

Rec'd 9/14/07



NATURAL RESOURCES DEFENSE COUNCIL

September 14, 2007

*Via Electronic Mail*

Chair Tam Doduc  
State Water Resources Control Board  
1011 I Street, 25<sup>th</sup> Floor  
P.O. Box 100  
Sacramento, CA 95812-0100

**Re: Item 7, Consideration of a Resolution to Develop Additional Information and Consider Actions Pertaining to Climate Change and Water Resources**

Dear Chair Doduc and Members of the Board:

The Natural Resources Defense Council and its more than 100,000 California members appreciate the State Water Resources Control Board's efforts to address climate change and its recent joint workshop with the Department of Water Resources. The workshop is an important first step, and we believe it must now be followed by rapid implementation of policies and programs that will assist California in meeting the goals of AB 32. This is particularly true given the range of actions that can be taken or accelerated by the Board that will reduce greenhouse gas emissions.

In that context, we strongly urge you to revise the proposed Resolution that you will consider on September 18 to be more specific and focused. It currently requires few, if any, specific actions that will reduce greenhouse gas emissions; is unclear regarding how the State Water Resources Control Board will address actions within its own control (as opposed to those it will consider with the Department of Water Resource); and it requires only a vaguely-described status update in early 2008. Given the imperative of swiftly addressing global warming, and the legal requirements in AB 32, prompt action is needed and the Board should pursue those actions that can be taken today.

We suggest, therefore, that the Resolution be modified so that it directs staff to identify within 90 days specific, near-term actions that can be taken by the Board or by its Executive Officer to implement AB 32. To cite just one of many possible examples, with direction from the Board, green building techniques, particularly Low Impact Development, can be rapidly implemented through Clean Water Act permits. "LID" techniques promote water conservation and, among many other environmental benefits, contribute to reduction of greenhouse gas emissions. By requiring that

[www.nrdc.org](http://www.nrdc.org)

1314 Second Street  
Santa Monica, CA 90401  
TEL 310 434-2300 FAX 310 434-2399

NEW YORK • WASHINGTON, DC • SAN FRANCISCO

Tam Doduc, Chair  
September 14, 2007  
Page 2

feasible steps be taken soon, the Resolution will better address the requirements and the spirit of AB 32. Moreover, the identification and implementation of near-term actions supports and is consistent with the commitments made by many other state agencies in the Climate Action Team's process to pursue "discrete early action measures." Because the State Water Resources Control Board did not identify "early action measures," doing so now will allow the Board to take actions similar to those already being taken by many other state agencies.

AB 32 requires all agencies to reduce global warming pollution, and it charges the Air Resources Board (ARB) with developing a "scoping plan" by January 2009 for how the state will meet the 2020 pollution limit. ARB has already begun developing the "scoping plan," and the State Water Resources Control Board should contribute to meeting AB 32's statewide pollution limit by committing to pursue specific programs and policies that will achieve global warming pollution reductions.

Thank you for considering our comments and for your commitment to addressing climate change through the important water quality and water supply programs you administer.

Sincerely,



David S. Beckman  
Senior Attorney



Ronnie Cohen  
Senior Policy Analyst

cc: Brian Prusnek, Deputy Cabinet Secretary  
Linda Adams, Secretary, California Environmental Protection Agency  
Eileen Tutt, Deputy Secretary for External Affairs, California Environmental Protection Agency  
Chuck Shulock, Program Manager for GHG Reduction, CARB