

CALIFORNIA URBAN WATER AGENCIES

March 3, 2017

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Felicia Marcus, Chair State Water Resources Control Board 1001 I Street, 24<sup>th</sup> Floor Sacramento, CA 95814 3-7-17Board Meeting-Item 7 Climate Change Deadline: 3/3/17 12 noon



Subject: Comment Letter – Climate Change Resolution

Dear Chair Marcus and State Board members:

The California Urban Water Agencies (CUWA) appreciates the opportunity to provide input on the proposed draft Climate Change Resolution. We applaud the State Water Resources Control Board (State Board) for considering the potential impacts of climate change on future water resources and ecosystem management; recognizing the importance of resilient water supplies, systems, and operations; and considering the needs of disadvantaged communities.

CUWA's member agencies have been taking steps for years to mitigate climate change and adapt to its anticipated impacts. Our agencies have taken "no regrets" actions on many levels to build resilience, such as achieving increased water use efficiency, expanding storage capacity, and developing drought-resilient supplies.

We support the State Board in addressing climate change mitigation and adaptation with strategies consistent with our member agencies' needs and resources and with CUWA's Climate Change Policy Principles. However, certain aspects of the proposed draft resolution have the potential to go beyond directing State Board divisions and offices and making recommendations to Regional Boards. In its current form, the proposed draft resolution establishes policies that have not adequately considered California's overall water system, feasibility, costs, and regional differences. As such, we offer the following suggestions, which are primarily based on CUWA's Climate Change Policy Principles (attached).

- Acknowledge the far-reaching consequences of climate change impacts and the evolving state of climate change science. State and local agencies should take measured approaches to respond to climate change impacts as science forecasts improve over time. The existing state of knowledge and remaining uncertainties about the scale and timing of impacts associated with climate change warrant immediate, incremental, and iterative strategies and actions rather than statewide prescriptive prioritization of resources and actions. Water agencies should be involved in developing climate change assessment tools, evaluating projected climate change impacts, and determining appropriate adaptation strategies and actions.
- Reflect that resilient water sources and systems are defined by site-specific needs and regional differences. CUWA agencies recognize the potential benefits of alternative water supplies such as those outlined under the Mitigation section (Items I.B.2, I.C.3, and I.D.4). We caution against the state utilizing the resolution to impose prescriptive requirements on how water agencies conduct water management planning to deal with uncertainties, such as climate change. What
  - 201 N. Civic Drive, Suite 115, Walnut Creek, CA 94596 925-210-2525 www.cuwa.org

constitutes a reliable water supply source for a water agency in one part of the state does not necessarily translate to all. For example, urban stormwater capture may not be a reliable supply for an agency where rain and/or storage capacity are lacking or where stormwater or groundwater quality is prohibitively impaired. The draft resolution directs State Board staff to prioritize stormwater capture and use statewide without recognizing the limitations of feasibility, energy intensity, and/or extensive infrastructure requirements in some regions. Furthermore, relatively drought-resistant supplies (e.g., water reuse, conservation, and desalination) may be considered a more effective adaptation strategy for some communities. To ensure flexible climate change strategies that best meet the needs of a community, we recommend that stormwater not be prioritized as stated in the resolution under Item I.D.4.

- Clearly define how the recommended strategies will be used or implemented to improve resilience of water resources management in the state. We recommend that the outcomes be implemented through existing plans such as the California Water Plan's specific strategies to increase resilience to climate change.
- Reassess the fiscal impacts of the resolution. From our involvement in similar efforts, the significant new tracking and reporting responsibilities will increase State Board staff workload to a level that is not inconsequential. The resulting fiscal impact of increased State Board staff effort should be shared with the public/taxpayers.

The proposed draft resolution calls for collecting information on the amount of stormwater captured and used statewide. CUWA recently prepared a white paper entitled The Potential for Urban Stormwater as a Water Supply (available on CUWA's website at:

http://www.cuwa.org/pubs/CUWA\_UrbanStormwater\_WhitePaper.pdf). The white paper summarizes information on our member agencies' current and planned urban stormwater capture amounts and uses as well as implementation opportunities and barriers. We welcome the opportunity to meet with State Board members and staff to share our findings from that work.

Our member agencies are committed to advancing a reliable, high-quality water supply for the State's current and future urban water needs. Several CUWA agencies plan to send their own letters with more detailed comments.

We hope our comments are helpful. In the meantime, we continue to take action on many levels to sustainably manage California's water supplies. Please contact Jenny Gain at 925.210.2225 with any questions, for further detail related to our comments, or additional assistance from CUWA in any way.

Sincerely,

Cindy Paulson, Ph.D. CUWA Executive Director

Jenny Gain, PE, QSD CUWA Staff Engineer

Enclosed – CUWA's Climate Change Policy Principles

**CUWA Policy Principles** 

# Climate Change – October 31, 2013

CUWA's mission is to provide a forum for combining the expertise and resources of its member agencies to advance a reliable, high-quality water supply for the State's current and future urban water needs. Climate change presents uncertainties that are important to consider for future water supply reliability. CUWA's member agencies are taking steps on many levels to address climate change, as summarized in the following policy principles.

### Science

• CUWA acknowledges the far-reaching consequences of climate change impacts and the evolving state of climate change science, which dictate deliberate action to protect water supply reliability. The existing state of knowledge and remaining uncertainties about the scale and timing of impacts associated with climate change warrant immediate, incremental, and iterative strategies and actions. Many CUWA agencies utilize climate change science and will incorporate new developments into their planning.

### Mitigation

- CUWA recognizes the importance of the water-energy nexus in mitigating climate change. CUWA member agencies support continued investment in programs to provide water savings and associated reductions in energy use and greenhouse gas emissions to help mitigate climate change. CUWA agencies are also committed to developing renewable energy sources.
- Cap-and-Trade revenues and other climate change sources of revenue should, in part, be invested in water-related mitigation efforts. As noted in the California Municipal Utilities Association (CMUA)/CUWA Joint Policy Principles on Cap and Trade General Auction Revenues, these revenues are an important source of funds to re-invest in other water-related projects that reduce the carbon footprint of the water sector.

## Adaptation

- **CUWA supports the development of flexible climate change adaptation strategies.** CUWA agencies are taking steps to assess potential effects of climate change and develop flexible strategies that enable adaptation to changing future conditions to maintain reliable high quality water supplies.
- Early actions should focus on "no regrets" strategies. Given the high degree of uncertainty with climate change impacts, near-term agency investments, in most cases, are best directed toward actions that would be effective across a broad spectrum of possible future scenarios. Other adaptation activities can be added as climate change science evolves.
- CUWA considers a resilient water system to be a key strategy in adapting to climate change. Resilience is achieved through the following:
  - Diversifying water supply portfolios and including relatively drought-proof supplies (e.g., water reuse, conservation and desalination),
  - Securing reliability of current supplies, and

- Implementing regional cooperative practices and projects (e.g., joint storage management). Resilience is enabled by infrastructure or processes that can adapt to changing conditions, including:
  - Flexible infrastructure to optimize multiple sources and to enable sharing with regional partners,
  - Improved water storage management and capacity, and
  - Robust treatment processes that can handle fluctuations in source water quality.

#### Planning

- Climate change is an important consideration for long-term planning. Consistent with CUWA's Water Supply Reliability Policy Principles, CUWA agencies are taking steps now to incorporate adaptation strategies in plans for water supply, demands and infrastructure to address potential impacts of climate change. Given the potentially far-reaching impacts of climate change on California water resources, broader re-consideration of traditional water resource management strategies may also be warranted.
  - Supply and demand. The risk of climate change impacts to the quality and quantity of water supplies can be accounted for through vulnerability assessments or other means, using the best available science to guide adaptation strategies. The effects of climate trends are also important considerations for long-term demand projections.
  - Infrastructure. Investment decisions must consider uncertainties created by climate change, given the multi-decade lifecycle of most water-related infrastructure.
  - Long-term decision-making tools. CUWA suggests agencies consider development and use of long-term decision-making tools, such as scenario planning, that could complement Urban Water Management Plan (UWMP) planning in assessing water supply vulnerability to climate change.
- Legislative and regulatory requirements developed for climate change planning and/or reporting need to be flexible and non-prescriptive. Given the highly uncertain nature of climate change effects, individual water agencies need flexibility to develop approaches that best meet future needs.
  - Planning horizon. The existing UWMP planning horizon of 20 to 25 years aligns with related planning factors, such as land use projections. The five-year UWMP reporting cycle is appropriate for providing periodic updates that reflect advancements in climate change science and other factors.
  - Recognition of site-specific needs. Climate change planning is not a one-size-fits-all approach. Local conditions and needs must be considered.
  - Adaptable, flexible requirements. Guidance for incorporating climate change into planning documents must be adaptable and flexible enough to recognize the evolving nature of climate change science, especially as related to down scaling of global impacts to local areas.