



Comment Letter—California Ocean Plan Amendments due 10.24.2011 Noon

You are not addressing the complexities of the Southern California Bight and the geological and weather effects that effect the quality of the water. To just monitor receiving waters is not addressing those effects of the ocean bottom and the weather, during certain parts of the year, that changes the ocean water.

We mean, that the bottom of the ocean washes into the shore as at the Santa Monica Bay. We hear this is a springtime effect, due to the winds. The bottom of that ocean has received waters that have settled. The measurements of the receiving water is a point in time and not a continuous application or adaptation of the effect.

So, discharge into the receiving water may be amplified at a later date. There is no measurements that would apply unless science is used adaptively.

We contend, that broken sewers may cause discharge into the receiving waters without any solution to end any contamination or pollutants. Capturing the storm water, in part in underground tanks, certainly does not solve the problem.

The City of Los Angeles is choosing that as a solution for “clean water.”

Where is the science and the related data collection.

Again, weather plays a role, not even mentioned in this document.

We learned this at a meeting Thursday, October 20, 2011 held by USC Dornsife College “Climate Change in the Southern California Bight-Integrating Science and Societal Implications.” Here scientists, federal agencies, state agencies, policymakers, journalists and the public met to address this issue. It is complex, pioneering, and needs collaboration at all ends. The military, on a classified basis, has concerns, so you can say it is a National Security issue.

You have an obligation under Public Health and Safety.

In Section 7.2 Storm Water you state:

The requirement for core toxicity monitoring may be waived at the discretion of the Regional Water Board, if the permittee participates in a regional monitoring program.

This is a loophole, period. Why place this in the Plan when you really need data that can be interpreted by scientists and personnel.

Mitigation can be costly or it can occur with brain power and application of facts and science.

The Regional Water Boards are not forward thinking by including any loopholes. Collaboration needs to occur with those in the field who can interpret the findings. You make no allowance for this new approach of Adaptive Planning. We see no role for the Boards in this collaboration as presented.

CEQA-wise it would have a Potentially Significant impact on Greenhouse Gas Emissions, Hydrology and Water Quality, Hazards and Hazardous Materials and Geology and Soils.

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