



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

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

March 3, 2017



VIA ELECTRONIC MAIL

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

Dear Marcus & Members:

March 7, 2017 Board Meeting Agenda – Agenda Item No. 7
Proposed Resolution Adopting a Comprehensive Response to Climate Change

On behalf of the Sanitation Districts of Los Angeles County, thank you for the opportunity to provide comments on the Proposed Resolution Adopting a Comprehensive Response to Climate Change. By way of background, The Sanitation Districts provide wastewater and solid waste management services for 5.6 million people in 78 cities and unincorporated areas within Los Angeles County, and our service area covers approximately 850 square miles.

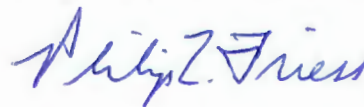
The Sanitation Districts are aware that climate change may affect wastewater facilities and services in various ways, and we agree with the Water Boards that it is important to reduce greenhouse gas emissions, assess the potential impacts of climate change, and to find ways to be resilient in the face of those climate-related impacts that cannot be avoided. As such, 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. It would appear from the language of the Proposed Resolution that 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, actions that could become enforceable by third party legal challenges. Therefore, stakeholders take this Resolution and efforts to implement it very seriously, and we believe it should include a section describing the water Board's authority related to implementation of requirements for climate change adaptation and mitigation.
2. We believe that 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 for the Water Boards to avoid promoting (or imposing) duplicative, overlapping or conflicting measures. This is particularly true in the area of greenhouse gas emissions mitigation, for which we believe the Air Resources Board is the lead agency.

3. As stakeholders with many activities underway that relate to items in the Proposed Resolution, we would like the opportunity 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 many of these initiatives. In fact, we believe it would be beneficial to form 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 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 have many benefits, including carbon sequestration, reduced water use and reduced fertilizer use.
5. We urge the Water Boards to focus on providing 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 appropriate in this context, because each agency has unique circumstances and needs. For instance, for some, sea level rise already requires adaptation, 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 may simply 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 (e.g. 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. Lastly, it appears that climate-related trends (e.g. 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. One key issue is that regulations to protect water quality, and plants, fish and wildlife, all are based on preserving or restoring what "is" or "was" at some point in time (i.e. a baseline). However, it can be expected that, even with reductions of emissions of greenhouse gases, some or even a lot of the impacts of climate change will occur anyway. Therefore the question that must be wrestled with as the Water Boards move forward is whether existing baselines can be attained or maintained, or whether an adaptive approach must be taken in the future to setting 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 be prepared to work together to resolve these issues.

Once again, thank you for the opportunity to provide comments on the Proposed Resolution. We look forward to working with the Water Boards during its implementation.

Very truly yours,



Philip L. Friess
Departmental Engineer
Technical Services

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