

3152 Shad Court
Simi Valley, CA 93063
May 18, 2009

CA Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street
Los Angeles, CA 90013
ATTN: Man Voong

Re: LOS ANGELES REGION INTEGRATED REPORT CLEAN WATER ACT
SECTION 305(b) REPORT AND SECTION 303(d) LIST OF
IMPAIRED WATER AVAILABILITY OF DOCUMENTS AND PUBLIC
COMMENT PERIOD.

Dear Man Voong:

The following are my comments from a lay person's
perspective for the Regional Water Board's consideration.

#1 - Page 2, it is stated in the legal NOTICE, under
Background of the 2008 Integrated Report, in the
first paragraph that "The Regional Water Board is
proposing to revise the surface water quality
assessment under Clean Water Act section 305(b)
and the list of impaired water under Clean Water
Act section 303(d) in a 2008 Integrated Report."

By revising the surface water quality assessment
in 2009 for the 2008 Integrated Report, the
Regional Water Board is in essence changing the
dynamics of NPDES permits' requirements and other
Orders approved for pollutants in discharges that
are impairing waterbodies throughout the region.
It would be a different picture if the Integrated
Report stated something to the effect that
beginning in XX XX, XXXX the proposed criteria
(Table 3-2 Lakes: Nutrient Concentration and
Biological Response Indicators Criteria Limits
(Rivers and Streams), and Table 3-3 Rivers and
Streams: Nutrient Concentration and Biological
Response Indicators Criteria Limits(Lakes)) will
be used after the Board public hearing.

- #2 - Since the Tables (Draft Integrated Report, Pages 13 and 14) information is inaccurate--Table 3-2 states "Lakes" yet the information is for "Rivers and Streams", and Table 3-3 states "Rivers and Streams" yet the information is for "Lakes"--even if I had the mathematical and technical knowledge to decide which of the mg/Ls and mg/m²s better protects the health of the: 1. public, 2. aquatic life, 3. wildlife, and 4. environment, I cannot comment because my support or opposition would be flawed.
- #3 - Even if I commented on the corrected criteria Tables, and even though it is stated on Page 2 of the Tentative Resolution, top of page, that "Regional Board staff responded to oral and written comments received from the public", there is no guarantee that my comments will be responded to by Regional Board staff. Example: I submitted 5 letters on the Ventura Countywide MS4 NPDES permit (3 by the deadline, and 2 within days of the deadline). Not one of my letters' comments were responded to by Regional Board staff. Many of my comments involved inaccuracies in the documents. It is stated also on Page 2 of the Tentative Resolution, last paragraph before the Executive Officer's statement, that "If during State Board's approval process the State Board determines that minor, non-substantiative corrections to the language of the report are needed for clarity or consistency, the Executive Officer may make such changes, and shall inform the Board of any such changes." The revised documents still contained the inaccuracies that my letters pointed out. The State Water Board is going to be considering corrections to the Calleguas Creek Watershed area's Nitrogen TMDLs. Thus, the Regional Board staff must revise the "Response to Comments" section of the April 30, 2009 Ventura Countywide MS4 NPDES permit.

The Regional Board staff's "Response to Comments" for the Boeing Company's Santa Susana Field Laboratory NPDES permit must also be revised to correct the misspelled name of commenter Ginn Doose--listed as "Moose" on Page 102 of 103.

- #4 - That there are 66 proposed new 303(d) listings in 35 waterbodies (Draft Integrated Report, Page 1, fourth paragraph) does not bode well for the Regional Board's responsibilities and actions. This means that enforcement continues to be a major problem in this region since according to the information on Page 19 (Draft Integrated Report) points to a number of "limitations". It is shameful that so many years have passed and just now the required Integrated Report is providing "the most complete 305(b) report for the Los Angeles Region" (last sentence, Page 19).
- #5 - I am opposed to delisting the Calleguas Creek Reach 4 (Revolon Slough Main Branch: Mugu Lagoon to Central Avenue) for Boron, Sulfates, and Total Dissolved Solids from the 303(d) list.
- #6 - I would have done a better job of addressing this extremely important subject, but already I have delayed commenting on the Department of Water Resources' Draft 2009 Water Plan Update's Volume 3 (Regional Report, specifically the South Coast) since the many draft tentative NPDES permits orders at the Regional Water Board level, and many State Water Board policies and plans that I have addressed have taken up a lot of time cross-referencing other documentation, though the information has all been priceless. Also, the Ex Parte Communications entanglement ate up a lot of my time as well. I have yet to hear from the Staff Senior Counsel from the State Water Board as to whether or not I violated the law. As long as this situation remains in limbo, I am being punished for participating in the public review and comment period because I have pointed out documents' incompleteness and inaccuracies, and in speaking out about defrauding of taxpayers.

Sincerely,

Mrs. Teresa Jordan

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