

## Gallon, Celine@Waterboards

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**From:** Arthur S. Pugsley <arthur@lawaterkeeper.org>  
**Sent:** Tuesday, April 03, 2018 2:11 PM  
**To:** WB-RB4-losangeles  
**Cc:** Gallon, Celine@Waterboards  
**Subject:** Comment - Climate Change Resolution

Los Angeles Waterkeeper has reviewed the tentative climate change resolution and wishes to submit the following comments:

- 1) Since the Resolution defers most actions on climate change regulatory adaptation and mitigation measures to the Part 2 planning process now underway, we believe it is critical that the Part 2 planning process receive adequate internal resources and staffing to allow for the release of the Part 2 document in the 2018-19 Fiscal Year.
- 2) On P. 1 of the resolution, we suggest changing the reference to “decreased streamflow” to something like “decreased streamflow overall, but potential for increased flashiness” to account for the possibility that future precipitation events could be more intense, which could lead to temporary increases in streamflow compared to the baseline conditions. Such an emphasis would also tend to increase the importance of stormwater capture/ multi-benefit projects.
- 3) On P. 4 of the resolution, we suggest adding clarifying language to Paragraph 1b that expressly disfavors shoreline protection such as ripraps, seawalls, and coastal armoring, due to the significant likelihood of negative impacts to beneficial uses from these types of shoreline protection.

Thank you for this opportunity to comment.

/s/

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