

commentletters - Submission of Comment Letters To Proposed Rulemaking Title 23 due 2-15-10

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Subject: Submission of Comment Letters To Proposed Rulemaking Title 23 due 2-15-10

- Regulations regarding beneficial uses of water have gone ignored by the Los Angeles Regional Water Quality Control Board.
- Requirements of reports and substantial evidence to support extraction and discharge of state waters have been ignored.
- Requirements of publicly available scientific reports to substantiate determinations of "no feasible alternatives" in order for groundwater to be discharged into local sewer systems- have gone ignored.
- Adherence to agreed upon conditions of development that involve the Board- go ignored by the Board since it stands outside of the California Environmental Quality Act (ceqa) agreements within approved EIRs.
- LARWQCB hides behind segmented oversight and does not apply its responsibility to look and comment upon 'the big picture' cumulative effects of extraction and discharge of groundwaters.
- LARWQCB does not coordinate with other agencies of oversight for project sites in order to provide for its responsibility to promote and protect the watershed and its ecosystems to the fullest extent possible.
- LARWQCB fails to adhere to Article X Section 2 of the California Constitution which provides for the requirement of waters of the state be put to beneficial use to the fullest extent of which they are capable, and that the waste or unreasonable use or unreasonable method of use of water be prevented and that the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare.

EG. Case study- Playa Vista (Playa Capital LLC) development project on the westside of Los Angeles on the Ballona Wetlands.

The only recourse the public has in order to attempt to illicit accountability and enforcement of the laws is to sue the Boards. Most of the public does not have the financial means to sue in order to illicit accountability and enforcement from the Boards which leaves the Boards in the godlike position of arrogance to not perform as required under law. This writer believes that this is the intended mode of operation of the Boards and thus nothing will change until there is a meaningful process of accountability rather than the mock(ing) accountability that currently exists.

Grassroots Coalition, Patricia McPherson

