

**Summary of Written and Oral Comments
on
Draft Resolution No. R1-2023-0001**

Condemning Racism, Xenophobia, Bigotry, and Racial Injustice
and
Strengthening Commitment to Racial Equity, Diversity, Inclusion, Access, and
Anti-Racism
in the North Coast Region

Public Participation Overview

The [draft Racial Equity Resolution](#) (Draft Resolution) was posted to the North Coast Regional Water Quality Control Board's (Regional Water Board's or Board's) [Racial Equity webpage](#) for a 45-day public review period from September 26, 2022 to November 7, 2022. The Regional Water Board received eight written comment letters on the Draft Resolution and Racial Equity Initiative during the public review period. Written comment letters were submitted by the Water Climate Trust, Save California Salmon, Big Valley Band of Pomo Indians, members of the Karuk, Yurok, Maidu, Wyandot Tribes and Tolowa Dee-Ni' Nation, and members of the public. Regional Water Board staff responses to written comments may be reviewed in the Response to Written Comments document located on the [Racial Equity webpage](#).

Regional Water Board staff received additional verbal and written feedback on the Draft Resolution, Racial Equity Initiative, and future Action Plan from 27 members of the public and tribes during the four engagement events held during the public review period. These engagement events included 1) a workshop in front of the Regional Water Board on October 7, 2022¹; 2) in-person listening sessions at the Blue Lake Casino and Hotel and Happy Camp High School on October 18 and 19, 2022, respectively; and 3) a virtual listening session on October 25, 2022.

The purpose of the Board workshop and listening sessions was to:

1. Inform communities of interest, tribes, and the public about the Regional Water Board's Racial Equity Initiative, the Draft Resolution and its review period, and future action plan;
2. Create a space for Black, Indigenous, Latinx, Asian, and other people of color to share their input, experiences, perspectives, and wisdom related to racial inequities and environmental injustices in the North Coast Region; and

¹ A recording of the Board workshop on the Draft Resolution may be viewed at the following webpage: [Video: Regional Water Quality Control Board North Coast Region- Oct. 7, 2022, 9 a.m. CAL-SPAN \(2:52:00\)](#).

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3. Invite comments and conversation from Black, Indigenous, Latinx, Asian, and other people of color communities, tribes, and other members of the public related to the Draft Resolution, future action plan, and racial equity at large.

Regional Water Board staff took shorthand notes of participant feedback during the Board workshop and small breakout discussions at each listening session. These staff notes may be reviewed in the *Public Comments from Community Engagement Events* document².

Summary of Comments

Staff transcribed, reviewed, and organized comments received in writing and during the Board workshop and listening session to determine 1) comment themes, 2) proposed revisions to the Draft Resolution based on the comment theme, and 3) ideas to incorporate into the future Action Plan and Racial Equity Initiative based on the comment theme. Staff determined the following comment themes, which are described in greater detail in Table 1 below³:

- Support Resolution Adoption
- Proposed Resolution Edits
- Action Plan Considerations
- Public Engagement Strategy
- Culture, History, and Pride
- Beneficial Use Access and Protection
- Tribal Collaboration
- Water Quality Issues
- Water Rights Issues
- Enforcement

² The *Public Comments from Community Engagement Events* document is available in the February 2023 board meeting link on the following webpage:
https://waterboards.ca.gov/northcoast/board_info/board_meetings/.

³ Please note that the comments and themes included in Table 1 are comment summaries and not direct quotes. Please review the *Response to Written Comments* and *Board Workshop and Listening Session Comments* documents for direct quotes from commenters and participants.

Table 1. Summary of comment themes from written comments and oral comments provided at the Board workshop and listening sessions received during the 45-day public review period.

Comment Themes	Change to Draft Resolution	Evaluate during Action Plan Development
<p>Support Resolution Adoption</p> <ul style="list-style-type: none"> Appreciative of Regional Water Board efforts and inclusion of Native American-specific section. 		
<p>Suggested Resolution Edits</p> <ul style="list-style-type: none"> Additions to various lists of items in Findings (e.g., <i>add “economic class” to list of marginalized communities, describe positionality</i>). Additions to <i>Acknowledging Native American Colonization, Genocide, and Resiliency</i> section (e.g., <i>better recognize sovereignty, continued stewardship of lands, and spiritual connection to water</i>). Revise mentions of “thousands of years” to “time immemorial” when referring to temporal presence of Native American peoples. 	X	
<p>Action Plan Considerations/Recommendations</p> <ul style="list-style-type: none"> Action Plan development and implementation should be community-based and -centric. Improve meeting time, location, hybrid meeting offerings. Go to the communities rather than asking to come to the Regional Water Board. Improve and expand community outreach and engagement strategy – don’t simply check a box; form partnerships to change power structure and be proactive to build relationships. Improve communication around what the agency is and does, and how agency actions affect communities. Increase Regional Water Board workforce diversity and tribal representation on the Board. Racial equity and justice training should be mandatory for Regional Water Board staff. 		X
<p>Public Engagement Strategy</p> <ul style="list-style-type: none"> Meetings should be held in tribal communities with advanced notice of meetings so that tribal members can plan to attend. Childcare and access to food would help facilitate attendance at meetings/events. 		X

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Comment Themes	Change to Draft Resolution	Evaluate during Action Plan Development
<ul style="list-style-type: none"> Some people feel hesitant to speak up because some Regional Water Board meetings are held in locations underrepresented by people of color where some members of the public feel unsafe and unable to voice their concerns. Consider tribal meeting locations or hiring security. Spend less time planning and more time listening and being out in the communities. 		
<p><i>Culture, History, and Pride</i></p> <ul style="list-style-type: none"> Tribes are dependent on water for livelihood, health, and religion. Clean water is necessary for ceremonial practices and needs to be a higher priority. Acknowledging the cultural importance of the health of the river is important. Tribal Ecological Knowledge was known well in advance of western knowledge and includes very sophisticated management practices of natural resources that have been implemented for thousands of years (e.g., fire science, basket weaving, watershed management, etc.). 	X	X
<p><i>Beneficial Use Access and Protection</i></p> <ul style="list-style-type: none"> Communities with lack of access to clean water are generally less affluent. Lack of flow in the watersheds directly affects tribal cultural uses. Access to water for ceremonial practices is limited. Direct human use (consumption, ceremonial uses, etc.) of water should be a water quality protection priority. The Regional Water Board should support and encourage preventative actions that may minimize impacts to beneficial uses from natural disasters. 		X
<p><i>Tribal Collaboration</i></p> <ul style="list-style-type: none"> The Regional Water Board needs resources and opportunities for collaboration with tribes and other communities to help with racial equity and other Regional Water Board efforts. Consultation should be done comprehensively rather than just checking a box to meet regulatory requirements. 		X

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Comment Themes	Change to Draft Resolution	Evaluate during Action Plan Development
<ul style="list-style-type: none"> • Various recommendations were received for outreach in communities in advance, and during development, of the Action Plan. Every community has different issues, concerns, and needs. • The Regional Water Board should provide opportunity for employees to learn about how tribal governments operate. • More collaboration is needed on updating Tribal Beneficial Uses. 		
<p><i>Water Quality Issues</i></p> <ul style="list-style-type: none"> • Dams have caused stagnant and green waters, which impact downstream communities. • Toxic waste into the rivers inhibits ceremonial uses of water. • Low water levels and high-water temperatures impact food sovereignty and traditional ways of life for tribes as well as aquatic ecosystems. • Impaired instream flows, and associated water quality problems impair, contaminate, or prevent water-related cultural, spiritual, and subsistence practices. 	X	X
<p><i>Water Rights Issues</i></p> <ul style="list-style-type: none"> • High quality water is being diverted for flood irrigation. • Water rights derive from opinions on water from the 18th century. • Pre-1914 water rights – Native peoples couldn't even be considered American citizens until 1924. • To have clean water, its use must be limited. 		
<p><i>Enforcement</i></p> <ul style="list-style-type: none"> • Funding should be provided to local agencies to help enforce regulations and laws meant to protect water bodies. • Enforcement priorities should be focused on what can cause change (e.g., keeping water in the river). • The Regional Water Board should focus on enforcing water quality standards. • The Water Boards have good regulations that are protective, but they need to be adequately enforced to be protective. 		X

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Comment Themes	Change to Draft Resolution	Evaluate during Action Plan Development
<ul style="list-style-type: none">• Enforcement and complaint response is lacking in rural and remote areas.		

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