



March 3, 2017

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

**Via Electronic Mail**

*commentletters@waterboards.ca.gov*  
*jelena.hartman@waterboards.ca.gov*

**Re: Resolution Adopting a Comprehensive Response to Climate Change**

To Whom it May Concern:

Please accept the following comments on behalf of Coastal Environmental Rights Foundation (CERF). CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. CERF was established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.

CERF supports the efforts of the State Water Resources Control Board (SWRCB) to prepare a resolution to address the significant impacts continued greenhouse gas (GHG) emissions and climate change will have on our environment, locally and globally.

CERF is focused on major environmental issues facing the world today. Climate change easily tops this list. Climate change mitigation and adaptation are of the utmost importance, especially for coastal communities like San Diego. Climate change threatens human health, natural resources, water supply, economic stability, and livelihood.

CERF therefore supports a resolution that protects public health and natural resources as advised by the best available climate science. The SWRCB's Draft Resolution is a significant step in that direction. Notably, the Resolution highlights the fact that the principal source of greenhouse gas emissions come from fossil fuels used in the conveyance, treatment and heating of water. As written, however, paragraph 4 of the Draft Resolution address only replacement of existing high carbon water supplies. The use of recycled water, storm water and natural infrastructure has the potential to not only replace existing higher carbon water supplies but offset the need for additional high carbon supplies in the future. Increased conservation and recycling/capture results in greenhouse gas reductions at all levels of the water supply chain.

CERF therefore urges the Board to adopt the Resolution with the following modification to paragraph 4, page 2:

The use of recycled water, the use of storm water, and the use of natural or green Infrastructure for storage, movement and treatment, have the potential to reduce greenhouse gas emissions if replacing an existing or future, higher carbon water supply.

Thank you in advance for consideration of our comments.

Sincerely,

Livia Borak Beaudin  
Legal Advisor  
Coastal Environmental Rights Foundation

