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September 13, 2017

County of San Diego
 Planning and Development Services
 Attn: Maggie Soffel, Land Use/Environmental Planner
 5510 Overland Avenue, Suite 110
 San Diego, CA 92123

VIA EMAIL: CAP@sdcounty.ca.gov

Re: Comment Letter – COUNTY OF SAN DIEGO CLIMATE ACTION PLAN (PDS2015-POD-15-002)

Dear Ms. Soffel,

On behalf of Olivenhain Municipal Water District, thank you for the opportunity to provide input on the County of San Diego’s updated Climate Action Plan. OMWD provides 84,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services. OMWD supports climate planning and greenhouse gas management efforts. As stated in our mission statement, we are committed to practicing sustainable operations through pursuing alternative and/or renewable energy sources with the most sustainable, efficient, and cost-effective approach.

In addition to expanding its use of renewable resources, OMWD has promoted GHG reduction by encouraging our customers through education and outreach to reduce their demand for potable water. By modifying plumbing fixtures and appliances, landscapes, and behavioral practices, OMWD customers have greatly reduced their water consumption since 2013. Furthermore, despite having no mandatory restrictions in place at the retail level for over a year, our customers have continued to use significantly less water than was used in 2013 and before.

Local supply reliability is a key issue for OMWD, as expanding local supplies reduces the energy demand of conveying water from faraway sources. OMWD is currently in the process of evaluating the feasibility of developing its own renewable source of potable water through the San Dieguito Valley Brackish Groundwater Desalination Study. We also support the expansion of recycled water as a means to reduce the demand for potable water and are members of the North San Diego Water Reuse Coalition. In conjunction with the county’s CAP, we encourage the county to continue to enhance its recycled water management system and to streamline the permitting and approval process for recycled water sites.

The county’s CAP asserts that if the state’s update to the MWELO does not implement a 40% reduction in water use for new and existing landscapes, the county’s Landscaping Ordinance will be changed to reflect that standard. What is the county’s motivation to differ from state standards? As an agency that provides water service in five cities in addition to unincorporated areas, we implore that regional uniformity is considered when updating any water use reduction guidelines. Additionally, the efficient use of water necessary to sustain the life of the landscape should be the primary driver of any MWELO, not an arbitrary percentage.

L1-1

L1-2

L1-3



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

Response to Comment Letter L1

Olivenhain Municipal Water District
Kimberly A. Thorner, General Manager
September 13, 2017


- L1-1** This comment provides an overview of the Olivenhain Municipal Water District (OMWD) and its commitment to practicing sustainable operations. As this comment does not raise an environmental issue related to the adequacy of the Draft SEIR, no further response is warranted.
- L1-2** This comment states that OMWD is in the process of evaluating the feasibility of developing its own renewable source of potable water and that OMWD encourages the County to continue to enhance its recycled water management system and to streamline the permitting and approval process for recycled water sites. The County appreciates the comment from OMWD. The County does not own or operate a recycled water management system. The County looks forward to working with OMWD or any other applicant that proposes projects, including recycled water projects.
- L1-3** The comment questions why the County may implement a 40% reduction in water use for new and existing landscapes if the State’s update to the Model Water Efficient Landscape Ordinance (MWELO) is not updated to reflect this standard. The comment encourages regional conformity when updating water use reduction guidelines. This comment does not raise an environmental issue related to the adequacy of the Draft SEIR. In order to meet its local GHG reduction targets, the County must take actions beyond those assumed by the State and within its local authority. The State is considering updating the MWELO by 2020; therefore, in keeping with the State’s trajectory, the CAP includes GHG Reduction Strategy W-1.2: Reduce Outdoor Water Use to conserve water resources and achieve GHG reductions through reduced electricity consumption from the extraction, conveyance, distribution, and

treatment of water. Please also refer to Master Response 7 regarding outdoor water consumption.

Overall, OMWD understands the intent of the county's CAP and is a willing partner for many of the measures highlighted in the plan. We look forward to working cooperatively with the county so that it may achieve the goals set forth in its Climate Action Plan.

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,



Kimbely A. Thorne
General Manager

L1-3
cont.