

March 3, 2017

3-7-17 Board Meeting-Item 7
Climate Change
Deadline: 3/3/17 12 noon

State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100
Sent via email to commentletters@waterboards.ca.gov



Re: Consideration of a Proposed Resolution Adopting a Comprehensive Response to Climate Change

Dear Chairwoman Marcus and Members of the State Water Resources Control Board,

Thank you for your commitment to addressing climate change through both mitigation and adaptation strategies. The communities with whom we work, and similar lower income communities of color, are often most vulnerable to the impacts of climate change as a result of impacted groundwater and drinking water supplies, increased vulnerability to floods, increased exposure to mosquitos, increased impacts of wastewater overflows, and increased costs associated with water management and delivery. It is critical that the state board take these vulnerabilities into consideration in its adoption and implementation of a comprehensive response to climate change. We presented comments to the stakeholder draft, yet few recommendations were included, so we have included them again in this correspondence.

We recommend that the Board's recitation of examples of the impacts of climate change on water quality and environmental quality (page 1, paragraph 2) include increases in standing water, increased groundwater pollution due to periods of decreased precipitation, and septic system overflows. Similarly, we recommend that the Board include critical adaptation strategies, such as the Board's authority to encourage and mandate drinking water and wastewater consolidation and other regional strategies, among its authorities and responsibilities laid out in paragraphs 13 or 14.

In Section I.A.1. (Methane Capture / Short Lived Climate Pollutants) include a commitment that the Division of Water Quality and the Regional Water Quality Control Board will work with CDFA, CARB and Calrecycle to ensure that programs and projects designed to address Short Lived Climate Pollutants will not have negative local impacts on drinking water supplies. (See Government Code 16428.86).

In Section I.E.5. (Energy Efficiency) include leak detection, repair and fixture replacement among potential strategies to further energy efficiency.

In Section III.11 (Respond to Climate Change Impacts) include climate change vulnerability assessments of communities reliant on state smalls and domestic wells, generally the most vulnerable residents to climate change. Additionally, include vulnerability assessments of wastewater treatment, especially in communities not served by public wastewater systems. Finally,



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ensure that information developed through climate change vulnerability assessments be made available for local water and land use planning processes, including Groundwater Sustainability Plans and Water Shortage Contingency Plans to facilitate integration among local and regional water and climate resilience efforts.

In Section III.12 change language to reflect that technical assistance and financial support shall be available to communities, not simply drinking water systems, to respond to and prepare for drinking water and wastewater impacts of climate change. Among the most vulnerable populations are those reliant on private wells.

In Section V (Funding) include a provision that climate change mitigation and adaptation objectives prioritize projects and policies that improve resilience in the state's most vulnerable communities, including those communities reliant on private wells and on site wastewater systems.

In Section VI.25 (Outreach) include a provision that the board will develop a dynamic list of communities most vulnerable to climate change impacts to prioritize and guide local and state level outreach and support.

We would be pleased to discuss these recommendations with the Board and staff and look forward to working with you to create a more resilient California.

Sincerely,

A blue ink signature of Phoebe Seaton, consisting of a stylized, cursive 'P' followed by a series of loops and a final flourish.

Phoebe Seaton
Executive Director
Leadership Counsel for Justice and Accountability

A blue ink signature of Jennifer Clary, featuring a stylized 'J' and 'C' with a series of loops and a final flourish.

Jennifer Clary
Water Program Manager
Clean Water Action

A black ink signature of Laurel Firestone, written in a cursive, flowing script.

Laurel Firestone
Co-Executive Director
Community Water Center

