

3152 Shad Court
Simi Valley, CA 93063
May 1, 2009

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

Re: "Comment Letter - Draft Construction General Permit."

Dear Ms. Townsend:

This letter is a follow-up to my April 29, 2009 and
April 30, 2009 letters.

DRAFT ORDER(Continued)

- #7 - Page 15, Section 6, I am opposed to the grand-fathering clause.
- #8 - Under the SPECIAL PROVISIONS section, there must be a "Duty to be Honest" requirement.
- #9 - Page 22, Section G.1, change "three years" to "five years".
- #10 - Page 23, Section I.1.a.iii(Electronic Signature and Certification Requirements), 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.
- #11 - Page 24, Section b.iii, the Mineral Estates LRP for a municipality must be only the "ranking elected official"--for a city, the Mayor; for a county, the Board of Supervisors' Chairperson.
- #12 - Page 24, Section 2, "All SWPPP revisions, annual reports, or other information required by the General Permit(other than PDRs and NOTs) or requested by the Regional Water Board, State Water Board, USEPA, or local storm water management agency shall be certified and

submitted" by the "ranking elected official" for a municipality--for a city, the Mayor; for a county, the Board of Supervisors' Chairperson.

#13 - Page 28, Section B, number 3 (NELs) is incorrect. Change number 3 to read "1."

#14 - Page 29, number 4 is incorrect. Change number 4 to read "2."

#15 - Page 29, number 5 is incorrect. Change number 5 to read "3."

#16 - Page 32, Section B (SWPPP Certification Requirements), change "a." to read "A QSD shall have one of the following registrations or certifications, and appropriate experience, as required for:". Change Sections "b." through "g." to read as follows:

- i. A California registered professional civil engineer;
- ii. A California registered professional geologist or engineering geologist;
- iii. A California registered landscape architect;
- iv. A professional hydrologist registered through the American Institute of Hydrology;
- v. A certified professional in erosion and sediment control registered through Certified Professional in Erosion and Sediment Control, Inc; (please note that the "." after Inc is missing in the text)
- vi. A certified professional in storm water quality registered through Certified Professional in Erosion and Sediment Control, Inc.;
- vii. A certified professional in erosion and sediment control registered through the National Institute for Certification in Engineering Technologies; or".

#17 - Page 33, Section h, change to read as follows:

"viii. A minimum of five years experience in developing SWPPPs for construction sites to comply with NPDES permits."

#18 - Page 33, numbers 2 and 3 change to "b." and "c."

#19 - Page 33, number 4 change to read "2. Qualified SWPPP Practitioner: The discharger shall ensure that all BMPs required by this General Permit are implemented by a Qualified SWPPP Practitioner (QSP)." Change "a." to read "A QSP is a person responsible for non-storm water and storm water visual observations, sampling and analysis, and for ensuring full compliance with the permit." Change "b." to read "Effective [two years from the date of adoption of this General Permit,] a QSP shall be either a QSD or have one of the following certifications:

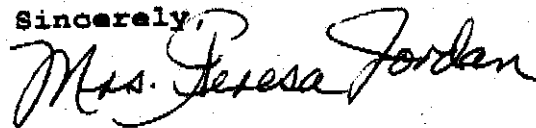
- i. A certified erosion, sediment and storm water inspector registered through Certified Professional in Erosion and Sediment Control, Inc.; or
- ii. A certified inspector of sediment and erosion control registered through Certified Inspector of Sediment and Erosion Control, Inc."

#20 - Page 33, numbers 5, 6, and 7 change to read "3.", "4.", and "5."

#21 - Page 37, Section XV. REGIONAL BOARD AUTHORITIES, add the word "WATER", or "WATER QUALITY CONTROL" between "REGIONAL" and "BOARD".

Ms. Townsend, I will submit my comments on ATTACHMENT A and ATTACHMENT B in a follow-up letter.

Sincerely,



Mrs. Teresa Jordan