

# VALLEY CENTER MUNICIPAL WATER DISTRICT

A Public Agency Organized July 12, 1954

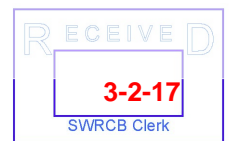
March 2, 2017

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Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
1011 "I" Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Attention: Ms. Jeanine Townsend, Clerk of the Board  
Sent via email to: [commentletters@waterboard.ca.gov](mailto:commentletters@waterboard.ca.gov)

**3-7-17 Board Meeting-Item 7**  
**Climate Change**  
**Deadline: 3/3/17 12 noon**



Dear Chair Marcus:

Thank you for the opportunity to comment on the proposed update to the Comprehensive Response to Climate Change Resolution. Valley Center Municipal Water District recognizes the importance of addressing climate change and we have over the years made significant investments to improve efficiency, reduce energy consumption and utilize improved technologies.

## Comments

We encourage the State Water Board to consider that the cost of control and implementation of these actions do not exceed the net benefits and place an unnecessary financial burden on our rate payers. We would also like to see cooperation and coordination with other agencies, like the Air Resources Control Board, to avoid conflicting or overlapping regulations and duplication of reporting requirements.

We would like to provide our comments to the specific resolution items listed below:

## Whereas #4 & #7

During implementation of the various proposed actions we would like the State Water Board to take into consideration the significant investments that individual agencies, like Valley Center, have already made.

As part of our response to limit our carbon footprint we have reduced energy consumption and increased efficiency at our District. We have constructed seven solar projects to offset energy use; made pump and facility upgrades to increase pumping efficiencies; developed energy management strategies; and implemented an aggressive pump testing program to increase overall efficiencies.

At our wastewater treatment plants we have also increased efficiency and reduced energy consumption by installing variable frequency drives and positive displacement blowers; installation of fine bubble diffusers, implementation of a nitrogen monitoring system to increase plant efficiency, and implementation of membrane digester thickeners to significantly reduce our energy consumption. These energy efficient advances have reduced our annual energy consumption at our Moosa Facility; subsequently, our plant received the Cal-Nevada Section, AWWA recognition for the Outstanding Energy Management Award in 2012. The District also has water reclamation at one of our wastewater plants and is in the process of evaluating reclaimed water potential at our other facility.

We have implemented automation technological improvements, like SCADA, remote monitoring equipment and Automatic Meter Reading technology, to decrease our emission by reducing driving times and reducing the number of vehicles in our fleet.

### **C. Recycled Water**

3. The District currently reports monthly and annual recycled water data to the San Diego Regional Water Quality Control Board. With the development of a proposed online data entry system to track recycled water use information, we would like to see consolidation of reporting requirements to the online data system to streamline and avoid duplicate reporting to multiple agencies.

### **III. Respond to Climate Change Impacts**

11. Climate change vulnerability assessments should be voluntary and restricted to agencies whose locality makes them highly vulnerable to climate change impacts. Many aspects related to climate change are already evaluated and addressed as part of the District's Urban Water Management Plan and are reviewed during the plan update. The regional impact of climate change is evaluated as part of the San Diego County Water Authority's Urban Water Management Plan.
15. Modification to permits and regulatory requirements should again be restricted to agencies whose locality makes them highly vulnerable to climate change impacts. Water and wastewater facilities are already designed in accordance with existing regulations which require their construction and design based on the location of the 100-year flood plain. Agencies that are subject to additional regulatory requirements should have funding options available to assist with incurred mitigation costs.

Valley Center Municipal Water District has a long history and remains committed to the implementation of adaptation strategies for climate change impact along with reducing

our overall energy expenditures and we will continue to evaluate ways within in our District to reduce our carbon footprint. Thank you for the opportunity to comment on the proposed update to the Comprehensive Response to Climate Change Resolution.

Sincerely,



Gary Arant  
General Manager

