



PALMDALE WATER DISTRICT
A CENTURY OF SERVICE

February 8, 2024

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Ms. Liane M. Randolph, Chair
California Air Resource Board
1001 I Street
Sacramento, California 95814

Sent Via E-mail

RE: COMMENTS ON CALIFORNIA'S DRAFT PRIORITY CLIMATE ACTION PLAN

Dear Ms. Randolph:

Thank you for the opportunity to comment on the Draft Priority Climate Action Plan (PCAP). Palmdale Water District (PWD) has reviewed the documents and has the following comments for your consideration:

- 1. Chapter 3.5 GHG Reduction Measures

Please add the following as an Industrial or Waste Measure:

Carbon removal measure that includes both direct air capture (DAC) and carbon capture and sequestration (CCS). The DAC/CCS measure will immediately benefit the State in the long-term reduction of greenhouse gas emissions as other measures are either slowed in implementation or public agencies/private businesses may continue to do business as usual.

PWD is currently implementing an indirect potable reuse project that will utilize tertiary-treated recycled water and provide a new water supply that is anticipated to meet 25% of the PWD's demand by 2030. PWD has teamed with Capture6 - a direct air capture start-up that takes brine and uses it to create a solvent that absorbs carbon dioxide from the air carbon to develop and implement the DAC/CCS project. This multi-benefit project would help mitigate long-term water shortages within PWD's service area, open the door further for innovative and scalable climate solutions in California and progress the States 2023 goal of

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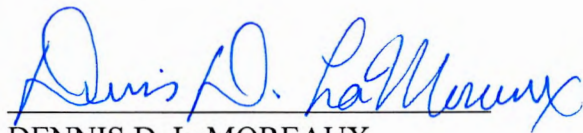


reducing GHG emissions by 40% in support of AB 32. Additionally, the project site is located in a large, disadvantaged community that would directly benefit from the investment in a myriad of ways, aligning with priorities from SB 535 and outlined in Section 3.3 of the PCAP.

Palmdale Water District looks forward to continuing to work with California's Air Resource Control Board on implementing measures and projects within the plan, which we hope includes PWD's Pure Water Antelope Valley (Pure Water AV) Project.

Should you have any questions, please feel free to contact me at (661) 456-1017 or dlaMOREAUX@palmdalewater.org or Scott Rogers, Engineering Manager, at (661) 456-1020 or srogers@palmdalewater.org.

Very truly yours,



DENNIS D. LaMOREAUX,
General Manager

DDL/SR/dh

Cc: Palmdale Water District Board of Directors