



March 3, 2017

Sent via Electronic Mail: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Consideration of a Proposed Resolution Adopting a
Comprehensive Response to Climate Change

Dear Chair Marcus and Members of the Board:

The City of San Diego (San Diego) appreciates this opportunity to submit comments related to the State Water Resources Control Board's (State Board) proposed resolution adopting a comprehensive response to climate change (Proposed Resolution). San Diego supports the overall intent of the Proposed Resolution and believes that it is generally in line with local initiatives already underway.

In December 2015, San Diego adopted an ambitious [Climate Action Plan](#) (CAP) that is based on the following five strategies: Energy and Water Efficiency; Clean and Renewable Energy; Bicycling, Walking, Transit and Land Use; Zero Waste; and, Climate Resiliency. The CAP builds off the City's 2015 Urban Water Management Plan (UWMP) and also includes the City's plans to incorporate potable reuse¹ (Pure Water) as its next major increment of water supply². The City's water supply planning is integrated into that of the San Diego County Water Authority (Water Authority), which is subsequently rolled up into the water supply planning of the Metropolitan Water District of Southern California (MWD). In this way, San Diego and its water supply wholesalers are coordinated in demand forecasting and supply development projections.

San Diego's residential water use is among the lowest statewide, averaging 59.79 gallons per capita per day (gpcd) between November 2015 and October 2016. However, conservation alone in San Diego will not be sufficient to achieve water supply reliability and drought resilience given that local precipitation averages only ten inches annually. The City's Pure Water program will produce 30 million gallons per day (mgd) by 2021 and a total of 83 mgd by 2035.

¹ For more information about the City's Pure Water program, please see www.PureWaterSD.org.

The societal and economic benefits of being able to produce water locally are twofold: San Diego will be able to reduce its purchases of imported water and create local supply resilience. The environmental benefits of potable reuse are also significant: it will reduce ocean discharges to a level beyond that which could be accomplished by conservation alone and it will reduce the salt load in drinking water supplies (San Diego's primary source of water is the Colorado River, which is high in salts).

The most successful climate action throughout the country has been at the local and regional level. Cities and local agencies have been tackling these issues and finding solutions that work. State agencies will be most successful by recognizing this as a valuable resource and working closely with partners at the local level to inform broader change. With this background in mind, San Diego offers the following comments.

1. Water Management Options: One Size Does Not Fit All.

The Proposed Resolution promotes base-loading certain water supply sources in order to mitigate greenhouse gas (GHG) emissions. San Diego strongly opposes policies intended to bypass local integrated planning efforts by imposing state mandated water management priorities that may not fit local water portfolio preferences due to unique geographic and hydrologic conditions. San Diego's options for new water supply development are extremely limited as compared to the rest of the state. San Diego is committed to reducing GHG emissions but cannot support the establishment of a one-size-fits-all prioritization of water supply sources statewide.

2. Please confirm that the term "recycled water" includes potable reuse.

3. The Proposed Resolution must recognize affordability.

A long-standing concern for local governments is the regulator's process for evaluating how much communities can afford for CWA-mandated and other water infrastructure improvements. In assessing municipalities' capability to finance infrastructure upgrades, EPA relies significantly on guidance issued in 1997.³ This guidance is intended to provide general boundaries to aid EPA, states, and cities in negotiating reasonable and effective schedules for implementing infrastructure upgrades. San Diego urges recognition of community affordability in the Proposed Resolution and asks that a basis upon which affordability can be determined and factored into integrated local planning and decision making processes be included.

4. The greenhouse gas emissions of any particular water supply source should not be assumed to correlate with energy usage intensity. Individual water supply projects must be allowed to have independent analysis of the project's greenhouse gas emissions.

The Proposed Resolution indicates that climate change mitigation can be achieved by reducing the energy intensity of the water sector (Whereas #4, #7 and Response #13). San Diego supports policies that promote lower GHG emissions, however, it must be recognized that

³ U.S. Environmental Protection Agency, Office of Water, Office of Wastewater Management, *Combined Sewer Overflows—Guidance for Financial Capability Assessment and Schedule Development*, EPA 832-B-97-004, February 1997, <http://www.epa.gov/npdes/pubs/csofc.pdf>.

water supply options can offset GHG emissions by procuring renewable energy to power the project. As such, a high energy intensity water supply project powered with 100% renewable energy will have lower carbon emissions than a lower energy intensity water supply project powered with only 35% renewable energy. The focus of the Proposed Resolution should be on assuring low carbon emissions, not energy intensity. .

5. Assure that comparisons of energy and GHG intensity among water supply sources are calculated based on the entire energy and GHG footprint, not just the portion of energy or carbon emissions pertaining to a particular water agency.

Certain water supply sources, such as imported water, will have multiple agencies contributing towards the total energy and GHG profiles used in the delivery and treatment of water whereas other supply sources will have the entirety of the energy profile borne by one agency. For example, an acre-foot of water imported by San Diego via the State Water Project will have energy uses borne by the California Department of Water Resources, MWD, the Water Authority and San Diego. The aggregate of all these energy sources, and their related GHG emissions, would represent that water supply's energy and GHG footprints. It is important that any comparison of energy use or GHG emissions related to supply source options be completed at the entire footprint level.

Taking into consideration the points made above, we recommend that Whereas #4 be rewritten as follows:

In the water sector, the principal source of greenhouse gas comes from the fossil fuel-based energy used to pump, convey, treat, and heat or cool water. Therefore, mitigation can be accomplished through reducing the energy carbon intensity of the water sector, replacing fossil fuels by with renewable energy, improving efficiency, and reducing water consumption to efficient levels. The use of recycled water (including potable reuse), the use of storm water, and the use of natural or green infrastructure for storage, movement and treatment, have the potential to reduce greenhouse gas emissions if replacing an existing, higher carbon water supply(ies) with higher greenhouse gas emission footprints, to the extent that it is feasible and affordable.

We also recommend the following changes in Whereas #7:

The AB 32 Scoping Plan is the core of California's climate mitigation efforts. Water-related AB 32 The Water-Energy Team of AB 32's Climate Action Team (WET-CAT) has recommended that mitigation measures target reducing energy requirements associated with providing by prioritizing certain reliable water supplies and demand management programs (water use efficiency, water recycling and reuse, and the capture and reuse of urban runoff) and reducing the amount of non-renewable electricity energy associated with conveying and treating water and providing adequate wastewater treatment (water and wastewater system energy efficiency, and increased renewable energy production). The greenhouse gas emissions reductions from these recommended measures are may be indirectly realized through reduced energy requirements, and these actions may also have adaptation co-benefits of improving

water quality and water supply reliability. Local supply availability options differ, however, and as such water agencies must evaluate their preferred water supply portfolio on the basis of feasibility, cost-effectiveness and related net greenhouse gas emissions.

We also recommend the following changes to Response #13:

State Water Board staff shall coordinate with the Regional Water Boards and relevant agencies, including local water agencies, to identify and recommend actions the Water Boards could take for effective efficient permitting of cost-effective projects to develop new and underutilized water resources that help to reduce the net carbon footprint of an agency's water supply portfolio, are consistent with local agency Urban Water Management Plans, assure long-term water supply reliability to meet efficient demands, expand surface water and groundwater storage where appropriate, and add operational flexibility to build and enhance resilience to impacts of climate change.

6. The Water Boards should assume an active role in the stakeholder collaboration and outreach program CalRecycle and the Air Resources Board are currently conducting to support implementation of the Short-Lived Climate Pollutant (SLCP) Reduction Strategy, and also fully engage in the implementation planning process.

The State Board can play a critical role in the evaluation and permitting of SLCP compliance strategies by wastewater agencies, including the evaluation of possible co-digestion opportunities and overhauling biosolids management practices throughout the state. Publicly-owned treatment works (POTWs) such as San Diego's will be a necessary part of any effective statewide strategy to expand methane capture and reuse, and are looking forward to working closely with the state on implementing these important programs. However, these critical climate change policy initiatives will also require significant assistance from the state in the form of regulatory flexibility, programmatic support, market development and significant financial assistance for both planning as well as major infrastructure construction. San Diego urges the Water Boards to become an active partner to CalRecycle, ARB, POTWs and other local agencies and their partners throughout the state in order to develop cost-effective SLCP implementation solutions that work for all of California's diverse communities. The following change to Resolution I.A.1. is recommended as follows:

Division of Water Quality (DWQ) shall, and Regional Water Quality Control Boards (Regional Water Boards) are encouraged to, support the development and implementation of the Air Resources Board's Short-Lived Climate Pollutant (SLCP) Reduction Strategy. Specifically, DWQ shall collaborate with Regional Water Boards Air Resources Board, CalRecycle, and California Department of Food and Agriculture, to assess opportunities for reducing methane emissions from landfills through organic waste diversion, and co-digestion at existing or new anaerobic digesters, or through composting, while achieving water quality objectives. As a part of the SLCP effort, DWQ and Regional Water Boards are also encouraged to identify opportunities to reduce methane emissions from dairies and concentrated animal feeding operations while achieving water quality objectives. Additionally, these agencies are encouraged to update

Page 5

Honorable Chair Felicia Marcus and Members of the State Water Resources Control Board
March 3, 2017

*biosolids management practices and pursue opportunities to improve the marketability of
"Class A" Biosolids.*

San Diego is committed to assuring that its water and wastewater systems are able to effectively adapt to changing conditions due to climate change while also reducing its net carbon footprint. We very much appreciate this opportunity for comment. If you have any questions, please feel free to contact myself or Ms. Cathleen Pieroni at 858.292,6424 or cpieroni@sandiego.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cody Hooven', followed by a long horizontal line extending to the right.

Cody Hooven
Chief Sustainability Officer

CH/mle

cc: Alejandra Gavaldon, Director of Federal Affairs and Water Policy, Office of Mayor
Kevin L. Faulconer
Cathleen Pieroni, External Water Policy Manager

