



Maximum extent practicable (MEP) is a generic term with no baseline for comparison. The problem with Best Management Practices BMPs is that the burden lies on taxpayer-funded solutions based on little to no science.

BMP is the wrong approach if the pollutant load is high. Identification of source points are important.

Fracking is an issue in California, unregulated by DOGR Department of Oil and Gas Resources. The process of fracking fluid, usually proprietary, could be a major contributor to the pollutant load. What BMP would alleviate the pollutant load?

None.

In the case of Los Angeles, with oil wells not necessarily mapped as records have been destroyed, what leakage that contributes to pollutant loads can be stopped by BMP?

None.

Pipelines can be found underneath Caltrans right-of-ways. Are the pipes leaking or broken? Pipelines are aging, may be dangerous and have no required disclosures or insufficient disclosures or completely incorrect disclosures.

They may be owned by the Gas Company, or Oil Transport Companies or a vary of owners.

Does Caltrans have the jurisdiction to require disclosure and monitoring and testing.

Where are the monitoring stations throughout the system? Most monitoring stations are at the coastline or receiving waters. Again, no source point has been identified. You expect the taxpayer to carry the burden to reduce pollutant loads with no source point identification.

The operations and maintenance cost, in the City of Los Angeles under their Proposition O (BMP program) is estimated at an unfunded \$350 million a year for a capital cost of \$500,000,000.

How many billions have you projected for the cost and who do you expect to pay for it?

The County of Los Angeles through the anticipated Clean Water Clean Beaches plans to raise funding for projects per a parcel tax. There is no baseline or measurement.

There is not enough geological assessment to identify nature versus man-made sources.

For instance, the City of Los Angeles and the Applicant LA Event Center LLC and LA Convention Hall LLC plans an NFL National Football League Stadium with absolutely no mention of the Watershed and Pollutants at the immediate site or any along the travel pathway of the thousands and thousands of visitors traveling to the site.

Caltrans' comments on this particular project made no mention of the pollutant load or mediation, yet travel on Caltrans right-of-ways is a major part of the success of the project.

Why the negligence. How can BMPs handle such increase in volume and related pollutants.

The urban setting needs more analysis and science behind these policy decisions. Lacking is the Public Health standards around BMPs and the jurisdictional responsibility. Outbreak of disease has never been addressed. The Southern California Bight needs to be addressed.

Basin Plans are implementing TMDLs without the collection of the vast information needed to determine applicability and reduction results. LID Low Impact Ordinances may have no effect whatsoever.

We do not see the structure at the Regional Board level to conduct proper monitoring and compliance of the Permits. This is becoming a ministerial process, taking it out of project responsibility, leaving the public as bearer of the financial burden for compliance.

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