

3152 Shad Court  
Simi Valley, CA 93063  
September 12, 2008

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

Re: Development of an Urban Water Conservation Regulatory  
Program--Public Comments Letter--Notice of Workshop.

Dear Members of the Board:

This letter is a follow-up to my September 11, 2008  
letter's comments, concerns, suggestions, and questions.

#13 - Page 5, as a customer, I understood the first  
paragraph, and the second number 1, but, as a  
layperson, I got lost on the rest of the  
information due to "volumetric" and "block rate".  
Then, too, it is stated in the second number 2  
that "There are other criteria in use." Every  
thing must be covered in order to make a  
knowledgeable decision in the "Key Issues and  
Questions" section of the "discussion paper".

#14 - Page 6, in case my September 11, 2008 letter was  
not clear enough, with regards to Key Issues and  
Questions' number 3, yes the regulatory program  
must apply to all areas of the state.

#15 - Page 6, the discussion paper should have included  
a chart, or bullet points summarizing the "other  
activities that the State Water Board will be  
pursuing to promote water conservation in the  
urban and agricultural water use sectors but will  
not be a matter for discussion at the public  
workshop to consider mandating water conservation  
actions" because the "activities are described  
in the Bay-Delta Strategic Workplan and 'Draft  
Strategic Plan Update 2008-2012'..." instead of  
having the reader researching these documents. I  
know all too well the time and effort it takes to

cross-reference other related documents. And, at times, I end up getting more confused if a document is inaccurate and incomplete. And, the agencies, whose plans, workshops, and policies, I respond to don't issue replies.

#16 - Page 6, Key Issues and Questions, I don't agree with number 4 "allowing latitude for urban water suppliers to select the practices to meet specified water use reductions" as "an effective approach" unless a disadvantaged community is involved, or the majority of a community's population is deemed poor by the U.S. Census. Too many times the big players--large urban water suppliers, and cities--take advantage of loop holes to get around the criteria and regulations in order to save the funding for water use increase projects, or salary increases, etc.

#17 - Page 7, Number 7, Key Issues and Questions, it was mind boggling to read "What data are available to support mandating particular water conservation practices and estimating the potential water savings associated with those measures?" California, we have a problem.

#18 - Page 7, References, since numbers 1 (DWR, Water Plan Update 2005), 3 (SWRCB, Strategic Workplan for Activities in the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, July 16, 2008), and 8 (Governor Schwarzenegger's Letter to California State Senate, February 28, 2008) are covered in my September 12, 2008 letter (3 Pages) to Mr. Paul Dabbs (DWR), I have enclosed a copy.

#### SUGGESTIONS (Continued)

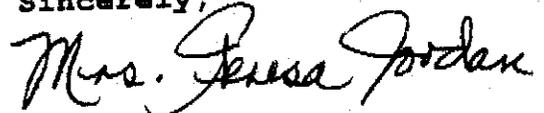
#6 - A chart would have been helpful to the reader who does not understand the textual information on Page 5 because of "volumetric".

#7 - A chart, or bullet points sheet with the water conservation activities described in the Bay-Delta Workplan, and the 2008-2012 Draft Strategic Plan Update would have been helpful to the reader. (Page 6)

QUESTIONS (Continued)

5. Why is agricultural not included with the other water use sectors listed in parenthesis--"()"?  
(Page 6, Number 4, Key Issues and Questions)
6. Number 4, under Key Issues and Questions, asks "Would a performance-based regulatory program, allowing latitude for urban water suppliers to select the practices to meet specific water use reductions, be an effective approach?". Does doing this not defeat the purpose of AB 1420? Or, is SWB proposing to get different legislation approved so that the other 25% of urban water suppliers do not have to join the CUWCC to get priority with their projects? (Page 6)
7. Why is it stated "the Draft Strategic Plan Update 2008-2012"? Has the SWB not yet approved the Plan?  
(Page 6, Planned Water Conservation Strategies)

Sincerely,



Mrs. Teresa Jordan

3152 Shad Court  
Simi Valley, CA 93063  
September 12, 2008

Mr. Paul Dabbs, Chief  
Water Resources Evaluation Section  
Statewide Water Planning Branch  
Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: The South Coast(SC) Hydrologic Region Working Draft,  
and Pre-Administrative Draft.

Dear Mr. Dabbs:

Since I have not received a reply to my September 4, 2008 letter on the aforementioned subject, I am writing this letter to have it included under the DWR's Regional Reports' Working Draft Comments section for the record.

Mr. Dabbs, it is unfair that the Pre-Administrative Drafts for most hydrologic regions have already been posted under the Regional Reports Website section when the South Coast(SC) Hydrologic Region's Working Draft was never posted. This Water Plan Update is supposed to involve a greater participation by the public, and yet this situation illustrates that the opposite is true.

Mr. Dabbs, for years I have fought the City of Simi Valley, the County of Ventura, FEMA, and the Army Corps of Engineers because of egregious violations of the public participation process. Recently, I have had to fight the Los Angeles Regional Water Quality Control Board (LARWQCB) in order to keep my submitted public comment letters on the Draft NPDES Permits for the Camarillo Sanitary District, the City of Thousand Oaks, and City of Simi Valley's treatment plants from being suppressed; and the State Water Resources Control Board(SWB) for voiding three public hearings, public testimony, and exhibits on the Sediment Quality Objectives(SQOs) for Bays and Estuaries because the Office of Administrative Law(OAL) found that the legal notice was not printed in the newspaper.

Mr. Dabbs, your silence, the FloodSAFE California Program staff's non-posting of public comments on the Draft Strategic Plan, and the OAL's non-reply to my request for a copy of its disapproval of the DWR's Emergency Regulations for major flood management projects tell me that all of these issues are related to the 2009 Water Plan Update, and, most especially, to the South Coast(SC) Hydrologic Region's Working Draft. I thought it was ideal that the 2009 Water Plan Update was going regional, but all of this tells me that "regional" is in the eye of the beholder, and not necessarily the eyes of the DWR. So much for public scrutiny, and the upholding of the State's laws.

Mr. Dabbs, I hope that the South Coast(SC) Hydrologic Region's Pre-Administrative Draft is posted on the Regional Reports Website section long before the October 3, 2008 public comments deadline. After addressing the current public review and comment period for the State Water Resources Control Board(SWB)'s Urban Water Conservation Regulatory Program, I get the feeling that either agency is not communicating with each other, or the lack of this communicating is deliberate. No wonder California is faced with a bleak water supply shortage future. No wonder Californians are not conserving as they should be. This is not the way to regain the "public trust".

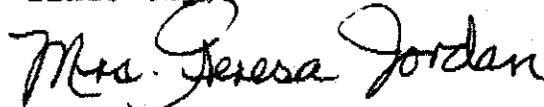
Mr. Dabbs, even though I addressed the 2005 Water Plan Update, to date I have not even begun to scratched the surface of the statewide picture, but I am trying because most Californians are under the impression that the right thing is being done, yet the opposite is true even with Governor Schwarzenegger's "open government" policy.

Mr. Dabbs, with regards to the Hydrologic Region Working and Pre-Administrative Drafts for the South Coast(SC), I have great concerns over because of the July 1, 2008 Ventura County Board of Supervisors adoption of Non-Coastal Zoning Ordinance Text Amendment to Eliminate the Current Zone Clearance Requirements Prior to Conducting Channel and Debris Maintenance for Public Works Maintenance Projects; and Revisions to the Definition of Public Works Maintenance Projects Less Than One Year Old in Duration; and filing of Notices of Exemption--I came across this subject while researching the Board's past agendas to comment on the SWB's Urban Water Conservation Regulatory Program's Workshop proposal of including all of, or part of, the CUWCC's 14 BMPs in the Bay-Delta Workplan.

It is stated on Page 2 of 4 of the Ventura County Board of Supervisors July 1, 2008 Staff Report/Letter (second paragraph) that "There is expected to be a cost savings, although not totally quantifiable, to the Watershed Protection District (District), related to these changes. Currently, most of the contracts that the District awards to remove debris from channels or debris basins obligate the contractor to be responsible for the soil sediment, adding to the contract total cost. These changes to the Zoning Ordinance will allow the soil sediment to be temporarily stockpiled on District controlled property. The District will then have the opportunity to market the sediment directly to end users; thereby reducing the net costs of removal of soil sediment from basins and channels." This impacts the Calleguas Creek Watershed and the Mugu Lagoon because of the contaminated sediment from the Boeing Company's Santa Susana Field Laboratory (SSFL)-- headwaters of Arroyo Simi--and the hazardous materials in the Marr Ranch area where the Las Lajas Dam is located.

It is stated on Page 2 of 4 of the Ventura County Board of Supervisors July 1, 2008 Staff Report/Letter (paragraph under Discussion) that "This request includes two actions that will affect the Non-Coastal Zoning Ordinance. The first is a request to eliminate the Zone Clearance requirement prior to conducting channel and debris basin maintenance by the Watershed Protection District for projects that are less than one year in duration, per Section 8105-4 (Mining and Accessory Use) and Section 8105-5 (Mining and Accessory Uses). The second affects revisions to the definition of Maintenance of Public Works Flood Control Facilities. In addition, the text amendment will only affect flood control clean out and maintenance projects undertaken by and conducted in basins and channels under the ownership of the Ventura County Watershed Protection District." The contractor that the District used to remove and haul away the sediment from the Las Lajas Dam has violated State laws, yet the District continues to contract with the company. And, mining is an item discussed in the SWB's Bays and Estuaries SQOs public hearing draft staff report.

Sincerely,



Mrs. Teresa Jordan