



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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TERESA TANAKA – Secretary, Calaveras County WD

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November 30, 2017

Via Electronic Mail Only

Andrew Altevogt
Assistant Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

SUBJECT: Proposed Central Valley Region Resolution No. 2017-XXXX Approving
Climate Change Work Plan

Dear Mr. Altevogt:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Proposed Resolution Adopting the *Central Valley Region Climate Change Work Plan* (Draft Resolution). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law.

CVCWA greatly appreciates the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) consideration of our comments on the Draft Work Plan that were submitted on November 27, 2017, and the changes made to the Work Plan in response to our comments. With respect to the Draft Resolution, and consistent with our comments made on the Draft Work Plan, we believe it is important that the Draft Resolution acknowledge that the Central Valley Water Board needs to evaluate its decisions in light of the impact those decisions may have on climate change. For

example, besides looking at the resiliency of wastewater infrastructure to address climatic changes such as extreme wet weather events, the Central Valley Water Board must also consider the impact that more stringent permitting decisions may have on climate change (e.g., more intensive treatment increases energy use).

We recommend that the resolution be amended to include an additional resolved clause that states as follows:

- New 2. “Will consider the impact on climate change when adopting new, more stringent permit and/or regulatory requirements.”
- Revise 7. “Directs Central Valley Water Board staff to collaborate with its stakeholders, the State Water Board, and the other Water Boards in the development of policies and regulations to address the impacts of climate change on water quality, and to consider the impact that its policies and regulations may have on climate change.”
- Revise 8. “Directs Central Valley Water Board staff to assist the State Water Board and relevant stakeholders in the development of performance measures for the evaluation of the Central Valley Water Board’s progress in promoting climate change resiliency, and in considering the impact that Central Valley Water Board permitting and regulatory actions may have on climate change.”

We look forward to working with the Central Valley Water Board as a partner in addressing climate change as it impacts all of us.

Please do not hesitate to contact me directly if you have any questions.

Sincerely,



Debbie Webster,
Executive Officer

cc: Pamela Creedon