

March 3, 2017

Jelena Hartman  
Senior Scientist for Climate Change  
State Water Resources Control Board  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov) (cc: [jelena.hartman@waterboards.ca.gov](mailto:jelena.hartman@waterboards.ca.gov))

**RE: Comment Letter – Climate Change Resolution**

Dear Jelena Hartman:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments to the State Water Resources Control Board (Board) on the Climate Change Resolution (Proposed Resolution).

ARCCA is a network of existing regional collaboratives from across California. Our members are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build local economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region’s most innovative and successful strategies; and determine how these strategies could be adapted to another region’s particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships.

We greatly appreciated the opportunity to engage in the stakeholder review process; we offer the following comments and recommendations for your consideration.

1. We acknowledge the substantial time and effort that was required to develop the Proposed Resolution through a rigorous approach. We greatly appreciate the Board’s commitment to adopting a comprehensive response to climate change.
2. We recommend elevating the important role that the headwater areas play, where most of the state’s water originates, in the state’s response to climate change, and strengthening the connections between upland water sources and downstream water users throughout the Resolution.
3. We recommend the inclusion of the forms (rain vs. snow) and levels of precipitation, the timing of release, the implications of areas denuded by extreme wildfires, and the urban heat island effect as key considerations of climate change impacts to the state’s water supply and quality.

4. We recommend further emphasizing green or natural infrastructure as an important strategy to build resilience to climate change impacts, which plays an equally important role in upstream/headwaters areas as it does in inland/floodplain and shoreline/coastal areas.
5. We recommend the Board commit to using the U.S. EPA's Climate Resilience Evaluation and Awareness Tool or a comparable approach to identify vulnerabilities to climate change impacts. Vulnerability assessments should also include the review of the number of communities and population that currently lack safe, potable drinking water, as well as the sources of contamination and the plans for resolution.
6. We encourage the Board to ensure that outreach will be conducted across all regions of the state, particularly those that are underserved and difficult to reach.
7. We recommend emphasizing the importance of sustainable groundwater management as a critical climate change adaptation and mitigation strategy, and highlighting Groundwater Sustainability Plans as a mechanism for climate resiliency planning.
8. We recommend elevating the role of local land-use agencies in implementing climate change response strategies across the Resolution, emphasizing local land-use agencies in State preparation for and adaptation to climate change. Particularly, the Resolution can address the role of local land-use agencies in the following ways:
  - Encourage local land-use agencies to update plans, permits, and policies to align with State and Regional boards' commitment to improving ecosystem resilience.
  - Include educational materials and technical assistance programs on open data platforms so local land-use agencies can access and use climate change data.
  - Coordinate closely with local land-use agencies when identifying and recommending actions to diversify water sources, expand surface water and groundwater storage, and building resilience to impacts of climate change.
  - Target local elected leaders and water agencies in outreach and education to ensure that local decision makers will prioritize climate change response strategies.
9. We commend your commitment to offer consultation to Tribes and create a process to track progress toward addressing Tribal needs.
10. We commend the Division of Water Quality and Regional Boards on evaluating water infrastructure vulnerability to flooding, storm surge, and sea level rise. We further recommend you include the impacts of severe droughts on infrastructure. Additionally, we recommend the Division of Water Quality and Regional Boards collaborate with other state agencies and academia to develop consistent monitoring protocols and metrics for

assessing the impacts from climate change. Standard monitoring methods and metrics will be important for comparison across the state.

11. We recommend the Board commit to coordinating with local and regional agencies working in fields such as transportation, public health, community development and agriculture in implementing the response actions laid out in this Resolution.

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments further.

Sincerely,



Jonathan Parfrey, ARCCA Chair

*The Los Angeles Regional Collaborative for  
Climate Action & Sustainability*



Kerri Timmer, ARCCA Vice Chair

*Sierra Climate Adaptation & Mitigation  
Partnership*



Kathleen Ave

*Capital Region Climate Readiness Collaborative*



Phil Gibbons

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Kate Meis

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