

## MODELING

### ES-2 Water Quality Priorities states:

*Subwatersheds in SMB were further modeled into compliance monitoring location (CML) regions. These modeled CML subwatersheds, and these are herein referred to “CML analysis regions” and were used in the RAA modeling*

## COMMENTS

The geology of the area including petroleum deposits and earthquake faults should be reviewed in more depth before any substantial planning. Santa Monica Fault is being studied by the state.

Aspects of the Southern California Bight should be addressed.

## RAINWATER HARVESTING

### 5.4.2. Public Retrofit Incentives for BMPs states:

*These programs are directed at incentivizing the public to decrease the amount of stormwater runoff from their property. Permittees are responsible for continued development, execution, enforcement, and reporting of the progress of these programs in their annual reports.*

## COMMENTS

This is incorrectly identified. Private property is not a Source Point for this permit and the description is about Rainwater Harvesting. California Building and Plumbing Codes cover this aspect for property owners. Consequently, it is unclear how Outfall Monitoring data is incorporated

## FINANCIAL STRATEGIES

### 7.4. Financial Strategies states:

*The financial strategy described in this section is focused on developing a set of options to address the expected additional costs associated with compliance with the new MS4 Permit. It is not intended to incorporate the costs associated with existing stormwater activities identified previously. **Just as the engineering and strategic solutions for watershed management rely upon a coordinated regional approach, so too does the financial strategy. Capital and operating costs for watershed programs are large and span decades. As such, there is no single “right” way to finance these programs. Instead, the financial***

*strategy presented herein outlines a set of multiple approaches, allowing each jurisdiction to select those strategies that best fit their specific circumstances.*

## COMMENTS

There is no Financial Strategy. Cities are not in the position to be speculators. They have requirements of solvency.

As a sample, the City of Los Angeles CONSOLIDATED ANNUAL FINANCIAL REPORT (FY June 30, 2015) requires disclosure under NOTES TO BASIC FINANCIAL STATEMENT:

### ***Total Maximum Daily Loads (TMDLs)***

*The USEPA and the LARWQCB are required to develop TMDLs for impaired water bodies. Various watersheds in the Los Angeles area have water body segments that are listed as impaired due to a variety of pollutants. Although some TMDLs have already been released, additional TMDLs will be under development and compliance with both existing and new TMDLs will continue into the next decade. At this time, it is difficult to predict the full impact of TMDLs on the National Pollutant Discharge Elimination System (NPDES) effluent limits at the City's four water reclamation and wastewater treatment plants. **In addition, the proposed Greater Los Angeles County Municipal Separate Stormwater Sewer Systems (MS4) permit, adopted by the LARWQCB in November 2012, contains provisions that require compliance with all the adopted TMDLs. It is expected that significant capital improvements funded by Sewer may be required to comply with the TMDLs and their resulting impact on the City's NPDES permits.***

This statement discloses Sewer funds as the source for “significant capital improvements.” This permit goes beyond the sewer system into streets and land, and the taxpayer has not been notified of the tremendous expected costs.

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