

3152 Shad Court  
Simi Valley, CA 93063  
September 17, 2007

Dr. Xavier Swamikannu  
LARWQCB  
320 W. 4<sup>th</sup> Street, #200  
Los Angeles, CA 90013-2343

2007 SEP 19 PM 12:15  
RECEIVED  
VENTURA COUNTY WATER  
CONTROL BOARD  
GENERAL REGION

Re: Ventura Countywide Second Draft MS4 (NPDES) Permit.

Dear Dr. Swamikannu:

When I first read the aforementioned document, I was set to oppose the item for various reasons. Then, on Sunday, September 16, 2007, I read the Ventura County Star article "Planned new storm-water restrictions cost millions", and decided to support the MS4 second draft permit based on "Ventura County" being "the first jurisdiction in California - and perhaps the nation - to face numeric limits on storm-water pollution"--as reportedly stated by Mr. Jeff Pratt, Director of the Ventura County Watershed Protection District, to the Ventura County Board of Supervisors during a Tuesday, September 13, 2007 workshop. Then, I researched SCA 12 (Torlekson, Lee, and Kuehl), and AB-938 (Calderon). ~~To my dismay, the AB 1003 (Nava) and AB 554 (Karnette/Nava) public deceit game plan had resurfaced.~~

Dr. Swamikannu, while I strongly agree with the article statement that "The rules, for the first time" will "establish limits on the quantity of pollutants allowed into lakes, rivers and the ocean and levy steep fines against those who don't comply", I for one will not stand by and allow the public to be misled, and robbed blindly, nor let the public participation process be violated and circumvented for the sake of bailing out local governments; many of which for decades played games with general fund and special district moneys to aid the business, and development communities through their redevelopment agencies programs and projects--to make rules flexible, waive, defer or delete them--instead of truly looking after the health, safety, and wellbeing of the citizenry.

Dr. Swamikannu, I am opposed to the Ventura County Second Draft MS4 (NPDES) Permit for the following reasons.

- #1 - The Second Draft MS4 Permit does not deal with violations of the public participation process, most especially responses to submitted public review period comments for County of Ventura, Ventura County Watershed Protection District, and 10 cities related documents. Thus, scrutiny by the public is significantly hampered. This is a circumvention of Governor Arnold Schwarzenegger's "open government" policy(found on his Website).

To date, I have not received a response to my letter on the County of Ventura Draft Multi-Jurisdictional Hazard Mitigation Plan(approved in 2005 by the Board of Supervisors in an incomplete and inaccurate form).

To date, I have not received a response to my letter on the Ventura County Watershed Protection District Flood Mitigation Plan(approved in 2005 by the Board of Supervisors in an incomplete and inaccurate form). I also have not received a response to my letter on the Watershed Protection District's existing NPDES related fees.

To date, I have not received a response to my letters on the City of Simi Valley Preliminary Base Budgets for the past 2 fiscal years. My formal requests for copies of City Council approved Final Budgets are not followed through. The City to date has built one of 6 to 11 regional storm water detention basins that it applied for and received millions of dollars from FEMA through the Hazard Mitigation Grant Program, and additional monies from the State's General/ Native American CDBG Program--these dams are NPDES permit related mitigation measures.

- #2 - Permit focuses on major discharge outfalls instead of at each individual polluting source.
- #3 - The Ventura Countywide NPDES Program Permit provides cover for Boeing's SSFL NPDES Permit, and, it's water quality related violations, as well as the penalties levied and paid.
- #4 - While local governments officials and employees are **alarmed** about the costs and requirements,

they are all waiting in the wings like vultures for SCA 12(Torlaksen, Lee, and Kuehl), and AB 938(Calderon)--which open up Pandora's Box with mismanagement, fraud, and embezzlement of funds by restricting public scrutiny--to become law. This is why the Ventura County Star September 16, 2007 article is titled "Planned new storm-water restrictions cost millions" to scare the citizenry into supporting the whims of **alarmed** local governments officials and staff members. But, even the newspaper is not completely convinced of this **alarm** since it not only provides the Ventura County Watershed Protection District's "staggering" estimate of \$140 million, but also mentions a low end cost of \$60 million.

- #5 - Stiff financial penalties and incarceration for local government officials and employees' deception of State and Federal government regulators and the public are not proposed.
- #6 - The Countywide Public Education Program falls short of the necessary mark for true progress.
- #7 - The City of Simi Valley's 1988 General Plan Update will not be speeded up, nor require inclusion of a Water Element, nor condition that the SSFL be covered in its Air Quality Element and Accompanying Technical Document.
- #8 - To date, health impacts to Camarillo, Moorpark, and Thousand Oaks citizens from the SSFL soil, water, and air toxic contaminants have not been disclosed.
- #9 - The City of Simi Valley's 1984 Groundwater Demineralization Study(prepared by Donald G. Rosen) has not been updated.
- #10 - The City of Simi Valley's 1985 Simi Valley West End Groundwater Study(prepared by Leighton & Associates) has not been updated.
- #11 - The City of Simi Valley's 1990 Master Plan of Drainage(prepared by Hawks) has not been updated.

QUESTIONS

1. Has the 1983-1984 Calleguas Municipal Water District's Ground Water Characterization Study been updated?
2. Has the City of Simi Valley's 1980's Water Plan been updated?
3. Has the County of Ventura's 1994 Water Management Plan(Volumes I, II, and III) been updated?
4. What happened to the water that used to flow through the Las Llajas Creek? Was it dammed up in order to be pumped up to the Rocketdyne Santa Susana Field Laboratory?
5. Which Ventura County cities, and communities are "cash-strapped" and will need "to tap existing budgets for emergency response, public works, law enforcement, recreation, and other services to come up with the money for a heightened" NPDES Program Permit--September 16, 2007, Ventura County Star article "Planned new storm-water restrictions cost millions"?
6. Past County of Ventura Public Works Agency problems with "trusts" accounts involved what type of issues that required auditing?
7. Does the City of Simi Valley Municipal NPDES Permit allow the Rancho Simi Recreation and Park District to empty the duck pond water from the Simi Hills golf course/park into the City's sewer, or drains to the Arroyo Simi? If not, does the Ventura Countywide NPDES Permit allow such discharges? If none of these permits allow this activity by the Park District, what does it have to do to comply with the law? Or the District does not have to comply?
8. Are there environmentally-friendly pool and spa cleaning materials that add less contaminated drainage runoff into waterways? If so, where can homeowners, and other residential property owners find such a list?

## SUGGESTIONS

1. Men are amongst the worst water quality offenders.

At home(single family residence) when mowing lawns; trimming trees, and shrubs/bushes; etceteras prefer to wash the material into the street than sweeping it up and throwing the debris in green waste cans.

At home(single family residence) when working on vehicles prefer not to use mats, newspapers, etceteras if the oil is changed; when used oil is emptied from the pan to recycled oil containers.

Public Education campaigns must stress, besides giving suggestions on how to be a better water quality caretaker, what the laws and penalties are(include the Local, State and Federal Governments code sections, and text). This will be useful for residential and commercial lawn maintenance businesses/operators.

2. Each Permittee should include a list of acceptable environmentally friendly pesticides and herbicides on their Websites.
3. Each Permittee should include a list of acceptable (biodegradable?) soap/detergent products to wash vehicles in residential areas(homes, apartments, town homes, condominiums, mobile homes, etceteras).
4. Stress to single family households in local government newsletters, Websites, etceteras the importance of keeping trash containers tightly closed especially on windy days.
5. Cities and communities must do everything in their power to guard from sewage spills into waterways.

Dr. Swamikannu, had the local governments done their jobs instead of kowtowing to the business and development industries, and not made redevelopment projects top priority from the beginning they would not now have to be meeting newer more stringent water quality requirements, and resorting to "hook or by crook" trickery of the citizenry to cover for their ill-conceived shortfalls.

Dr. Swamikannu, if the business and development industries, local governments, parks districts, educational institutions, equestrian centers, animal keeping owners, residents, the public, etceteras do their parts lawsuits; costs and penalties will be minimized; the taxpayers pockets will not get so many hits through fees, and bonds; and State legislators don't have to destroy public scrutiny through ill-advised proposals.

Sincerely,



Mrs. Teresa Jordan

Enclosure:

August 30, 2007, Letter to Cassandra Owens, Los Angeles Regional Water Quality Control Board; Boeing SSFL NPDES Permit. (9 Pages)