

**BEFORE THE STATE OF CALIFORNIA REGIONAL WATER QUALITY CONTROL
BOARD SAN DIEGO REGION**

In the matter of:

**Climate Change Considerations for the San Diego Water Board
Docket No. 8**

COMMENTS OF Green Cities California

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For GREEN CITIES CALIFORNIA

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I. Introduction

Green Cities California (GCC) was established in 2007 and supports an active network of the most progressive local governments across California. A priority of member cities is to prepare for the resiliency of their communities. In order to do so, they have developed Climate Action Plans and/or Sustainability Plans with a strong focus on water availability. Representing more than 9 million people in CA, the GCC members are committed to advancing smarter water use, developing more locally-sourced water, and adapting the current “business as usual” approach into one that recognizes and integrates climate change.

II. Current State and Local Water Conservation and Capacity Building are Not Adequate

Attachment One includes excerpts from the August 12, 2015 posted Agenda and background documents. The level of importance presented in Part-B *The Drought Story and Impact* (Attachment B-2) reveals a new normal that requires more dramatic action than what previously would have seemed warranted. This is starkly contrasted with Part-A “Staff Activities” and the highlighted programs with outcomes that will continue to be grossly inadequate to meet the challenges ahead of San Diego and Southern CA.

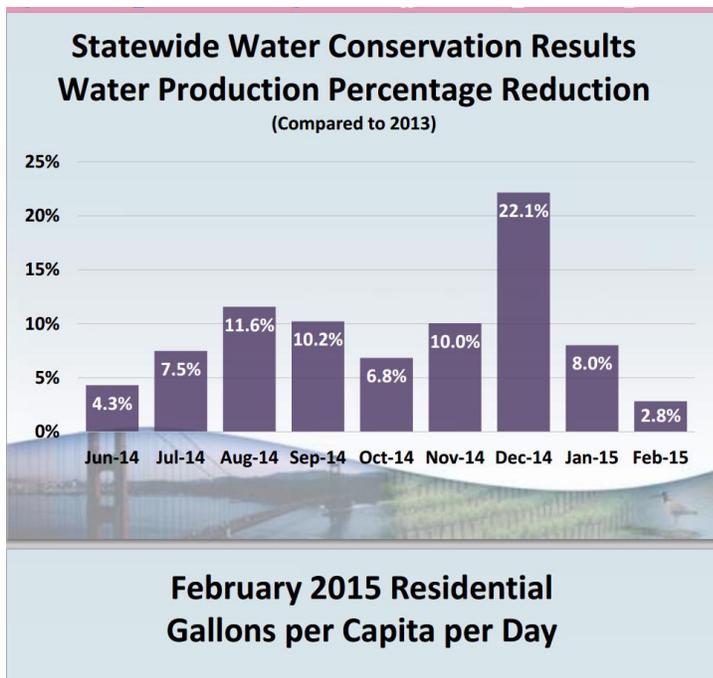
The Drought Story and Impact (Attachment B-2)- Board Members Eric Anderson and Gary Strawn attended a presentation at CSU San Marcos by Alex Tardy, Chief Meteorologist at NOAA’s National Weather Service, on the latest perspectives on current arid conditions, mega droughts, and the possible separation of the ENSO from the current weather cycle... The combination of below normal precipitation this past year, and the past four years combined being the driest on record, have all led to the extreme drought conditions....

Recycled Water Annual Summary Report 2014 - The San Diego Water Board annually surveys recycled water facilities to collect information on production, reuse, and the quality of recycled water in the San Diego Region.... About 58 percent of the recycled water produced was beneficially reused in 2014. Unfortunately, recycled water use supplied only a small fraction of the total water demand in the Region. The San Diego

Water Authority reported that only 4 percent of its 2014 demand was met with recycled water...

Drought Summit Meeting on Achieving Reductions in Potable Urban Water Usage -The San Diego Water Board hosted a summit to solicit input from urban water suppliers and storm water management agencies in the San Diego Region on collaborative solutions to meet Governor Brown's recent call for a mandatory 25 percent reduction in statewide urban water usage...

The table below indicates that current efforts to engage the public are not as successful as we need them to be. There are a number of reasons for this, but one that stands out is the apparent lack of commitment to seriously reduce water use and increase supplies by state and local agencies. When the actions are not there to support the rhetoric, then people respond in a very lackluster manner.



III. Climate Change Considerations for the San Diego Water Board

GCC member agencies and the Water Board have a common goal—to protect our current water supplies through conservation and reuse and to increase source water to the extent possible. However, we see very few water agencies taking the necessary action to address this. For that reason, the Climate Changes considerations should be very specific:

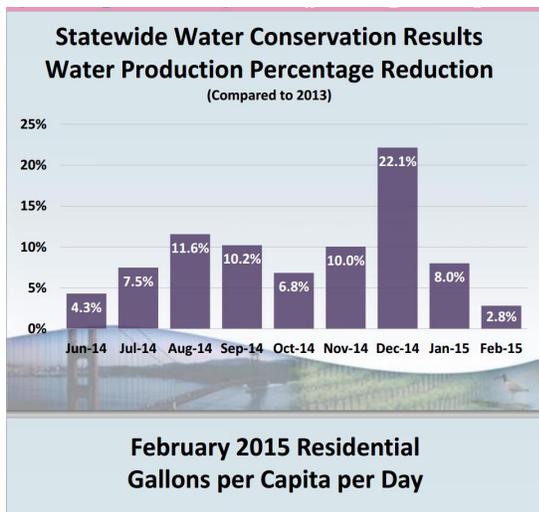
1. Support more stringent water conservation, especially in developments with large single family homes and expansive grounds and urge water agencies in our region to take aggressive measures. One example is the Goleta Water District- GWD declared a Stage 3 drought and the GWD Board will be considering adoption of drought surcharge rates in June. <http://www.goletawater.com/home/featured-story/stage-iii-water-shortage-emergency-information/>

A second example is the City of Santa Monica.
<http://www.smgov.net/departments/publicworks/water.aspx>

2. Align the San Diego region with best practices that have been proven internationally.
<http://laverne.edu/news/files/2013/02/Timothy-Brick-Alliance-for-Water-Efficiency.pdf>
3. Consider developing a comprehensive cost: benefit analysis that sufficiently values natural resources. Standard net present value calculations endorse later action because high discount rates are typically used and because water is treated merely as a commodity rather than life sustaining resource. Two resources that highlight this are included below:
<http://www.marketplace.org/topics/sustainability/water-high-price-cheap>
http://mudancasclimaticas.cptec.inpe.br/~rmclima/pdfs/destaques/sternreview_report_complete.pdf and the related update
<http://thinkprogress.org/climate/2013/01/28/1507651/nicholas-stern-i-got-it-wrong-on-climate-change-its-far-far-worse/>
4. Invite city staff, specifically including those who are taking the leadership role in climate response, to meet with Water Agency personnel to present and exchange ideas. GCC would be happy to help facilitate this, if needed.

V. Conclusion

What has been tried and true is no longer adequate to meet the needs of a growing population with less water. Until and unless this is taken seriously, we will continue to play “catch” up in a flurry of actions that are not linked to a comprehensive plan with measureable outcomes.



ATTACHMENT ONE- Significant Issues and San Diego Regional Staff Activities

Excerpted from the May 8, 2015 Meeting Summary (Part B- Significant Issues)

The Drought Story and Impact (Attachment B-2)- Board Members Eric Anderson and Gary Strawn attended a presentation at CSU San Marcos by Alex Tardy, Chief Meteorologist at NOAA's National Weather Service, on the latest perspectives on current arid conditions, mega droughts, and the possible separation of the ENSO from the current weather cycle. Currently, state water supply is 62 percent of historical average capacity and snow melt runoff and recharge was very little in spring 2014 due to historical low snowpack. Water supply is nearing all-time lows but remains higher than 1976-77. The diminished water supply will be further impacted by the record local snowpack in the Sierra Nevada and very warm temperatures. The combination of below normal precipitation this past year, and the past four years combined being the driest on record, have all led to the extreme drought conditions.

FACTS: → 2014 warmest year on record for California (4.1° F above normal). → 2014-2015 warmest 12-month period on record for California (4.5° F above), the south coast and San Diego. → Through March 2015, warmest 48-month period for California at 2.5° F above normal. → Sierra Nevada California snowpack on April 1 was five percent of average (next closest was 25 percent 2014). → Current California water supply is 12.5 million acre feet or 62.5 percent of average storage. → 2014-15 precipitation in California was 30 to 60 percent of average (most in December and February). → January 2011 to March 2015 is the driest period on record for California (-26 inches). → 1923-24 and 1976-77 years were drier than 2013-2015. → Historical tree rings records indicate a similar drought in 1653-55. → Southern California is missing 1.5 to 2.5 seasons of precipitation since January 2011. → Weak El Niño conditions were observed during the start of the 1976-77 and 2006-07 droughts. → El Niño years (weak to moderate have produced a range of 4 to 22 inches at San Diego. → Last wet year for California was 2010-11, which was during La Niña conditions.

Excerpted from the May 8, 2015 Meeting Summary (Part A – San Diego Region Staff Activities)

Recycled Water Annual Summary Report 2014 - The San Diego Water Board annually surveys recycled water facilities to collect information on production, reuse, and the quality of recycled water in the San Diego Region. The information is analyzed and summarized in the Recycled Water Annual Summary Report (Report). The report for 2014 is Attachment B-5 to this Executive Officer's Report. Based on the information reported, slightly over 61,000 acre feet of recycled water was beneficially reused in the San Diego Region. Annual recycled water use in the Region increased for the fifth straight year with 2014 amounts exceeding 2010 amounts by almost 20,000 acre feet. About 58 percent of the recycled water produced was beneficially reused in 2014. Unfortunately, recycled water use supplied only a small fraction of the total water

demand in the Region. The San Diego Water Authority reported that only 4 percent of its 2014 demand was met with recycled water, while the Rancho California Water District met only 5 percent of its demand with recycled water. Comparing 2013 to 2014, the number of inspections conducted by recycled water agencies increased by 414, with the percent of inspected sites with violations decreasing from 5 to 3 percent. Typical violations included broken sprinkler heads, broken pipes, over-spray of application areas, ponding, unapproved modifications, and runoff of recycled water at reuse sites. Overall, recycled water quality across the Region met effluent limitations specified in applicable permits. Comparing historical data, there are no discernible trends for individual facilities or constituents, suggesting that the overall quality of recycled water remained consistent for the last two decades.

Excerpted from May 8, 2015 Meeting Summary

Drought Summit Meeting on Achieving Reductions in Potable Urban Water Usage -The San Diego Water Board hosted a summit to solicit input from urban water suppliers and storm water management agencies in the San Diego Region on collaborative solutions to meet Governor Brown's recent call for a mandatory 25 percent reduction in statewide urban water usage. The summit agenda covers a wide range of topics pertaining to the need for urban water suppliers and storm water management agencies to step up efforts towards realizing water use reductions and discouraging water waste to meet the statewide 25% conservation standard. Key issues on the agenda that warrant attention for factoring into conservation strategies include increased integration of storm water capture and recycled water into the water supplies.