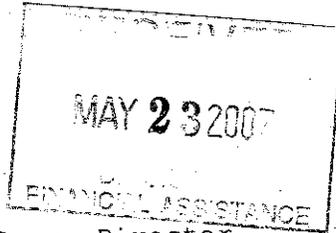


from R. Jordan (1) 5/23/07. 10 PM (20 pp.)
and T.



3152 Shad Court
Simi Valley, CA 93063
February 14, 2007

Mr. Lester Snow, Director
Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814

Re: Agency Requested Public Input on the Integrated
Regional Water Management (IRWM) Grant Program
(Propositions 50, 84, and 1E).

Dear Mr. Snow:

I learned about the January scoping meetings on February 5, 2007 while surfing the DWR's Website on a different water related issue. Since additional opportunities will be scheduled in the future for public input on the aforementioned subject, I am writing now to get my comments in on time. Please note that I utilized the "PROPOSAL EVALUATION Proposition 50, Chapter 8 Integrated Regional Water Management Grant Program Implementation Step 2 Proposals" form (Pages 1-4) made available for PIN: 9604 (the Watersheds Coalition of Ventura County's Integrated Regional Water Management Plan Implementation Project). Please note that the major focus of my comments, questions, suggestions and recommendations is the Calleguas Creek Watershed Area; more specifically that portion that runs through the City of Simi Valley.

Mr. Snow, before I get to my points, I want to state that I am opposed to the whole aspect of integrated regional water management because many fine details and crucial locality points can be missed, or deliberately omitted from submitted grant application forms, and from approved local governments' plans. Too often, for the past 7 years, I have found that City of Simi Valley, and County of Ventura documented plans are incomplete and inaccurate. Since the IRWM system is the law, I am willing to set aside my opposition--even though I am aware that one community can benefit immensely at the expense of other areas that desperately need the grant moneys to avoid disasters but don't have the matching funds--to the process, but only for this grant program public review period. Public safety is first and foremost in addressing issues. Making sure that I am not made a party to ill-conceived, and ill-advised decisions at all levels of government is a close second.

Mr. Snow, please note that my comments are broken down per the "Question" format. I did not include all of the categories. For some of the categories, I included: 1. point of interest statements, 2. statements relevant to issues of concern, and 3. statements that must stand out.

ADOPTED IRWMP AND PROOF OF FORMAL ADOPTION

- #1 - "The IRWMP is currently under development and scheduled for adoption prior to January 1, 2007."

DESCRIPTION OF REGION

- #1 - "...the IRWMP does not address either the future water resources of the region or the water demand for the minimum of 20-year planning horizon."

WATER MANAGEMENT STRATEGIES AND INTEGRATION

- #1 - "The applicant states that the final IRWMP will correlate the water management strategies with the objectives to assign priorities for implementation."
- #2 - "The groundwater management section could be stronger especially since a number of the projects are groundwater related."

PRIORITIES AND SCHEDULE

- #1 - "A long-term list of projects and programs will be identified for implementation and will be included in the final IRWMP."
- #2 - "The applicant does not fully address the criteria because it does not discuss how: 1) decision-making will be responsive to regional changes, 2) responses to implementation of projects will be assessed, and 3) project sequencing may be altered based on implementation responses."

IMPLEMENTATION

- #1 - "Long-term actions are not included in the IRWMP, but are supposed to be included in the final IRWMP."
- #2 - "The applicant does not clearly describe the institutional structure that will ensure plan implementation."

IMPACTS AND REGIONAL BENEFITS

- #1 - "The primary interregional benefit of the IRWMP will be the creation of an institutional structure to bring together different water interests within the region into a single unified group with a common purpose and direction."
- #2 - "The applicant adds that another major benefit of a regional plan is the cost savings to the individual agencies."
- #3 - "The IRWMP does not address the potential negative impacts."
- #4 - "Considering that extensive use of groundwater in the region, observed land subsidence, salt water intrusion, and groundwater basin overdraft, additional discussion on the benefits and impacts of groundwater appears necessary."

TECHNICAL ANALYSIS AND PLAN PERFORMANCE

- #1 - "The applicant states that a detailed strategy for monitoring plan performance will be identified as part of the development of the final IRWMP."

DATA MANAGEMENT

- #1 - "Data will be disseminated through a website that the applicant created."
- #2 - "Originally, the main purpose was to keep coalition members on top of the latest information regarding the IRWMP."

FINANCING

- #1 - "The applicant does not fully describe financing for implementation and O&M costs."
- #2 - "The local funds by project or fund source are not explicitly identified in the IRWMP, although some general categories are listed."
- #3 - "A more detailed plan is needed."

COMMENT: Numbers 1-3, these observations were right on the money so to speak. The reason that: 1. the financing for the implementation and O&M costs were not fully described, 2. the local funds by project or fund source were not explicitly identified with some generalities, and 3. a more detailed plan is needed is due to the fact that Countywide NPDES related flood control/watershed protection district assessment fees were levied without public hearings. These fees cannot be increased without a vote of the people, and County consultants have advised against pursuing increases--the truth would be revealed.

The property-related fees that the County and its cities placed their hopes on to help cover NPDES related projects have been put on the back burner temporarily because the way that the State legislation(Nava) was pursued to get this authorization was rushed, and not all i's were dotted, and t's crossed. The original Nava bill was vetoed by Governor Schwarzenegger. The authorization to levy these fees was eventually signed by the

Governor, but only because the language was included in another legislator's bill at the last minute. But, the signed bill is flawed.

FEMA Hazard Mitigation Grant Program funds for NPDES related County and City of Simi Valley projects are under investigation by the U.S. Department of Homeland Security's Office of Inspector General(OIG Complaint Number: 0403210).

RELATION TO LOCAL PLANNING & SUSTAINABILITY

- #1 - "The applicant will serve as the coordinating body to identify and resolve policy terms and practices between the local plans and the IRWMP."
- #2 - "In addition to extensive coordination with State and federal agencies, over 120 local agencies are represented."
- #3 - "Providing the relationship of specific actions in the IRWMP to specific sections in local planning documents would have resulted in a higher score."

COMMENT: Number 3, by not providing the relationship of specific actions in the IRWMP to specific sections in local planning documents allows the local governments and special districts to control and manipulate water management projects and programs since there is not a lot of public involvement in such matters.

STAKEHOLDER INVOLVEMENT & COORDINATION

- #1 - "More discussion on the stakeholder process related to EJ and DAC concerns would have resulted in a full score."
- #2 - "The applicant provides the forum for conflict resolution and has identified areas of potential conflict with wetlands and within the context of statewide priorities."

COMMENT: Numbers 1 and 2, limiting the discussion on the stakeholder process related to EJ and DAC concerns benefits the applicant and shortchanges the public. Please refer to my comment under RELATIONSHIP TO LOCAL PLANNING & SUSTAINABILITY.

Since my understanding is that the public is also a stakeholder, please note that while the applicant is providing the forum for conflict resolution, I have no confidence in the Watersheds Coalition of Ventura County. Back on January 2005, I submitted a letter to the County Flood Mitigation Plan Coordinator on the Draft Flood Mitigation

Plan. I never received a reply. Also in January 2005 I submitted a letter to Anna Davis, URS Corporation, on the County's Draft Multi-Jurisdictional Hazard Mitigation Plan. I never received a reply. I have notified the Board of Supervisors of this situation on several occasions when addressing other County and Watershed Protection District for the past 2 years to rectify the matter. Instead the County prefers to continue violating the public participation process. These plans were approved by the Board in an incomplete and inaccurate form.

Also, in 2006, I addressed the FEMA/County of Ventura/Nolte current Draft Preliminary Flood Insurance Study (FIS), and Preliminary Flood Insurance Rate Maps (FIRMs). To date, I have not heard from FEMA or the County. The Study was terribly flawed--inaccurate and incomplete. Some of the FIRMs had errors. For example: One FIRM had a major reservoir/dam mislabeled.

For 7+ years, I have addressed the City of Simi Valley Preliminary Base Budgets. For most of that time, I have been the only person present at the Budget staff/public meeting. Two such meetings used to be held. Then, it was dwindled down to one meeting. The citizenry had at least 7 days to review the Preliminary Base Budget between the time the documents (3 or 4) were release and the meeting was held. For the 2006 Budget staff/public meeting, the days were dwindled to less than a week. Not enough time to review all of the information, nor cross-reference the Budget with other pertinent documents. Per City staff request, my comments have been submitted in writing. In 2006, even though I missed the Budget staff/public meeting, I still submitted my written comments. To date I have not received a reply. Without answers to my questions, I am in the dark about local, state and federal funding, projects, and programs. Many times, due to the close scrutiny, I have saved City staff's faces, and my City money with my suggestions and recommendations. Sadly, those who run the City of Simi Valley prefer to violate the

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public participation process. In 2005, I was asked by the Budget staff at the meeting to defer from finishing reading the rest of my FY 2005-2006 Preliminary Base Budget letter.

If I'm not mistaken the City of Simi Valley (WWD#8), and the County (Watershed Protection District) are members of the Watersheds Coalition of Ventura County.

The aforementioned plans, study and maps are crucial to the Integrated Regional Water Management Program. Without complete and accurate documentation and records, the data is flawed, and thus its management is negatively impacted--mismanaged.

The State of CA legislators, and members of Congress that I have written to also don't care much about what I tell them.

With the escalation of natural disasters, and biblical catastrophic proportion ones impacting the Nation more often, FEMA does not have the capital, the personnel, nor the expertise it once used to in order to help out the local, tribal, county, state, and federal governments.

Some insurance companies, for policies issued in the U.S. coastal areas, are substantially increasing home and business coverage rates.

Some insurance companies are refusing to issue policies in some of the coastal areas.

Only time will tell if insurance companies substantially increase rates for policies in inland areas that continuously flood from levee and dam breaks, and poorly maintained and built drainage projects. Or that policy holders will no longer be covered because they didn't prepare or prevent damage to property, or loss of life.

Already the U.S. DHS Secretary has placed the blame on the citizenry, to counter federal government incompetence, or blame is placed on the apocalyptic catastrophe.

WORK PLAN

- #1 - "The proposed projects are summarized and overall the application addresses the criterion well."
- #2 - "Each of the eleven projects is discussed including the goals and objectives, tabulated overview, maps, synergies and linkages, budget, permitting and CEQA, project status, and what is to be built or performed."
- #3 - "Plans and specifications were submitted for four of the proposed projects."

COMMENT: In future PROPOSAL EVALUATION forms, provide the project(Example: C-11) breakdown for all categories instead of just giving the number.

- #4 - "Seven projects are still in conceptual stages, preliminary design stages, or pilot project phase."

COMMENT: In future PROPOSAL EVALUATION forms, provide the project(Example: SC-3) breakdown for all categories instead of just giving the number. Also, breakdown the projects per stage and/or phase.

- #5 - "Tasks are clearly described with expected outcomes, but there is not much discussion on how the individual projects will accomplish overall goals of the IRWMP."

COMMENT: By limiting the discussion on how the individual projects will accomplish the IRWMP's overall goals the applicant benefits, and the public is shortchanged. It shows why proposed projects can be picked in order to just generate additional revenue. Limited discussion leads to someone else, like members of the public, to do the cross-referencing of documents in order to connect the dots and determine if proposed projects are vital, and feasible.

- #6 - "More detail on how the work, including construction, will be performed is needed in the work plan."

COMMENT: Limited detail on how the work will be performed benefits only the applicant, and shortchanges the public's input since too often it is difficult for citizens at the fringes to visit the Public Works Agency to review records, records' copying costs can be prohibitive, and work plans are not posted with Board of Supervisors' Agenda Items staff reports.

Unless a proposed project requires a 4/5ths vote, cities city councils and the county Board of Supervisors agendas don't have to list them under public hearings. Thus, no public notice in the newspapers.

Sometimes it is difficult to access the City of Simi Valley City Council, and Ventura County Board of Supervisors agendized items on their websites because the information cannot be displayed for circumstances beyond local governments'

control, and circumstances that can be under their control.

Close scrutiny by the public is imperative to make sure that contracts are not just awarded to a particular business, or individual, and that contingency fees are not unreasonable, or awarded too often.

BUDGET

- #1 - "The budget items generally agree with the work plan and schedule."
- #2 - "The budgets for all of the proposed projects have cost information by task and the costs are considered reasonable."
- #3 - "...it is difficult to review the detailed budgets without more narrative explanation."
- #4 - "The construction contingencies for Projects C-1, C-3, and C-7 need more explanation."
- #5 - "O&M costs are included for some projects."

COMMENT: Numbers 1-5, for years I have found it extremely difficult to understand and cross-reference the County of Ventura, and special districts' budgets because of the very statement under #3. When there is more narrative explanation for Board agendas items' staff reports, the pertinent detailing is lacking. Unless the reader is aware of, and well versed about, the subject in question, the limited information is a detriment to public participation, and to the scrutiny by the State and federal government agencies.

While the statements under numbers 1 and 2 are welcome, because of the statement under #3, numbers 1 and 2 seem to be in conflict to this reader with the overall conclusions since numbers 3, 4, and 5 outweigh

"generally agree" and "budgets for all of the proposed projects have cost information by task and the costs are considered reasonable."

SCHEDULE

- #1 - "Six of the 11 projects are scheduled to be implemented before December 1, 2007."
- #2 - "The schedules are consistent and generally reasonable."
- #3 - "...some schedules appear overly optimistic. For example, Projects C-11 and SC-3 have construction start dates in October/November 2006, yet design and permitting are not complete."

SCIENTIFIC AND TECHNICAL MERIT

- #1 - "The applicant has documented each project thoroughly with the associated studies or plans that support the technical and scientific merits of the proposal." *** (County/Flood/FEMA plans)
- #2 - "Included in the supporting documents are plans, design alternatives and studies, and required CEQA documents or permits." *** (C/F/F plans)

- #3 - "...more explanation in the application how the references were applied to a specific proposed project would have provided assurance of the projects technical feasibility.

MONITORING, ASSESSMENT and PERFORMANCE MEASURES

- #1 - "The Monitoring, Assessment, and Performance Measures tables provide a concise description of reasonable means to achieve or contribute to the project goals and targets for each goal of the individual projects."

- #2 - For most of the other projects procedural assurance protocols are to be included in the funded activities."

COMMENT: No! Assurances must be stated in the IRWMP.

When the City of Simi Valley submitted its application to the FEMA for Hazard Mitigation Grant Program for the Regional Stormwater Detention Basins Project, their urgency in stemming flooding was highlighted. Out of the six basins (the application may have been for 11 dams but due to City staff not making past documents available--employees see no benefit in revisiting history--I cannot say for sure; the number of basins was discussed in the 1990 City of Simi Valley Master Plan of Drainage. Not all development projects were guided by this document. For Example: The Wood Ranch development--within the area of inundation from the Bard Reservoir/Wood Ranch Dam--'s drainage planning was undertaken with each proposed project. Thus, significant negative cumulative impacts are not well documented, nor reasonable.

Around the middle of the 1990's, then Mayor Greg Stratton wrote that City staff would not be answering my City's Preliminary Base Budget questions because the information would be forthcoming at the time projects were undertaken. Such has not been the case.

Even though the Joint Water Well project between the City of Simi Valley and the Calleguas Municipal Water District has been mentioned at City Council meetings, and the project information has been included in the CMWD's Urban Water Management Plan, to date there have no public hearings on the issue.

ECONOMIC ANALYSIS

- #1 - "The quality of the economic analysis and supporting documentation is good."
- #2 - "WWD recycling project(250 AF) are not included."
- #3 - "Benefits claimed are less than costs, but a variety of benefits claims are conservative."

COMMENT: Please clarify this evaluation statement.

- #4 - "For example, reduced salinity for households and Calleguas/Camarillo feeder avoided costs are not included and the use of fines as a proxy for water quality benefits probably understates the benefits."

COMMENT: Please clarify "the use of fines as a proxy for water quality benefits probably understates the benefits."

- #5 - "The economics of the two most costly projects depend on a larger planned project that includes a brine line and six groundwater desalters."

COMMENT: This reminds me of a City of Simi Valley City Council meeting for HUD Community Development Grant Program funding allocations when one social services provider's application was contingent upon another social services provider's application being funded, and questionable practices by this provider--that jeopardized its non-profit status--would have been funded if the questionable information had not been disclosed in time.

This is also so reminiscent of the City of Simi Valley's Municipal NPDES Permit mitigation measures (construction of detention

basin 1-11 joint project with the County).

PROGRAM PREFERENCES

#1 - "Overall, the projects implemented should provide multiple benefits, improve regional water supply reliability, contribute to attaining water quality standards, address impaired water bodies, and improve groundwater water quality in a DAC."

COMMENT: The evaluation statement is only true as long as the projects are undertaken, and undertaken as the applicant's IRWMP states, and that the applicant has been above board throughout the entire proposal(s) process.

#2 - "The Calleguas Creek projects integrate salt management, riparian habitat improvements, water reuse facilities, and water treatment plant improvements."

COMMENT: Please note that I opposed the Current FEMA/ County of Ventura/Nolte Preliminary Flood Insurance Study (FIS), Preliminary Flood Insurance Rate Maps (FIRMs) did not cover the entire City of Simi Valley. It only undertook the Calleguas Creek Watershed up to the City's westernmost boundary. The Federal Emergency Management Agency relied on the City's previous FIS and FIMRs, but there were also problems with them. Thus, my written opposition to them in 1996. One of the main points of contention was the FIRM that did not correctly name the Las Llajas Creek; it was labeled as a canyon. _

#3 - "The purpose of some activities is to meet regulatory requirements, such as salt and nutrient loadings, TMDLs, and address impaired water bodies on the 303(d) list."

COMMENT: For years, at least as far as the City of Simi Valley is concerned, Municipal NPDES Permit requirements were not met due to various excuses--equipment not functioning correctly, anyone could access the refrigerators where samples were kept because they were not combination or padlocked, and to aid the Rockedyne for its Santa Susana

Field Laboratory's surface, ground and drinking water impacts--and waiting for the Los Angeles Regional Water Quality Control Board rules decisions.

Then, the fear factor relative to the costs associated to deal with the TMDLs was touted

by City Council members to the constituents in order to avoid complying with the LARWQC Board approved rules.

The City of Simi Valley City Council approves the use of its special districts' and special fund accounts to pay for all sorts of things. Since redevelopment projects generate huge revenue for City government, Municipal NPDES Permit projects have taken a back seat since 1992--the year that the City Council approved the request of the County to allow detention basin fees under the then Flood Control District (now Watershed Protection District)'s Benefit Assessment Program; a few years later, the City's Director of the Public Works Department (now the Director of the County's Public Works Agency) informed the City Council that the District had no such funding mechanism in place. Yet, these are those illegal assessment fees because no public hearings took place at the County and cities levels. Yet, the City of Simi Valley City Council approved the use of special districts' funds to purchase property for its regional mall.

Also, the City did not hold public hearings on the regional stormwater detention basins project. The North Simi Drain Regional Stormwater Detention Basin, and the Dry Canyon Regional Stormwater Detention Basin were instead listed under the Agenda's Consent items section. The residents adjacent to the Dry Canyon Regional Storm Water Detention Basin were not notified about the meeting by the County or City. I went around the neighborhood notifying them.

- #4 - "Removing septic systems and installing lines to a WWTP will help to meet RWQCB requirements and improve the local water resource, including those

of a groundwater dependent DAC(El Rio)."

STATEWIDE PRIORITIES

#1 - "Documentation is comprehensive and thorough."

COMMENT: Some of the evaluation counters this.

#2 - "The certainty of meeting Statewide Priorities will depend on obtaining required permits and completion of unfinished project design and subsequent work plans."

COMMENT: It must also depend on the truthfulness, and thoroughness of the applicant.

#3 - "Some conflicts between water users will likely be reduced from those projects that increase water supply, particularly the C-1, C-11, and V-1 projects."

COMMENT: Likelihood is no ensurance.

#4 - "The Calleguas Watershed projects demonstrate, at a minimum, a moderate degree success in meeting floodplain management, desalination of groundwater, or recycling priorities."

COMMENT: Compliance with the NFIP is not guaranteed because the degree of success that the projects will bring is "moderate" even when they are the "minimum".

#5 - "Benefits to Delta and the CALFED Bay-Delta Program are claimed but are not expected to be significant or certain."

#6 - "Surface water right conflicts are only marginally addressed."

COMMENT: Simi Valley resident Ginn Doose has been kept from being heard in State and Federal court in order to record the Writ of Possession for over a decade. She was defrauded of her home through a intricate web of corruption and conspiracy by the governments and corporate America because

her property is tied to water rights.

JORDAN QUESTIONS

1. Does each "Question" have a different scoring range? If so, how many points can be awarded under each "Question"--I notice that some scores range in single digits, and others are in the teens and twenties?
2. Does the DWR review final IRWMPs to monitor that applicants have followed through on what was stated in the PROPOSAL EVALUATION form?
3. With regards to "decision-making will be responsive to regional changes", and "project sequencing may be altered based on implementation responses"--points 1 and 3 under Priorities and Schedule--are these responses related to answers to submitted public review period comments on projects?
4. Who fills out the "PROPOSAL EVALUATION" form--DWR staff members, or the staff of a contractor?
5. Is the Website created by the applicant to disseminate the data included under the County and its cities' Websites "Links" section? Will the cities have this link on their Websites?
6. Is an applicant required to set up a data disseminating website by law? If so, is this website supposed to be perpetual? Will there be an "Archives" section?
7. Will an applicant's "coordinating body" status impact negatively the public hearings process at the cities and county levels? Is such a body legally authorized to resolve policy terms and practices between the local plans and the IRWMP?
8. Is the "City/County Planning Association"--that meets monthly--associated with the Calleguas Creek Watershed Management effort land use subcommittee? Is this related to the Calleguas Creek Watershed Management Plan Group?
9. Are applicants allowed to delete, defer, and/or modify their projects for which funds were applied and allocated?
10. Does the State have a monitoring program in place

for the projects that receive funding?

11. Can applicants submit future applications to cover the costs of projects already submitted and grant funds approved for?
12. Are unused approved grant funds supposed to be returned to the State, or is an applicant allowed to use the moneys toward other water management projects that are not part of the application?
13. Is providing the relationship of specific actions in the IRWMP to specific sections in local planning documents a State code requirement?
14. Are submittals of plans and specifications for all proposed projects a State code requirement?
15. Is the PROPOSAL EVALUATION's "Total Proposal Score" the only determining factor as to which applicant is chosen for funding in each grant program round? Or, does the amount of matching funds also enter into the picture? Do red flag statements--such as not enough detail or discussion--carry any weight in choosing which applicants are funded?
16. How are schedules determined to be "consistent"?
17. How are schedules determined to be "reasonable"?
18. How are proposed projects related costs determined to be "reasonable"?
19. How is the "quality of the economic analysis and supporting documentation" determined to be "good"?
20. Should "WWD recycling project(250 AF)" have been included? Were they not included because recycling projects costs being shouldered by the development community(for water fountains, open space), or existing and new businesses(such as golf courses), park districts(duck, or fishing ponds, aesthetic streams) to benefit from recycled water use?
21. Should it not matter that benefits to "Delta and the CALFED Bay-Delta Program" are not expected to be significant or certain"?

22. Why were groundwater rights not included along with "surface water right conflicts" under the Statewide Priorities" Question?
23. Are grant program applicants supposed to certify the information in their applications--as is the case for HUD CDBG Program applicants?
24. How are the applicants and the DWR reaching out to the legally blind community to inform them about the IRWMP at the local and state levels?

JORDAN SUGGESTIONS

- #1 - Include on the "PROPOSAL EVALUATION" form the date that it is filled out.
- #2 - Include on the "PROPOSAL EVALUATION" form the name of the individual(s) that filled it out. If Agency staff, if name is not feasible, then give the name of the Department. If an employee of a contractor did the evaluation, then give the individual's name, or the contractor's name.
- #3 - Include a number with each "Question" instead of just listing the subject.
- #4 - Include the name of the proposed project(s) instead of just giving the number.

Mr. Snow, under the "Objectives" Question evaluation, the statement is made that the "applicant defines success as when individual projects meet their goals and cumulatively contribute to IRWMP objectives." Success must also be measured by accurate and complete documentation, and compliance with the public participation process. Not only is success important, but so is the protection of the bond funds in light of the SEC's changes to limit shareholder--in IRWMP case "stakeholder"--litigation, and compensation awards. Then, too, the SEC has no authority to take on municipal bond fraud.

For example: Back in 1991, the City of Simi Valley fraudulently levied the Royal Corto Assessment District fees on 63 homeowners at the cost of about \$20,000 for a period of 20 years in the Griffin Homes "Greenbriar" housing tract project. State law required a City Council 4/5ths vote, and the vote was 3-0. Homes in this area that have not paid off the assessment, and are resold carry that illegal

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assessment. The Ventura County Grand Jury first questioned my bringing the issue forward because I was not one of the homeowners, but agreed to look into the matter when I mentioned that a family member was among the 63 homeowners. The Grand Jury found no problem.

Mr. Snow, who ever made the proposal evaluation for the Watersheds Coalition of Ventura County did an exceptional job (agency staff, or contractor employee), even though I have noted shortcomings in my letter. It is not an easy task cross-referencing documents in order to see whether or not applicants comply with set laws, and guidelines.

Mr. Snow, due to the length of this letter, I am not including copies of my January 20, 2005 letter to the Ventura County Flood Mitigation Plan Coordinator, nor my January 26, 2005 letter to Anna Davis, URS Corporation. That information is available through the County of Ventura Website's Board of Supervisors Agenda section for March 1, 2005. If you prefer, I can forward that documentation along with a copy of my letter on the FEMA/County of Ventura/Nolte current Preliminary Flood Insurance Study (FIS), and Preliminary Flood Insurance Rate Maps (FIRMs).

Sincerely,

Mrs. Teresa Jordan

Enclosures:

March 1, 2005, Ventura County Board of Supervisors Meeting Agenda, Correspondence Agenda Items 3 & 6.

February 1, 2007, Letter to Mr. David Todd, Chief DWR Financial and Technical Assistance Branch.
(5 Pages)

from R. Jordan
and T.

5/23/07. (2)

10 PM.

2 pp.

3152 Shad Court
Simi Valley, CA 93063
February 21, 2007

Mr. Lester Snow, Director
Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814

Re: Agency Requested Public Input on the Integrated
Regional Water Management (IRWM) Grant Program
(Propositions 50, 84, and 1E).

Dear Mr. Snow:

This letter is a follow-up to my February 14, 2007 letter on the aforementioned subject. In my February 14, 2007 letter, on Page 20, I stated that I could forward a copy of my letter on the FEMA/County of Ventura/Nolte current Preliminary Flood Insurance Study (FIS), and Preliminary Flood Insurance Rate Maps (FIRMs). I had forgotten that like my January 20, 2005 letter to the Ventura County Flood Mitigation Plan Coordinator, and my January 26, 2005 letter to Anna Davis, URS Corporation, I had also submitted my correspondence on the FIS and FIRMs to the County of Ventura Board of Supervisors for the record. Like the January 2005 letters, the FIS and FIRMs correspondence can be found on the County Website's Board of Supervisors Agenda section (copy enclosed).

Mr. Snow, on February 16, 2007, the article "Federal plan would cede control of water" (copy enclosed) was posted at www.latimes.com. I don't know if the Westlands Water District has applied for any IRWMGP funds in the past or currently. But, if the U.S. Bureau of Reclamation approves an agreement that would have the Westlands Water District "drop out of the system" and "assume the rights to a million acre-feet of water - more than the City of Los Angeles consumes in a year", in order to restructure the federal Central Valley Project, then I want to go on the record in opposition to such an agreement and to any future IRWMGP funding application for projects related to fixing the "San Joaquin Valley drainage problem" that now costs the "U.S. taxpayers several billion dollars to solve" because, as I stated to Governor Arnold Schwarzenegger in my February 20, 2007 letter to him, the moneys from Propositions 50, 84 and 1E could be bankrupted; and for the following reasons.

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- #1 - "forgive a debt of nearly half a billion dollars the irrigators owe for construction of the mammoth project",
- #2 - give Westlands Water District, "the most powerful irrigation district in the state", "even more clout",
- #3 - the U.S. taxpayers are still impacted because the "water Westlands was taking over would continue to be pumped by federal facilities from the Sacramento - San Joaquin Delta, the deliveries would still be subject to endangered species and other environmental restrictions", and
- #4 - "ownership of the San Luis Reservoir near Los Banos" would be transferred to "the joint authority and the state, which uses about half of the reservoir to store supplies for the State Water Project."

My February 14, 2007 illustrates some of the types of insurmountable obstacles that are placed on Californians' shoulders because the public participation process is woefully disregarded by federal and local governments, and special districts. I haven't completely decided about the State's compliance with the public participation process (please refer to enclosed copy of my February 21, 2007 letter to Mr. Jonathan Bishop, LARWQCB Executive Director).

Mr. Snow, since I have not heard from Mr. Mark Stuart, or Mr. David Todd, I kindly request of you a copy of the DWR's comments on the City of Simi Valley/WWD #8's 2005 Urban Water Management Plan Update. I would greatly appreciate it if the information is forwarded to my fax No. (805)522-5016 as soon as possible. Thank you.

Sincerely,

Mrs. Teresa Jordan

from R. Jordan
and T.

(3)
4 pp.

5/23/07

10 PM.

3152 Shad Court
Simi Valley, CA 93063
February 22, 2007

Mr. Lester Snow, Director
Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814.

Re: Agency Requested Public Input on the Integrated
Regional Water Management (IRWM) Grant Program
(Propositions 50, 84, and 1E)..

Dear Mr. Snow:

This letter is a follow-up to my February 14, 2007 and
February 21, 2007 letters.

Mr. Snow, besides my January 20, 2005 letter to the
Ventura County Flood Mitigation Plan Coordinator on the
Watershed Protection District's Draft Flood Mitigation Plan,
my January 26, 2005 letter to Anna Davis, URS Corporation on
the County Draft Multi-Jurisdictional
Hazard Mitigation Plan, and my February 6, and 14, 2006
letters to Mr. Mike Sedell on the Preliminary Flood
Insurance Study (FIS), and Preliminary Flood Insurance
Rate Maps (FIRMs), my May 13, 2005 letter (2 pages) to the
Ventura County Board of Supervisors on the Special Session
with the Ventura County Watershed Protection District on
Flood Protection; Property Related Fees; A.B. 1003 (Nava)
Amended; the Countywide National Pollution Discharge
Elimination System was submitted for the record to the Board
of Supervisors on May 24, 2005. Due to the 85 pages
(includes enclosures), I am once again just enclosing a copy
of the County Board of Supervisors May 24, 2005
Correspondence Agenda--this information can also be found in
the County's Website Board of Supervisors' Agenda & Summary
section (past agendas). My May 13, 2005 letter to the
Ventura County Board of Supervisors validates my February
14, 2007 letter statements.

The following is a list of the correspondence included in
my May 13, 2005 letter to the Ventura County Board of
Supervisors.

May 12, 2005, Letter to U.S. Senator Susan M. Collins;
FEMA Hurricane Katrina Response. (2 Pages)

May 11, 2005, Letter to CA Senator Michael Machado;
A.B. 1003(Nava; amended). (7 Pages)

April 10, 2005, Letter to CA Assemblywoman Lois Wolk;
A.B. 1003 Nava. (4 Pages)

February 11, 2005, Letter to Ventura County Board of
Supervisors; Amend Ventura County Watershed
Protection District Act to Allow for the Collection
of Fees by Watershed Protection District. (5 Pgs)

April 10, 2005, Jordan Transcription of Ventura County
Board of Supervisors February 15, 2005, Meeting
Agenda Item 34(Revised). (11 Pages)

February 15, 2005, Ventura County Board of Supervisors
February 15, 2005 Meeting Summary; #34.

April 18, 2005, Letter to Ventura County Board of
Supervisors; Amendment to White Oak Creek I
Agreement. (4 Pages)

May 10, 2005, Letter to CA Senator Sheila Kuehl;
A.B. 1003(Nava).

May 4, 2005, Letter to CA Senator Sheila Kuehl;
A.B. 1003(Nava). (3 Pages)

May 1, 2005, "Flood protection erodes in county - As
channels wear out, costs increase, but money isn't
there", Ventura County Star. (3 Pages)

May 1, 2005, "Where needs are" Exhibit, Star.

May 1, 2005, "Flood control called 'critical' - Major
county flood events" Exhibit, Star.

May 1, 2005, "The issue is not a sexy one at polls",
Ventura County Star.

April 19, 2005, Letter to CA Senator Sheila Kuehl;
A.B. 1003(Nava). (4 Pages)

April 12, 2005, Letter to CA Senator Sheila Kuehl;
A.B. 1003(Nava).

March 10, 2005, Letter to CA Senator Sheila Kuehl;
Current Session Bills.

March 24, 1992, Letter from Mayor Greg Stratton to the Ventura County Board of Supervisors; City of Simi Request to Include Detention Basins in the Ventura County Flood Control District's Benefit Assessment Funding Program--Stormwater Runoff Control.

August 30, 2000, Letter to State of CA HCD Department; City of Simi Valley Request for Release of CDBG/DRI Funds, and FONSI. (6 Pages)

September 6, 2000, Letter to Mr. David Fukutomi, FEMA Region 9; City of Simi Valley North Simi Drain Canyon and Dry Canyon Detention Basin Flood Mitigation Plan Implementation Project (FEMA DR-1008 -CA HMGP-7251), FONSI (July 21, 2000 Final EA), and Release of HMGP Funds. (5 Pages)

April 4, 2002, County of Ventura Grand Jury Complaint; Investigate County Flood Control District's Benefit Assessment Program fees for detention basins.

June 2, 2003, Letter to U.S. EPA Inspector General Nikki L. Tinsley; Investigate the City of Simi Valley Compliance with Countywide NPDES Program Permit. (2 Pages)

July 1, 2003, Letter to Mr. Richard Skinner, FEMA Inspector General; Investigate City of Simi Valley FEMA Funds for Six Regional Stormwater Detention Basins (FEMA 1044-1046). (2 Pages)

July 29, 2003, Letter to Mr. Robert J. Lastrico, FEMA Region 9 Audit Branch Chief; Appeal of Decision to not do Anything about My Investigation Request of the City of Simi Valley HMGP Detention Basins Funds Expenditures.

September 26, 2003, Letter to Mr. Robert J. Lastrico; My July 29, 2003 Letter, and FOIA Request.

February 27, 2004, Letter to Mr. Clark K. Ervin, FEMA Inspector General; Investigate City of Simi Valley Tapo Canyon Regional Stormwater Detention Basins. (2 Pages)

March 4, 2004, Letter from the Department of Homeland Security's Office of Inspector General; OIG Complaint Number: 0403210.

4

March 12, 2004, Letter to Ventura County Board of Supervisors; U.S. Department of Agriculture - Natural Resources Conservation Service Agreement for Tapo Canyon Debris Basin Emergency Project (DSR No. 06-04-3657). (3 Pages)

April 8, 2004, Letter to Mr. Clark K. Ervin, DHS Inspector General; OIG Complaint No. 0403210 (County of Ventura/City of Simi Valley Tapo Canyon Regional Stormwater Detention Basins). (2 Pages)

April 20, 2005, Letter to Richard Skinner, DHS Acting Inspector General; OIG Complaint No. 0403210). (3 Pages)

April 20, 2005, Letter to Nikki Tinsley, U.S. EPA Inspector General; Investigate County of Ventura and Its Cities Countywide NPDES Permit, and Joint Regional Stormwater Detention Basins Program. (2 Pages)

Mr. Snow, this is my final letter on this Public Input Request on the Integrated Regional Water Management (IRWM) Grant Program.

Sincerely,

Mrs. Teresa Jordan

Enclosure:

May 18, 2006, Letter to Ventura County Board of Supervisors; NPDES Program. (4 Pages; Unsigned)

from R. Jordan
and T.

(4)

5/24/07

10 PM

3 PB.

3152 Shad Court
Simi Valley, CA 93063
May 16, 2007

Ms. Tracie Billington
Department of Water Resources
IRWM Grant Program
1416 Ninth Street
Sacramento, CA 95814

Re: Public Comments on the DWR and SWB's Round 2 of the
Proposition 50 Integrated Regional Water Management
Grant Program--May 24, 2007 Deadline.

Dear Ms. Billington:

I am still reviewing the April 2007 Proposition 50 Chapter 8 Integrated Regional Water Management Grant Program Guidelines Proposal Solicitation Packages Public Review Draft, and comparing it with the April 25, 2007 Proposition 50 Chapter 8 Integrated Regional Water Management Grant Program Round 2 Guidelines and PSP Packages Public Workshop slide presentation. Though I have not finalized my thoughts on the aforementioned documents, I am writing now in order to point out a couple of issues with regards to the Round 2 IRWMGP process.

- #1 - The notices for the informational workshop and two public meetings states that written comments are to be submitted via "E-mail". This is unacceptable. The general public must also have postal, and facsimile avenues to submit comments. Otherwise, this violates the "open government" policy set by Governor Schwarzenegger. The DWR has an outstanding IRWMGP "Public Comments", and process information site. Please, the Agency must not tarnish its fine work by limiting the public comments submittal avenues.
- #2 - The April 16, 2007 "Advisory" Notice states that written comments are to be e-mailed to you, and Scott Couch(SWB). The April 20, 2007 Press

Release lists you, and Shahla Farahnak(SWB). The April 25, 2007 IRWMGP Guidelines and PSPs Workshop slide presentation lists you, and

Scott Couch.

QUESTIONS

1. Which person from the State Water Board must be contacted--Mr. Couch, or Shahla Farahnak?
2. Were my February 14, 2007, February 21, 2007, and February 22, 2007 letters to Mr. Lester Snow on the Agency's Requested Public Input on the Integrated Regional Water Management (IRWM) Grant Program (Proposition 50, 84, and 1E) forwarded to you?
3. Are only e-mailed public comments going to be posted on the DWR's IRWMGP site?

SUGGESTION

1. In future "advisories" and "press releases" relative to any public review and comments matters, please have Ms., Mrs., or Mr. included before the contact person's name.

Ms. Billington, I do not use the family computer to e-mail. I do 99.99% of my communication via my fax machine to comment on city, county, state, and federal government issues. Just Monday, May 14, 2007, I forwarded my comments on the U.S. Senate's discussions of H.R.1495(S.1248)--the Water Resources Development Act. I submitted my comments' letter to the Los Angeles Regional Water Quality Control Board (LARWQCB) for its workshop on the County of Ventura countywide MS4 (NPDES) Permit via the mail in order to abide by the legal public notice. I made it clear that it was violating Governor Schwarzenegger's "open government" policy by limiting the public comments' submittal avenues.

Ms. Billington, I would really appreciate a written response from you on this letter as soon as possible. You can have it faxed to me at (805) 522-5016. Thank you.

Sincerely,

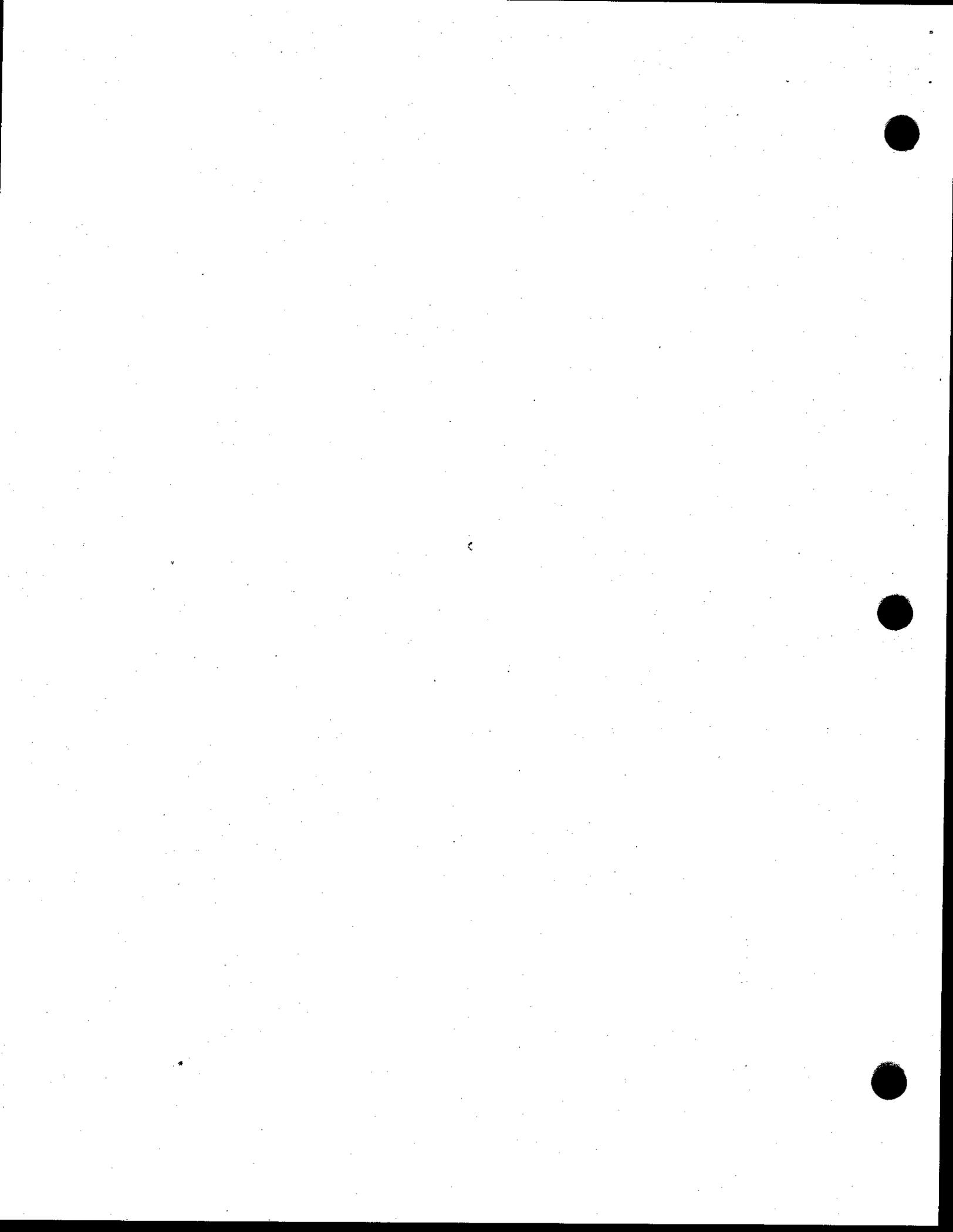
Mrs. Teresa Jordan

Enclosures:

February 14, 2007, Letter to Director Lester Snow.
(20 Pages, Minus Enclosures)

February 21, 2007, Letter to Director Lester Snow.
(2 Pages, Minus Enclosures)

February 22, 2007, Letter to Director Lester Snow.
(4 Pages, Minus Enclosure)



from R. Jordan
and T.

(5)

5/23/07

10 PM

1 P.

3152 Shad Court
Simi Valley, CA 93063
May 18, 2007

Mr. Scott Couch, P.G.
Division of Financial Assistance
State Water Resources Control Board
1001 I Street
Sacramento CA 95814

Re: Integrated Regional Water Management Implementation
Grant Program - Round 2.

Dear Mr. Couch:

Please note that I have submitted comments to Mr. Lester Snow, and Ms. Tracie Billington from the Department of Water Resources on the aforementioned item. Since the State Water Board is partnering on the Proposition 50 grant program, I am now following up with you.

Mr. Couch, even though I have addressed water issues at the city, county, state and federal government levels, I have found integrated programs difficult to follow. I have been able to keep my head above water, so to speak, on the integrated regional water management grant program because of familiarity with some of the information on the Ventura countywide project application for Round 1. Since there are areas that have to be cross-referenced for the Public Review Draft IRWMGP Guidelines and PSPs, I am still moving at a snails pace to make sure I understand the information to take supporting or opposing stands on the various revisions, implementation vs. planning, include/exclude disadvantaged communities, etceteras. I have had to get past the "by invitation only" Step 2 rule since it is a new concept for me as far as competitive project applications are concerned at all government levels. I also had to realize that the State itself can and should be applying for funding through the IWRMGP process.

QUESTIONS

1. Does the State have to compete with other applicants?
2. Since 2 State agencies oversee this grant program process, how can they be objective when it comes to State projects/applicants?

2

3. Is it not awkward for State agencies staff members to decide, or not, to invite, or not the State project applicants? If an invitation is not forthcoming in Step 2, are jobs in jeopardy? Or, could there be a tendency for arm twisting to get these applications prioritized?

Mr. Couch, I will forward my final comments on Round 2 of the IRWM Grant Program next week. Hopefully in a timely manner by May 24, 2007. I have also been reading up on the Regional Boards' Strategic Plan Update, and the upcoming hearing on Water Right Enforcement.

Mr. Couch, I notice that for the State Water Resources Control Board's State Revolving Fund(SRF) Loan Program Priority List(List) public review and comment period a facsimile is given as an avenue for submittals. The same avenue must be available for submittals of the IRWMGP Round 2, and future related public participation processes with the State Water Resources Control Board, and DWR.

Sincerely,

Mrs. Teresa Jordan

Enclosure:

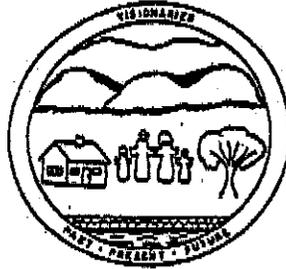
May 16, 2007, Letter to Ms. Tracie Billington, DWR
IRWM Grant Program. (29 Pages)

2

from T. Jordan

6

10 pp.



TERESA JORDAN
3152 SHAD COURT
SIMI VALLEY, CA 93063
TELEPHONE NO. (805) 522-5016

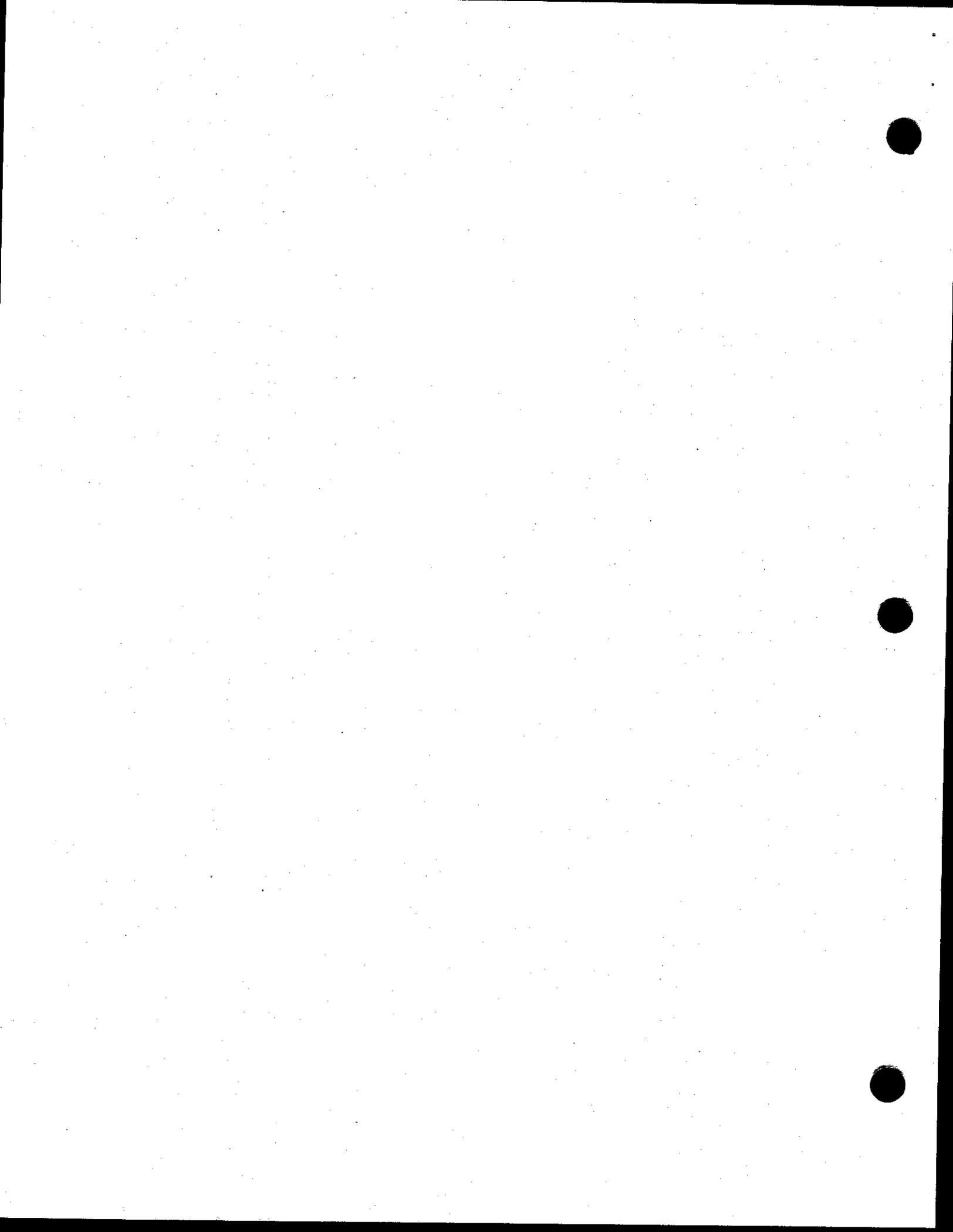
TO: Mr. Scott Couch, P.F.
Division of Financial Resources
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

FAX NO.: (916) 341-5707

DATE: May 23, 2007

NO. OF PAGES: 10 (includes cover sheet)

RE: Proposition 50, Chapter 8 Integrated Regional
Water Management Implementation Grant
Program - Round 2, Public Review Comments on the
Draft Revisions to the Guidelines and
Proposed Solicitation Packages (PSPs).



3152 Shad Court
Simi Valley, CA 93063
May 22, 2007

Ms. Tracie Billington
DWR - IRWM Grant Program
1416 Ninth Street
Mr. Scott Couch, P.G.
SWRCB - Financial Assistance Div.
1001 I Street
Sacramento, CA 95814

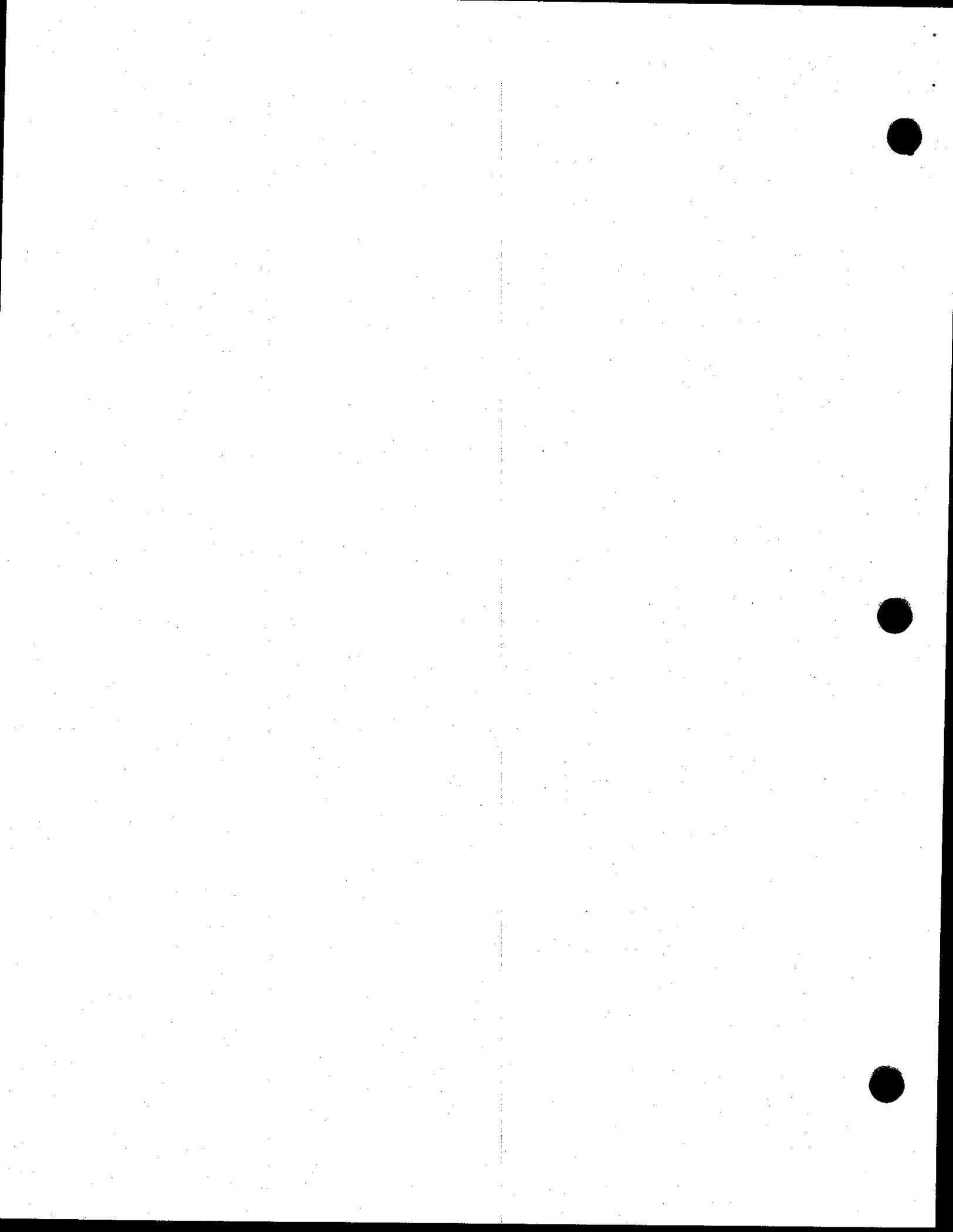
Re: Proposition 50, Chapter 8 Integrated Regional Water
Management Implementation Grant Program - Round 2,
Public Review Comments on the Draft Revisions to the
Guidelines and Proposal Solicitation Packages (PSPs).

Dear Ms. Billington, and Mr. Couch:

The following comments are a result of comparing the information in the Draft Guidelines and PSPs with the April 25, 2007 Public Information Workshop slide presentation bullet points, and with the May 21, and May 23, 2007 Public Meetings' slide presentation bullet points, and taking into consideration other water related matters on the Websites.

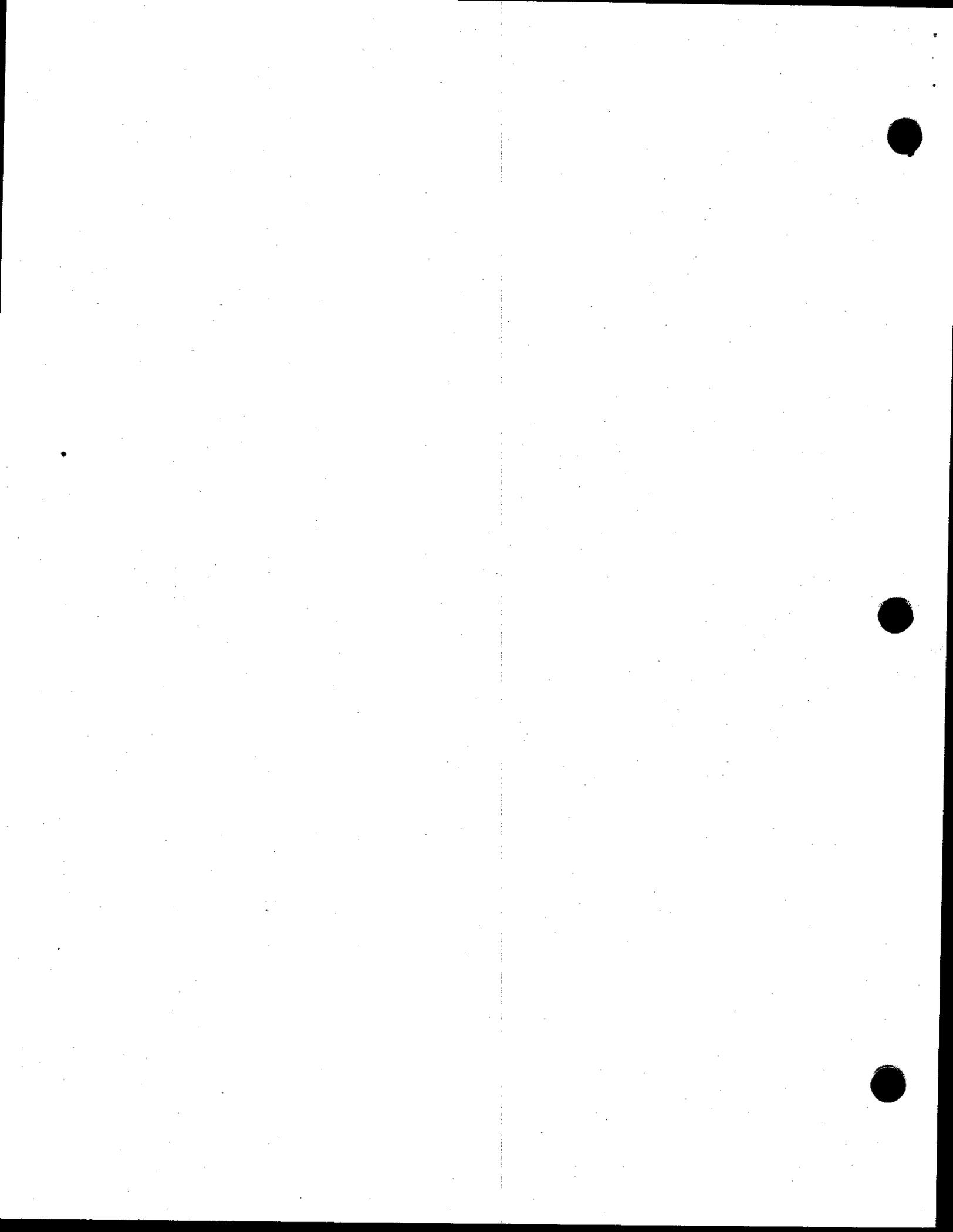
#1 - Since the Draft document did not include a Table of Contents, it was confusing to make sense of the referenced Guidelines' Sections. In order to facilitate "better logic and flow", I had to put together a Table of Contents. The reader whether a professional, or general member of the public must be able to readily find a particular area of interest. A copy of my Table of Contents is submitted for your consideration. Please note that I tried various format types for hours and this one simplified my review, and understanding. Please include a Table of Contents in the final Guidelines and PSPs document for Round 2.

#2 - The interactive Draft document feature on the Website was extremely helpful most of the time, once I understood the process--which is the



reason why I downloaded and printed the Draft. Please note that sometimes "File Download" would pop up instead of the reader being taken to the clicked specific Draft document section. This is why a Table of Contents is also helpful.

- #3 - The interactive Draft document feature on the Website was frustrating when an Exhibit or Appendix toward the end of the document was clicked and there was no easy way to return to the spot the reader was first focused on. The mouse has to be used to roll back to the spot.
- #4 - Since the DWR and the State Water Board will be distributing information via email in addition to their Websites, then change "Mailing List" on Page 2 to read "E-Mail List".
- #5 - The Draft document, the April 25, 2007 Public Information Workshop slide presentation, and the May 21, and May 23, 2007 Public Meetings' slide presentation state that approximately \$64 million is available for Round 2 proposals funding. About \$21 million may be available for Northern CA, and about \$64.5 million will be awarded to proposals located in Southern CA (Page 5, Draft). This is impossible. The amount available for Southern CA proposals is off.
- #6 - Regions that already received grant awards under Round 1 are eligible to apply for Round 2 if the total funding under Round 1 did not surpass the \$25 million cap. This is unfair to those regions that were not awarded funding, and to other regions that did not apply, or were denied funding due to incomplete applications.
- #7 - While "Disadvantaged Communities" are being included in the regional grant funding program participation process, it is also important that their representatives understand the process, program, and regional proposal(s).
- #8 - "Disadvantaged Communities" must hold public hearings to include the localized citizenry in the regional grant funding program participation process.

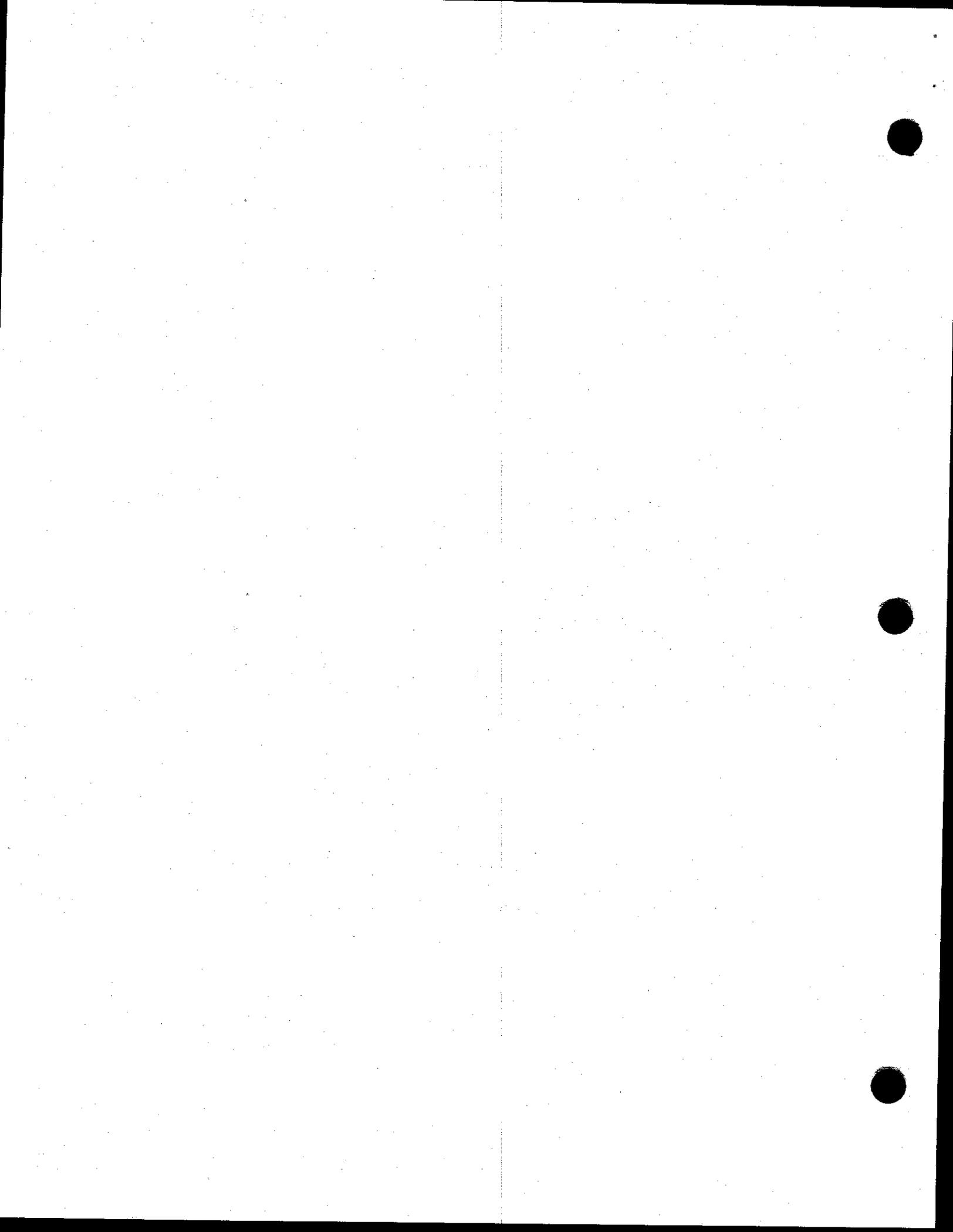


- #9 - While "Environmental Justice" is mentioned in the Draft document, and the Public Information Workshop slide presentation, and the Public Meetings' slide presentation, the subject is not included in the text as a bullet point under Section II.E. Program Preference. It is stated, on Page 6, "DWR and the State Water Board will also give preference to proposals that address environmental justice concerns."
- #10 - It is problematic if regions that "only partially overlap the dark shaded areas in Figure 1" are going to be eligible to apply for funding as long as they "make a compelling demonstration that the region has fundamentally different objectives and needs..." under the proposed exception rule. While "Confidentiality" will be waived once the participant's application package is submitted to the agencies (Page 8), it is stated on Page 32, under APPENDIX C.C.5. Attachment 13 Letters of Support or Opposition (If Applicable), "Attachment 13 must be used to submit electronic copies of any letters of support for or opposition to the Proposal or individual projects contained within the Proposal. General letters of support or opposition will not be considered. Letters of support or opposition must clearly state how the implementation of the proposal/project will benefit or adversely impact the individual or entity providing the letter. All letters should be addressed to"

Ms. Shahla Farahnak
State Water Resources Control Board
Division of Financial Assistance
1001 I Street, 16th Floor
Sacramento, CA 95814

Ms. Tracie Billington
Department of Water Resources
Division of Planning and Local Assistance
P.O. Box 942836
Sacramento, CA 94236-0001

Already I have opposed the e-mailing of comments on the Draft document rule, and questioned if



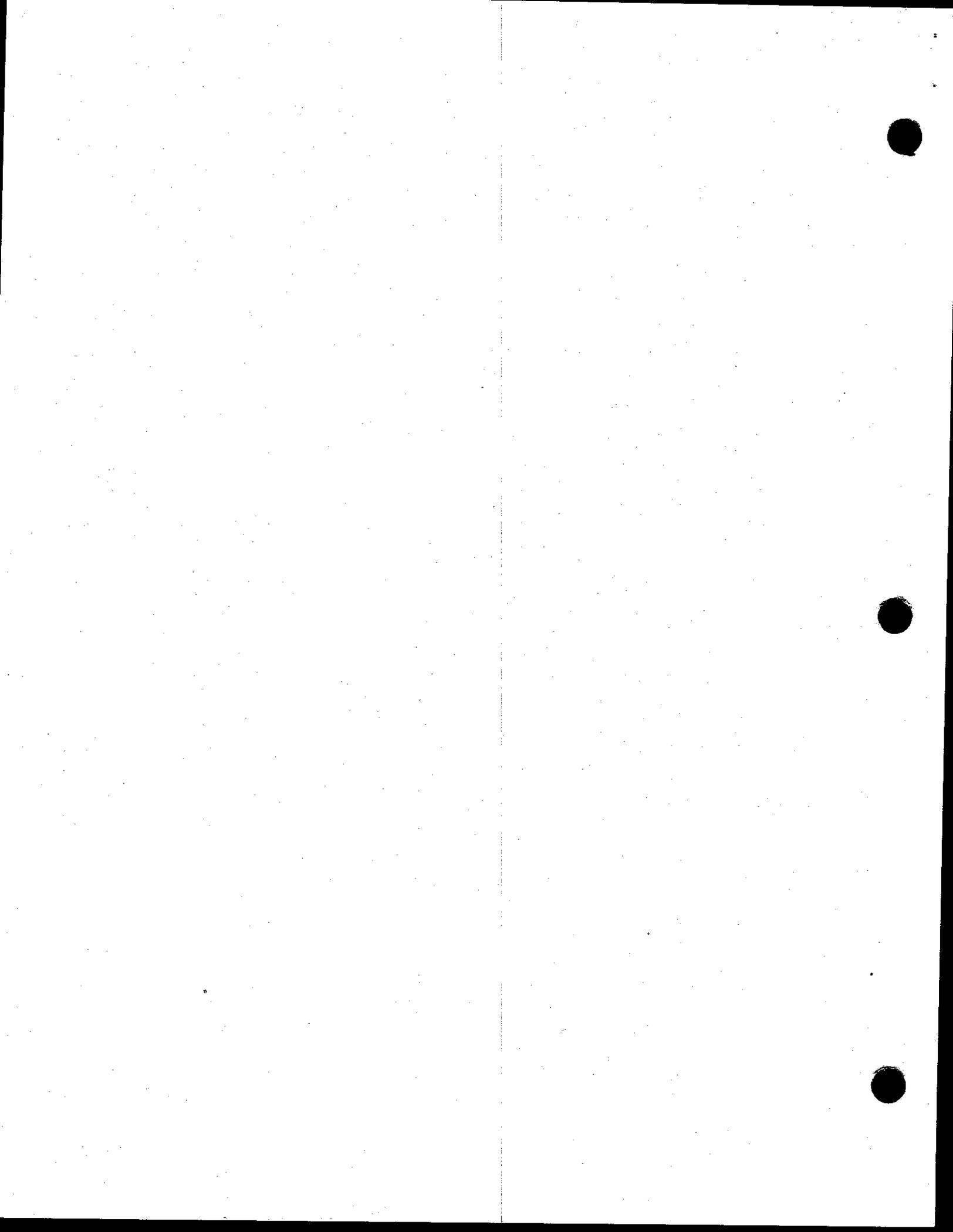
State Water Board staff person Couch or Farahnak is to be contacted.

Applicants are asked to provide "General Information". The fourth bullet point under APPENDIX C.C.5. Attachment 6 Scientific and Technical Merit, Page 30, states "Provide copies of the most complete design plans and specifications for the proposed project(s)."

It is stated, on Page 9, under Guidelines Section IV.I. Waiver of Litigation Rights "Grant agreements funded by the State Water Board will specify that under no circumstances may a Grantee use funds from any disbursement under the grant agreement to pay costs associated with any litigation the Grantee pursues against the State Water Board or any Regional Water Board, regardless of the outcome of any such litigation, and notwithstanding any conflicting language in the grant agreement, the Grantee agrees to complete the Project funded by the grant agreement or to repay the grant funds plus interest." The NFIP is already in shambles, FEMA is in chaos, and floodplain management projects fail because general comments--unlike letters that are technically and scientifically savvy--are not considered.

Applicants who circumvent and violate the public participation process by not responding in kind to letters submitted in "good faith" for public review proposals/plans must be weeded out from the IRWMGP funding process.

- #11 - The final Guidelines and PSPs document must include more information on "donated services from non-state sources", and "state services" (Page 6, Section II.D. Minimum Funding Match Requirements). The DWR and State Water Board Websites should also have information on this.
- #12 - The Draft document takes hours to print!!! Please have a note to this effect. For the business time is money. For the general public time is taken away from printing other documents in a timely manner.



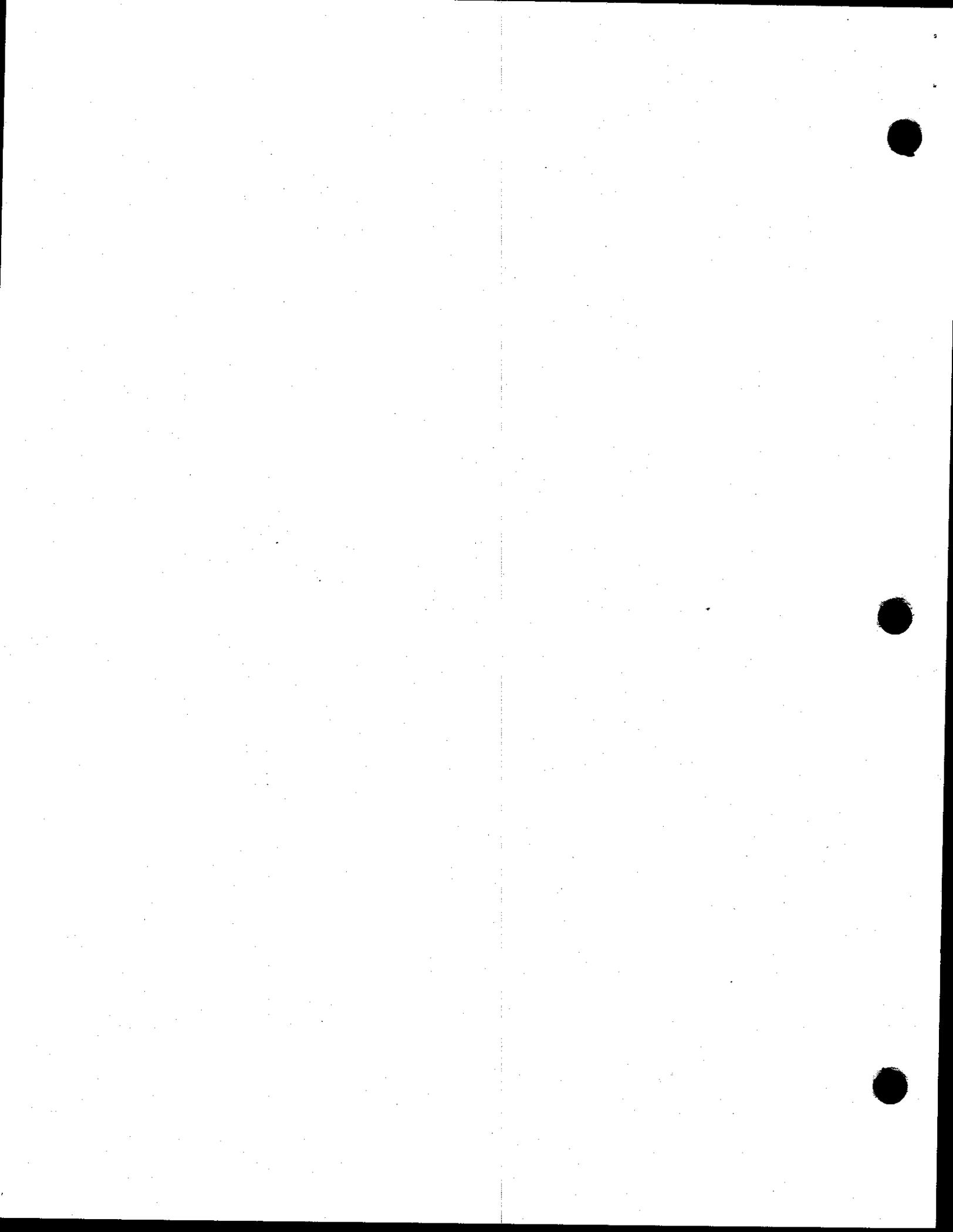
- #13 - Capitalize all of the TABLES and their Titles. It is stated on Page 4 "To foster understanding and clarity DWR and the State Water Board will use the following terms consistently in these guidelines..." (Guidelines II.A. Usage of Terms). The same rule must apply to the TABLES.
- #14 - The size of the Draft document's wording (text) is extremely small. Strains the eyes of readers who wear glasses, and/or contact lenses especially.
- #15 - The text about DWR reviews of 2005 UWMPs must not be deleted.
- #16 - Reevaluation of the Plan must not be eliminated with regards to APPENDIX C Step 2 PSP.
- #17 - The May 21, and May 23, 2007 Public Meetings slide presentation's "Additional Changes to Draft" information should have been noted in an Addendum, or Supplemental on the DWR's and State Water Board's Websites.
- #18 - Detailed Census Guidance must not be deleted.

SUGGESTION

1. Title FIGURE 1, on Page 5, "Geographic Implementation Grant Funding Distribution Map".

ERRORS

- #1 - Page 3, change the subject "ACRONYMS AND ABBREVIATIONS USED IN THESE GUIDELINES AND APPENDICES" to read "ACRONYMS AND ABBREVIATIONS USED..."
- #2 - Page 17, the paragraph encouraging applicants to review the FFAST User Manual, the sentence "In necessary, DWR and the State Water Board may make minor technical and administrative changes..." should read "If necessary..."
- #3 - The TABLES begin with TABLE 3. TABLE 1 and TABLE 2 are missing, or TABLE 3 is not numbered



correctly (Page 13, or refer to copy of Jordan TABLE OF CONTENTS). This is confusing because it is stated on Page 42, under ROW(I) Grand Total (Sum Rows(A) through (H) for each column) --EXHIBIT 2 BUDGET-- "From this summary sheet use the grand total from the 'Non-state Share (Funding Match)' column, and use this cost to include in Table 1 - FFAST Checklist, under the box entitled 'Local Cost Match'".

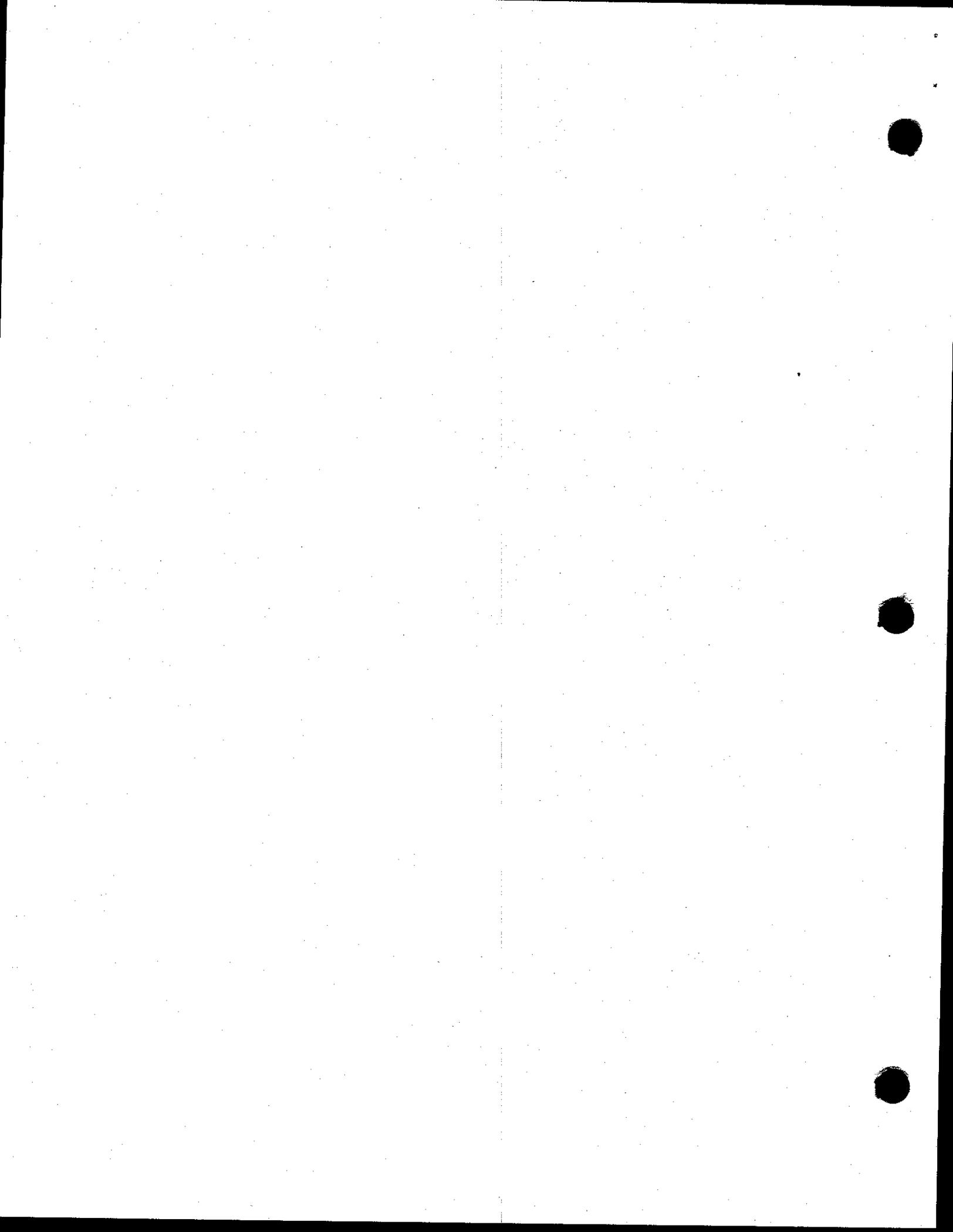
- #4 - The Roman numeral for Guidelines Section IV. Schedule is incorrect. Change to "VI" (Page 13).

QUESTIONS

1. Why were the "New Appendix B", "FAAST Attachment Instructions", and "Detailed FFAST instructions available online" bullet points from the April 25, 2007 Public Workshop deleted for the May 21, and May 23, 2007 Public Meetings? Has Appendix B been deleted altogether?

Page 17, of the Draft document, states "Applicants must submit a complete application on-line using the State Water Board Financial Assistance Application Submittal Tool (FAAST)." --APPENDIX B. Also, Page 18, APPENDIX C.C.1 PSP for Step 1. TABLE C-1 - STEP 1 CHECKLIST states under "2." "If this item is not completed FFAST will not accept the application."

2. Does DWR, and/or the State Water Board have a list of the "Disadvantaged Communities" throughout California?
3. Why are "donated services from non-state sources" being considered for the funding match (Page 6)?
4. Are "donated services from non-state sources" cash related, or volunteer related?
5. If "donated services from non-state sources", and even "state services" are going to be considered, how is a monetary value put on non-cash type salaried hours?



6. If Northern California has met the 40% funding requirement, and Southern California meets the 40% funding requirement of the available grant awards (=80%), where does the remaining 20% (+80% =100%) end up? Are there set requirements somewhere for the remaining 20%? Or, why are the percentages not adding up to 100%?
7. Why was NEPA not included under Guidelines Section IV.E. CEQA Compliance, on Page 9--it was joined with CEQA under Guidelines V.J. Grant Agreement on Page 12, and under EXHIBIT 1 WORK PLAN (Page 38)?
8. If "Statewide Priorities" were removed from the Guidelines, Selection Panel Factors, and the Scoring Criteria, why are these significant words still included under APPENDIX A - IRWM PLAN STANDARDS "L" on Page 15?
9. What is the DWR and the State Water Board doing to reach the visually impaired citizenry to get this disabled population involved in the IRWMGP process?
10. Why was the "One contract per region" April 25, 2007 Public Information Workshop slide presentation bullet point deleted from the May 21, and May 23, 2007 Public Meeting slide presentation?
11. Did "GW" Comprehensive Monitoring refer to groundwater in the April 25, 2007 Public Information Workshop slide presentation--Past Awards/Expenditures (3 slides)?
12. Since Draft IRWM Plans are being limited, is the publicly noticed review & comment period (Workshop) referring to the "General Letters" in support or opposition that will not be considered? Is the public notice being limited? Is the public review and comment period being limited?

Sincerely,

Mrs. Teresa Jordan

Mrs. Teresa Jordan

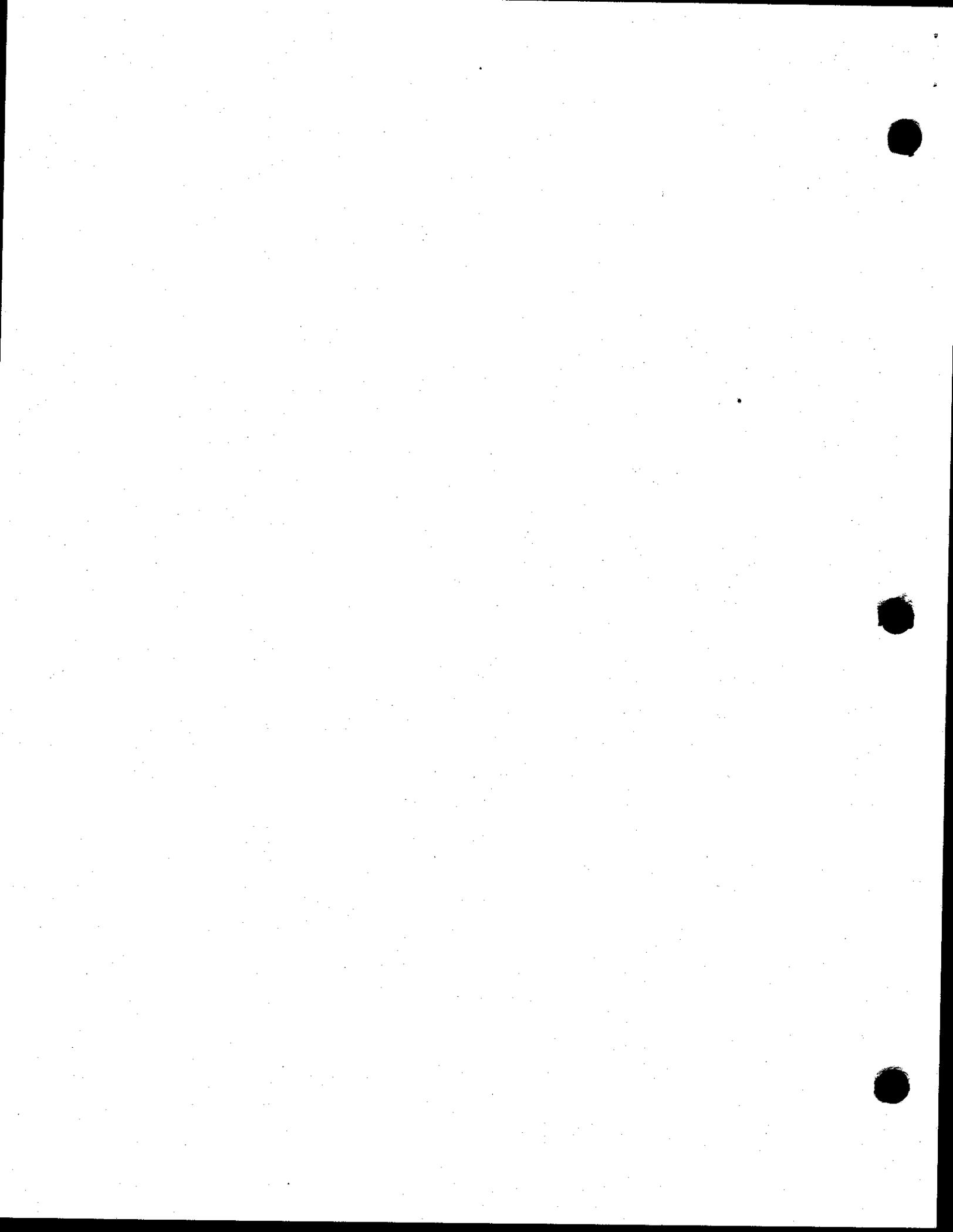


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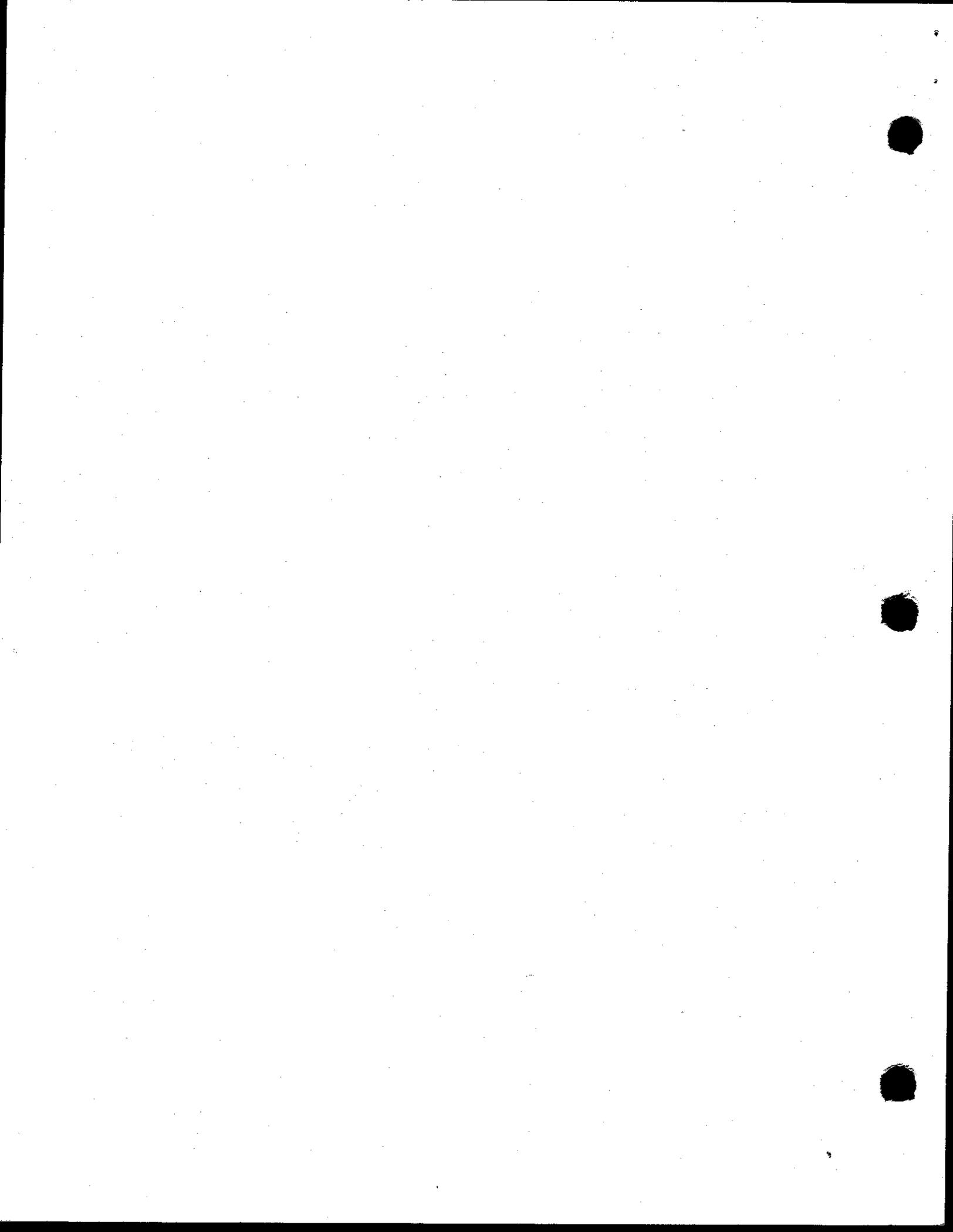


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