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

March 2, 2017

State Water Resources Control Board  
Attn: Jeanine Townsend, Clerk of the Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



VIA EMAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Re: Comment Letter – Climate Change Resolution**

Dear Ms. Townsend,

On behalf of Olivenhain Municipal Water District, thank you for the opportunity to provide the State Water Resources Control Board with input on the climate change resolution. OMWD provides 84,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

We appreciate being recognized as critical partners vital to the effective planning and implementation of the climate change mitigation goals, and will continue to work collaboratively with the state. We welcome the opportunity to provide feedback on the development of climate change mitigation and adaptation actions. OMWD proudly purchases all of its energy from a renewable energy supplier, 3 Phase Renewables, in addition to employing hydroelectric generation throughout its services area for its own operational needs. Though mitigating climate change is an important task that we all must continue to work on, we are concerned with unintended consequences that may result from the proposed resolution.

Water conservation regulations must consider the unintended consequences that are likely to result from increased restrictions on water use. Customers that allow their landscapes to die, or replace them with hardscapes, affect climate change through decreased CO<sub>2</sub> absorption and increased thermal absorption and subsequent radiation. The impact that restrictions on water use will have on climate change needs to account for these types of consequences, as the decrease in vegetation may unintentionally contribute to climate change.

Additional reporting requirements on recycled water may also have unintended consequences that affect climate change. Burdensome data collection and reporting will increase staffing demands, and it is not clear how this data will be used as it is not specified. Regulations that increase the burden on recycled water production without serving a tangible benefit are disincentives to recycled water production and should be avoided. Recycled water that is



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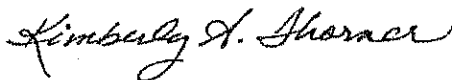
A Public Agency Providing Water Wastewater Services Recycled Water Hydroelectricity Elfin Forest Recreational Reserve

produced and used locally serves many environmental benefits that help to mitigate against climate change, and regulations should serve to encourage its use.

Finally, loading water supply development order based on energy consumption without consideration to the reliability of each water supply would be shortsighted and increase vulnerability to drought and shortages. A diversified water supply portfolio is essential to both ensure water supply reliability and the ability to address climate change. Energy consumption of water supplies is one of many important factors that should be considered in development of water supplies, but safety and reliability are vital considerations.

If you or your staff should need any additional details pertaining to this assessment, please do not hesitate to contact me at 760-753-6466.

Regards,



Kimberly A. Thorner  
General Manager

CC: Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown, Jr.  
Assemblywoman Marie Waldron  
Assemblyman Rocky Chavez  
Assemblyman Brian Maienschein  
Assemblyman Todd Gloria  
Senator Pat Bates  
Senator Joel Anderson  
Senator Toni Atkins  
Mark Muir, Board Chairman, San Diego County Water Authority  
Tom Howard, Executive Director, State Water Resources Control Board  
Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board  
Planning and Performance  
Dave Bolland, Director of Regulatory Relations, Association of California Water Agencies