



**Central Sierra Environmental Resource Center**  
**Box 396 • Twain Harte, CA 95383 • (209) 586-7440**



February 23, 2017

Jeanine Townsend  
Clerk to the Board, State Water Resources Control Board

To Ms. Townsend:

Our Center is supportive of the State Water Board adopting the proposed updated climate change resolution. Please accept the following comments submitted by our Center regarding the proposed updated resolution.

CSERC works to protect and restore ecosystems throughout the Northern Yosemite region through advocacy, monitoring and stewardship. The forests of the Sierra Nevada provide a tremendous amount of water for California as well as serving as a carbon sink. As climate changes, it is imperative to establish and maintain resiliency so forest ecosystems can continue to provide these critical functions of storing both water and carbon. Improving ecosystem resilience is the most meaningful directive in the proposed climate change resolution. It is an overarching concept that has great potential to allow the ecosystem to adapt by restoring natural processes.

CSERC strongly advocates for the State Water Board to incentivize water conservation, improvements to efficiency of water treatment and delivery, and actions that restore and protect ecosystems and their functions. Financial incentives to encourage these actions would likely improve both quality and quantity of outcomes.

Many of the “areas proposed to be addressed” through the resolution work to respond to climate change but also have many fringe benefits, such as enhanced water quality. The emphasis on storm water detention, for example, increases infiltration and reduces the risk of pollution. This sort of dual benefit is a good example of where thorough and accurate documentation and acknowledgement of ecosystem benefits should be employed.

CSERC supports the Water board’s focus on methane capture. Methane and other short lived climate pollutants make sense as priority pollutants to address given the ability to alter concentrations in the atmosphere very quickly. Where changes in carbon emissions take time to be reflected in atmospheric concentrations, changes in methane concentrations occur more rapidly; this makes it feasible for actions to reduce methane to be both efficient and effective.

Recycled water has great potential in California and CSERC encourages the Water Board to put funds and efforts towards enhancing this option in the State. The Water Board should

pursue options to facilitate and incentivize advancements in recycled water use. Making reporting a requirement could be beneficial as it allows those who use recycled water to receive credit for such, which may encourage others to do the same. Ensuring the reporting system is streamlined and user-friendly may increase use and support of such a system.

Given that many communities are already in need of improved wastewater treatment and drinking water treatment systems, it is especially beneficial to provide funding to make those systems energy efficient and not low carbon systems.

Although a wetter winter in 2017 has relieved some drought stress, California would be very wise to come up with a strategy to anticipate and address the likelihood of more frequent drought periods. CSERC fully supports water conservation as a way of life in California. This piece is especially important given misconceptions amongst the general public about the impacts of climate change. Educating the public about the importance of water efficiency and conservation will be especially important in above average water years that some interpret as contradictory to climate change. There are many far-reaching benefits from water conservation for people and the ecosystem.

Adjusting to the impacts of climate change will require *adaptation* as the SWB acknowledges; this adaptation will require changes that are likely to be substantial and require financial investment. While the value of a healthy watershed is immeasurable, the ecosystem services they provide can be quantified. Investing in ecosystem resilience through restoration of ecosystems and their functions promises to be highly impactful over the long-term as humans adapt to climate change.

As the climate changes, people's actions must also change. As the agency designated to protect water in California, the State Water Board should provide strong guidance and assistance to ensure public water resources are protected and enhanced as we adapt to a changing climate. CSERC supports the State Water Board adopting the proposed updated climate change resolution.

Thank you for considering these comments,



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John Buckley, executive director



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Megan Fiske, biologist