



You state:

One of the difficulties of defining reference conditions in California is that many waterbodies in the state have been severely altered from their natural condition.

Comments:

Missing is any discussion on historical data collection and timeline/ progression of destruction of the natural conditions.

You state:

Some of these alterations are not a result of controllable environmental factors and thus do not fall under the regulatory authority of Cal/EPA.

Comments:

You need to determine the extent of this statement. The approach may need to be distinguished by region and responsibility of alternations.

You state:

“Controllable” water quality factors are generally defined in the basin plans as human actions that influence water quality that can be controlled.

“Uncontrollable” factors, on the other hand, are either from natural sources or are impacts that cannot reasonably be expected to change (i.e., they would cause widespread economic, social or environmental impact).

Comments:

In urban areas the two definitions must be distinguished. Otherwise, these policies are just contract creating policies with no measurable or realistic results.

It also addresses land use and development and the lack of integration of Biological Objectives as an effect on the environment. Again, we rely on CEQA and an overall policy would change project specific mitigation.

You state:

In highly altered systems where biological conditions are limited by uncontrollable factors, the focus is on expectations for the “best attainable” conditions; that is, the conditions that can be expected even in highly altered areas after best management practices have been implemented to eliminate all controllable factors.

Comments:

“Best attainable” conditions are a guessing game at this point. We see, in Los Angeles, the experimentation of projects, not the expectation of tested results.

Projects are designed in “concept” which is placing taxpayers at risk for the downside operations and maintenance and/or more capital improvements.

Upland issues should be addressed, but we never see that as any priority. Focus is on hard core capital spending.

You state:

Further work is still needed on other types of waterbodies, such as non-perennial streams, large rivers, lakes and wetlands.

A recent, statewide study concluded that approximately 50% of the State’s perennial stream miles have either altered or severely altered biological condition and up to 60% have degraded physical habitat.

The study also found that degraded biological condition occurs in areas in which agricultural and urban development are prevalent (Ode et.al. 2011).

Comments:

Because ecosystems are flowing, all waterbodies should be addressed as a system. It is the system that California needs to address in policy and not individual waterbodies.

You cannot expect development to reduce as it is a tax generator. What you do need to be realistic is the accessibility of water to serve the population in all forms and uses.

We do not see that approach in the Basin Plans or in Statewide Policies.

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