



April 13, 2018

Via e-mail and U.S. mail to:

Dr. Celine Gallon
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Re: Comments on the Resolution to Prioritize Actions to Adapt to and Mitigate the Impacts of Climate Change on the Los Angeles Region’s Water Resources and Associated Beneficial Uses.

Dr. Gallon:

The Natural Resources Defense Council (NRDC) thanks you for this opportunity to comment on the Los Angeles Regional Water Quality Control Board’s (Board) proposed Resolution to Prioritize Actions to Adapt to and Mitigate the Impacts of Climate Change on the Los Angeles Region’s Water Resources and Associated Beneficial Uses. We have reviewed the tentative Resolution and respectfully suggest the following changes.

On p.1 at ¶ 3, the Board should recognize and consider an increase in the urban heat island effect due to climate change, and the effect that green infrastructure and nature-based projects have on reducing urban heat island effect.

The Board should include in its research and monitoring projects the water quality effects of wildfires and subsequent flooding and possible mudslides, including the effect of the chemicals used for fighting wildfires. (p.5 at ¶ 3.c.; p.1 ¶ 3.) The Board should also consider the impacts of increased stream flashiness on water quality and stormwater management projects. (p.1 ¶ 3.)

P.4 ¶ 1.a. should include the conservation and protection of existing stream buffers and wetlands in addition to restoration and establishment of these resources.

On p.4 ¶ 3.a., the Board should strike “move forward towards” so that the it reads:
“The Board directs staff to continue refining permit language to address climate change vulnerabilities, and to incorporate[e] appropriate language in National Pollution Discharge Elimination System (NPDES) permits...”

On p.4 ¶ 2, the Board should include green infrastructure projects and nature-based solutions so that the paragraph reads:

“In the face of expected increases in the frequency and duration of droughts, the Board supports the augmentation of local water supplies via projects such as green infrastructure projects and nature-based solutions that capture, recharge, and reuse stormwater for the benefit of our communities, local wildlife and other natural resources.”

NRDC also suggests adding language to p.4 ¶1.b. that disfavors shoreline protection such as ripraps, seawalls, and coastal armoring because of their negative effects on beneficial uses, ecosystems, and habitat.

Finally, because specific actions to address climate change will be developed during Part 2 of the process—“Los Angeles Region Framework for Climate Change Adaptation and Mitigation *Potential Regulatory Adaptation and Mitigation Measures*,” it is imperative that this process adequately engage stakeholders, grant opportunities for ample public input, and receive adequate internal resources and funding.

Thank you again for this opportunity to comment. We appreciate that the Board is prioritizing the consideration of climate change and working to mitigate climate change’s impacts on water quality. NRDC welcomes the opportunity to work with the Board to ensure that water quality is protected for present and future generations, and for the survival and well-being of humans, plants, and wildlife.

Sincerely,
Corinne Bell
Policy Analyst