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DONALD BREN SCHOOL OF ENVIRONMENTAL SCIENCE AND MANAGEMENT SANTA BARBARA, CA 93106
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August 1, 2008

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

Re: AB 32 Draft Scoping Plan and Appendices

Dear Ms. Nichols:

I am writing today in support of comments on the June 2008 Draft Scoping Plan for AB 32 submitted by the Natural Resources Defense Council (NRDC) on the use of Low Impact Development (LID) as a cost-effective and technically viable means of reducing greenhouse gas (GHG) emissions in California. These comments were included as part of a larger package submitted by NRDC on the overall Draft Plan. (For full disclosure, I have reviewed NRDC's work and I assisted with portions of their analysis of LID opportunities.)

Water management options including water use efficiency improvements, water recycling and reuse, and stormwater management, can and should play an important role in reducing GHG emissions while also improving energy and water reliability, providing economic efficiencies, and contributing to the restoration of environmental systems.

Water systems – including the extraction, conveyance, treatment, use, and wastewater treatment – constitute the largest use of electricity in California.[1] As a result, both the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC) have concluded that the energy (and emissions) embedded in water presents large untapped opportunities for cost-effectively improving energy efficiency and reducing GHG emissions. The CEC and CPUC are working with the Department of Water Resources (DWR), the State Water Resources Control Board (SWRCB), and other agencies to tap the multiple benefits of these water management opportunities. These important efforts should be part of the AB 32 portfolio.

Low Impact Development or "LID" practices involve infiltrating storm water and urban runoff to the ground in order to recharge local groundwater supplies as well as harvesting rooftop runoff for use in

[1] California Energy Commission (November, 2005) Integrated Energy Policy Report, CEC-100-2005-007-CMF.

on-site irrigation or greywater recycling systems.[2] Because these practices result in an increase in available local water supply, LID presents significant opportunities in to reduce the need for energy-intensive imported sources of water and their associated GHG emissions in many parts of the state.

The use of measures such as LID can increase local water supply, reduce the need for imported water sources, and avoid the energy use and emissions associated with the transport of water. NRDC has presented a well-reasoned analysis indicating that LID practices have the potential to substantially reduce GHG emissions statewide. I supported their analysis, and I support their comments calling on CARB to require the implementation of LID for future development and redevelopment statewide as part of AB 32's portfolio of measures to reduce GHG emissions in California.

Sincerely,

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[2] See generally, Prince George's County, Maryland, Department of Environmental Resources (July 1999) Low Impact Development Hydrologic Analysis, *available at* http://www.lowimpactdevelopment.org/pubs/LID_Hydrology_National_Manual.pdf; US Department of Housing and Urban Development ("HUD") (July 2003) The Practice of Low Impact Development, *available at* http://www.huduser.org/publications/destech/lowImpactDevl.html