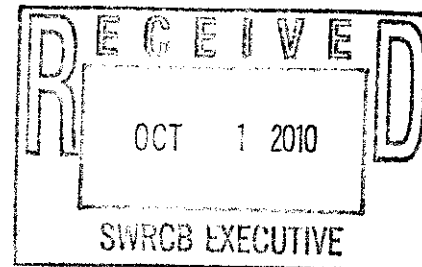


3152 Shad Court  
Simi Valley, CA 93063  
October 1, 2010

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



Re: "Comment Letter - CGP Reopener".

Dear Ms. Townsend:

After reading the documentation for the aforementioned subject, adopted Order No. 2009-0009-DWQ, and my letters of April 29, 2009, April 30, 2009, and May 1, 2009(2), the following comments on ORDER NO. 2010-XXXX-DWQ (NPDES NO. CAS000002) are submitted for the Board's consideration.

- #1 - I am opposed to modifying the adopted Construction General Permit definition for Legally Responsible Person (LRP). (Appendix 5 - Glossary page 5)
- #2 - I am opposed to modifying the adopted Construction General Permit definition for Approved Signatory. (Appendix 5 - Glossary pages 1-2)
- #3 - I am opposed to the proposed modifications to Section D. Obtaining and Terminating Permit Coverage of the adopted Construction General Permit's Section D. Obtaining and Terminating Permit Coverage. (Fact Sheet pages 11-12)
- #4 - I am opposed to the proposed modifications to all of the Electronic Signature and Certification Requirements section. (Section IV - Special Provisions pages 24-25)
- #5 - I am opposed to the proposed modifications to Section 9. Electronic Signature and Certification Requirements ("a.", "i", "(1)", "(2)", "ii", "iii", "b.", and "c."). (Attachment A, Section E - Special Provisions pages 10-11)

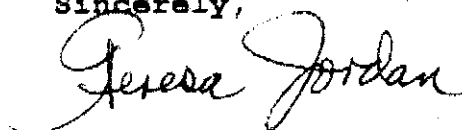
QUESTIONS

1. Legal Notice of Adoption Hearing, Page 1 (bottom of Background section) and Page 2 (top of page), it is stated "When the Construction General Permit became effective on July 1, 2010, State Water Board staff received, and has continued to receive, numerous complaints that the definition of LRP for non-linear construction projects is unduly burdensome and threatens to stall many important construction and other land disturbance projects in the state". How many complaints have been received?
2. How many complaints were received for "unduly burdensome" reasons?
3. How many complaints were received for "threatens to stall many important construction and other land disturbance projects"?
4. How many complaints were received by E-mail?
5. How many complaints were received by telephone/cell-phone?
6. How many complaints were received by other communication means? What form of communication were they?
7. From whom were the complaints received--type of entity?
8. How is the adopted Order "unduly burdensome"?
9. How does the adopted Order "threatens to stall many important construction and other land disturbance projects in the state"?

In my first May 1, 2009 letter, I wrote that "the LRP for a municipality must be only the 'ranking elected official'-- for a city, the Mayor; for a county, the Board of Supervisors' Chairperson" (Comments #10, #11, and #12). I have not submitted those words lightly to the State Water Resources Control Board, nor to the Los Angeles Regional Water Quality Control Board.

- "DA, FBI investigating city of Oxnard: Officials swarm City Hall, locking down building after warrant served", the Ventura County Star, August 13, 2010.
- "Moorpark terminates public works director for undisclosed reason", the Ventura County Star, August 17, 2010.
- "Ex-Santa Paula public works chief finds new job with county", the Ventura County Star, August 30, 2010.

Sincerely,



Teresa Jordan