



Via electronic mail to: [RB5S-Climate-Change-Comments@waterboards.ca.gov](mailto:RB5S-Climate-Change-Comments@waterboards.ca.gov)

June 22, 2017

Dr. Karl E. Longley  
Board Chair  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

**RE: Comment Letter-Draft of the Central Valley Region Climate Change Work Plan**

The Community Water Center (CWC) and the Environmental Justice Coalition for Water (EJCW) appreciate the opportunity to comment on the draft of the Central Valley Region Climate Change Work Plan (“Work Plan”).

As community-based organizations, CWC and EJCW are dedicated to achieving equitable access to water resources for all low-income and communities of color in California. Section 106.3 of the Water Code declares that every Californian has the right to sufficient clean, safe, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. CWC and EJCW work to ensure every Californian’s Human Right to Water is being met. We build community movements towards water equity and advocate for the adoption and implementation of climate change resiliency strategies that address the needs of California’s most vulnerable communities.

As outlined in the draft of the Work Plan, climate change remains a severe threat to California, with unique impacts for the Central Valley. The Work Plan details ways in which the state will experience an overall decrease in precipitation and diminished surface water supplies, leading to increased reliance on the already overdrafted groundwater supplies in the Central Valley. Additionally, the quality of water from both sources is expected to diminish as well, with the combination of higher average temperatures, low precipitation, and lowering of groundwater tables expected to increase the concentration of contaminants and salts.

These scenarios are only a sample of how climate change will continue taking a devastating toll on the region, but not all Californians experience these effects equally. Disadvantaged communities (DACs) and other rural and low-income populations disproportionately bear the burden of the water supply and water quality impacts of climate change. For example, in Tulare County alone, over 2,000 domestic wells went dry during the drought, denying residents of their

Human Right to Water which is enshrined into California law. This makes the inclusion of these Central Valley communities an utmost priority for the Work Plan.

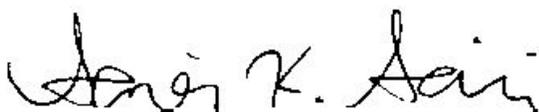
CWC and EJCW provides the Central Valley Regional Water Quality Control Board (“the Board”) with our comments on the above agenda item.

**Specific Comments:**

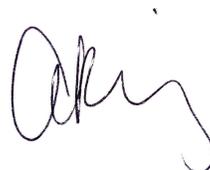
1. **Acknowledge how climate change will disproportionately affect DACs and the Board’s adaptation strategies.** Strengthen the draft Work Plan by including the unique climate-related challenges faced by DACs and putting forth concrete plans to address them. Furthermore, the Board should include a section addressing strategies it will take to build adaptive capacity and resilience in vulnerable communities, such as calling for the adoption of adequate drought vulnerability and mitigation plans.
2. **Develop a public outreach plan.** Include a public outreach plan that describes what the outreach process is and present clear goals and benchmarks. The State Water Resources Control Board (SWRCB) has set an admirable precedent with its comprehensive response to climate change (Resolution No. 2017-0012). This resolution highlights the importance of providing technical assistance and financial support to protect drinking water systems, and of identifying the communities most vulnerable to climate change impacts to ensure they have access to information and assistance. Without a concerted effort to reach out to these communities, their needs will remain unaddressed and they will continue to suffer disproportionately from future droughts.
3. **Consider the impact climate change has on water contamination.** While there are several programs aimed at regulating nitrates, the plan should consider the impacts climate change has upon the movement and concentration of nitrate contamination within groundwater, and how this affects communities reliant upon groundwater for their domestic supply.

We thank you for the opportunity to comment on the draft of the Central Valley Region’s Work Plan, and we look forward to continuing to engage with the Board on this important issue.

Sincerely,



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Community Water Center



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Sacramento Area Program Coordinator  
Environmental Justice Coalition for Water