



Association of California Water Agencies

Leadership Advocacy Information *Since 1910*

February 22, 2007

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Re: Association of California Water Agency (ACWA) Concerns
with Proposed Amendments of Rule 1110.2

Dear Sirs:

The Association of California Water Agencies (ACWA) is a statewide organization representing some 450 public water districts. Collectively, our members supply 95 percent of the water delivered in California. We are contacting you to voice our extreme concern with some of the directions that SCAQMD appears to be heading.

Specifically, we are concerned that proposed new 1110.2 amendments will severely restrict the ability of water agencies, which are recognized as essential services by the State of California, from performing their duties. Such increased regulations will have a negligible impact on the air pollution problems facing the basin, but will have devastating impacts on some water agencies.

Negligible Impacts

Even if all water agency natural gas engines were removed, there would be no discernable change in the emissions load in the area. Water agencies in the South Coast Air Basin operate some 650 natural gas engines that are used for water pumping. Collectively these engines contribute less than 1/10 of 1 percent (0.01%) of the emissions in the area.

Devastating Impacts to Affected Water Agencies

Water agencies use natural gas engines as alternatives to electricity for precisely that reason – *they are an alternative to electric service*. Water agencies must have this option in order to provide reliable water supplies during power outages. The following example is typical of the critical service natural gas engines provide in California's water infrastructure.

The Old Fire was a wildfire that started on October 25, 2003, in the San Bernardino Mountains. It took almost two weeks to completely contain it. Before it was contained it burned almost 100,000 acres, cost \$42,045,093 to fight, destroyed 993 homes, damaged 35 homes, destroyed 10 commercial properties and killed 6 people.



A map of the fire is provided below. Note that there is a non-burned area in the center of the fire. The reason that this area was spared is solely due to the local water agency having natural gas pumps.



Crestline Lake Arrowhead Water Agency (CLAWA) provides water to 25 retail water agencies in this area. The sole source of surface water for this area is from Silverwood Lake (on the left side of the above map), where the water is pumped up some 4,000 vertical feet, using primarily high pressure natural gas engine-driven pumps. CLAWA's water transmission pipelines throughout the area contain fire hydrants where pressure allows and fire vehicle access is available.

One of the first things that happened in the 2003 Old Fire (as well as in the 1999 Willow Fire and the 1981 Panorama fire) is that electrical service was lost to the area, as the following status report mentions. During the Old Fire, CLAWA provided

fire fighters 19 million gallons of water, which was credited with saving most of the mountain, solely from its natural gas driven pumps.



***“Preliminary note from Arrowhead Communities Fire Safe Council”
Oct 31, 2003, 2:51 pm***

Below are two official notices from the County of San Bernardino. These notices provide updates on fire status and complexities of returning to evacuated communities.

In a nutshell, utility lines are not only down, but many power poles have burned and need replacement. Trees around the power poles and lines are a serious risk to rebuilding powerlines in the mountains and reenergizing SCE customers. The process will take a while to work out a safe plan of action. ... SCE line construction crews will reenter areas and build power lines, set poles, hardware, transformers and other steps related to a complete rebuild, after areas are declared safe from falling trees, brittle limbs and fire risks. The process cannot be done over night. ... Incident: Old Fire Expected Containment: 11/08/2003 1800 Hours Acreage: 95,395 Cost to Date: \$5,553,795 Containment: 25%”¹*

¹ <http://www.2020hindsight.org/2003/10/31/preliminary-note-from-arrowhead-communities-fire-safe-council/>

In part as a response to this devastating fire, CLAWA has installed stationary natural gas engines at all six booster stations, its main office, and at its water treatment plant to provide electricity during system power failures.

The repercussions from this fire have continued for years (e.g., see Cedar Glen Disaster Recovery EIR²), and further illustrate the absolute necessity for CLAWA to be able to maintain its natural gas engines. For example, Arrowhead Manor Water Company (AMWC) states:

"AMWC once provided service to approximately 560 customers in the unincorporated community of Cedar Glen and vicinity, one mile southeast of Lake Arrowhead, San Bernardino County. Wildfires that raged through San Bernardino County in late October, 2003, destroyed all but approximately 200 homes in the service area. The fire also destroyed much of AMWC's infrastructure, including pumping stations, storage tanks and water mains.

As a result of the wildfires, AMWC has been unable to provide and deliver its own source of water supply to its customers. The only source of water available to AMWC since the fires has been through the purchase of water from the Crestline Lake Arrowhead Water Agency (CLAWA). Until the AMWC system can be repaired to the point where it can supply its customers with its own water supply, AMWC must rely solely on CLAWA as a water source."³

To deprive CLAWA of the ability to pump water using natural gas engines is to doom this area to destruction during the next fire.

The water agencies are as concerned as anyone about the air pollution problems in California, but not allowing an exemption for essential services such as water pumping using natural gas engines will not accomplish anything in this area, and the consequences are potentially devastating.

We urge SCAQMD to either revisit the proposed 110.2 amendments, or specifically allow an exemption from them for essential services such as water agencies.

Sincerely,



Krista Clark
Director of Regulatory Affairs

KC/mjw

² Draft Programmatic Environmental Impact Report Redevelopment Plan for the Cedar Glen Disaster Recover Redevelopment Project, County of San Bernardino Redevelopment Agency, June 2005.

³ California Public Utilities Commission, RESOLUTION NO. W-4450, January 8, 2004.

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