



StopWaste is the Alameda County Waste Management Authority, the Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency.

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September 5, 2014

Laura Peters  
Senior Engineer, Water Resources  
California Department of Water Resources

Re: Comments Regarding the Water-Energy Grant Program Draft Guidelines and PSP

Dear Ms. Peters:

Thank you for the opportunity to submit comments on the Water-Energy Grant Program Draft Guidelines and PSP. StopWaste is the Alameda County Waste Management Authority, Alameda County Source Reduction and Recycling Board, and the Energy Council operating as one public agency. For over a decade, our agency has been working at the nexus of waste-water-energy issues. We have conducted research connecting the materials management sector to Climate Action Plans, energy programs, green building programs, and many other strategies listed in the AB32 Scoping Plan.

We offer the following recommendations in order to help the program better achieve the GHG emissions reduction goals of AB 32, since this grant is funded by the Cap-and Trade program.

- 1) We recommend that the evaluation criteria be adjusted to maximize GHG emissions reductions. Specifically, **projects should be given credit for additional GHG reductions achieved from integrated resource management strategies**. The proposed calculation methodology does not include GHG reductions delivered from the project outside of those associated with water and energy. Projects should be allowed to demonstrate and document GHG benefits by other means. (Please see our prior comments, which provided data on the GHG benefits of using compost).
- 2) We recommend that **GHG be included in the ranking criteria**. This program was established by the Legislature to achieve GHG reductions, energy savings and water savings, yet the ranking criteria exclude GHG reductions. They include DAC, energy and water. This approach presumes that there are no additional GHG benefits to projects beyond those attributed to water and energy. It does not incentivize project applicants to maximize overall GHG reductions, which should be an objective for Cap-and-Trade funded programs.
- 3) Lastly, we recommend that the **definition of a Regional Project should be expanded** to say "a project that is included in an adopted Integrated Regional Water Management Plan or serves the objectives of multiple (2 or more) water agencies".

Thank you for your consideration and for your commitment to soliciting public input.

Sincerely,

Karen Kho  
Senior Program Manager