

From: Joyce Dillard <dillardjoyce@yahoo.com>
To: <commentletters@waterboards.ca.gov>
Date: 1/21/2011 11:19 AM
Subject: Comment Letter – Policy for Toxicity Assessment and Control due 1.21.2011
Attachments: LA Fault Rupture Study.pdf

Comment Letter – Policy for Toxicity Assessment and Control due 1.21.2011
Noon

Several factors need to be considered in how toxicity occurs.

Geology is one that seems to be missed and factors of location to saltwater and saltwater intrusion needs to be addressed.

The Los Angeles Region and the City of Los Angeles is one of a giant oilfield, unusual to most areas of the country, but duplicated in the Southern California region.

Though ocean waters such as Santa Monica Bay are not included, there is a factor of saltwater intrusion into the protected waters covered by this policy because of the proximity to the coastline.

The proper NPDES permitting and monitoring would be expected. That does not occur with reliability. Wetlands are threatening, such as the Ballona Creek, to saltwater intrusion because of methane mitigation and de-watering. That methane monitoring does not exist in a reliable system. The groundwater basin is not adjudicated and not subject to a water master or other judiciary oversight.

These groundwater basins without adjudication are not addressed properly or required to adhere to groundwater monitoring. Groundwater measurement and monitoring is not required or monitoring by a qualified agency with qualified personnel. If the water extracted is not measured, then discharge into the sewer system can occur and no one would know. We are talking about methane and other toxic elements.

In the same water basin are areas affected by the Alquist-Priolo Special Study Zones and Fault Rupture Study Areas (map attached.) Ruptures can trap, geologically, pollutants, such as septic tank leakage, into the Santa Monica Bay. The area around the Santa Monica Bay has not been analyzed completely for earthquake fault lines, per the research of Pacific Palisades resident Patrick Hart. He has visited Caltech and spoken to state agencies responsible.

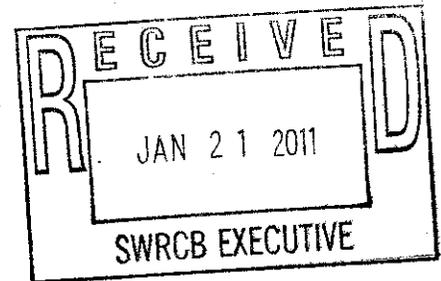
Without the proper mapping, that leaves any area geologically susceptible and the waters covered by this policy susceptible to pollutants and toxicity that have no controls or analysis of source.

Sludge is trapped geologically with no where to go but settle on the bottom of the bay and close to the coastline.

Wildlife is threatened as the saltwater intrudes into the wetlands. The source of pollutants is difficult to access.

The State Board has monitoring stations close to the coastline, but not inland. They do not have jurisdiction, nor do the State courts, over inland pollutant sources for the Santa Monica Basin. Private property owners are legally responsible. Monitoring would be required on non NPDES permit holders.

The Hollywood Basin also has no adjudication.



There needs to be more coordination between State Agencies and a will to study regions as living ecosystems. This is important when there are no Basin plans and no legal jurisdiction for the State Water Board.

CEQA issues should be reviewed for projects that fall into Methane Monitoring for their compliance or lack thereof. The required monitoring has no reporting requirements or State agency designation. We do not see where you address non adjudicated groundwater basins for cumulative impacts under the CEQA definition.

Past lawsuits have resulted in odor control, not toxicity elimination.

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

Attachment: LA Fault Rupture Study (Patrick Hart)

