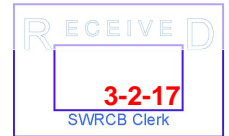




San Diego County Water Authority

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March 2, 2017

MEMBER AGENCIES

Carlsbad
Municipal Water District
City of Del Mar
City of Escondido
City of National City
City of Oceanside
City of Poway
City of San Diego
Fallbrook
Public Utility District
Helix Water District
Lakeside Water District
Olivenhain
Municipal Water District
Otay Water District
Padre Dam
Municipal Water District
Camp Pendleton
Marine Corps Base
Rainbow
Municipal Water District
Ramona
Municipal Water District
Rincon del Diabla
Municipal Water District
San Dieguito Water District
Santa Fe Irrigation District
South Bay Irrigation District
Vallecitos Water District
Valley Center
Municipal Water District
Vista Irrigation District
Yuima
Municipal Water District
OTHER
REPRESENTATIVE
County of San Diego

**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: Comment Letter – Climate Change Resolution

Dear Chair Marcus and Members of the Board:

The San Diego County Water Authority (Water Authority) appreciates the opportunity to submit comments on the State Water Resources Control Board (State Water Board) proposed resolution, “Consideration of a Proposed Resolution Adopting a Comprehensive Response to Climate Change,” dated February 9, 2017, which updates Resolution No. 2007-0059 pertaining to climate change and water resources. The Water Authority is a wholesale water agency in San Diego County with 24 retail member agencies, serving a population of 3.3 million residents and supporting the region’s \$222 billion economy.

The Water Authority understands the importance of adapting to climate change and being a leader in sustainability and natural resource stewardship. Our mission is to provide a safe and reliable water supply to our member agencies, and planning for the potential impacts of climate change is integral to meeting this mission. As part of the Water Authority’s long-term urban water management planning, evaluation and preparation for the potential influence of climate change on the region’s projected water resources mix has been and will continue to be performed. The Water Authority has partnered on several research projects to better understand the uncertainties and impacts associated with climate change. The San Diego Basin Study, which is a collaborative effort between the City of San Diego, the Water Authority and the U.S. Bureau of Reclamation, examines climate change impacts on the region’s water demand and local supplies. The Water Authority is an active and founding member of the Water Utility Climate Alliance which consists of 10 of the largest water providers in the nation collaborating on climate change adaptation and greenhouse gas (GHG) mitigation. In 2014, the Water Authority

A public agency providing a safe and reliable water supply to the San Diego region

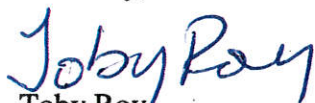
became one of the first water agencies in California to voluntarily adopt a Climate Action Plan to address carbon footprint and GHG emissions, with a goal of minimizing emissions through reduction measures focused on energy efficiency and opportunities to develop renewable energy.

In collaboration with its member agencies, the Water Authority has been implementing a long-term strategy to diversify the region's supply sources since the early 1990s. This strategy includes water use efficiency and the development of local supplies such as recycled water, brackish groundwater recovery, seawater desalination, and in the future, potable reuse. Given that water supply reliability is our mission and highest priority, the development of local reliable supplies becomes even more important as an adaptation to climate change. To meet the goals of the Climate Action Plan and in the interest of reducing greenhouse gases, the Water Authority is also diversifying its energy supply portfolio by pursuing renewable energy procurement and generation opportunities such as hydroelectric and solar energy projects. Energy diversification can help to reduce energy costs and the potential reliability risks for the Water Authority and our member agencies.

We request that the resolution not infer or specifically create a "loading order" to prioritize development of low energy intensity water supplies. Our highest priority is to deliver a safe and reliable supply of water to our customers. As an example, although some new local supplies, such as desalination, can require greater energy inputs, these same local supplies also provide the highest water supply reliability and reduce the region's vulnerability to drought and shortages. We believe that a diversified water supply portfolio is essential to both ensure water supply reliability and adapt to climate change.

The Water Authority also has specific recommendations for changes to the proposed resolution that are submitted for your consideration as an attachment to this letter. Thank you for the opportunity to comment. Please contact Goldy Herbon if you have any questions at (858)522-6767 or by email at GHerbon@sdewa.org.

Sincerely,



Toby Roy

Water Resources Manager

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

Attachment: Recommended Changes to Proposed Resolution Adopting a Comprehensive Response to Climate Change

Attachment

Recommended Changes to Proposed Resolution Adopting a Comprehensive Response to Climate Change

WHEREAS:

4. Mitigation, in the context of climate change, refers to actions taken to reduce concentration of greenhouse gases in the atmosphere. The most effective way to reduce greenhouse gas concentrations in the atmosphere is to reduce emission sources. In the water sector, the principal source of greenhouse gas comes from the fossil fuel-based energy used to pump, convey, treat, and heat water. **According to the California Water Plan, approximately 12 percent of the total energy used in the State is associated with the water sector, of which ten percent is for end-customer uses such as heating water, and two percent is to pump, convey, treat and distribute water.** Therefore, mitigation can be accomplished through reducing the energy intensity of the water sector, replacing fossil fuels by renewable energy, improved efficiency, and reduced water consumption. The use of recycled water, the use of storm water **and other new local supplies,** 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, **and by reducing or eliminating the energy associated with transporting water long distances.** Other mitigation includes long-term carbon storage in the environment, and ecosystem management and restoration to ensure that the environmental carbon sink is resilient and grows over time.
7. The AB 32 Scoping Plan is the core of California's climate mitigation efforts. Water-related AB 32 mitigation measures target reducing energy requirements associated with providing reliable water supplies (water use efficiency, water recycling, and reuse of urban runoff), and reducing the amount of non-renewable electricity associated with conveying and treating water and providing adequate wastewater treatment (water system energy efficiency, and increased renewable energy production). **As renewable energy for electricity increases throughout the State, the energy and greenhouse gas emissions required to produce, convey, and treat water continue to be reduced.** The greenhouse gas emissions reductions from these measures are indirectly realized through reduced energy requirements, and these actions also have adaptation co-benefits of improving water quality and water supply reliability.
9. Many aspects of climate change and associated impacts will continue for centuries, even if anthropogenic emissions of greenhouse gases are reduced or stopped. Therefore, California is making efforts to adapt to a changing climate. A principle of the state's adaptation strategy document, Safeguarding California, is to prioritize actions that not only mitigate greenhouse gas emissions, but also help the state prepare for climate change impacts. Improved coordination, implementation, and integration of adaptation planning efforts and funding of the state's climate policies can directly protect the state's natural and built infrastructure, communities, environmental quality, public health, safety and security, natural resources, and economy from the unavoidable impacts of climate change.

Safeguarding California: Implementation Action Plans identifies priority strategies for reducing climate risk, including increasing regional self-reliance and diversification of local water supplies, and maximizing water conservation and water use efficiency to better respond to changing economic and climatic conditions while ensuring a reliable water supply. These strategies will ultimately be planned for and implemented by local and regional water management agencies throughout the State.

11. The California Water Action Plan is a suite of actions developed to build resiliency into California water management and the ecosystems it supports. The Water Action Plan directives include conservation, integrated management, ecosystem protection, drought planning, expanded water storage, recycled water use, and sustainable and integrated financing. **The Water Action Plan emphasizes that diversified regional water portfolios provide resiliency to drought, flood, population growth and climate change.** The Water Action Plan also emphasizes multiple-benefits projects, which are integral to climate mitigation and adaptation. Diversified regional water portfolios will make communities more resilient against drought, flood, population growth and climate change.

THEREFORE BE IT RESOLVED THAT

I. Reduce Greenhouse Gas Emissions

D. Storm Water

4. Storm water capture and use provides flood protection, augments local water supplies, and increases water supply reliability as a climate adaptation strategy, in addition to water quality benefits, and enhanced aquatic habitats. DWQ shall collaborate with the Department of Water Resources, and other state and local land use, **water supply, and storm water** agencies to prioritize storm water detention and infiltration **alternatives taking into consideration technical and economic feasibility and existing water rights.**

E. Energy Efficiency and Renewable Energy

5. Division of Financial Assistance, and Division of Drinking Water **shall provide technical assistance to disadvantaged communities that prioritizes providing a safe and reliable water supply, and may include** as a part of existing ~~technical assistance~~ programs, ~~for disadvantaged communities, shall include~~ assistance to finance, construct, upgrade, and operate energy-efficient drinking water and wastewater treatment systems, and to power those systems with zero-carbon and low-carbon renewable energy technologies, **where it is technically and economically feasible.**

THEREFORE BE IT FURTHER RESOLVED THAT

II. Improve Ecosystem Resilience

7. The Executive Director shall engage in dialogue with the United States Environmental Protection Agency (U.S. EPA), and interested stakeholders on how best to address meeting water quality standards given climate change impacts that contribute to or exacerbate degradation of water quality, including but not limited to increased surface water temperatures, decreased surface water flows, changes in water chemistry (such as increases in salinity, bacteria, and nutrient concentrations), hydrology, and ecology. **Management of nutrients in surface water runoff should be prioritized to prevent eutrophication and harmful algal blooms.**

III. Respond to Climate Change Impacts

11. By July 1, 2018, Division of Drinking Water (DDW) shall, in consultation with Office of Information Management and Analysis (OIMA) **and through coordination with the Department of Water Resources (DWR), begin developing guidance for** including climate change vulnerability assessments into community water system sanitary surveys **in consultation with stakeholders,** and shall encourage drinking water systems to use the U.S. EPA's Climate Change Resilience Evaluation and Awareness Tool or a comparable approach to identify vulnerabilities to climate change impacts. DDW shall work with Division of Information Technology **and DWR** to develop a publicly accessible reporting system for the results of these climate change vulnerability assessments.
13. State Water Board staff shall coordinate with the Regional Water Boards and relevant agencies to identify and recommend actions the Water Boards could take for effective **and streamlined** permitting of projects to **support local agency development of** new and underutilized water resources, expand surface water and groundwater storage where appropriate, and add operational flexibility to build and enhance resilience to impacts of climate change.

