Comment Summary and Reponses
2023-2025 Triennial Review
Comment deadline: October 9, 2023

Commenter:

1	Beach Cities Watershed Management Group (Beach Cities WMG)
2	County of Los Angeles and County of Los Angeles Flood Control District (LA County and LACFCD)
3	Los Angeles County Sanitation District (LACSD)
4	City of Los Angeles Sanitation and Environment (LASAN)
5	Heal the Bay and Los Angeles Water Keeper (NGOs)

Comment Summary and Responses:

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1.1	Beach Cities WMG	As permittees subject to the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Water Toxic Pollutants TMDL limits for copper, lead and zinc, the Beach Cities WMG is particularly supportive of the priority project to continue work to incorporate the Biotic Ligand Model (BLM) for copper into the Basin Plan freshwater quality criteria.	Comment noted.
2.1	LA County and LACFCD	I. Prioritize participation in stakeholder-led studies Updating Basin Plan standards and implementation provisions often requires conducting site- or region-specific scientific studies. Several studies are currently underway in the region to collect necessary data and information across various watersheds, the findings of which can assist the	The Triennial Review process is the opportunity for the Los Angeles Water Board to set its own priorities in response to multiple factors including State or federal legal requirements,

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		Regional Board in updating the Basin Plan standards and associated TMDLs. Over $12 million in public funds are being invested in these studies with the understanding that such studies are crucial for water quality protection and prioritization of projects and programs. Some of these studies include the Regional Pathogen Reduction Study, Zinc Recalculation Study, and Street Sweeping Study. The Zinc Recalculation Study, led by the City of Los Angeles, will use an EPA established method to help develop site-specific zinc objectives for the region based on recent data. This will help to update a 22-year-old zinc standard, considered outdated. The study is funded largely by the SCWP [Safe, Clean Water Program] and encompasses three watersheds: Los Angeles River, Ballona Creek, and Dominguez Channel watersheds. The County and District, along with other stakeholders, are actively participating in the aforementioned studies to help advance scientific understanding and guide the development of strategy to address water quality issues in our region. Regional Board staff have helped provide guidance and input for some of the preliminary study efforts. Regional Board staff's expertise in amending the Basin Plan based on the scientific findings of these studies is critical. As such, the County and District request the Regional Board to continue prioritizing support for stakeholder-led studies as part of the 2023-25 triennial review.	judicial mandates, State Water Board plans and policies, needs of other state and federal agencies related to water quality, and stakeholder priorities. The Los Angeles Water Board carefully considers and selects which stakeholder-led studies to dedicate resources to from the larger body of projects under consideration.
2.2		II.Prioritize updating TMDLs Over the last 10 years, the County has been focusing on implementation of projects and programs to meet the requirements of the Regional MS4 Permit. The County is	The establishment of, or reconsideration of, a TMDL is a separate process from the triennial review. The Los

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		part of 12 WMP groups, and projects are distributed throughout all watersheds. The County has completed six large-scale regional projects with a total cost of over $125 million. Three projects with a total cost of $60 million are currently under construction, and two projects with a total cost of over $70 million are expected to commence construction soon. Several additional projects are in the design and planning phases. In addition, both the County and District have contributed toward several co-permittee-led projects. Permittees, including the County and District, are making every effort to implement projects under these constraints and challenges. Equally important is for the Regional Board to ensure that the water quality standards, which these projects are being designed to address, are up to date and consistent with science. In particular, it is crucial to reconsider and update TMDLs on a timely basis. For example, existing Bacteria TMDLs need to be updated to reflect the current bacteria standards in the Basin Plan, including the removal of total coliform bacteria objectives from coastal Bacteria TMDLs. Further, reconsideration of final deadlines for various TMDLs is necessary to allow time to complete planned projects.	Angeles Water Board has reconsidered many TMDLs in the Los Angeles region (most recently the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants TMDL reconsideration adopted by the Los Angeles Water Board on September 8, 2022) These TMDL reconsiderations include, where supported, extending final compliance deadlines (examples include the Revision of the Implementation Schedules for MS4 Dischargers for Nine TMDLs, effective May 2, 2022). The Los Angeles Water Board will continue to update TMDLs to meet commitments and in response to new data, updated objectives and stakeholder needs as resources allow. We note that while several bacteria TMDLs are based on the “old” bacteria objectives, practically, the “old” objectives and the current objectives are so similar (both “old” and current bacteria criteria are based on an equivalent health risk) that it is unlikely that any difference in

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			implementation requirements would be created by updating the TMDLs to the current objectives. In addition, Finally, we note that Time Schedule Orders (TSO) may also be available for dischargers to allow time to complete planned projects that will result in meeting the TMDLs.
2.3	LA County and LACFCD	III. Expedite the completion of BLM-based metal standards The County and District support the continued prioritization of updating the copper objectives based on the Biotic Ligand Model (BLM) approach. This project started during the 2017-19 triennial review cycle and continued through the 2020-22 cycle. This project is taking longer than expected, and the County requests that it be prioritized and completed during the current triennial review period. In support of this project, many stakeholders, including the County and District, have collected data on BLM parameters in several watersheds. As indicated in the February 1, 2023, letter, in addition to copper, the County would like to request zinc be included in the scope of this project. Zinc is a primary driver of WMP implementation in many watersheds and, thus, should be given priority. This is especially important for watersheds that are not covered under the aforementioned Zinc Recalculation Study. This request is consistent with the Regional Board's intention during the 2020-22 triennial that directed staff to evaluate zinc criteria in a similar manner as copper.	Updating freshwater metal criteria based on the Biotic Ligand Model (BLM) remains a priority of the Los Angeles Water Board. While past efforts primarily focused on copper for the Los Angeles Water Board and the State Water Board, zinc has now also become a priority project for the State Water Board. As detailed in the draft Staff Report, given the complexity of applying the BLM (e.g., there are no implementation guidelines from the 2007 U.S. EPA copper BLM, nor U.S. EPA's BLM guidelines for zinc), the Los Angeles Water Board is now following State Water Board's lead on the project and is focused on how

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			BLM could be implemented in the Los Angeles Region for both copper and zinc.
2.4	LA County and LACFCD	IV. Increase staffing resources to adequately address basin planning matters Page 34 of the Staff Report states, *"[t]he Los Angeles Water Board's Basin Planning Program currently consists of 1.7 personnel years (PYs). Carrying out the projects identified during the triennial review process is only one of the responsibilities of those staff whose time comprises the 1.7 PYs each year. Therefore, the number of projects that can be addressed during the time remaining in this triennial review period is limited.*" This was used as a primary factor for not prioritizing a large number of projects, which has been the case for many years. This is of great concern to the County and District as critical basin plan issues cannot be addressed. As indicated in the Staff Report, there are over 30 basin planning projects that were identified by Regional Board staff and stakeholders. However, less than one-third of these projects were prioritized for the 2023-25 triennial review. From previous experience, even those prioritized projects are often not completed. For example, out of ten projects prioritized during the last triennial review cycle (2020-22), only one project (or 10 percent) was completed. With this level of progress, it would not only take many decades to address the current basin planning issues, but also makes it difficult to keep up with emerging issues, which would in turn lead to relying on outdated standards to implement water quality projects for many years to come, with projects and	Staffing resources is determined at the State level. As such, consideration of increasing staff is not part of the Triennial Review process. Additionally, regional boards have limited ability to shift staff resources between program areas because funding sources are often specific and tied to performance goals. At the program level, staffing resources are allocated to the projects identified for the current triennial review period, and priority is given to projects that are already ongoing. The remaining projects will be addressed subsequently by staff, for example when new water quality criteria from U.S. EPA become available, and/or new statewide policies are adopted by the State Water Board.

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		efforts that are often more costly than warranted. Therefore, it is imperative for the Regional Board to allocate sufficient staffing and funding resources toward the Basin Plan to ensure that standards are up-to-date and public resources are spent wisely.	
3.1	LACSD	The Sanitation Districts strongly support the Regional Board's priority to "Oversee studies evaluating the temperature water quality objectives" for the 2023-2025 Triennial Review cycle. As discussed in our February 6, 2023 letter, titled "2023-2025 Triennial Review," throughout 2021 and 2022, seven of the Sanitation Districts' National Pollutant Discharge Elimination System (NPDES) permits for treated wastewater discharges to surface waters were updated by the Regional Board with a new interpretation of the temperature objectives, resulting in more stringent wastewater treatment plant effluent and receiving water temperature limitations, which currently cannot be consistently met with existing infrastructure, climate change trends, and other conditions. As such, the Regional Board included temperature compliance schedules in the Sanitation Districts' NPDES permits, in both the San Gabriel and Santa Clara River watersheds.	Comment noted.
4.1	LASAN	I. The following priority should be added to the list of priorities for the 2023- 25 Triennial Review period: "Initiate coordination with stakeholders on the re-evaluation of the Basin Plan's Bacteria Objectives for Fresh, Estuarine, and Marine Waters Designated for Water Contact Recreation." LASAN agrees that studies need to be conducted to know the levels of alternative indicators that would ensure an	The bacteria objectives have recently been updated. The State Water Board updated the bacteria objectives in 2019 and the Los Angeles Water Board incorporated the updated bacteria objectives in the Los

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		acceptable health risk in order to establish alternative water quality objectives. For that reason, LASAN has been supportive of conducting studies which aim to gather the local data necessary to answer this complex question, including the study being funded by the Safe, Clean Water Program which will commence during the 2023-25 Triennial Review period. In order for these studies to gather the information that the Regional Board has stated that it needs, it is critical to have Regional Board staff participate and provide feedback early on during study development and throughout the studies (e.g., during development of the study work plans, selection of stakeholder and technical advisory committees, and participation in committee meetings). Without meaningful engagement by Regional Board staff, these studies are at risk of not providing the information that the Regional Board has stated that it needs. As such, LASAN is requesting that Regional Board staff make coordination with stakeholders on the re-evaluation of the Basin Plan's bacteria objectives for fresh, estuarine, and marine waters designated for water contact recreation a priority. This priority would be similar to the proposed priority of continuing to coordinate with stakeholders on the re-evaluation of the Basin Plan's temperature water quality objectives.	Angeles region's Basin Plan in 2020. The Los Angeles Water Board acknowledges that stakeholders are interested in alternatives to the most recently adopted bacteria objectives. Both the Los Angeles Water Board and the State Water Board are carefully following the state of the science on alternative indicators of microbial pollution. The State Water Board held a bacteria summit to review with stakeholders the status of the science on September 14-16, 2022 and will hold another bacteria summit focusing on tribal and non-governmental organization concerns in 2024. See also response to comment 2.1.
4.2	LASAN	II. Section 3.1 of the Draft Staff Report should be corrected to accurately reflect the projects adopted for the 2020-22 Triennial Review period under Resolution 2020-004. LASAN would also like to note that the list of projects for the 2020-22 Triennial Review period from Section 3.1 of the Draft Staff Report appears to be inconsistent with the	Section 3.1 of the draft Staff Report has been revised to accurately reflect Resolution No. 2020-004. Additionally, the titles of Sections 6 and 7 of the draft Staff Report have also been revised from 2020-2022 to reflect

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		projects adopted under Resolution 2020-004. Section 3.1 of the Draft Staff Report removes the project to "Provide support for efforts towards developing region-specific bio-objectives", removes the evaluation of steps to evaluate zinc freshwater quality objectives, and adds the following projects that were not included in Resolution 2020-004: • Consider a high flow suspension of REC-1 beneficial use for the engineered channels in Ventura County; • Continue the development of a regional strategy to address the effects of climate change on water quality; • Provide support to other Los Angeles Water Board programs, including TMDLs; and • Provide support to statewide standards-related initiatives. LASAN requests that Section 3.1 of the Draft Staff Report be corrected to accurately reflect the projects adopted for the 2020-22 Triennial Review period under Resolution 2020-004.	the correct years, and now read "2023-2025 Triennial Review: Potential Projects Identified by U.S. EPA and Stakeholders" and "2023-2025 Triennial Review: Staff Recommendations on Priorities," respectively. In staff recommendations (Section 7.1 of the draft Staff Report), staff also revised the sentence, "Continue the work on updating the freshwater quality objectives for copper" to read, "Continue the work on updating the freshwater quality objectives for copper <u>and evaluate steps necessary to address zinc in a similar manner.</u>"
5.1	NGOs	I. Pursue a Basin Plan amendment proposing Biological Objectives for the Los Angeles Region, following and surpassing the lead set by the San Diego Regional Water Quality Control Board. The current statewide effort to develop water quality objectives for nutrients, biostimulatory substances, and cyanotoxins to protect the biological integrity of California's streams is long overdue. While we appreciate that the 2023-25 Triennial Review identifies supporting the State Water Resources Control Board (State Board) efforts to develop such statewide water quality objectives, those statewide objectives will be highly limited in nature due to the narrow	The Los Angeles Water Board continues to develop the information that will be necessary to create specific bio-objectives for the Los Angeles region or to develop the tools for implementation of State Board-developed objectives. The State Water Board's website states that it is considering the Biostimulation, Biological Conditions Provisions

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		focus on nutrients, biostimulatory substances, and cyanotoxins, and the final provisions adopted will leave many water bodies throughout the state without biological water quality objectives. As such, we are disappointed that the Regional Board did not go further to continue its efforts to develop fulsome biological water quality objectives throughout the Los Angeles Region, as identified in the previous Triennial Review cycle. Specifically, in the 2020-22 Triennial Review, Resolution R20-004 identified as a priority project for the Regional Board during that cycle as to "[p]rovide support for efforts towards developing region-specific bio-objectives." It is challenging to objectively measure the progress achieved with respect to that priority, given that staff did not identify this topic as a previous priority within the 2023-25 Triennial Review Staff Report, and did not analyze progress achieved to date. We acknowledge that staff closely tracked the development of Biological Water Quality Objectives adopted by the San Diego Regional Water Quality Control Board, and the U.S. Environmental Protection Agency's recommendations to address nutrient pollution in lakes and reservoirs. However, tracking those developments is not the same as supporting efforts that would develop Biological Objectives for all water bodies within the Los Angeles Region. By failing to identify the development of Biological Objectives in our region as part of the priority list for the 2023-25 Triennial Review, the Tentative Resolution falls short of fulfilling the priority identified in the previous Triennial Review cycle. We urge the Regional Board to follow the lead of the San Diego Regional Board and continue the process to develop region-specific Biological Objectives. The biological	(Provisions) that *"may also establish and implement biological condition assessment methods, scoring tools and targets aimed at protecting the biological integrity (biointegrity) in California's wadeable streams. The Provisions will be established as state policy for water quality control and will include a water quality control plan component*". Because the Provisions may include biological conditions, it will be more efficient if Los Angeles Water Board staff resources are allocated towards supporting this statewide effort. As stated in section 5.7 of the Staff Report, supporting the development of the statewide Provisions is a priority project in this 2023-2025 triennial review period for the Los Angeles Water Board. Once the Provisions are adopted by the State Water Board, the Los Angeles Water Board will follow suit by incorporating them into the Basin Plan as water quality objectives, as appropriate, and may go further to consider any specific

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		condition of a stream tells a meaningful and comprehensive story of the condition of the stream's water quality, habitat, and biota. The reliance for many years on assessing a waterbody's condition on a chemical-by-chemical basis is inadequate to protect ecological beneficial uses. With the understanding that the health of our waterways requires far more than regulating traditional "chemical parameters" of pollution, the Triennial Review should be a key mechanism for the Regional Board to expand what is being regulated. Further, as we previously noted in our parallel comment letter with other organizations during Phase I (Attachment A), there is now ample scientific basis to develop Biological Objectives, not just for water bodies with natural streambeds but also hardened channels (a common occurrence in the Los Angeles Region), allowing the Regional Board to go even *further* than the San Diego Regional Board to protect biological integrity of all region waterways. Accordingly, as discussed in greater detail in Attachment A, we recommend that the Los Angeles Regional Board allocate sufficient resources, including staff time, to implement this project, including the following actions: • Compile a census of relevant existing monitoring efforts and obtain all relevant existing data. • Evaluate to what extent existing data could be used to calculate scientifically sound California and Algal Stream Condition Index (CSCI and ASCI) scores and ensure that appropriate reference sites exist regionally and statewide. • Target new monitoring in any areas where data gaps may exist.	objectives for hardened channels as appropriate if, for example, the Provisions do not contain any specific objectives for hardened channels. In addition, the Los Angeles Water Board continues to develop the understanding necessary to develop region-specific bio-objectives and has, over the past several years, contracted with SCCWRP for Los Angeles Region-specific studies including an evaluation of *Ambient Assessment of Freshwater Harmful Algal Blooms (FHAB) Species and Toxins Lakes and Estuaries* and a study to *Evaluate and Develop Ephemeral Stream Assessment Tools*. As part of the efforts, the Los Angeles Water Board is also monitoring the update from San Diego Water Board on its biological objectives for future reference. Note that the San Diego Water Board's biological objectives have not been approved by the State Water

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		• Create a useful "clearinghouse" by assembling supporting data currently scattered over numerous sources and compiling the associated CSCI and ASCI scores in one user-friendly format accessible to the general public. • Produce a final project report by the end of the 2023-25 Triennial Review cycle that can function as a technical appendix in a Basin Plan Amendment proposing Biological Objectives for the Los Angeles Region in the next triennial review cycle. We recognize that pursuing region-specific Biological Objectives will likely require additional staff resources and expertise, which may take time to develop. That said, we strongly believe the Regional Board must continue to identify this as a key priority project in the 2023-25 Triennial Review to allow for continued consideration of Biological Objectives this cycle, enable greater resource procurement, and ensure this remains a priority for future Triennial Review cycles.	Board and they do not apply to engineered channels.
5.2	NGOs	II. Implement beneficial uses with respect to hydromodifications as pollutants On its own, hydromodification is not currently considered a source of pollution. However, hydromodification of waterways in the Los Angeles Region amplifies impacts of contamination from both anthropogenic sources and natural sources such as birds, other animals, and geological formations. Hydromodification essentially destroys the natural hydrology, leads to increased water temperatures and reduced biodiversity, and prevents support of many designated beneficial uses.	Hydromodification is the alteration away from a natural state of stream flows or the banks of moving waterbodies, that result in hydrogeomorphic changes. While hydromodifications can impact beneficial uses, the Los Angeles Water Board has several reasons for not considering hydromodifications as pollutants

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		One approach to addressing hydromodification issues in the regulatory context would be to include it as a potential impairment. Similar condition-based impairments have been used for 303(d) listings and the development of Total Maximum Daily Loads (TMDLs), such as invasive species, sedimentation, fish barriers, and benthic communities in the Malibu Creek Watershed. Environmental stressors degrading beneficial uses in these cases included both water quality and physical habitat quality. The absence of listing factors for non-pollutant impairments in the State Water Board's Water Quality Control Policy for 303(d) Listings, which the 2023-25 Triennial Review Staff Report relies upon in its response to our comments made in Phase I, does not preclude the Regional Board from following other available guidance from the State Water Board, U.S. EPA, or other sources on non-pollutant impairments to develop fulsome hydromodification impairments in the Los Angeles Region beyond those already identified on the 303(d) list. Accordingly, we strongly recommend that the Regional Board consider for priority the development of water quality objectives with respect to hydromodification as a Class IV impairment as part of the 2023-25 Triennial Review.	at this time, as detailed in the Staff Report. First, whether a parameter such as hydromodification is considered an impairment is governed by California's Water Quality Control Policy for Developing California's CWA Section 303(d) List or Listing Policy, adopted in 2004. The Listing Policy does not consider invasive species, flow or hydromodification as non-pollutant parameters. It instead provides listing factors based solely on pollutant impairments. As a result, any 303(d) listings based on hydromodification would be contrary to the Listing Policy. Second, hydromodifications, unlike pollutants, cannot directly be addressed through the development of water quality objectives. However, the Los Angeles Water Board reiterated its authority over hydromodification via Resolution No. 2005-002: Regional Board Resolution on the Impacts from Hydromodification on the Water Quality and Beneficial Uses of Water Courses in the Los

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			Angeles Region. Therefore, the Los Angeles Water Board primarily relies upon a three-pronged approach to regulating hydromodification: (1) Waste Discharge Requirements (WDRs) issued pursuant to Water Code section 13263 and waivers issued pursuant to Water Code section 13269, (2) water quality certifications issued in accordance with CWA section 401, and (3) municipal stormwater permits issued pursuant to section 402 (p) of the CWA to address stormwater related impacts to waterbodies.
5.3	NGOs	III. Develop water quality objectives for flow in Los Angeles River Establishing site-specific flow objectives for the Los Angeles River is critical, considering the unique hydrology in the Los Angeles area from hydromodification, and in light of the momentum towards recycling wastewater that is currently discharged into the river. As explained in the 2023-25 Triennial Review Staff Report, considerable work has been accomplished on this topic through coordinated efforts from the Water Boards and the Southern California Coastal Water Research Project on the Los Angeles River Environmental Flows Project. This Environmental Flows Project developed processes and management tools that can be used for establishing flow criteria, but offers non-	While the proposed Triennial Review projects do not include a specific project on flow, given the close association between flow and temperature, the Los Angeles Water Board will consider implementing and translating the principles, approaches, knowledge and understanding used to develop the management tool for flow objectives in the ongoing reconsideration of temperature water quality objectives. As

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		binding guidance only, rather than actual flow criteria that can be implemented. Unfortunately, the State Water Board has not yet committed to using the valuable tools from the Environmental Flows Project to establish binding minimum flow thresholds in the Los Angeles River, which was what we had expected would be the outcome of the flows study from its inception. As such, and as acknowledged in the 2023-25 Triennial Review Staff Report, this incredible work will only be used voluntarily by the State Water Board through individual 1211 Change Petitions, and not applied on an enforceable watershed-scale approach through a transparent and public policy determination process. The latter is needed to maintain the biological integrity of the waterways in a consistent and transparent manner moving forward. During the 2017-19 Triennial Review, staff declined to undertake a process to develop water quality objectives for flow, stating, "… The State Water Board has initiated work on the potential development of flow objectives or an in-stream flow policy." However, despite our advocacy efforts and attempts to obtain funding for the State Water Board to conduct a comprehensive flows analysis for the Los Angeles River, the State Water Board has thus far not completed statewide flow objectives, nor any flow objectives specific to the Los Angeles Region. Therefore, we strongly urge the Regional Board to take a leadership role in determining flow objectives in the Los Angeles River during the 2023-25 Triennial Review in order to protect beneficial uses and biological integrity in Los Angeles waterways. We also encourage the Regional Board to consider additional waterways within the Los Angeles Region where flow	written on the Los Angeles River (LA River) temperature study workplan: "*The [temperature] study will use the HEC-RAS model compiled to inform the Los Angeles River Environmental Flows Project (Stein et al. 2021) to calculate hydraulic parameters at key assessment points along the LA River. The developed model simulates the cross-sectional attributes such as depth, width, velocity along the LA River from Sepulveda Dam to the estuary. The model will allow assessment of depth, velocity, width, and flow. The river characteristics will be used as input to the temperature model described in the following subsection*". The temperature studies cover a broader area than the Los Angeles River as they also include temperature studies in San Gabriel and Santa Clara Rivers, which may broaden the inclusion of flow parameter in rivers other than Los Angeles River.

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		objectives may be necessary, and the possibility of region-wide flow objectives.	
5.4	NGOs	IV. Identify specific tasks that will be taken to continue implementation of the Climate Change Framework We commend the Regional Board for their work on the 2019 Climate Change Framework. However, the Regional Board did not include implementation of the Climate Change Framework as a priority during the 2020-22 Triennial Review, and it is missing again from the 2023-25 priority list. The 2023-25 Triennial Review Staff Report States that "The Climate Change Framework is an initial step in the development of a regional climate change action plan for the Los Angeles Water Board," but the absence of any further action as a priority in the 2023-25 Triennial Review will allow for the Regional Board to lose sight of this important mission over the next three years and delay necessary progress in developing such an action plan. The Regional Board must identify next steps in the development of a regional climate change action plan, and include those actions in the 2023-25 Triennial Review priority list. It is imperative that this become and remain a high priority for the Regional Board as impacts from climate change are already being felt in our water scarce region.	The Los Angeles Water Board will not lose sight of the importance of climate change or the importance of considering and incorporating an understanding of climate change in the actions we take. At this time, individual program areas are considering the impacts of climate change in planning efforts and permitting. Specific to basin planning, the temperature study in the San Gabriel, Santa Clara and Los Angeles Rivers is an example of a priority project which focuses on the implementation of the Climate Change Framework. Other priority projects that are in the 2023-2025 triennial review and consistent with the Climate Change Framework are the continued development of Salt and Nutrient Management Plan and supporting the development of the Statewide Biostimulatory, Cyanotoxin and Biological Condition Provisions.

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			In addition, TMDL development projects consider impacts of climate change, including in substitute environmental documents to support TMDLs. The Wetland and Riparian Area program area assesses the potential for climate change carefully especially for coastal projects and restoration and mitigation bank projects. NPDES permits for wastewater treatment plants frequently require Climate Change Effects Vulnerability Assessment and Mitigation Plans to assess and manage climate change-related effects that may impact the wastewater treatment facility's operation, water supplies, its collection system, and water quality, including any projected changes to the influent water temperature and pollutant concentrations, and beneficial uses. Los Angeles Water Board staff also participate in the State Water Board's Water Board Quarterly Climate Roundtable meetings to stay appraised of State strategies and to

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			coordinate with other regions on climate change.
5.5	NGOs	V. Deprioritize updates to copper objectives Given that limited staff time and resources are often a challenge, we recommend that the Regional Board prioritize actions for the 2023-25 Triennial Review that are most protective of ecosystem health and that will lead to implementation of water quality improvement projects, and conversely, de-prioritize actions that only serve to weaken standards and reduce the ability to protect ecosystem health. As important as it is for the Regional Board to expand its scope of regulation beyond traditional chemical parameters (such as Biological Objectives and hydromodification as an impairment, discussed above), it is also critical that the Regional Board does not prioritize weakening existing standards for chemical parameters, which the supposed updates to the copper objectives likely would do. As such, we suggest that the Regional Board *not* prioritize updates to copper objectives, and instead focus efforts on necessary water quality protections such as climate action, hydromodification designations, and development of biological and flow objectives.	Updating copper objectives has been a priority project for the Los Angeles Region since the 2020-2022 Triennial Review, and now the State Water Board has also begun work developing guidance for the State of California for updated copper objectives. Los Angeles Water Board staff is working closely with the State Water Board staff in order to effectively use resources. Different from the existing hardness-based CTR, the BLM requires ten toxicity modifying factors to calculate a freshwater copper criterion: temperature, pH, dissolved organic carbon (DOC), calcium, magnesium, sodium, potassium, sulfate, chloride, and alkalinity. The use of a BLM-derived objective would not weaken the copper standard. Although the BLM-based water quality criteria can be more or less stringent than the current hardness only-based copper criteria, the BLM-based criteria is also protective of aquatic life and

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			has been promulgated by US EPA as part of the national recommended freshwater aquatic life criterion for copper.