water in California contributes significantly to the state's greenhouse gas emission crisis. In California's Water-Energy Relationship (2005), the California Energy Commission (CEC), concluded that the water sector is the largest user of electrical energy in the state, accounting for 19 percent of all electricity consumed in California, 30 percent of non-power plant-related natural gas use, and 88 million gallons of diesel burned every year. In 2005, Governor Schwarzenegger's Climate Action Team estimated that the energy used to move and treat water in California results in the release of approximately 44 million tons of CO2 emissions annually.

Fortunately, there are many cost-effective opportunities to reduce the greenhouse gas impacts from water use in California. For example, the Climate Action Team noted that accelerating investment in Water Use Efficiency to meet the Department of Water Resources' California Water Plan Update (CWPU) 2030 water conservation goals by 2010 would result in a cumulative reduction of 40 million tons of emissions by 2030. In testimony before the California Public Utilities Commission (CPUC) several California utilities have stated that water use efficiency measures reduce energy use in a more cost effective manner than traditional energy efficiency measures, sometimes costing as little as \$.58 for every \$1.00 spent on traditional energy efficiency programs. In addition, new policies, such as efficiency and GHG emission guidelines for the use of energy-intense ocean water desalination facilities, would be essentially cost-free.

In fact, despite some laudable progress in water use efficiency, most of California's efficiency potential remains untapped. Numerous analyses, including those presented in the "Investment Strategy for California Water" (2004), prepared by the Planning and Conservation League, DWR's "California Water Plan Update" (2005), the Pacific Institute's "An Efficient Future" (2006), and the CALFED Bay-Delta Program's "Water Use Efficiency Comprehensive Evaluation" (2006), show that California can accommodate substantial increases in population while reducing our overall water use through cost-effective, environmentally-beneficial water management strategies.



1107 9th Street, Suite 360, Sacramento, CA 95814 Phone: 916-444-8726 Fax: 916-448-1789

Website: [www.pcl.org](http://www.pcl.org) Email: [pclmail@pcl.org](mailto:pclmail@pcl.org)

This letter is printed on 60% recycled fiber, 30% post consumer waste, acid free paper.



However, without a substantial change in state agency policy, these reductions in water use will not be achieved and greenhouse gas emissions from the water sector will continue to rise. For example, the CWPU predicts that while overall water use in California will remain relatively steady through 2030, urban water use is expected to increase by 3 million acre feet while agricultural use will decrease. Because the energy-intensive end uses make urban water use generally more carbon-intensive than agricultural water use, this transition in water use would result in an increase of CO<sub>2</sub> from the water sector. In addition, several urban communities in California are currently planning to build large-scale oceanwater desalination facilities. Because ocean water desalination is the most carbon-intensive method of treating water, if these communities do not fully mitigate their energy-related greenhouse gas emissions, these projects would greatly increase emissions from water use.

In addition, many activities that reduce the greenhouse gas emissions from California water use will also help reduce our vulnerability to crisis and conflict resulting from the impacts of global warming on California's natural hydrology. For example, by implementing water use efficiency measures that reduce Southern California's reliance on the California Bay-Delta, we will not only reduce the energy-intensive transport and use of water, we will also increase Southern California's ability to withstand alternations of the timing, intensity, and duration of precipitation that feeds the Bay-Delta.

Fulfilling the mandate of AB 32, the Global Warming Solutions Act of 2006, and avoiding the unmanageable impacts predicted to occur in the absence of such actions internationally, requires the full commitment of every state agency as well as all regional and local governments.

We therefore propose that the California Department of Water Resources (DWR), the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), the State Water Resources Control Board (SWRCB), and the Regional Water Quality Control Boards (RWQCBs) undertake the following activities:

### **1) Integrate Climate Change into California Water Planning**

Adopt the provisions of AB 224 (Wolk) into all major water planning documents in California, including the California Water Plan Update, State Water Project Delivery Reliability Report, Urban Water Management Plans, and Integrated Regional Water Management Plans, as well as all FERC re-licensing, flood plans, surface storage studies, and CEQA/NEPA documents.

Review and comment on Environmental Impact Reports (EIRs) and Environmental Impact Statements (EISs) regarding the adequacy of the lead agency's global warming analysis. For example, when reviewing and commenting on an EIR/EIS for a new water treatment facility, the SWRCB and the appropriate RWQCB should ensure that the environmental review includes alternatives analysis of various pollution prevention measures and compares the greenhouse gas emissions associated with each alternative. Likewise, for a major development project, the SWRCB and the appropriate RWQCB should ensure that the EIR/EIS adequately analyzes how

the proposed project may contribute to global warming, which, by changing California's hydrology will affect California's water quality and supply.

## **2) Require Certification of Best Management Practices that Reduce GHG Emissions**

SWRCB, DWR, CEC and the CPUC should partner to create a certification program and body of licensed certifiers to ensure implementation of Urban Water Conservation Best Management Practices contained in the MOU of the California Urban Water Conservation Council (CUWCC). Require water agencies to demonstrate certification as a minimum standard to receive grant funds from Proposition 84 and other funding sources. Prioritize funding for those projects that will demonstrably decrease water and energy demand, increase water and energy efficiency, and reduce GHG emissions. Collaborate to improve Urban Water Conservation BMPs to specifically target GHG emission reductions.

## **3) Transition to a Carbon-Neutral Energy Portfolio for California's Water**

Ensure that DWR and other water agencies across the state aggressively develop a carbon-neutral energy portfolio and tie these new sources to the divestment and decommissioning of high GHG emitting power supplies. For example, DWR should consider entering into contracts to develop large-scale solar generation projects on lands owned by DWR (e.g. Sherman Island) and provide a clear schedule for divestiture of the Reid-Gardner coal power plant by January 1, 2010.

Actively participate in planning efforts between the CPUC and the CEC regarding appropriate locations for large-scale renewable energy development in California.

In all surface storage studies, ensure that all GHG emissions directly and indirectly induced from the construction and operation of the facility have been properly quantified.

## **4) Reduce Consumptive Water Use and Related GHG Emissions**

Partner with other agencies to fund and implement aggressive water conservation and water recycling to reduce consumptive water use. Ensure that these activities are tied to reductions in pumping of surface and groundwater and the resultant GHG emission reductions are properly quantified. DWR and its partner agencies should ensure that the 2009 California Water Plan Update articulates the steps necessary to achieve the 3.1 million Acre Feet of available urban water use efficiencies described in the 2005 CWPU.

In addition, DWR should create a series of graduated "caps" on annual pumping from the Harvey O. Banks Pumping Plant and the Edmonston Pumping Plant that demonstrate the agency's commitment to achieving immediate and sustained GHG reductions.

## **5) Accurately Measure California Water Use and Related GHG Emissions**

SWRCB, DWR, CEC and the CPUC should partner to create a statewide water use database and a system for reporting water deliveries and diversions. Ensure that the database includes

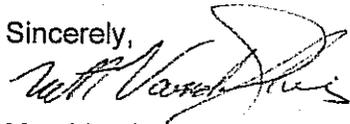
the GHG emissions that result from each water delivery and, where feasible, from each phase of water use—storage and diversion, conveyance, treatment, local distribution, end use, wastewater treatment, and disposal. Implement administrative actions identified by the CALFED staff proposal on water measurement and by the AB 2717 Landscape Task Force, including measuring crop water use consumption via remote sensing, better assessment of net groundwater usage, and upgrading the California Irrigation Management Information System (CIMIS).

#### **6) Reassess Beneficial Uses and Water Rights in light of Global Warming**

These fundamental issues of water use in California deserve careful attention and public input. For example, in consideration of the constraints imposed upon California's water resources by global warming, the SWRCB should re-examine whether to permit the irrigation of selenium laden lands as a beneficial use of California water.

As Governor Schwarzenegger has said, "the time for action is now." We look forward to working with the ETAAC Committee as you consider these recommendations and propose a series of actions to effectively address our global warming crisis.

Sincerely,



Matt Vander Sluis  
Planning and Conservation League  
Global Warming Program Manager  
[mvander@pcl.org](mailto:mvander@pcl.org)  
(916) 313-4515