



San Diego County Water Authority

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April 10, 2017

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County of San Diego

Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**Subject: San Diego County Water Authority Comments on January 20, 2017
Climate Change Scoping Plan Update.**

Dear Chair Nichols:

The San Diego County Water Authority (Water Authority) appreciates the opportunity to comment on the 2017 Climate Change Scoping Plan Update (Scoping Plan). The Water Authority supports the California Air Resources Board’s (CARB) efforts to address climate change by reducing Green House Gas (GHG) emissions in California. The purpose of this letter is to provide comments on the Scoping Plan released on January 20, 2017.

The Water Authority is a wholesale water agency with 24 retail member agencies in San Diego County. Our mission is to provide a safe and reliable water supply to our member agencies serving a population of 3.3 million and supporting a \$222 billion economy. The Water Authority has made great strides in implementing Greenhouse Gas (GHG) mitigation programs and policies for its facilities and operations. In 2014, the Water Authority became one of the first water agencies in California to voluntarily adopt a Climate Action Plan (CAP) to address carbon footprint and GHG emissions. The goal of the CAP is to minimize Water Authority GHG emissions through the implementation of measures focused on energy efficiency and opportunities to develop renewable energy.

The Water Authority’s comments focus on the water sector section of the Scoping Plan. We agree with the Association of California Water Agency’s (ACWA) comment letter, dated April 6, 2017, on the Scoping Plan, and offer the following additional comments for your consideration.

Section II.F.1 Looking to the Future

Goal: Develop and support more reliable water supplies for people, agriculture and the environment, provided by a more resilient, diversified, sustainably managed

A public agency providing a safe and reliable water supply to the San Diego region

water resources system with a focus on actions that provide direct GHG reductions (Page 126)

The Water Authority supports the development of more reliable water supplies and a more resilient, sustainably managed water resource system. The Water Authority began pursuing actions to diversify the region's supply sources after a severe, protracted drought reduced imported water deliveries in the 1990s. The Water Authority supports maximizing recycled water development and use of seawater desalination as a means of diversification. Several Water Authority member agencies are completing studies pertaining to potable reuse, the advanced treatment of recycled water for potable uses. In 2015, the Claude "Bud" Lewis Carlsbad Desalination Plant began commercial operation producing 50 million gallons per day of locally controlled, drought-proof water supply; it is the largest desalination plant in the nation.

We would like to highlight that although these advanced systems offer an extremely reliable source of water, they may require greater energy inputs than conventional water sources. Ensuring reliability now and into the future means investing in new sources of water and projects that reduce the region's vulnerability to shortages from any one source. The Scoping Plan should include a focus on supply reliability and should prioritize the development of the most reliable and drought-proof supplies as an adaptation to climate change conditions, pertaining to water supply, even if those actions do not result in a direct GHG reduction. The increased energy efficiency requirements in the Renewables Portfolio Standard will help to reduce GHG emissions in the water sector by creating greater carbon neutrality and will minimize any GHG impacts from higher energy using sources that provide greater reliability.

Goal: Make conservation a California way of life by using and reusing water more efficiently through greater water conservation, drought tolerant landscaping, stormwater capture, recycling, and reuse to help meet future water demands and adapt to climate change (Page 126)

The Water Authority and its member agencies have made conservation a way of life in the San Diego region. Water-use efficiency is an important ongoing component of the Water Authority's long-term strategy to increase the reliability of the San Diego region's water supply. Per capita potable water use in the San Diego region decreased 39 percent between fiscal year 1990 and fiscal year 2015, and continues to fall. However, to foster broad sustainability, conservation needs to be considered from an integrated perspective that considers impacts to recycled water supplies, supply reliability, and the need to support urban forests.

Additionally, Governor Jerry Brown officially declared an end to the state's five-year long drought with an executive order signed on Friday, April 7, 2017. Going forward, the Water Authority will continue to embrace water-use efficiency as a way of life. We expect that the Scoping Plan will revise its goals and supporting actions to reflect the

Governor's latest order. If significant changes are made to the Scoping Plan, we request that the CARB release the revised draft for an additional public comment period.

Goal: Develop and support programs and projects that increase water sector energy efficiency and reduce GHG emissions through reduced water and energy use (Page 126)

The Water Authority supports programs and projects that increase water sector energy efficiency and reduce GHG emissions through reduced water and energy use. A 2005 California Energy Commission report entitled, *California's Water-Energy Relationship*, found that end uses of water use more energy than any other part of the state's water use cycle. For more than 25 years, the Water Authority and San Diego Gas & Electric have partnered to generate significant water and embedded energy savings from end uses. We recommend that the Scoping Plan prioritize energy savings from end users.

Furthermore, the Water Authority is actively participating in the California Public Utilities Commission's (CPUC) Water-Energy Nexus Embedded Energy Cost Calculator development. The Water-Energy Calculator currently quantifies the energy saved by reducing water use. We suggest that the CPUC efforts on the Water-Energy Nexus Calculator be described in the Scoping Plan (page 128; Ongoing and Proposed Measures) to highlight the cooperative endeavors of water agencies and the investor-owned utilities in the state.

Goal: Reduce the carbon footprint of water systems and water uses for both surface and groundwater supplies through integrated strategies that reduce GHG emissions while meeting the needs of a growing population, improving public safety, fostering environmental stewardship, aiding in adaptation to climate change, and supporting a stable economy.

GHG savings from renewable investments by water agencies are supplemental to the state's overall effort to reduce GHG. Per the California Water Plan, approximately 12 percent of the total energy used in the State is associated with the water sector, of which ten percent is for end-customer uses such as heating water, and two percent is for water systems to pump, convey, treat and distribute water. GHG reductions in water systems will not be significant on a statewide level as compared to other options that effect the statewide energy supply. Nonetheless, in the interest of reducing greenhouse gases and to meet the goals of its CAP, the Water Authority is diversifying its energy supply portfolio by pursuing renewable energy procurement and generation opportunities such as hydroelectric and solar energy projects. Energy diversification can help to reduce energy costs and the potential reliability risks for the Water Authority and its member agencies.

Additionally, the State Water Resources Control Board adopted a resolution on March 7, 2017 requiring a proactive approach to climate change in all Board actions including drinking water regulation, water quality protection and financial assistance. If CARB

revises its goals and supporting actions in the Scoping Plan to consider items in the Water Board's resolution, then a subsequent release for public comment should follow.

Section II.F.3 Efforts to Reduce Greenhouse Gases

Potential Additional or Supporting Actions: Local water and wastewater utilities should adopt a long-term goal to reduce GHGs by 80 percent below 1990 levels by 2050 (consistent with DWR's Climate Action Plan), and thereafter move toward low carbon or net-zero carbon water management systems where technically feasible and cost-effective (Page 129)

In its 2015 CAP, the Water Authority set a goal to reduce its GHG emissions to 15 percent below 2009 levels by 2020. Although Executive Order S-3-05 identifies an emissions goal of 80 percent below 1990 levels by 2050 for water and wastewater utilities, this is generally considered too far into the future to realistically estimate emissions and reductions, and may not be achievable. In addition, the ability to reduce GHGs by 80 percent will be agency specific. The Water Authority's system operates primarily as a gravity flow system and has extremely low energy use. The Water Authority and some of its member agencies already capture excess energy from the system to generate electricity. Our specific local circumstances will make it difficult to achieve an 80 percent GHG reduction. However, the Water Authority can provide additional benefits to reduce GHGs such as using storage in local reservoirs as an energy pumped storage system to facilitate production and use of renewable energy. While the 80 percent reduction may be appropriate as an aspirational goal, it may not be technically feasible or cost effective to achieve as an enforceable goal.

The Water Authority appreciates the opportunity to comment and thanks CARB for its review and consideration of these comments. Please contact me with any questions at (858) 522-6743 or by email at troy@sdewa.org.

Sincerely,



Toby Roy
Water Resources Manager

by electronic submittal at: https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=scopingplan2030&comm_period=N

cc: Goldy Herbon, San Diego County Water Authority