

Comments to Proposition 84 Round 2 Planning Grant due 8/24/2012Session
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Joyce Dillard [dillardjoyce@yahoo.com]

Sent: Friday, August 24, 2012 4:48 PM**To:** DWR IRWM GrantsYou state:**TABLE 1 STATEWIDE PRIORITIES**

Proposals that include projects that implement water use efficiency, water conservation, recycling and reuse to help meet future water demands, increase water supply reliability, and adapt to climate change. Desirable proposals include those with projects that:

- *Increase urban and agricultural water use efficiency measures such conservation and recycling*
- *Capture, store, treat, and use urban stormwater runoff (such percolation to usable aquifers, underground storage beneath parks, small surface basins, domestic stormwater capture systems, or the creation catch basins or sumps downhill of development) or projects outlined PRC §30916 (SB 790)*
- *Incorporate and implement low impact development (LID) design features, techniques, and practices to reduce or eliminate stormwater runoff*

Comments:

Missing in the capture, store, treat etc are any references to any Public Health Codes and the Department of Public Health. So far, the County of Los Angeles Department of Public Health has issued Guidelines, non-binding and inadequate to the Public Health and Safety.

Treatment may NOT be executed by a qualified agency in this form of priority, not does it have oversight of any creditable entity.

Remember, you are talking UNDERGROUND STORAGE TANKS not cisterns.

Under LID designs, geology is completely omitted. In areas of oil and tar, as in Los Angeles, LID design does not resolve the problem, it aggravates the problem. By making a ministerial policy and not a CEQA finding, you negate the intent of not doing harm to the environment.

You also do not take into consideration earthquake faults and mapping and any vibration issues that may cause flooding in this type of approach for water retention.

There is also a Sediment Management disregard in relationship to storm water capture. No one has addressed on site sediment versus sediment that flows into receiving waters, like the ocean, after a storm.

No capacity is addressed if there becomes a problem of removal and its effects on retention overall.

If there is Sea-Level rise on projects near the coast, what precautions have been made for these retention vehicles? Will flooding create more of a disaster if stormwater is retained onsite and then adds to the flooding, threat to life of persons, property and animals?

You state:

TABLE 2 IRMW PLAN STANDARDS

Missing are:

Bodies Politic that adopt the Plan, not just the Leadership Committee of an IRWM Planning Area, which make it a legislative action. Planning Departments disregard the IRWM entirely and adhere to approved Local Integrated Water Resource Management Plans (LADWP and Metropolitan Water District).

Relationship and Enhancement to the Watershed or Sub-Watershed.

Sea-Level Rise Impacts or Mitigation

Impacts of Fish, Birds, Wildlife, Plants

PUBLIC PARTICIPATION as sharp citizens have uncovered foundations acting on behalf of State agencies, signing as signatories and doing this without any contractual authority. Some would call it a coop to capture control of water, its projects and contract possibilities. STAKEHOLDERS leave out the PUBLIC and there should be mandated meetings for outreach and PUBLIC COMMENT as well as opportunities for written PUBLIC COMMENT. The problem is now aggravated with the onslaught of WATERSHED AUTHORITY GROUPS (LA County Flood Control District)-appointed, not elected.

Conflict-of-Interest Codes (mentioned, no requirement) and Forms 700 Filing must be mandatory and with proof of compliance. We have none in the Greater LA County IRWMP. The words "penalty of perjury" must be used.

You state:

RWMGs must ensure that Plan objectives are consistent with such overarching goals as they apply to specific regions. RWMGs must consider the objectives in the appropriate basin plan or plans and strategies to meet applicable water quality standards, CWC §10541.(e)(2). California set a goal of a 20% reduction in per capita.

Comments:

It is all relative. LOS ANGELES REGION BASIN PLAN FOR COASTAL WATERSHEDS is about Total Daily Maximum Loads, not groundwater and/or aquifer non-contamination not about future growth.

We, in Los Angeles, are facing huge density growth via TOD Transit Oriented Districts. Any reduction will be used to offset water supply for DEVELOPMENT. This is more than homes, it is hotels and football stadiums.

These IRWM have always backed away from identifying planned development and even annexation. Even affordable housing has and will continue to be developed on School District Public Facilities land (eminent domain powers) and, in the future, Flood Control District Public Facilities land (eminent domain powers). The Affordable Housing will be considered (LID) Infrastructure (in lieu of redevelopment funding dissolution).

The Water stakeholders are clueless as to the Transportation and Urban Development planning on Federal, State and Local levels.

No one reviews any General Plan and Its Elements including the Housing Element or Conservation Element to see what is legally binding to the municipalities.

You state:

WATER QUALITY IMPROVEMENT

A program to improve water quality may include projects, such as:

- *Building or upgrading wastewater treatment plants/technology*
- *Conversion of septic tanks to a sewer system*
- *Construction of new and updating collection, sewer, and interceptor sewer facilities*
- *Capture and treatment of stormwater/urban runoff, including the construction of rain gardens*
- *Construction of wetlands for water quality treatment*
- *Contaminant removal*
- *Salinity management*

Wetlands are a sensitive issue in the Los Angeles Region Basin. The Wetlands Banking has trumped Federal planning from the 1950s to protect saltwater intrusion. The Poland Report has been ignored and House Document 389 (Ballona Creek Estuary). Malibu Lagoon is another problem issue.

The Port of Los Angeles openly uses Wetland Banking.

Not publically evident, is that wetlands are being used for FUTURE DEVELOPMENT, not for water quality treatment.

General Comments:

You need to ask if the Groundwater Basins are adjudicated or the responsibility of each property owner.

Emergency Response and Disaster Plans, again, are not under any Water Agencies jurisdiction. You need to incorporate GENERAL PLANS into this process. Many Elements have not even been written much less adopted. Other Elements are too old to be viable.

We will repeat, a legislated approval, such as a City Council approval, may be the trigger to making IRWM viable and allow it to be integrated into the planning process.

It is a stand-alone, non-priority document currently in the world of planning execution. Its use is for grant funding only.

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