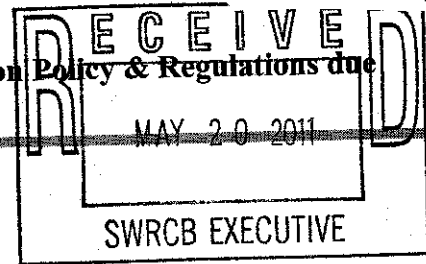


commentletters - Comment Letter - CEQA-Wetland Area Protection Policy & Regulations due 5.20.2011 Noon



From: Joyce Dillard <dillardjoyce@yahoo.com>
To: <commentletters@waterboards.ca.gov>
Date: 5/20/2011 11:54 AM
Subject: Comment Letter - CEQA-Wetland Area Protection Policy & Regulations due 5.20.2011 Noon

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The Initial Study needs to address the GENERAL PLANS in more detail. In the City of Los Angeles, there are a high number of General Plan Amendments, based on individual property needs, not on the overall plan adoption. This is difficult for the citizen to monitor and does not coincide with the Environmental Impact Report and Mitigation and Monitoring measures adopted by the City.

The age of the Elements of the General Plan plays a factor. Some are so out-of-date as to be immaterial to today. This affects the Community Plans and any Specific Plans.

Infrastructure Reports have not been prepared for years, so it is difficult to ascertain if there is compliance with the General Plan and its Elements.

Many Mitigated Negative Declarations are issued without regard to hydrology and the current beneficial uses of water being addressed in State and local bonds. Basin Plans may not even be mentioned. Watershed areas are neglected in these documents as well as Integrated Water Management Plans IRWMP.

Compensatory Mitigation is rarely, if ever, addressed. Monitoring, reporting, scientific measurement and qualified personnel to address these issues are areas that need to be addressed.

Climate Action Plans are expected to be incorporated into General Plans at a future time (mentioned at a Los Angeles Regional Collaborative for Climate Action and Sustainability meeting.)

We now have a proposed ordinance on CORE FINDINGS which includes languages that changes conformance to the General Plan to:

"substantial conformance with the purpose, intent, and provisions of the General Plan and applicable community plan."

In other words, due process is being removed without regard to the Environmental Measures of the General Plan.

This Initial Study needs to address combined groundwater basins, watersheds, rivers, lakes, streams, bays and wetlands into one ecosystem and its impacts if disturbed or destroyed.

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