PADRE DAM
Municipal Water District

March 3, 2017

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Delivered via e-mail to: commentletter@waterboards.ca.gov

Subject: 3/7/17 BOARD MEETING– ITEM # 7 "Consideration of a proposed Resolution adopting a comprehensive response to climate change."

Dear Chair Marcus and Members of the Board:

On behalf of Padre Dam Municipal Water District, thank you for the opportunity to comment on the proposed Resolution by the State Water Resources Control Board adopting a comprehensive response to climate change.

Padre Dam provides water, sewer, recycled water and recreation services to approximately 100,000 residents to the East San Diego County communities of Santee, Alpine, Harbison Canyon, Crest, Flinn Springs and other unincorporated parts of El Cajon and Lakeside.

Padre Dam appreciates the importance of a comprehensive response to climate change in the context of the State Water Board's authorities regarding California's water resources. California's water agencies have for many years been engaged in water management policy leadership and project development which is already contributing to increased water supply reliability and helping position the state to adapt to the challenges posed by changes in hydrology associated with climate change.

General Comments

Padre Dam recognizes that the Resolution and the proposed implementation actions are intended to affect water management decisions by water agencies statewide, and that these impacts could be beneficial or adverse depending on how specific actions are implemented. We encourage the State Water Board to commit to transparent implementation of this Resolution in consultation with other state agencies.

The Resolution does not explicitly propose State Water Board ranking or prioritization of types of water supply projects based on energy intensity (sometimes referred to as a "loading order"). However, we caution against trying to impose such a concept as part of project permitting or funding decisions as the Resolution is implemented by the State Water Board and Regional Water Quality Control Boards (collectively, the Water Boards). Public water agencies have made and are continuing to make

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significant investments in a variety of water supply sources in response to local water demands, balancing many important local policy, planning and cost considerations. Creating a top-down "preferred" state prioritization, or ranking, based on energy demand or source is infeasible as multiple water supply sources must be developed simultaneously in order to ensure resiliency in the water supply system and a diverse water supply portfolio. The need to develop a comprehensive and robust portfolio of water supply projects is articulated clearly in the Governor's California Water Action Plan and The California Water Plan, and is the basis of most water agency integrated water resources planning, including Agricultural and Urban Water Management Plans.

Padre Dam supports the recognition in Whereas #11 of the contribution of multi-objective water management projects, including surface and groundwater storage and recharge, as being "integral to climate mitigation and adaptation." Successfully adapting local, regional and state-wide water systems to anticipated future climate conditions will require continued and increasing investment in new multi-objective water management projects, especially significant new surface and groundwater storage and recharge projects, as essential elements of California's climate adaptation strategy.

Specific Comments
Padre Dam recommends the following changes to specific resolution sections:

Climate Change Hydrology (Whereas #2, p.1). This discussion should be amended to specifically recognize that warming is also expected to alter the amount and timing of runoff.

> Recommendation: Add to second sentence "Changes in hydrology include…, changes in the timing and volume of runoff and surface water flows, and consequent impacts on water quality and water availability."

Water Conservation and Efficiency (Resolved I. B. #2, p.4). This discussion should be amended to accurately characterize how the limitations inherent in the emergency nature of the Governor's drought declaration affect authorities that the SWRCB has for the development and implementation of water efficiency and conservation regulations identified in Executive Order B-37-16 and to identify that the SWRCB would require new, and as yet unspecified, statutory authorities to support some conservation actions.

> Recommendation: Amend the text accordingly.

Streamline Recycled Water Reporting (Resolved I. C. #3, p.4). This proposed new reporting requirement should be implemented in a way that is integrated and streamlined with other proposed new water production reporting requirements to reduce overall reporting burdens.

> Recommendation: Amend the text to reflect this commitment.

Water Quality Standards (Resolved II. #7, p.5). This proposed action assumes that surface water flows will decrease, but it is possible that they might also increase due to warming causing increased snowmelt and runoff.

> Recommendation: Amend the sentence to read: "…including but not limited to increased surface water temperatures, ~~decreased~~ changes in surface water flows and runoff, …".

Climate Change Vulnerability Assessments in Sanitary Surveys (Resolved III. #11, p.5). This proposed action will require a "phase in" period in which the State Water Board works with water agencies to

define the scope of the proposed climate change vulnerability assessments and proper use of the evaluation tool cited in the text.

> Recommendation: amend the first sentence to read: "…begin developing guidance for climate change vulnerability assessments in community water system sanitary surveys, in consultation with stakeholders, and shall..."

Effective and Efficient Project Permitting (Resolved III. #13, p.6). This proposed action should incorporate means to increase the efficiency and incentivize project permitting.

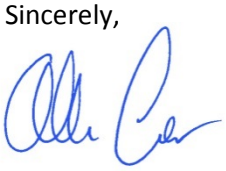
> Recommendation: Amend the first sentence to read: "…could take for effective and efficient permitting of locally cost-effective projects to incentivize development of new and underutilized water resources…"

Eliminate Use of Water Energy Cost Effectiveness Calculator (Resolved V. #22, p.7). The proposed Resolution requires the use of the California Public Utilities Commission's Water Energy Cost Effectiveness Calculator. ACWA opposes use of this calculator beyond its original intended purpose, which is to facilitate a partnership between the Investor Owned Utilities and the water sector to co-fund energy utility programs to reduce energy consumption by the water sector in supplying, conveying, treating, and distributing water. This calculator has not been designed to address, or shown to be applicable to, greenhouse gas reductions or the cost effectiveness considerations of public water agencies.

> Recommendation: Delete Resolve #22.

Padre Dam appreciated the opportunity to provide comments on this matter. We believe they will improve understanding and value of the Resolution while helping to inform and develop support for its implementation. Given the significance of the Resolution, we ask that after the State Water Board considers all comments and makes the changes to the Resolution, a revised draft be recirculated for public review and comment before the State Water Board considers adoption.

Sincerely,



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