



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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Chief Engineer and General Manager

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## ***Via Electronic Mail***

Madelyn Glickfeld, Chair, and Members  
California Regional Water Quality Control Board, Los Angeles Region  
320 W. 4th Street, Suite 200  
Los Angeles, CA 90013  
Attention: Dr. Celine Gallon

Dear Chair Glickfeld & Members of the Regional Boards:

### **Comment Letter – Climate Change Resolution**

On behalf of the Sanitation Districts of Los Angeles County (Sanitation Districts), we appreciate the opportunity to provide comments to the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Regional Board) on the 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” (Proposed Resolution). By way of background, the Sanitation Districts provide wastewater and solid waste management services to approximately 5.6 million people in 78 cities and unincorporated areas in Los Angeles County.

The Sanitation Districts are involved in climate change adaptation and mitigation activities in many ways. In addition to our primary mission to protect the environment and public health through safe management of wastewater and solid waste, we have many activities and projects that contribute to regional climate change resiliency through conversion of waste into useful resources, including recycled water, renewable energy, and recycled materials. For instance, the Sanitation Districts are working on implementation of a project that will divert up to 550 tons/day of food waste for processing and anaerobic digestion at our solid waste and wastewater facilities, which will produce renewable digester gas that will be used to create low carbon fuel or further processed into biomethane to be injected into common carrier natural gas pipelines for use as fuel or to generate power. This project will reduce greenhouse gases by avoiding methane emissions at landfills and through the replacement of fossil fuel-based fuel/energy with low carbon fuel/energy. The Sanitation Districts also partner with numerous water agencies in our region to supply approximately 100,000 acre-feet of recycled water per year, and we are working to develop several new water recycling projects, which if fully implemented have the potential to triple the amount of recycled water we contribute to the Region’s water supply.

### **Comments on Proposed Resolution**

In general, we support many elements of the Proposed Resolution. We would like to offer the following comments on and proposed changes to the Proposed Resolution for the Los Angeles Regional Board’s consideration.

1. **Resolved #1** – We recommend that Resolved #1 be broadened to include climate change mitigation and adaptation activities that many stakeholders are engaged in, such as supplying recycled water and acceptance of additional organic waste diverted from landfills at publicly owned treatment works (POTWs) to create renewable fuel or energy from biogas, be recognized and encouraged by the Los Angeles Regional Board.

***Recommended change to Resolution:***

*Revise Resolved #1 to read: “The Board encourages stakeholders in the region, including other agencies, to take actions to help mitigate direct and indirect impacts of climate change on the region, including on water quality and beneficial uses. Actions may include:”*

*Add new (f) to Resolved #1, to read: (f) Encouraging and incentivizing, where feasible, the regulated community to take steps to mitigate and adapt to climate change, including, but not limited to, developing recycled water supplies, producing biogas and other forms of renewable energy, and recycling biosolids.*

2. **Resolved #3a** – We recommend that the Los Angeles Regional Board coordinate closely with the State Water Board and other Regional Boards as they develop their approach regarding the preparation of vulnerability assessments at facilities in the Los Angeles Region, consistent with the State Water Board’s expressed intent in Item 15 in the *Comprehensive Response to Climate Change* resolution (Resolution No 2017-0012). In particular, we encourage the Los Angeles Regional Board to consider approaches other than incorporating requirements for POTWs to conduct vulnerability assessments into permits. For example, consider voluntary efforts to prepare vulnerability assessments and the use of existing planning efforts (i.e., facility planning documents and municipal Climate Action Plans).

If the vulnerability of a facility to climate change has not been assessed through other means and a permit requirement to do so becomes necessary, we strongly recommend that the requirements be flexible in order to target a facility’s specific vulnerability, that they be coordinated with other facility planning efforts in order to avoid duplicative work by permittees, that they provide sufficient time for facility plan development, and that the approach/strategy adopted for increasing the resilience of a facility allow for case-specific modifications, depending on the unique circumstances of a given facility’s location and anticipated vulnerabilities.

***Recommended changes to Resolution:***

*Revise Resolved 3(a) to read: ~~“The Board directs staff to continue refining permit language to address climate change vulnerabilities, and to move forward towards incorporating appropriate language in National Pollution Discharge Elimination System (NPDES) permits, Clean Water Act (CWA) section 401 water quality certifications, waste discharge requirements (WDRs) and waivers of WDRs issued by the Los Angeles Water Board. The Board also directs staff to work with others to explore meaningful metrics and tools for conducting vulnerability assessments to ensure infrastructure protection. The Board also directs staff to investigate existing strategies being used to plan for climate change adaptation in the Los Angeles Region and to work with the State Water Board and other Regional Boards, as well as stakeholders, to develop new approaches that take adequate steps to assess vulnerabilities and protect infrastructure. These approaches may include regional approaches, voluntary approaches, and continuing to develop refinements to potential permit language to address climate change vulnerabilities.”~~*

3. **Resolved #5** – We recommend that the Los Angeles Regional Board form a Stakeholder Advisory Group to create a forum for collaboration among the staff and various interested parties. Several of the Resolved items direct staff to work with stakeholders and other parties, and a

Stakeholder Advisory Group could provide an organized forum for collaboration and discussions on all of these interrelated topics. As appropriate, subgroups could be formed to focus on targeted subject matter.

***Recommended changes to Resolution:***

*Revise Resolved #5 to read: "The Board directs staff to form a Stakeholder Advisory Group to provide a forum to coordinate with appropriate partners, including public agencies and nongovernmental organizations in the region, to address the impacts of climate change and to collaborate to maximize efficiency and success of the Board's actions."*

4. **Resolved #6b** – We recommend that local agencies also be included and consulted in the "projects and actions related to instream flow," particularly in relation to studies and processes occurring in the context of Section 1211 change petitions, which currently are underway for the San Gabriel, Los Angeles, and Santa Clara Rivers and potentially are or may in the future be undertaken for other water bodies in this region. The more coordinated and integrated these efforts can be, the more efficient and effective they will be for everyone involved.

In conclusion, we greatly appreciate the opportunity to comment on the Proposed Resolution. As recognized by the Los Angeles Regional Board, the understanding of the impacts of climate change on the Los Angeles region is evolving over time. Similarly, it is certainly appropriate to develop an approach that can evolve, reflecting the latest scientific information and approaches to adaptation. We look forward to working closely with the Los Angeles Regional Board as the Board's climate change-related actions are identified and implemented.

Very truly yours,



Ann T. Heil, Division Engineer  
Reuse & Compliance Section  
Technical Services

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