VIA E-MAIL: commentletters@waterboards.ca.gov

March 1, 2017

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

RECEIVED
3-1-17
SWRCB Clerk

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

Subject: March 7, 2017 Board Meeting – Item #7 "Consideration of a Proposed Resolution Adopting a Comprehensive Response to Climate Change"

Dear Chair Marcus and Members of the Board:

Eastern Municipal Water District (EMWD) appreciates the opportunity to provide comments on the proposed Resolution by the State Water Resources Control Board (State Water Board) adopting a comprehensive response to climate change.

EMWD is a water, wastewater, and recycled water provider to 795,000 residents within a 555-square mile territory serving seven cities and a portion of the unincorporated county within western Riverside County. For the past three decades, EMWD has worked to diversify its water supply portfolio to include a variety of sustainable local sources including groundwater, brackish groundwater, and recycled water supplies. Of note is EMWD's beneficial reuse of 100 percent of its wastewater within the service area through its investments in recycled water. Recycled water is EMWD's most climate resilient, least energy and least greenhouse gas (GHG) intensive water supply, and equates to roughly 36 percent of EMWD's overall water supply portfolio. EMWD has taken a proactive approach to supporting the State's efforts to reduce GHG emissions.

In August 2014, EMWD finalized its first "Energy Management Plan," which prepared baseline

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energy use and emissions (2011-2012) for the agency and developed eight different portfolios of projects which sought to reduce future GHG reductions in all facets of operations through 2032. A 'Preferred Portfolio' of projects was selected, and will reduce EMWD's GHG emissions an average of 4,940 metric tons (MT) per year.

For many years, EMWD has collaborated with our local energy provider, Southern California Edison (SCE), on several fronts where we have had the opportunity to partner on many programs that save both water and energy. In addition, EMWD has installed five solar projects that produce 5.5 megawatts (MW) of renewable energy at its wastewater treatment plants, brackish groundwater desalination facility, and office headquarters building. EMWD also actively pursues new technologies that provide energy efficiency, while also providing reductions in overall GHG emissions. EMWD's comments on the proposed Resolution adopting a comprehensive response to climate change are based on this breadth of experience. In addition, EMWD agrees with and supports the comments submitted by the Association of California Water Agencies (ACWA) to the State Water Board on this item. To that end, EMWD will not reiterate those specific comments here.

General Comments

EMWD appreciates that it is the intent of the Resolution, through its implementation, to affect water management planning decisions by local water agencies. In this light, we encourage the State Water Board to consult transparently and continuously with the local water agencies, as well as State agencies, including the Department of Water Resources and the Air Resources Board in development of their 2030 Scoping Plan Update, during implementation of the Resolution.

In Whereas #10 of the Resolution, EMWD appreciates and supports the recognition of the need for "flexible and adaptive approaches to prepare for uncertain climate impacts." As water suppliers face the increased challenges of reliable water in the face of climate change, climate adaptation strategies must provide flexibility in sources of supplies and how to use them. Development of new water resources going forward will be unique to any agency, and conditions are extremely variable throughout the state, with some regions having the benefit of gravity flow systems and potential for hydroelectric generation, and other regions required to import significant volumes of water with energy-intensive pumping to overcome natural barriers. Sources of water are equally variable, with some regions having access to multiple sources of high quality surface and groundwater, and other regions having very limited sources and variable quality, with a high level of reliance on imported water. For regions with limited supply sources such as Southern California, development of new local supplies such as brackish groundwater desalination and potable reuse, which are energy-intensive, represent significant

and important new water sources that are reliable, high quality, adapt to the effects of climate change, and enhance water supply safety.

While not explicitly contemplated in the Resolution language, EMWD would oppose a concept of developing water supplies in order of a least energy intensive to most energy intensive ranking, sometimes referred to as a "loading order" policy. A loading order policy for the water sector would be completely at odds with the primary mission of water suppliers, and is contrary to the successful long-term strategy implemented in our region and much of California over the last 20 years: water supply diversification. The State of California, in its Bulletin 160 State Water Plan, has for many years endorsed and encouraged supply diversification or in simpler terms, doing everything we can to make our supply reliable. The Governor's Water Action Plan reflects this approach to long term water supply reliability in the state.

According to the California Department of Water Resources Water Plan 2013 Update, approximately 12 percent of the state's total energy is used for the pumping, distribution, treatment, and end uses of water. Of this 12 percent, only approximately two (2) percent is used for pumping, transporting, and treating California's water supplies – the remaining 10 percent of energy use is attributed to water end uses, such as in-home, business, and agricultural uses. Therefore, the water-energy programs with greatest success in achieving the dual goal of energy and water savings have come from programs that focus on energy-intensive end uses. Building on the success of past programs, there are further opportunities to explore water-energy programs that focus on the higher levels of end use energy intensity, while also saving lower levels of embedded energy in the pumping, treatment, and distribution of water.

Finally, EMWD concurs with ACWA's recommendation of deleting Resolve #22 in the proposed Resolution. The intended use of the California Public Utilities Commission (CPUC) Water Energy Cost Effectiveness Calculator, which EMWD staff was heavily engaged in during the development process, was very narrow - to be used as a tool solely by the private Investor Owned Utilities (IOU) regulated by the CPUC to facilitate a partnership between the water sector to co-fund programs targeted to reduce energy consumption by the water sector in supplying, conveying, treating, and distributing water. The calculator tool was not designed to address, or even be applicable to, the cost effectiveness considerations of public water agencies.

EMWD appreciates the opportunity to provide the above comments and welcomes the chance for future coordination with the State Water Board and other stakeholders on implementation of a refined Resolution based on our comments, and those provided by ACWA. We are available to discuss these and any other comments. I can be reached at gagek@emwd.org or (951) 928-3777, extension 4561.

Sincerely,

Kelley Gage

Kelley Gage
Senior Director of Water Resources Planning

KG:sgc

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