



April 5, 2017

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

RE: 2017 Climate Change Scoping Plan Update

Dear Chair Nichols and Board Members:

Thank you for the opportunity to comment on the 2017 Climate Change Scoping Plan Update ("2017 Update"). Los Angeles Waterkeeper (LAW) submits these comments primarily to point out the large existing GHG emissions associated with California's outdated system of water supply. Our water supply relies primarily on pumping water over vast distances, using it once, treating it, and then dumping it as "wastewater," often into California's rivers and bays where it becomes a source of water pollution. The inefficiency and wastefulness of the current system is also an opportunity—the increased commitment to conserve water and to develop local sources of sustainable water supplies, rather than relying on imported water pumped over great distances, could prove to be the single greatest steps California can take to reduce its GHG emissions. Such a commitment would also effectuate improvements in water quality. Now is the time to seize this win-win opportunity for our air and our water, as the world looks increasingly to California for environmental and political leadership on climate change issues.

LAW is a nonprofit environmental organization with over 3,000 members dedicated to protecting and restoring all surface and ground waters in Los Angeles County and ensuring an environmentally and socially sustainable water supply. LAW advocates the "4R" approach to Integrated Water Management: Reduce use of water through conservation with a goal of 50/gallons/person/day; Reuse greywater and capture stormwater; Recycle through wastewater reclamation; and Restore watershed health both in source areas of water supply and in the increasingly important aquifer underlying large sections of the San Fernando Valley.

The GHG emissions associated with California's current wasteful water supply choices are unsustainable, especially given the ambitious and now legally binding goal to reduce California GHG emissions to 40% below 1990 baseline levels by the year 2030. But the very GHG inefficiency of the water supply system presents an enormous opportunity to realize large additional reductions in GHG emissions through a mix of water conservation and increased reliance on multi-benefit stormwater capture projects and increased water recycling. For example, U.C. Davis researchers found that between June 2015 and February 2016, when mandatory water conservation measures were in place due to an historic drought, California's water conservation rate of 23.9 percent over 2013 levels resulted in energy savings that translated into a reduction in greenhouse gas emissions of 219,653 metric tons.<sup>1</sup> LAW also

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<sup>1</sup> See Tara Lohan, *Water Conservation Saves Energy in California*, KQED SCIENCE (June 9, 2016), <https://ww2.kqed.org/science/2016/06/09/water-conservation-saves-energy-in-california/>.

recently filed an administrative appeal with the State Water Resources Control Board, seeking to quantify the benefits- including the GHG benefits- of ending ocean discharge of treated “wastewater” from the Hyperion Water Treatment Plant in Los Angeles. LAW believes these discharges constitute an unconstitutional waste and unreasonable use of a California water resource.<sup>2</sup> While the GHG analysis is currently lacking (necessitating in part the appeal), LAW has no doubt that the GHG reductions from ending open ocean discharge of municipal wastewater are substantial. LAW requests that CARB consider carefully and fully the GHG benefits of a more efficient water supply as it plans for meeting the 40% GHG reduction target. The efficiency improvements should come from increased emphasis on conservation, increased and aggressive use of water recycling, and increased use of stormwater capture and infiltration for multi-benefit projects including water supply.

LAW thanks you for the opportunity to comment on the 2017 Update.

Sincerely,

A handwritten signature in cursive script that reads "Arthur S. Pugsley".

Arthur S. Pugsley  
Senior Attorney  
Los Angeles Waterkeeper

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<sup>2</sup> See Article X, Section 2 of the California Constitution, and Section 100 of the California Water Code.