



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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March 3, 2017

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

Ms. Felicia Marcus, Chair and Members
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100
Via Electronic Mail



Re: California Association of Sanitation Agencies Comments Regarding the Proposed Resolution Adopting a Comprehensive Response to Climate Change

Dear Chair Marcus & Members:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the Proposed Resolution Adopting a Comprehensive Response to Climate Change (Proposed Resolution). CASA is an association of local agencies, engaged in advancing the recycling of wastewater into usable water, and the generation of renewable energy, biosolids, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians.

CASA understands that climate change will likely affect wastewater facilities and services in various ways, and we agree with the Water Boards that it is important to reduce greenhouse gas emissions, assess the potential impacts of climate change that cannot be avoided, and identify ways to be resilient in the face of those impacts. We appreciate that the Proposed Resolution is intended to provide transparency regarding how the Water Boards plan to use their programs and authorities to further climate change mitigation and adaptation.

Our comments on the Proposed Resolution are as follows:

1. CASA recommends the Water Board explain its authorities related to climate change mitigation and adaptation. Although many of the proposed actions are internal in nature, it is unclear if the intent of the Water Board is to incorporate climate change-related provisions into permits, plans and policies which could not only lead to requirements for actions that must be taken by permittees, but, in the case of NPDES permits, these actions would become enforceable by third party legal challenges. Therefore, we take this Resolution and efforts to implement it very seriously, and we would like to understand the Water Board's authority over activities that may lead to such requirements.
2. It is very important for the Water Boards to collaborate with other state agencies, as identified in Item I.A.1 and several other items, in order to avoid promoting (or imposing) duplicative, overlapping or conflicting measures. This is particularly true in the areas of greenhouse gas emissions mitigation, for which we believe the Air Resources Board is the lead agency, and organic waste diversion, for which we believe CalRecycle is the lead agency.
3. Many CASA members have projects underway that relate to items in the Proposed Resolution. It would be highly beneficial for them (as stakeholders) to participate in

the Water Boards' implementation activities. At a minimum, we would like to see the Water Boards incorporate robust stakeholder involvement opportunities into these initiatives. CASA recommends forming a stakeholder or technical advisory committee to work with the Water Boards on the implementation of the Resolution.

4. We urge the Water Boards to incorporate measures into the Resolution (and its implementation) that support the use of biosolids and biosolids compost to build and maintain healthy soils, as well as the use of biosolids for reclamation efforts such as fire ravaged lands and former mines. Biosolids used in this way result in many benefits, including carbon sequestration, reduced water use, and reduced fertilizer use.
5. We urge the Water Boards to provide timely technical information, technical assistance, and incentives to support the efforts of wastewater agencies to identify and adapt to projected climate-related impacts. One-size-fits-all mandates are not effective in this context, because each agency has unique circumstances and needs. For instance, sea (or tide) level rise is already a reality for some, while for others, it is not a concern. We also recommend that the Water Boards focus on supporting and incentivizing voluntary efforts, rather than developing regulatory mandates that divert attention and resources from higher priority issues. For instance, incorporating climate change adaptation analysis into regularly occurring local infrastructure planning processes, rather than applying mandates for climate change analysis in isolation (i.e., mandating that every local agency prepare a particular type of plan on a set schedule), is in our opinion the most cost-effective and efficient way to achieve the goal of better planning for climate change.
6. Climate-related trends (e.g., changes in temperature, rainfall, etc.) can give rise to, or intensify, conflicts between water supply and in-stream uses, and sometimes wastewater agencies become caught between these competing issues. Regulations to protect water quality, and plants, fish, and wildlife, are based on preserving or restoring what "is" or "was" at some point in time (i.e., a baseline). However, even with reductions of emissions of greenhouse gases, impacts of climate change will occur. Therefore, the question the Water Boards must tackle as we move forward is whether existing baselines can be attained or maintained, or whether an adaptive approach must be taken in the future to set the baseline for what it is you are trying to protect. In some cases, new approaches or compromises among competing uses may be necessary, and it is imperative that all stakeholders work together to resolve these issues.

Thank you for your consideration of these comments on the Proposed Resolution. We very much look forward to working with the Water Boards during its implementation. Please contact me if you have any questions at (925) 705-6404 or via email at sdeslauriers@carollo.com.

Sincerely,



Sarah A. Deslauriers, P.E.
CASA Climate Change Program Manager