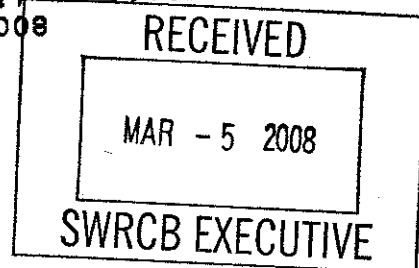


3/18/08 Bd. Mtg. Item 11
Wetlands & Riparian Areas
Deadline: 3/5/08 by 12 p.m.

3152 Shad Court
Simi Valley, CA 93063
March 4, 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:

This letter is a follow-up to my March 3, 2008 letter--
Emailed yesterday, and faxed today. The purpose of this
letter is to present additional comments, make corrections,
and finish listing the rest of the JORDAN REFERENCES.

Members of the Board, it is stated under the "FOREWORD"
section in California Riparian Systems Ecology,
Conservation, and Productive Management (1984 book edited by
Richard Warner and Kathleen Hendrix) that "Rigorous
protection of desert riparian systems, so few in number and
so vital to wildlife, would also seem reasonable,
especially because of their extreme vulnerability to human-
use impacts...there is an awakening public appreciation of
the beauty, interest, and productive values of riverine
forests, streamside woodlands, desert washes and oases, and
their richly endowed ecosystems...Hopefully, from this
auspicious beginning there will emerge enduring public and
private determination to perpetuate the rich values of
riparian systems throughout California." This is one
reason that riparian areas must not take a back seat to the
proposed statewide policy.

Members of the Board, also, in the aforementioned 1984
book, Mr. Huey Johnson states under the "IN MEMORIAM"
section that "Rick Warner" who passed away "since
completing this book...was a remarkable field scientist and
activist who could be counted on to get things done
correctly regardless of the difficulties. He was a strong
moral force that will be sadly missed in the ongoing
struggle to maintain a semblance of environmental quality."

Members of the Board, then, too, among the various topics covered under Chapter 6 ECONOMIC AND SOCIAL VALUES IN RIPARIAN SYSTEMS (California Riparian Systems...) was "A Farmer's View of Riparian Systems 1". The Ventura County Star March 2, 2008 "Government's ability to seize property at stake on ballot" article mentioned that in June Californians will have the opportunity to vote for Proposition 98 and 99--"The initiatives...would make it tougher for government agencies to seize a person's home". The League of California Cities sponsored Proposition 99 is apparently backed by farmers and environmentalists. This initiative and Proposition 98, like U.S. Senator Feingold's and House Rep. Oberstar's "waters of the United States" Bills call into question the independent judgment of the Judiciary Branch of government at the highest level when it comes to protecting fauna, flora, and homo sapiens. Don't let it also be a pressured statewide Protection of Wetlands and Riparian Areas proposed policy judgment on the Executive Branch of the State of California government. I remember when I was following up on the NPDES Permit Program in the middle 1990's and being flabbergasted and unnerved reading that the County of Ventura District Attorney was being pressured. I didn't learn from where, or who, the pressure was coming from. Nor did I ever learn if he gave in, or followed the law. I do know that his office interfered with Ginn Doose's and my research into whether or not the Big Sky owners paid the Court levied fees for the illegal grading case filled on behalf of the people of California. Thus, the judge ruled that we were to have copies done by a copying firm. We were not allowed to make the copies of public information in the County's possession. We did not find a ledger entry, or copy of a check, or any other type of document in the various and numerous stacks of information at the County to verify that the payment of the Court imposed fee had been made.

Members of the Board, I noticed last week that there are 2008 entries for SCA 12 (property-related fees) on the State Legislature's Bill information Website section. I am opposed to levying property-related fees. When the County of Ventura Board of Supervisors undertook in 2005 having the Ventura County Watershed Protection Act amended to authorize such fees it was mentioned in the discussions that large shopping center property owners would end up paying the same as residents because the amount would not be imposed on a weighed scale (understood as "acreage").

Members of the Board, as long as local governments are allowed by the Governor's Office of Planning and Research to slide with regards to updating their comprehensive general plans--warning after 8 years, and after 10 years refer the matter to the State Attorney General--"isolated" waters will continue to plague a comprehensive protection wetlands and riparian areas policy, effort, and accomplishment since the land trading/habitat relocation local governments decisions will continue unimpeded.

Members of the Board, with regards to the "assessment method for collecting wetland data to monitor progress toward wetland protection and to evaluate program development", I am still at a loss about its meaning. Thus, I cannot decide on whether to support or oppose this concept if I don't know if it is the right way, or the best way to do it.

QUESTIONS

1. Does "assessment method" mean monitoring assessment method?
2. Does "assessment method" mean a method for assessing the data gathered?
3. Does "assessment method" mean a method for assessing the compilation of the gathered data?
4. Does "assessment method" mean a method for assessing biological, chemical, radiological, or other type conditions?
5. Does "assessment method" mean a method for setting measurements?
6. Does "assessment method" mean a method for conducting surveys?
7. Does the "assessment method" refer to "accurate assessment method"?
8. Do the State and Regional Water Quality Control Boards use "volunteers" to monitor wetland and riparian areas?

9. If so, are monitoring kits provided for their use, or are they required to purchase them?
10. Does the State's liability insurance policy cover "volunteers" medical needs if injured, or are contaminated, or get infectious disease, etc?
11. How does do the State and Regional Water Boards, or Cal/EPA define "volunteers"--the information in some of the reference documents and programs that I read about mention government employees, universities(not sure if the personnel involved are students, faculty, scientists, scholars, groups, organizations, etceteras), individuals (trained and untrained), organizations(trained and untrained members), and watershed monitoring organizations(perhaps trained)?
12. Do State and Regional Water Boards' staffs know if the various monitor volunteers' groups that provide this activity in California have a uniform checklist, or report, for the conditions observed on the field?
13. Does staff know if there is a uniform method for the compilation of these monitor volunteers' groups checklists/reports/forms?
14. Government agencies' employees have Workman's Comp to fall back on, do State and Regional Water Boards' staff know what kind of insurance coverage is available for the various "volunteers"?
15. Does Cal/EPA, or the Water Boards, hold events to celebrate the annual World Water Monitoring Day?

CORRECTIONS/CLARIFICATIONS (March 3, 2008 Jordan Letter)

1. Page 5, Jordan Reference number 7 should read "Clean" instead of "Clear".
2. Page 7, Jordan Reference number 31, the "V." stands for Vladimir.
3. Page 4, comment number 20, the "water quality trading" should have read "effluent trading".

I don't believe that this program activity accomplishes the water quality objectives that we are all supposed to be striving for. Thus, regulations must be implemented, with a strong stomach to accurately monitor areas, and assess data correctly, and enforce the Clean Water Act as it should have been followed for 30 years.

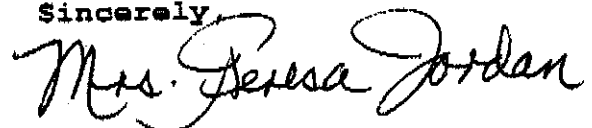
JORDAN REFERENCES (Continued)

32. 1984, California Riparian Systems Ecology, Conservation, and Productive Management (University of California at Berkeley; Editors Richard Warner and Kathleen Hendrix).
33. September 2004, WORKPLAN: FILLING THE GAPS IN WETLAND PROTECTION (SWRCB - Cal/EPA).
34. August 2002, Federal Register Notice: FY 03 Wetland Program Development Grants Guidelines (USEPA).
35. March 2003, Elements of a State Water Monitoring and Assessment Program (USEPA).

Members of the Board, there were many other wetland and riparian areas information Websites that I visited, and many more smaller documents researched that are not listed in my letters. I had to draw the line at some point in order to meet the March 5, 2008 comments deadline.

Members of the Board, I wish that I could have spent more time on this subject because I learned so much, and connected more dots with regards to the lost opportunities for the Santa Susana Field Laboratory (SSFL)--a.k.a. Rocketdyne facility--Community(ies) Study. Alas, the Burn Pit Area public review and comment period is almost upon me, then followed by Groups 8, 5, and 2 RCRA reports, and the 2009 update of the California Water Plan public review and comment periods.

Sincerely,



Mrs. Teresa Jordan