



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

Correspondence Received

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
64.		Oppose	Mark A Grey	



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64.		Oppose	Patricia K Johns	Members of the Board: I am writing to request that the Board defer the proposed revisions to Chapter 12.84 of the Los Angeles County Code from the current agenda in order to allow for additional review and input from the engineering, development, and environmental community. The County is obligated to align the Low-Impact Development (LID) Ordinance with the requirements of the 2021 MS4 Permit, and it appears that the proposed revisions do not align with the 2021 MS4 permit. The non-aligning revisions warrant further evaluation by the practitioners who will be responsible for interpreting, designing and constructing under these updated standards. The professional engineering community was provided with the opportunity to review the draft ordinance in February 2025 where these issues were brought up. Subsequently, there has been no response to comments, or revisions to the ordinance reflecting the comments. Contrary to the Board letter, this ordinance update will have a negative impact on current County Services and projects. Specifically, the ordinance unnecessarily restricts the definition of "Biofiltration" and "Flow-based BMPs" such that affordable housing and infill development projects will take approximately three months longer to permit by requiring project by project review by the Water Board. The more restrictive definitions are contrary to the County's Strategic Plan North Star 1 and North Star 2. Development projects on sites constrained by space limitations or geotechnical hazards, including many infill and redevelopment sites developing Housing for Homeless and affordable housing currently have access to innovative high performance biofiltration systems. The changes to the LID Ordinance will restrict access to these important tools without project specific review by the Waterboard. This will increase development costs and extend design to construction timelines. These restrictions also hamper Vibrant and Resilient Communities and Climate health goals by restricting the implementation of Low Impact Development designs that provide superior water quality outcomes based on current science. If order to provide the County the opportunity to more closely align their ordinance with the requirements for the 2021 MS4 permit and meet their North Start goals, I respectfully request that the Board: 1. Defer this item from the current agenda, and 2. Direct Public Works to conduct additional outreach, workshops, or stakeholder review sessions with licensed civil engineers, hydrology professionals, developers, and other affected parties prior to bringing the ordinance back for adoption, and 3. Align the ordinance align with the MS4 permit by revising the Ordinance definitions of "Flow-based BMPs" and "Biofiltration" Thank you for your attention to this request and for your continued leadership on water quality and sustainable development in Los Angeles County. I would welcome the opportunity to participate in any future stakeholder discussions.

As of: 11/17/2025 9:00:23 PM

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
64.		Oppose	Vaikko Allen	Please see the attached letter requesting that this item be withdrawn from the consent calendar for amendment.
		Item Total	3	
Grand Total			3	