



Public Comment  
Anti-Degradation Policy  
Deadline: 12/17/08 by 12 noon

3152 Shad Court  
Simi Valley, CA 93063  
November 20, 2008

State Water Resources Control Board  
Jeanine Townsend, Clerk to the Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Re: "Comment Letter - Anti-degradation Policy (Resolution 68-16)."

Dear Members of the Board:

This letter is a follow-up to my November 19, 2008 letter, and a continuation of my comments on this subject.

Members of the Board, in the second to last paragraph, on page 3 of my November 19, 2008 letter, I mentioned the "Mission of the State and Regional Water Boards". I wrote down "Mission" because I was not going to jot down every difference between the 9 Regional Water Boards with regards to the State Water Board's statement. I was mistaken. For the record, please note the following differences.

STATE WATER RESOURCES CONTROL BOARD MISSION STATEMENT

"The State Board's mission is to preserve, enhance and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations."  
(Website: Water Boards Structure section)

REGIONAL WATER QUALITY CONTROL BOARDS' MISSION STATEMENTS

REGION 1: The North Coast Board has "State Water Resources Control Boards Mission". "To preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations." (Board's Website Section: Water Boards Structure.) Same SWRCB words!

- REGION 2: The San Francisco Bay Board, I could not find any type of mission statement in the "About Us", and "Water Boards Structure" sections of its Website!
- REGION 3: The Central Coast Board has "Our Mission Statement". "Our mission at the Central Coast Regional Board is developing and enforcing water objectives and implementing plans that will best protect the area's waters while recognizing our local differences in climate, topography, geology and hydrology." (Board's Website Section: About Us.) It is difficult to determine the "enhance", "restore", and "ensure their proper allocation and efficient use" components of SWRCB's mission statement!
- REGION 4: The Los Angeles Board has "The Mission of The Regional Board". "The mission of the Regional Board is 'to preserve and enhance water quality in the Los Angeles Region for the benefit of present and future generations.'" (Board's Website Section: About Us.) It lacks the "restore", and "ensure their proper allocation and efficient use" components of the SWRCB's mission statement!
- REGION 5: The Central Valley Board has "Mission of the Regional Water Boards". "To preserve and enhance the quality of California's water resources for the benefit of present and future generations." (Board's Website Section: About Us.) It lacks the "restore", and "ensure their proper allocation and efficient use" components of the SWRCB's mission statement!
- REGION 6: The Lahontan Board has the same wording as REGION 1 (North Coast Board)'s, and the SWRCB's mission statements. (Board's Website Section: About Us.)
- REGION 7: The Colorado River Basin Board has the same wording as REGION 1 (North Coast Board)'s, REGION 6 (Lahontan Board)'s, and the SWRCB's

mission statements. (Board's Website Section: About Us.)

REGION 8: The Santa Ana Board has "The mission of the Water Board is to ensure the highest reasonable quality for waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses." (Board's Website Section: Water Boards Structure.) It lacks the "protect", "enhance", "restore", and "present and future generations" components of the SWRCB's mission statement!

REGION 9: The San Diego Board has "Mission Statement". "Our mission at the San Diego Regional Board is developing and enforcing water quality objectives and implementing plans that will best protect the area's waters while recognizing our local differences in climate, topography, geology and hydrology." (Board's Website Section: About Us.) The wording is the same as REGION 3 (Central Coast)'s mission statement! It is difficult to determine the "enhance", "restore", and "ensure their proper allocation and efficient use" components of the SWRCB's mission statement!

Members of the Board, as far as the APU Number 90-004 document (as posted on the Website) is concerned, with regards to Pages 1 (Intent) to 7 (Figure 1), the following are my observations and suggestions.

- #1 - Page 1, if the original page is modified, then, include the name in print, along with the signature of the staff person, under "Approved, Executive Director".
- #2 - Page 3, if the original page is going to be modified, but the same numbering information is left intact, then, under the section "COMPLETE ANTIDEGRADATION ANALYSIS REQUIRED" add a "3." to the "In particular, an antidegradation finding

should be made and, if necessary, an analysis should be conducted when performing the following permit activities: ..." sentence. Also, change "1." ("Issuance of a permit for any...") to "a.". Change "2." ("Material and substantial alterations ...") to "b.". Change "3." (Reissuance or modifications of permits...) to "c.". This keeps from confusing the reader with the previous "1." and "2." statements under this section.

- #3 - Page 4, if the original page is going to be modified, but the same information is left intact, then, add the word "Step" in front of "1." ("Compare receiving water quality..."). Also, add the word "Step" in front of "2." ("Balancing the proposed action...").
- #4 - Page 5, if the original page is going to be modified, but the same information is left intact, then, add "Step 3." to the "Factors that should be considered when determining whether the discharge is necessary to accommodate social or economic development and is consistent with maximum public benefit, include: ..." statement. This keeps from confusing the reader with the previous "b.", "c.", and "d." statements. Also, add "Step 4." to the statement "The Regional Board should encourage the participation of the public and appropriate government agencies in the public interest balancing process so that the environmental, social, and economic impacts of the project are accurately assessed. EPA's Water Quality Standards Handbook (Chapter 5) provides additional guidance in assessing financial and socioeconomic impacts." Change the words "appropriate government agencies" to "intergovernmental agencies".
- #5 - Page 6, if the original page is going to be modified, but the same information is left intact, then, change "3." (Report on the antidegradation analysis) to "Step 5".
- #6 - Page 7, if the original page is going to be modified, add the title "PROCEDURE FOR COMPLETE ANTIDEGRADATION ANALYSIS" at the top of the page. Also, add the page number along with the "(See

Step \_)" in each box that such notice is stated. Then, too, add boxes for the Steps as outlined under my #4 and #5 comments.

Members of the Board, please keep all of the original Appendices intact. Don't archive them.

Members of the Board, with regards to the issue of mixing zones, my position on this matter was made very clear in my October 30, 2008 letter on "Bacterial Standards for REC-1 Waters" (since it is included under the Board's Website's "Documents for Public Comment" section, it is hereby being referenced, instead of enclosed).

Members of the Board, if the State's Antidegradation Policy is amended, then, determine the use of the words "anti-degradation" or "antidegradation, "water bodies" or "waterbodies", "non-point sources" or "nonpoint sources", and "ground water" or "groundwater" for consistency purposes.

Members of the Board, it would have been extremely helpful to have had a list of all of the State waters that are presently considered to have higher quality. The reader should never have to cross reference so much information to become somewhat knowledgeable about the topic in order to address issues of concern.

Sincerely,



Mrs. Teresa Jordan