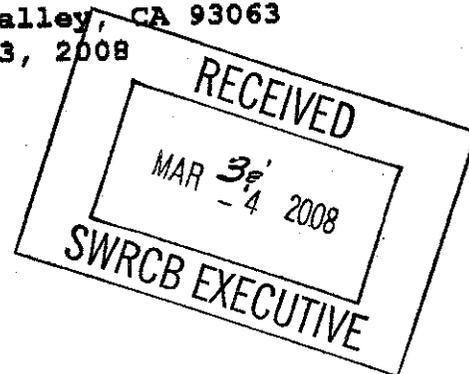


3/18/08 Bd. Mtg. Item 11
Wetlands & Riparian Areas
Deadline: 3/5/08 by 12 p.m.

3152 Shad Court
Simi Valley, CA 93063
March 3, 2008



Ms. Jeanine Townsend, Clerk
to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: "Comment Letter - Policy to Protect Wetlands and
Riparian Areas."

Dear Members of the Board:

For over a year, I have been addressing many State and Regional Water Quality Control Boards' water related issues workshops and draft plans. All have taken extensive research on my part, but none of them compare to the extraordinary effort that I have put into this subject.

Members of the Board, I am willing to concede making it statewide policy to use: 1. the USACE/USEPA's "wetlands" definition (without additional modifications by the Water Boards since it is already recognized that California has a diverse array of wetlands; this can be stressed in the Resolutions Recitals), and 2. the USEPA's "watershed management" approach even though:

1. the USEPA (Washington, DC headquarters) has time and again denied my investigation requests of the City of Simi Valley's non-compliance with the NPDES Permit regional storm water detention basins mitigation measures,
2. the USACE (Los Angeles Office) did not hold a public hearing on the City of Simi Valley's Tapo Street over the Arroyo Simi Bridge project--no EIR done,
3. the Santa Monica Mountains Conservancy's complacency in monitoring the Corriganville Park \$1,000,000 State grant which allowed the City of Simi Valley to levy the fraudulent Royal Corto

Assessment District No. 89-1 on the Griffin Homes "Greenbriar" housing tract first time homebuyers, low-income families, and retirees--the City Council approved the fees by a 3:0 vote in violation of the State's 4/5ths law, and "majority protest" rule, and the City's development project Engineering Report tacked onto the Acquisition Phase costs assessed homeowners a 1/3rd or more of the Construction Phase costs; the City issued Series A Bond fees are in effect until 2016, and go with the homes whose owners have not paid off the \$20,000+ to date each time the home is sold,

4. the County of Ventura has to date not responded to my public review comments letter on the Draft Multi-Jurisdictional Hazard Mitigation Plan--the document approved by the Board of Supervisors is incomplete and inaccurate--a violation of the public participation process,
5. the Ventura County Watershed Protection District has to date not responded to my public review comments' letter on the Draft Flood Mitigation Plan --the document approved by the District Board of Directors is incomplete and inaccurate--a violation of the public participation process,
6. the Federal Emergency Management Agency (FEMA) to date has not responded to my public review comments' letter on the current Ventura County Flood Insurance Study (FIS), and Flood Insurance Rate Maps (FIRMs)--these documents are incomplete and inaccurate--a violation of the public participation process,
7. the Federal Emergency Management Agency (FEMA) approved the City of Simi Valley's 1997 FIS and FIRMs in an inaccurate state,
8. the City of Simi Valley does not respond to my letters on the fiscal year Preliminary Base Budgets--an egregious violation of the public participation process,
9. the City of Simi Valley does not comply with my California Records Act requests for copies of the

City Council approved Final City Budgets--a violation of the public participation process,

10. the County of Ventura does not respond to my letters on various Board Agenda Items--egregious violation of the public participation process,
11. the State of California, the Federal government, and the City of Simi Valley conspired to defraud Ginn Doose of her home, and property water rights, and have kept her from being heard in court in order to record the Writ of Possession--an egregious violation of her constitutional civil rights and civil liberties,
12. the U.S. Department of Homeland Security's Office of Inspector General (formerly the FEMA's OIG) has taken years investigating the City of Simi Valley, and the County of Ventura's federal funding applications for the regional storm water detention basins projects--OIG Complaint Number: 0403210 also includes investigation of the Tapo Canyon Water Treatment Plant federal funding request,
13. I still have concerns over joint NPDES Permits,
14. I still have concerns over the health and welfare of the volunteers, most especially the children, who participate in creek cleanup projects that are now connected to coastal cleanup annual events, and Earth Day related activities since they do not wear the protective equipment and get the shots like local governments employees,
15. "extensive monitoring" has not occurred in the upper part of the Calleguas Creek Watershed,
16. the "short-term" Calleguas Creek "watershed-wide regional monitoring program" that "was created to fill in data gaps" eliminated supposedly "duplicative and unnecessary monitoring",
17. U.S. Senator Russ Feingold(S.1870), and House Rep. James Oberstar(H.R.2421) in 2007 had to propose bills to Amend the Federal Water Pollution Control Act to clarify waters of the United States,

18. the National Audubon Society's conclusion that the USEPA "falls short in protecting wetlands",
19. U.S. Senator Hillary Clinton's Bills S.1911 (TCE), and S.2549 (Environmental Justice) are stuck in the U.S. Senate's Committee on Environment and Public Works,
20. I am opposed to the policy of NPDES Permit program "water quality trading",
21. the Cal/EPA's DTSC's public notices on the Boeing Company's Santa Susana Field Laboratory (SSFL) public review and comment periods for related documents do not appear in the local newspapers' "Classified" sections--they appear instead in the main section which can be overlooked, and
22. the Boeing Company's Santa Susana Field Laboratory (SSFL) will not be listed as a "Superfund" site.

Members of the Board, while I concur with the USACE/USEPA "wetlands definition", and with the "water management approach" proposed statewide policy, please note that I disagree with the "Phases" as proposed. Also, there are too many open ended issues that have not been determined for any additional alternatives and recommendations considered in the future above and beyond those already outlined in the 2004 Workplan.

Members of the Board, Wetlands and Riparian Areas must be protected at the same time. The proposed policy does not state "protect Wetlands now and much later protect Riparian Areas". Riparian Areas definitions and objectives must be approved at the same time as those for wetlands.

Members of the Board, Wetlands must be protected at the same time from dredge, fill, and all other activities that affect water quality.

Members of the Board, the Los Angeles Regional Water Quality Control Board's December 2007 Water Management Initiative Chapter must be corrected to stipulate "Ventura County Watershed Protection District (formerly the Ventura County Flood Control District)" on Page 2.10-13; top

paragraph, second sentence. The WMI must also have a paragraph for the "SANTA SUSANA FIELD LABORATORY SITE CLEANUP PROGRAM" like the "DOD SITE CLEANUP PROGRAM" added.

Members of the Board, I am not quite sure about the use of the "assessment method for collecting wetland data to monitor progress toward wetland protection and to evaluate program development" since I ran out of time to research this part of the proposed statewide policy.

Members of the Board, the public participation process must be protected from becoming an endangered species; mere Water Boards' policies mention of commitment is not enough.

JORDAN REFERENCES

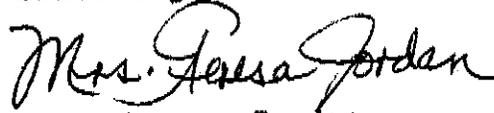
1. December 2007, Watershed Management Initiative Chapter (LARWQCB).
2. March 2003, Elements of a State Water Monitoring and Assessment Program (USEPA; 841-B-03-003).
3. January 1987, Wetlands Delineation Manual (USACE).
4. October 2007, Simi Valley General Plan Update Technical Background Report--contains inaccuracies (City of Simi Valley).
5. March 2004, Interim Draft Calleguas Creek Watershed TMDLs (Calleguas Creek Watershed Management Plan).
6. December 2004, An Evaluation of Compensatory Mitigation Projects Permitted Under Clean Water Act Section 401 by the Los Angeles Regional Quality Control Board, 1991-2002 (LARWQCB).
7. August 2007, An Evaluation of Compensatory Mitigation Projects Permitted Under Clear Water Act Section 401 by the California State Water Resources Control Board, 1991-2002 (SWRCB - Cal/EPA).
8. May 2007, H.R.2421--"waters of the United States" (U.S. House Rep. James Oberstar Bill).
9. July 2007, S.1870--"waters of the United States" (U.S. Senator Russ Feingold Bill).

10. August 2007, S.1911--"TCE" (U.S. Senator Hillary Clinton Bill).
11. January 2008, S.2549--"Environmental Justice" (U.S. Senator Hillary Clinton Bill).
12. June 2006, Rapanos vs. United States Case (U.S. Supreme Court Ruling).
13. September 2004, Carabell vs. USACE Case (U.S. Supreme Court Ruling).
14. January 2001, Solid Waste Agency Northern Cook County v. USACE Case (U.S. Supreme Court Ruling).
15. March 2003, Comment on Advanced Notice of Proposed Rulemaking on Definition of "Waters of the United States" (SWRCB - Cal/EPA).
16. January 2001, EFFECT OF SWANCC V. UNITED STATES ON THE 401 CERTIFICATION PROGRAM letter from Craig Wilson, Office of Chief Counsel, to the State Board Members and Regional Board Executive Officers (SWRCB - Cal/EPA).
17. April 2003, REGULATORY STEPS NEEDED TO PROTECT AND CONSERVE WETLANDS NOT SUBJECT TO THE CLEAN WATER ACT - Report to the Legislature Supplemental Report of the 2002 Budget Act (SWRCB - Cal/EPA).
18. March 2007, Public Scoping Meeting for Proposed Wetland and Riparian Area Protection Policy - Informational Document (SWRCB; Cal/EPA).
19. April 2007, Wetland & Riparian Area Protection Policy CEQA Scoping Presentation (SWRCB & RWQCBs).
20. May 2006, Integrated Watershed Protection Plan Fiscal Year 2005 Zone 3 (Ventura County Watershed Protection District).
21. December 2003, Contemporary streamkeepers: a comparison of two urban horticultural restoration programs [Temescal Creek, Alameda County, Northern California; and White Oaks Creek, Ventura County, Southern California] (Charles Rowley - University of

California, Berkeley Multi-Campus Research Unit;
Water Resources Center Archives Restoration of
Rivers and Streams; Final Draft).

22. June 2007, Ventura Countywide Stormwater Quality Management Program Presentation to the Local Government Commission (Ventura County Regional Watershed Planning Project).
23. February & March 2008, Website Information (USEPA).
24. March 2008, Website Information (USACE).
25. September 2003, Watershed-Based Permitting Under the National Pollutant Discharge Elimination System (NPDES) Program: A Summary of Related Background Information (Tetra Tech, Inc.).
26. March 2008, Website Information (Southern California Wetlands Recovery Project).
27. November 2001, Regional Restoration Strategy (Southern California Wetlands Recovery Project).
28. March 2008, "Water Resources Glossaries" Website Information (USGS).
29. March 2008, Southern California Wetlands Inventory (<http://ceres.ca.gov>).
30. Date Unknown, "A Compilation of Technical Water, Water Quality, Environmental, and Water-Related Terms" "Water Words Dictionary" (State of Nevada, Department of Conservation & Natural Resources Division of Water Resources).
31. November 2003 2nd Edition, Water Quality: Diffuse Pollution and Watershed Management (V. Novotny).

Sincerely,



Mrs. Teresa Jordan