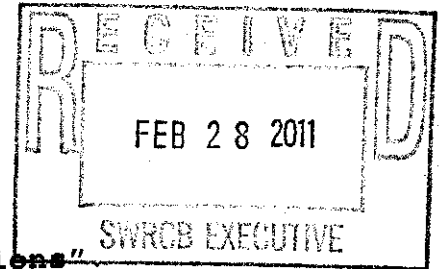


3152 Shad Court
Simi Valley, CA 93063
February 28, 2011

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



Re: "Comment Letter - ASBS Special Protections"

Dear Ms. Townsend:

The following are my comments on the aforementioned subject for the State Water Board's consideration.

- #1 - I am in opposition. When I read the public notice, I decided not to comment since I had given my two cents on a couple of areas during the Ocean Plan update. Then, I read the January 18, 2011 Program Draft EIR, Resolution No. 74-28, and the August 2010 Map of the State Water Quality Protection Areas of Biological Significance and I could not remain silent.
- #2 - The January 18, 2011 Program Draft EIR cover states "California 40 years of WATER LEADERSHIP WATER BOARDS". Since the State Water Board's Resolution No. 74-28 has been compromised, the future exceptions will also compromise the Ocean waters for beneficial uses because there is no true water leadership by the State and Regional Water Boards, just excuses of lack of staff, lack of resources, pressure from dischargers, and compliance costs to dischargers. This policy is geared toward shielding dischargers from current and future public lawsuits.
- #3 - The Program Draft EIR pages, Page 2 of 331 to Page 18 of 331, are not numbered. Also, these pages did not include the statement "ASPS Program Draft Environmental Report January 18, 2011" as was the case with the rest of the pages, Page 19 of 331 to Page 331 of 331.

- #4 - To the Table of Contents page, unnumbered Page 3 of 331, add "S.0 SUMMARY.....6".
- #5 - Unnumbered Page 3 of 331, Table of Contents, "S.0 SUMMARY.....6" must be in bold print.
- #6 - Unnumbered Page 3 of 331, Table of Contents, "S.1 INTRODUCTION", "S.2 TYPE OF EIR", "S.3 PROJECT OBJECTIVES", "S.4 PROJECT CHARACTERISTICS", And "S.5 ALTERNATIVES" must be in bold print.
- #7 - Unnumbered Page 3 of 331, Table of Contents, the titles of "S.1", "S.2", and "S.3" must be properly indented for consistency.
- #8 - Unnumbered Page 3 of 331, Table of Contents, the titles of Section 5.0 ENVIRONMENTAL BASELINE subsections must be properly indented for consistency.
- #9 - Unnumbered Page 3 of 331, Table of Contents, the subsections of Section 6 must be properly indented for consistency.
- #10 - Unnumbered Page 3 of 331, Table of Contents, relocate Section 7.0 ECONOMIC ANALYSIS OF SPECIAL PROTECTIONS.....287 to unnumbered Page 4 of 331.
- #11 - Unnumbered Page 4 of 331, Table of Contents, properly indent the titles of Sections 7.1 to 7.7 for consistency.
- #12 - Unnumbered Page 4 of 331, Table of Contents, subsections "7.4" to "7.7" and their titles must be in bold print for consistency.
- #13 - Unnumbered Page 4 of 331, Table of Contents, subsections "8.1" to "8.3" and their titles must be in bold print for consistency.
- #14 - Unnumbered Page 4 of 331, Table of Contents, add a section for "TABLES" and list the Tables and their respective page numbers.

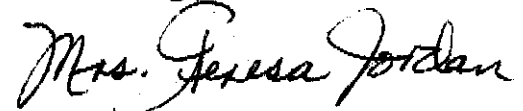
- #15 - Unnumbered Page 10 of 331 to Page 15 of 331, the text for the "Alternatives" and "Proposed Project" is confusing when the "Project Alternatives" information on Page 52 of 331, Page 53 of 331, and Page 54 of 331 is compared.
- #16 - Unnumbered Page 11 of 331, Table S.1, the titles of the "Alternatives" and "Proposed Project" do not match the "Project Alternatives" titles mentioned on Page 52 of 331, Page 53 of 331, and Page 54 of 331.
- #17 - Unnumbered Page 11 of 331, Table S.1, if the words "Comparison of Impacts of the Alternatives with Those of the Proposed Project" do not comprise the title, then add a title in bold print. If this is the title, it must be in bold print for consistency.
- #18 - Unnumbered Page 11 of 331, Table S.1, modify "No Action (Status Quo Alternative)" to read "Alternative A: No-Project Alternative (i.e., No Exception)"; or a combination of the two titles.
- #19 - Unnumbered Page 11 of 331, Table S.1, modify "Change Ocean Plan (Prescriptive Alternative)" to read "Alternative B: Amend the Ocean Plan's Prohibition to Allow Existing Discharges into ASBS under Special Conditions"; or a combination of the two titles.
- #20 - Unnumbered Page 11 of 331, Table S.1, modify "Continue with general exception for Non-point Source and Storm water discharges: a. With enforcement for noncompliance with waste discharge (Preferred Alternative)" to read "Alternative D: Implement a General Exception for Selected Discharges (Preferred Alternative)"; or a combination of the two titles.
- #21 - Unnumbered Page 11 of 331, Table S.1, modify "Continue with general exception for Non-point Source and Storm water discharges: b. Without enforcement for noncompliance with waste discharge prohibition" to read "Alternative C: Implement Individual Exceptions for Each Storm

Water and Nonpoint Source Discharger"; or a combination of the two titles.

- #22 - The reader should not have to take the time to match the "Alternatives" and "Proposed Project" information from Table S.1 on Page 11 of 331 with the "A" through "D" Project Alternatives information on Page 53 of 331, and Page 54 of 331. If it is preferable to keep the Alternatives and Proposed Project language provided in Table S.1 (and text on Page 11 of 331 to Page 15 of 331) then include the Alternative letter and page number. The information on these pages must coincide to be "reader-friendly".
- #23 - Unnumbered Page 11 of 331, Table S.1, it is confusing to have "Prescriptive Alternative" and "Preferred Alternative". Even though the discharger community, environmental groups, and the USEPA have not supported the changes to the Ocean Plan under the Prescriptive Alternative, Board staff is hoping for its implementation over the Preferred Alternative. This is a major contradiction.
- #24 - Page 22 of 331, the applicants named in the Project title do not add up to the "27 applications" received. The applicants listed in Table 1 (Page 23 of 331, Page 24 of 331, Page 25 of 331, and Page 26 of 331) add up to 28. The Project title must name the applicants and their respective ASBS. The Project title must not include an applicant in parenthesis.
- #25 - It is stated on Page 124 of 331 and Page 125 of 331 that "No Survey Conducted" for Del Mar Landing ASBS, Salmon Creek Coast ASBS, San Nicolas Island & Begg Rock ASBS, and San Clemente Island ASBS (Table 5.5.1).
- #26 - It is stated on Page 195 of 331 that "no information provided" by the Humboldt County-Public Works Dept. for ASBS 7, and by the U.S. Dept. of the Interior-redwood National State Parks for ASBS 8 (Table 5.8.1).

- #27 - It is stated on Page 196 of 331 that "no information provided" by the Los Angeles County-Dept. of Public Works for ASBS 24, the Malibu City-Public Works for ASBS 24, and the Connolly Pacific Company for ASBS 25 (Table 5.8.1).
- #28 - Page 195 of 331, Table 5.8.1, for ASBS 7 and 8 capitalize the "n" in "no information provided" for consistency.
- #29 - Page 195 of 331, Table 5.8.1, for ASBS 11 capitalize the "u" in "unknown, personal/private property use only" for consistency.
- #30 - Page 196 of 331, Table 5.8.1, for ASBS 24 and 28 capitalize the "n" in "no information provided" for consistency.
- #31 - Page 195 of 331, Table 5.8.1, for ASBS 6, 7, 8, and 9 include the city, county or federal agency designation with the applicants "Dept. of Parks and Rec.", and "Dept. of Parks and Rec".
- #32 - Page 196 of 331, Table 5.8.1, for ASBS 24 include the county, city or federal agency designation with the applicant "Dept. of Transportation".
- #33 - Page 196 of 331, Table 5.8.1, for ASBS 24 include the county or federal agency designation with the applicant "Dept. of Parks and Rec.".

Sincerely,



Mrs. Teresa Jordan