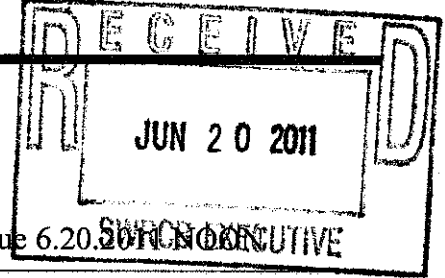


**commentletters - Comment Letter-Los Angeles Water Board Indicator Bacteria due 6.20.2011
NOON**



From: Joyce Dillard <dillardjoyce@yahoo.com>
To: <commentletters@waterboards.ca.gov>
Date: Monday, June 20, 2011 11:51 AM
Subject: Comment Letter-Los Angeles Water Board Indicator Bacteria due 6.20.2011 NOON

Comment Letter-Los Angeles Water Board Indicator Bacteria due 6.20.2011 NOON

What needs to be recognized is the General Plan and its Elements, the CEQA mitigations and infrastructure planning and maintenance in relationship to those municipal General Plans and the permittees.

The source points of the TMDLs need to be addressed for each permittees. Regular testing points- microbial and genetic- should be addressed as well as the analytical relationships of the results-microbial, geologic and land use.

The Federal Clean Water Act is about navigable uses. The mitigation and monitoring may not be addressed in the General Plan and its Elements CEQA documents.

That presents a problem of execution and compliance to standards set by this Board that was not considered in the CEQA processes of the municipalities.

Consideration is needed to the Board approach to new permitting and the flexibility in the approach and standards presented in the 5.25.2011 meeting on the development of the updated Los Angeles County MS4 permit.

BMP Best Management Practices may not mitigate the TMDL reductions and be too expensive to maintain without consideration of revenue, staffing and monitoring-by each individual municipality.

Broken sewers may be a problem that is not addressed in this amendment. Sewer pipes are not under this Board's jurisdiction. Property owners are responsible for their pipes to the municipal connection.

Oil and its toxics, prevalent in the region, may not be addressed properly. Migrating gases have effects on oil and tar rising to surface. Fracking and oil and gas extraction has not been addressed by this Board as a source point.

Landfills and exemptions to allow disposal have not been addressed as a source point. No studies have been presented to our knowledge. Sunshine Canyon Landfill should be analyzed.

Has the Basin Plan been adopted by all municipalities involved and incorporated into the General Plan and its Elements.

More science and monitoring should be established. The public cannot be expected to foot an assessment on strategy alone nor should they be asked to pay property taxes for Clean Water

when there are no measurable results, such as Proposition O in the City of Los Angeles in the amount of \$500,000,000.

US EPA, Heal the Bay and Santa Monica Baykeeper consent decree execution may be more odor control from sewer spills and not TMDL mitigation leading to reduction.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031