Comments ARB Natural and Working Lands Symposium due 8.31.2015

Urban expectations in the reduction of greenhouse gas emissions are overstated in highly dense areas like Los Angeles.

There is no baseline on which to determine reductions to start. Environmental issues such as methane mitigation, and oil fields have not been recognized or even addressed. Methane does migrate, and when not mitigated, emits dangerous gases into the atmosphere.

Density is producing traffic congestion. Mitigation through bicycles has been shoved down the residents' throats without any data to substantiate any greenhouse gas reductions.

The same holds for vehicle miles traveled. There are not the studies to sustain any reductions.

Politically, there is an anger when people value their time and money and vote for congestion reduction and management.

Stormwater is a controversial issue in Los Angeles as the LA Regional Water Quality Control Board has issued an MS4 Municipal Separate Storm Sewer Permit. This Permit bypasses outfall monitoring and pollutant load reductions for improved water quality in exchange for the 85th percentile storm and capture.

There was no cost-benefit analysis and the figures the municipalities are facing are in the billions of dollars with no revenue stream. There is a Cap and Trade scheme being discussed for Stormwater Capture Credits.

There is no rain and where it does rain, stormwater is already captured. There are no realistic plans for storage and no adjudication analysis and groundwater rights analysis.

Projects like the AVALON GREEN VALLEY NETWORK were funded, in part, by Proposition O for the categories:

> Water Conservation, Drinking Water and Source Protection Projects
> Storm Water Capture, Clean-Up and Re-Use Projects

The description is:

> Construction of stormwater BMPs in an alley located in the South Los Angeles area to capture, infiltrate, and retain stormwater runoff from the tributary area: permeable pavers, dry wells, and rainwater harvesting for plant irrigation.

It is not a Water Conservation project. No rainfall data has been applied.

CEQA needs to be taken seriously and the work needs to happen in the planning stages. GIS databases may be convenient, but the story underground, in the geology and the atmosphere are not reflected.

During drought times, trees die.

Infrastructure issues such as water main breakage play a role much larger than a few gallons of storm water capture.

Because water is a complex issue and multi-agency jurisdictional, we suggest the Integrated Water Resource Management should start at the sources of water. In the Greater Los Angeles IRWMP, there is no tie to the sources in Northern California.

Water suppliers are key players, yet may not sit at the table on some of these very expensive, data poor plans.

We suggest addressing urban land issues in relationship to the land, the uses, the density and the circulation involved.

Circulation Elements have been ignored.

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