

## Rodgers, Theresa@Waterboards

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**From:** Villar, Rosie@Waterboards on behalf of WB-RB4-losangeles  
**Sent:** Wednesday, October 07, 2015 7:28 AM  
**To:** Gallon, Celine@Waterboards  
**Subject:** FW: Comments LA Waterboard 2014-2016 Triennial Review due 10.2.2015

5<sup>th</sup> on 10/2...

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**From:** Joyce Dillard [<mailto:dillardjoyce@yahoo.com>]  
**Sent:** Friday, October 02, 2015 1:53 PM  
**To:** WB-RB4-losangeles; [Celine.Gallon@waterboards.ca.gov](mailto:Celine.Gallon@waterboards.ca.gov)  
**Subject:** Comments LA Waterboard 2014-2016 Triennial Review due 10.2.2015

Proposed:

- b) Continue the development of a regional strategy to address the effects of climate change on water quality;*
- d) Administratively update Chapter 4 of the Basin Plan;*
- e) Provide support to other Los Angeles Water Board programs, including TMDLs, Municipal Permitting, and Stormwater Permitting;*

Comments:

Antidegradation Policy needs to be defined in terms of baselines. Effects cannot be determined if there is no starting point for comparison.

Water quality standards should have some basis in natural conditions and deviations from those conditions. Data is lean and even lacking completely.

Las Virgenes–Triunfo Joint Powers Authority are concerned over the Monterey

Formation. That formation effects water quality throughout the region and all related studies need to be applied instead of wasting taxpayers' money to correct a natural condition.

Impaired waterbodies and TMDLs need to be incorporated.

Recycling should be addressed in regards to water suppliers. Public Health Guidelines are lacking for stormwater capture projects not planned for distribution or sale.

Climate change needs to be defined. It is not clear what aspect is being addressed such as greenhouse gas emissions or sea-level rise. Methane migration is an issue due to the oil formations in the region and past drilling that was unregulated.

Proposed:

- f) Provide support to statewide standards-related initiatives, including*
  - The development of a groundwater workplan;*
  - The development of watershed-based stormwater compliance and management guidelines and tools;*
  - The development of nutrient objectives;*
  - The development of a biological integrity assessment implementation plan;*
  - The application of the State's Antidegradation Policy to groundwater;*
  - The development of a contaminants of emerging concern (CEC) strategy*

Comments:

Groundwater issues are complex due to adjudication issues and mineral rights.

Funding needs to be addressed.

Management Guideline and Tools need to be addressed into applications of databases with real data. There is not a centralized access to data needed for this process.

Not addressed are plans for Stormwater Capture Credits or Cap and Trade.

Outfall monitoring should be addressed.

This agency lacks in Information Technology and needs to update the systems to become usable to the public.

Joyce Dillard

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