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To: CBSC@DGS
Subject: Comments BSC-EF-01-15-NOPA-Pt11 due 10.26.2015

Public Health and Safety must be the first consideration.

Model Water Efficient Landscape Ordinance lacks jurisdictional issues including testing and monitoring of storm water collection devices or storage in relationship to contaminants and vector control issues.

A Department of Public Health, not a Building and Safety department, needs to oversee the results the lab testing. As we have learned in the City of Los Angeles Bureau of Sanitation, not all storm water collection is used for the intended irrigation. If the (bacteria) counts do not meet a County health guideline, then the water must be flushed down the storm drain. Any water sitting past the regulated period for vector control, must not be used.

It is unclear of the effects on birds and wildlife.

We see no Monitoring Plans in the environmental documents of storm water capture projects and this regulation does not address that issue. Most of the documents are related to the construction process only and not the outgoing monitoring required for this type of use.

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