

CEQA Addendum is not appropriate and Environmental Impact Reports need to be prepared for all watersheds involved. Hydrological and Geology and Soils are key issues in the compliance of the Municipal Separate Storm Sewer LAMS4 Permit.

Any CEQA Addendum has to be approved by the LEAD AGENCY which is the LA COUNTY FLOOD CONTROL DISTRICT, not the CITY OF LOS ANGELES.

These plans must be MONITORED FOR WATER QUALITY. Drainage should be mapped.

Once these plans are operational and not in the planning stage, water quality standards must be met. Details and proper planning, including modeling, must occur now and not later.

Adaptive Management must be addressed with these plans. Accountability and transparency must be within the scheme.

These plans have not even been circulated for Public Review and Comment. We understand that a Parcel Tax is being considered, yet you show qualifications for Proposition 218 compliance.

There is no reference to existing NPDES permitting and the effect of their discharges on each watershed.

Feasibility for stormwater capture is more than just processing water through wastewater treatment plants. More detailed study is needed including faults, landslide and liquefaction zones. Oil and methane zones/wells should be addressed also.

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