

From: Joyce Dillard [mailto:dillardjoyce@yahoo.com]
Sent: Monday, November 22, 2010 3:32 PM
To: Groundwater Elevation Support
Subject: Comments to CASGEM Groundwater Elevation Monitoring due 11.22.2010

We do not understand how non-adjudicated groundwater basins are being addressed in this draft when there is no groundwater management. Enforcement for non-compliance is not addressed or are penalties. Private property owners may be involved, not just agencies. There may be contamination issues involved.

What are the plans to enforce Groundwater Basins, sub-basins like Hollywood and Santa Monica, in the Coastal Los Angeles Groundwater Basin to report withdrawals? Those two sub-basins are not adjudicated and are under no obligation to report data. There are oil wells in both sub-basins with methane issues. Salt water intrusion may be an issue, but your guidelines do not seem to address potential problems.

In other basins, landfill contamination presents problems.

Because the South Coast region has aquifer contamination, that issue needs to be addressed as groundwater cannot be used properly and for beneficial use, as defined in the State Constitution, Article 10.

We do not see "beneficial use" being applied across the board.

How are sewers and pipelines being addressed as a source of contamination? Are you requiring that a reporting entity verify the condition of pipelines in the groundwater basin?

Science needs to be used to address the intention of the exercise with consistent and informative information. We do not see that the legislation forces private property owners to comply.

Private property owners, in the City of Los Angeles, may be required to buy water from groundwater wells (NBC Universal Inc.) in addition to the water agency (Los Angeles Department of Water and Power). That withdrawal, if significant, changes the aquifer supplying the groundwater.

Without complete information, the monitoring, as it is written, may still lead to considerable and expensive problems.

Joyce Dillard

P.O. Box 31377

Los Angeles, CA 90031