

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

Mr. Jeff Barnickol
Zori Lozano-Friedrich
Cal/EPA
1001 I Street
Sacramento, CA 95814

Re: State and Regional Water Quality Control Boards
2007 Strategic Plan Update--Outreach Workbook.

Dear Mr. Barnickol, and Zori Lozano-Friedrich:

According to the information in the Department of Toxic Substances Control's October 2003 Public Involvement Fact Sheet, as I understand it, the government's role to its constituents is to ensure individuals and communities "have an opportunity to actively participate in the decision-making process." And, the public's role is participating actively in the government "decision-making process." With this in mind the following are my comments on the 2007 Strategic Plan Update Summit/Regions Outreach Workbook.

SUMMIT ISSUES

- TRENDS AND ISSUES ANALYSIS("3. Changing Political Realities--2nd bullet point--greater awareness and involvement of the public, Tribes, regulated community, and other stakeholders):
 1. Public Participation Process Consistency
 2. Environmental Justice/Public Health
 3. Integrity

PUBLIC PARTICIPATION PROCESS CONSISTENCY

The Cal/EPA has an excellent public participation outreach program, but its public comments submittal policy is circumventing and violating Governor Schwarzenegger's "open government" policy, as far as the State and Regional Water Boards are concerned, with the requirement for only electronic means(e-mail).

A. PUBLIC NOTICE(Legal)

Cal/EPA has an excellent public participation outreach program, but its public comments submittal policy is circumventing and violating Governor Arnold Schwarzenegger's "open government" policy with the requirement for only electronic submittals. Unless otherwise noted, notices, documents, laws, etceteras were acquired through various Websites' information.

Public Comments Submittal Avenues Inconsistencies:

- Traditional(mail, facsimile, messenger(courier service, visit office, plus e-mail, etceteras-- "historical trend").
 1. California Public Records Act Guidelines, **"REQUESTS TO VIEW PUBLIC RECORDS(FILE REVIEW)--** ...An appointment can be made by email, fax, telephone, or in person."
 2. 2007, DTSC, Environmental Fee(Z-07-0427-05)-- "Please direct all written comments, procedural inquiries and requests for documents by mail, e-mail or fax..."
- Non-Traditional(e-mail only--not "historical trend")

Water Boards differ on traditional/historical trend public comment submittal avenues.

 1. June 13, 2007, San Francisco Bay Region Water Board's public outreach session--"...the Water Board will provide online opportunities to contribute ideas and suggestions later in June."
 2. May 7, 2007, SWRCB, 2007 Water Boards Strategic Plan Update--"...on-line access to submit comments relating to the planning process will be posted as they become available."
 3. May(?) 2007, Lahontan Regional Water Quality Control Board public sessions(2)--"We hope you can join us...If not, please contribute your ideas anyway at <http://waterboards.ca.gov/strategicplan/2007update.html>. Under **Regional Outreach Meetings**, click the **Interactive** link for the Strategic Plan Regional Meeting

Workbook." "If you are unable to attend one of the public outreach sessions, an opportunity to contribute your ideas on-line will be available after the outreach sessions."

B. STATE LAWS/AGENCY POLICY

- Date Unknown, State Water Resources Control Board's "Who We Are" Website section "Employment"--"* **Water Quality**...supporting the development of local solutions to local problems with the full participation of all affected parties."
- January 04, 2007, Cal/EPA Website section "Decisions Pending and Opportunities for Public Participation"--"**How to Participate**...can submit comments on draft regulations."
- January 04, 2007, Cal/EPA Website section "Decisions Pending and Opportunities for Public Participation"--"The Government Modernization, Efficiency, Accountability, and Transparency Act of 2005 requires that State agencies post information on their web sites about public meetings, proposed regulations, and how to comment or otherwise participate." Modern man marvels at newly discovered cave paintings, and archeological digs that bring to light ancient civilizations because they connect him/her to the past to know what life was like, the environment around at that time, etceteras. With all of the paper reduction taking place from the local to the federal government levels agencies employees cannot cover their backs when a given situation turns ugly, and the public's trust cannot be regained without backup records that are in plain sight. My experiences at my City and County government levels have been incredible ones.
 1. Due to "black widow" infested shed(s), some records are unattainable because staff members would jeopardize their health and lives going into the facility.
 2. Staff does not know what records are kept in the "black widow" infested shed(s).

3. The City placed City records in metal containers at the Sanitation Plant that is located near the Arroyo Simi.
4. Staff does not know what records were put in those metal containers because there is not a list of the items, supposedly.
5. Because I was informed by staff, I know that the VISION 2020--which replaced the comprehensive update of the 1988 General Plan as a blueprint for developing the community since 1995--records were placed in the metal containers.
6. Staff would ask why I needed certain plans, reports, instead of following through on requests for copies.
7. Staff sometimes would limit my review of certain records when I made requests.
8. A City Council staff report stressed that workshops would be held, but in reality what took place were Planning Commission, and City Council public hearings.
9. A workshop on the implementation plan for the VISION 2020 final "SEEDS..." report was supposed supposed to be held, but it was not.
10. A disabled resident was bemoaned by members of the Planning Commission, and the City Council when she presented her testimony before them on City matters.
11. Staff does not respond to my requests for copies of City Council approved final City Budgets.
12. Staff does not respond to my typed letters on the City's fiscal years Preliminary Base Budgets.
13. Ventura County and Watershed Protection District staff do not respond to my typed letters on the public review and comment periods for the Draft Multi-Jurisdictional Hazard Mitigation Plan, and

Flood Mitigation Plan. These documents approved by the Board of Supervisors were incomplete and inaccurate.

The same has been my experience dealing with the Federal Emergency Management Agency(FEMA), and the U.S. Department of Homeland Security(DHS). My investigation requests to the Inspector Generals have been stalled for years. Telephone messages are not returned. My typed letters on the current FEMA/Ventura County/Nolte Preliminary Flood Insurance Study(FIS), and Preliminary Flood Insurance Rate Maps(FIRMs) to date have not been responded to. These documents are incomplete and inaccurate.

I have received the same cold treatment from the U.S. Army Corps of Engineers on the FIS and FIRMs, and on the City of Simi Valley's Bridge over the Arroyo Simi at Tapo Street project.

The U.S. EPA has not been any better. They prefer I do the agency's job by being involved at the local level!!!

The disdain and complacency that I received at the hands of Mr. Abrams(?) from DTSC regarding my interest in the characterization of the landfills on the Rocketdyne Santa Susana Field Laboratory property I had never experienced from other State agencies employees.

None of the above experiences compare though to the "invisible" person treatment by State Legislators-- Assemblypersons and Senators, and legislative proposals' analysts.

When I addressed the Metropolitan Water District 2000 Urban Water Management Plan, submitted a typed letter to the Board, a staff member telephoned just days before the meeting to say that a response would be forthcoming. To date I have yet to receive one.

As a layperson, I have learned on my own about the Public's Right to Know, and Environmental Justice. These two issues should have been disclosed in a timely manner during the Rocketdyne Santa Susana Field Laboratory Cleanup Workgroup meetings!!!

I have an exemplar "reputation" with the Governor's Office of Emergency Services(OES), and with the 2003-2004 Governors Davis and Schwarzenegger Blue Ribbon Fire Commission--assembled to address the 2003 Southern California Fire Sieges. And, with the U.S. Senate's Homeland Security and Governmental Affairs Committee, and House of Representatives Government Reform Committee--on the aftermath of Hurricane Katrina.

I have saved my City, County, State, and Federal Governments time and money by undertaking the monumental task of correcting incomplete and inaccurate reports, plans, and manuals.

I refuse to be made a party to ill-conceived and ill-advised actions and decisions by elected and appointed government representatives, and agencies' employees. If government representatives, agencies' staffs, and the business and regulated communities cared as much, litigations at all levels of government would be lessened considerably.

What law stipulates, like the California Public Records Act, that "participation in the conduct of the people's business is a fundamental and necessary right of every person in this state"?

- Date Unknown, Cal/EPA Website section "DTSC: Welcome"--"**PUBLIC NOTICES**...DTSC Welcomes comments on all proposed regulations, in keeping with California's commitment to provide meaningful public involvement in governmental decisions...For more information on how to participate in California's rule-making, visit the Office of Administrative Law."

C. DOCUMENTS(Plans, Manuals, Reports, Etc.--State and U.S.)

- May 2005, Draft Cal/EPA Proposed Recommendations for A Public Participation Policy
- April 2005, Center for Collaborative Policy Public Involvement Needs Assessment
- October 2001, DTSC Public Participation Manual
- May 2003, USEPA Public Participation Policy

D. SUGGESTIONS

- Need a Public Bill of Rights. Cal/EPA Website has a Bill of Rights for Environmental Permit Applicants (under "About the Water Board"/State Water Resources Control Board section; Miscellaneous). Some of the reasons that such a Public Bill of Rights is needed:

1. only "meaningful public participation"
2. IRWMGP Round 2 Draft Guidelines/PSPs "general letters" on projects are not accepted
3. "identify" invite-able public members

Otherwise, it is the same as saying that only certain people are entitled to: a job, a home, an education, health care, food, life, etceteras.

- Need Public Participation Process Definitions:

1. Public Participation Process
2. Public Participation Policies
3. Public Participation Program
4. Public Participation Procedures
5. Public Participation Plan
6. Public Participation Manual
7. Public Participation Framework
8. Public Participation Tools
9. Public Participation Activities
10. Public Participation Tasks
11. Public Participation Implementation Plan
12. Public Participation Practices
13. Public Involvement Process
14. Public Involvement Policy
15. Public Involvement Activities
16. Public Involvement Techniques
17. Public Involvement Implementation Plan
18. Open Government
19. Outreach Session
20. Workshop
21. Meeting
22. Public Hearing
23. Collaborative Processes
24. "Meaningful Participation"

ENVIRONMENTAL JUSTICE/PUBLIC HEALTH

- Make this crucial matter a high priority because disaster preparedness goes hand-in-hand with it.

INTEGRITY

- Without credibility of elected and appointed government representatives, and agency employees at every level of government, there will never be a restoration of the "Public's Trust".

OTHER

- Lack of/Limited Number of Educated State Employees --article--is a concern. I cannot believe that training employees already in an agency is counterproductive, and thus outside hiring is best.
- Contradictory Water Board Agenda Public Forum statements--"Any person may address the Water Board regarding a matter within the Board's jurisdiction that is not related to an item on this Meeting agenda...Comments regarding matters that are scheduled for a future Meeting will generally be prohibited."(San Francisco Bay Regional Water Board June 13, 2007 Agenda).

Mr. Barnickol, and Zori Lozano-Friedrich, while I did not know that Cal/EPA had such an extensive Public Participation Process, I have been living it and addressing it at all levels of government. I have met my public role. So must my government meet its fiduciary role. But, no one should ever be put in the position--homelessness after being defrauded of her home with water rights--that Ginn Doose has been placed in for exercising her public role.

Sincerely,

Mrs. Teresa Jordan

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

Mr. Jeff Barnickol
Zori Lozano-Friedrich
State Water Resources Control Board
Cal/EPA
1001 I Street
Sacramento, CA 95814

Re: The 2007 State and Regional Water Quality Control
Boards' Strategic Plan Update--Outreach Workbook.

Dear Mr. Barnickol, and Zori Lozano-Friedrich:

This letter is a follow-up to my June 14, 2007 letter. I notice that the Board's Website does not have a deadline for submittal of comments on this matter so I am taking the opportunity to expand on a few items that I somewhat touched base on in my June 14, 2007 letter.

SUMMIT ISSUES(Continued)

- TRENDS AND ISSUES ANALYSIS("3. Changing Political Realities--2nd bullet point--greater awareness and involvement of the public, Tribes, regulated community, and other stakeholders"):
 1. Public Participation Process Consistency:

PUBLIC PARTICIPATION PROCESS CONSISTENCY(Continued)

B. STATE LAWS/AGENCY POLICY(Continued)

- The Water Boards are required by California Water Code, Section 13292 to "undertake a review of the regional boards' public participation procedures." (Center for Collaborative Policy's April 13, 2005 Public Involvement Needs Assessment, Page 5, paragraph after "3.", third sentence).

- California Government Code Section 11364(a)(1)(2)(3)(4)(5), and (b), and (c).
- California Government Code Section 11365.
- California Health and Safety Code Section 25395.96 (a) through (G), and (b)(3).
- California Senate Bill 1949--Public participation, State Water Resources Control Board(Soto, Chaptered).
- California Government Code Section 53338(a)(b) and (c).
- California Government Code Section 12740(e) and (f).
- California Government Code Section 12741(c).
- California Government Code Section 6251.
- California Government Code Section 6252(a)(b)(d)(e), and (g).
- California Government Code Section 7528(a) through (c).
- California Government Code Section 7528.1.
- California Government Code Section 8331.(a) and (b).
- California Government Code Section 8332.

C. DOCUMENTS(Plans, Manuals, Reports, Etc.--State and U.S.)
(Continued)

- April 2005, Center for Collaborative Policy's Public Involvement Needs Assessment(Continued)

One of the most outstanding reports--in analysis, format, text, and recommendations--that I have read in the 25+ years that I have been involved in dealing with civic matters.

Question 1: Page 2, it is stated in the first sentence of paragraph 1, under **PREFACE**, "...pursuant to an interagency agreement with the California Water Boards(formerly known as the State Water Resources Control Board)." Was the State Water Resources Control Board renamed as such? Was it not renamed?

While all of the information was excellent, and vital, one eye opening sentence was on Page 5, last paragraph, "The Needs Assessment found that the terms 'outreach' and 'public participation' had specific meanings for many staff members, who did not view many of their interactions with the public as either outreach or public participation."

Other crucial sentences, same aforementioned page and paragraph, "...this assessment uses the terms outreach and public participation in the following narrow senses: 'Outreach' is a systemic attempt to provide information or services beyond conventional limits, as to particular segments of a community, while 'public participation' refers to legally mandated procedures for public input, such as public notice, public comment, response to comments, and public testimony. An umbrella term used throughout the remainder of this Needs Assessment Report is 'public involvement,' which is a term used by public policy scholars to refer to the broad spectrum of ways in which the public and agencies interact and inform one another. This Needs Assessment addresses ways for the Water Boards to improve public involvement across a broad spectrum of activities, in addition to traditional outreach and public participation." The critical sentence was "Working within a limited timeframe and resources, the Needs Assessment was not intended to be a comprehensive evaluation of all public involvement activities conducted by the Water Boards statewide, nor does it single out(for criticism or praise) any specific Water Board region, program, activity, or employee." (Page 6, first paragraph under **III. ASSESSMENT DESIGN AND METHODS, A. Design consideration.**)

- Public Participation Manual(SWRCB Website, "Coming Soon", updated 2/28/07--printed 5/30/2007)

Question 1: Is this the same document as the Outreach and Public Participation Manual mentioned on Page 5 of the Center for Collaborative Policy's April 2005 Public Involvement Needs Assessment Report, paragraph after "3"?

Question 2: Is this the same manual that was to "be created through the Water Leadership Academy"(Page 27 of the CCP's April 2005 Public Involvement Needs Assessment Report, **V. CONCLUSION**)?

Suggestion 1: If the Manual is the same as the document alluded to in Qs 1 and 2, and the Water Leadership Academy is not undertaking the work, then, the Center for Collaborative Policy(CCP) would be one ideal contractor to undertake this document--if the company does this type of work--due to its attention to details(April 13, 2005 Public Involvement Needs Assessment Report's data analysis being qualitative and quantitative, and especially because of the information contained on Pages 24 through 31: **COURSE AND MANUAL ELEMENTS, APPENDIX A: Suggestions for Public Involvement Manual Organization, and APPENDIX B: Suggestions for Course Content**).

- October 2001, DTSC Public Participation Manual (Continued)

Another outstanding document. I did not know just how complex the Public Participation Process has become. No wonder staff perception is problematic. No wonder the citizenry is up in arms over its treatment by government agencies, etceteras.

It is stated on Page 4, of Chapter 2, under **Environmental Justice**, that "...environmental justice must be defined by the affected community ..."

Question 1: By "community", does Cal/EPA mean an entire town, city, Tribe, etceteras? Or, does DTSC mean a local group of concerned citizens, or a recognized local organization, etceteras? Why are the concerns of just one credible individual not enough to define environmental justice?

Much appreciated was the information on the laws (Statutory and Regulatory Authorities).

D. SUGGESTIONS(Continued)

- Need Public Participation Process Definitions:
(Continued)
 25. Minimum Legal Requirements
 26. Staff Comfort(Increase)
 27. Staff Skill(Increase)
 28. Staff Efficiency
 29. Public Satisfaction
 30. Limited Resources(Maximize)
 31. Key Opportunities
 32. Solid Foundation
 33. Creative Public Involvement
 34. Appropriate Materials(Standardize)
 35. Appropriate Procedures(Standardize)
 36. Conventional Limits(Provide Information and Services)
 37. Public Input
 38. Stakeholder
 39. Staff Perception
 40. Public Expectation
 41. Needs(Strengths & Weaknesses)
- Undertake the comprehensive evaluation of all public involvement activities conducted by the Water Boards statewide now.

- Undertake the program to single out (for criticism or praise) any specific Water Board region, program, activity, or employee now. If criticism is taboo, then do not undertake that part of such a program, but implement constructive training to improve agency employees skills, and education instead.
- Implement a true/false Questionnaire for agency employees to build life experiences education. Or, hold life experience workshops. But, above all, teach common sense if this trait is lacking.

Sincerely,

Mrs. Teresa Jordan

3152 Shad Court
Simi Valley, CA 93063
January 28, 2008

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: "Draft Strategic Plan Update: 2008-2012"(Version 3).

Dear Members of the Board:

I am opposed to the aforementioned document and the strategic plan update process for the following reasons.

DRAFT DOCUMENT STRUCTURE

- #1 - The "Executive Summary", "Organization Description", "Plan for Monitoring and Tracking Performance", "Resource Assumptions", and "Appendices: 1. Internal/External Assessment Summary, 2. Water Board Program Areas, 2A. Water Board Financial Assistance Programs" are not included.
- #2 - The "Foreword" and "TABLE OF CONTENTS" pages are not numbered.
- #3 - Corresponding pages are not included for the subjects listed in the "TABLE OF CONTENTS".
- #4 - The "Foreword" statement "...this draft plan highlights several planning priorities and organizational performance priorities(first page, second paragraph, last sentence) is misleading. There are 2 planning and 3 organizational priorities not "several".
- #5 - The "Environmental", "Planning", and "Organizational" Priorities were not broken down as was done for "Appendices". Inconsistency.
- #6 - The "Planning" and "Organizational Performance" Priorities' breakdowns are not numbered right.

#7 - The "TABLE OF CONTENTS" spacing between subject sections is inconsistent.

EXAMPLE: TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary	
Mission Statement(Included)	1
Organization Description	
Vision(Included)	1
Principles and Values(Included)	1
Desired Conditions(Included)	2
Overarching Framework(Included)	3
Environmental Priorities(Included)	6
Priority 1: Protect and Restore Surface Waters	6
Priority 2: Protect Groundwater	12
Priority 3: Promote Sustainable Water Supplies	16
Planning Priorities(Included)	19
Priority 1: California Water Quality Plan	19
Priority 2: Basin Planning	19
Organizational Performance Priorities(Included)	23
Priority 1: Transparency and Accountability	23
Priority 2: Consistency	27
Priority 3: Workforce Capacity	30
Plan for Monitoring and Tracking Performance	
Resource Assumptions	
Appendices	
1. Internal/External Assessment Summary	
2. Water Board Program Areas	
2A. Water Board Financial Assistance Programs	

[NOTE: The information on Page 2 was done in smaller font in order to view the Example on one page. It also covers comments #5, #6, and #7.]

2007 UPDATE PUBLIC PARTICIPATION PROCESS

- #1 - The Internet Forum was not easy to access. Once this link-up was deleted from the Strategic Plan Update site, the forum remained open for comments under the Cal/EPA's website, yet this information was not disseminated to "Update" visitors. Nor did the Cal/EPA's forum site note a deadline for the comments. It was just non-existent one day.
- #2 - The Public Participation Manual listed under the Public Participation Program site has been "Coming Soon!" since the 2/28/07 posting; almost a year ago!!!
- #3 - Public comments for those who cannot attend the February 6, 2008 Draft Workshop are being accepted only by E-mail(strategicplan@waterboards.ca.gov). This crucial information was not mentioned in the *Foreword's Opportunities for Public Comment* paragraph.
- #4 - The small workshop discussion group setting was chosen instead of time-limited public testimony. A lot of workshops/summits have already been undertaken. Public testimony must be allowed in order for comments to be entered into the record. This is another reason that all traditional forms of public comments submittals/avenues/tools(mail, facsimile, courier, etc.) must be allowed!
- #5 - Even though "water management has become increasingly technical and complex" the State and Regional Water Boards are not truly committed to educating, or listening, to the public! (Page 4, 5. *Education*) So, how can the public really, and truly understand who the Boards are, what they do, and whether or not they are looking after the health of Californians--especially when not everyone(low-income, elderly, the disabled, the homeless, etceteras) has a computer, or is able to make it to the library to access one?!?

CLEAN WATER ACT COMPLIANCE

- #1 - "Water Rights" have been hidden. The section in the October 23, 2007 Version 1 Draft (Strategic Program Priority 3. Water Rights, Page 9) was replaced with "Stream Flows" (Strategic Program Priority 3., Page 9) in the November 30, 2007 Version 2 Draft, and in the January 25, 2008 Version 3 Draft section both have been replaced with Environmental Priority 1. "Protect and Restore Surface Waters". The ideal section title is Water Rights, Stream Flows, & Surface Waters.
- #2 - It is stated, on Page 9, that "The Water Boards will use all of its regulatory authorities and programs to address impaired water bodies, focusing on TMDL adoption and implementation that is consistent with the State Water Board's TMDL policy (Resolution 2005-0050)...will maximize the effectiveness of available resources." Yet, it is stated, on Page 8, that "...continuing to enhance more timely and effective use of our regulatory programs may result in a significant improvement in water quality, potentially eliminating the need to develop a TMDL." Not only is this a contradiction, but this state of affairs impacts the integrated approach to TMDL that the Water Boards are aiming for, and thus impact the "scale and scope of the master implementation plans that are to be developed!"
- #3 - Groundwater data management systems should have been in place long ago.
- #4 - The "Comprehensive Watershed Approach" is not practical nor achievable since only priority watersheds are considered. Thus, the "absence of a shared watershed approach to decision-making can result in actions, within and among agencies, that do not address priority problems and their causes" exists. (Page 4, 3. *Decentralized Regulatory Framework*)
- #5 - NPDES Permit Compliance Schedules have not been met, and the statewide changes being proposed will lead to giving dischargers an economic break, and stymie the people's right to sue.

SUGGESTIONS

1. Number the "Foreword" pages "i", and "ii" to aid referencing statements.
2. To Page 3 of the Version 3 Draft, move "Overarching Framework" at the top to coincide with all other major titles indentations.
3. Continue "Overarching Framework" on Page 2, after "Desired Conditions" to avoid ½ a blank page.
4. Page 19, separate the 2 California Water Quality Plan paragraphs from Basin Planning, and include under the California Water Quality Plan Priority.

Members of the Board, when water quality regulations violations by dischargers are allowed to continue, instead of enforcing compliance you and the Regional Boards' members' integrity will always be questionable. The Boeing Company's Santa Susana Field Laboratory practices is the biggest example--its non-compliance impacts Simi Valley's Municipal Permit, and the people's pocketbooks in property-related fees to cover NPDES Permit related projects since this policy from what I read seems like a sure bet to be implemented because the majority of voters don't know what has been going on behind their backs. More importantly, is the integrity of the dischargers. Dishonesty in grant applications keeps small, and economically strapped communities and dischargers from achieving compliance.

Sincerely,

Mrs. Teresa Jordan

Enclosures:

June 14, 2007, Letter to Jeff Barnickol and Zori Lozano-Friedrich. (8 Pages)

June 22, 2007, Letter to Jeff Barnickol and Zori Lozano-Friedrich. (6 Pages)

3152 Shad Court
Simi Valley, CA 93063
February 1, 2008

Ventura County Board of Supervisors
Hall of Administration
800 S. Victoria Avenue
Ventura, CA 93009

Re: Agenda Item 41 - Ratification of an Application
Submitted to the Governor's Office of Emergency
Services(OES) for the FY2008 Pre-Disaster Hazard
Mitigation Grant Program--FEMA.

Dear Members of the Board:

I am opposed to the aforementioned item for the
following reasons.

#1 - To date, no response has been forwarded for my
January 26, 2005 letter submitted to Ms. Anna
Davis(URS Corporation) for the Ventura County
Draft Multi-Jurisdictional Hazard Mitigation
Plan. This is an egregious violation of the
Public Participation Process since a public
review and comment period was part of this 2000
Disaster Mitigation Act related document.
Violations of the Public Participation Process
will be multiplied because nothing guarantees
that comments I submit on the updated Multi-
Jurisdictional Hazard Mitigation Plan will be
responded to either. The Final Plan did not
even acknowledge letters from the public, and the
Board approved this document in an incomplete and
inaccurate state. Complete and accurate
documentation is crucial to the Integrated
Regional Water Management Plan(IRWMP), and all
applications for State of California IRWM Grant
Program funds(State Water Resources Control
Board, and Department of Water Resources).

#2 - To date, no response has been forwarded for my
January 20, 2005 letter submitted to the Flood
Mitigation Plan Coordinator(Vta. Co. Watershed

Protection District) for the Ventura County Watershed Protection District's Draft Flood Mitigation Plan. This is an egregious violation of the Public Participation Process. Violations of the Public Participation Process will be multiplied because nothing guarantees that comments I submit on the updated Flood Mitigation Plan will be responded to either. The Final Plan did not even acknowledge letters from the public, and the District Board of Directors approved this document in an incomplete and inaccurate state. This Plan is critical to the County's Multi-Jurisdictional Hazard Mitigation Plan. Complete and accurate documentation is crucial to the Integrated Regional Water Management Plan (IRWMP), and all applications for State of California IRWM Grant Program funds (State Water Resources Control Board, and Department of Water Resources).

- #3 - To date, no response has been forwarded for my February 6, 2006 and February 14, 2006 letters submitted to Mr. Mike Sedell for the FEMA/County of Ventura/Nolte current Preliminary Flood Insurance Study (FIS), and Preliminary Flood Insurance Rate Maps (FIRMs). This is an egregious violation of the Public Participation Process. These documents are incomplete and inaccurate. These documents are critical to the County's Multi-Jurisdictional Hazard Mitigation Plan, and the Watershed Protection District's Flood Mitigation Plan. Complete and accurate documentation is crucial to the Integrated Regional Water Management Plan (IRWMP), and all applications for State of California IRWM Grant Program funds (State Water Resources Control Board, and Department of Water Resources).
- #4 - Sheriff Brooks states in his January 29, 2008 letter/staff report, on Page 1 under Reason for Ratification, that "This grant application was due to the State Office of Emergency Services on December 28, 2007", yet the California Governor's Office of Emergency Services Notice of Interest (NOI) Instructions stated under Notice of Interest Form, that "The NOI must be received by OES no later than 5:00 pm on Friday October 19, 2007. No late NOIs will be accepted, and an

approved NOI is required for each sub-grant application to be submitted."

- #5 - "The County Executive Officer authorized the Sheriff's Office of Emergency Services to submit this application prior to Board approval."
- #6 - When the County's Draft Multi-Jurisdictional Hazard Mitigation Plan was being compiled, there a couple of cities (Simi Valley, and possibly Thousand Oaks), and, I believe, some special districts that decided not to participate in the process. Thus, not making this a comprehensive undertaking in the first place--though it was noted that these entities DMA 2000 (DMA 2K) plans could be integrated in the future. The entities who will be included in the update of the Plan must share in the costs for this undertaking to offset the estimated total of \$114,000.

QUESTIONS

1. Why can't the Tsunami Plan just be incorporated into the Multi-Jurisdictional Hazard Mitigation Plan?
2. Why can't the additional hazards of severe winter storms, and drought just be incorporated into the Multi-Jurisdictional Hazard Mitigation Plan?
3. What are the names of the three cities and special districts that were not initially included in the Ventura County Operational Area's Multi-Jurisdictional Hazard Mitigation Plan.

Members of the Board, back on April 20, 2006, I wrote to Supervisor Linda Parks suggesting that the County's Disaster Council meetings information--notices, agendas, minutes, etceteras--be included in the County's Website. I had spoken to County staff regarding the Disaster Council in 2005, and I was told that the information would be posted in the County's Website in the future. Also, in my letter to Supervisor Parks, I stated "As far as the County OES information on the Sheriff's Website is concerned, it deserves to be of the quality that the County of Los

Angeles' Website has since they are our neighbors." This situation has not changed to date. "County constituents deserve a top-rate emergency services informational system." Your constituents still do.

Sincerely,

Teresa Jordan

Enclosures:

March 1, 2005, Ventura County Board of Supervisors Meeting Correspondence Agenda--Number 3(Jordan letter regarding the County Multi-Jurisdictional Hazard Mitigation Plan), and Number 6(Jordan letter regarding the County Watershed Protection District Draft Flood Mitigation Plan).

February 28, 2006, Ventura County Board of Supervisors Meeting Correspondence Agenda--Number 3(Jordan letter to Mike Sedell appeal of FEMA FIS and FIRMs), and Number 5(Jordan letter to Mike Sedell appeal of FEMA FIS and FIRMs).

3152 Shad Court
Simi Valley, CA 93063
February 10, 2008

State Water Resources Control Board
1001 E Street
Sacramento, CA 95814

Re: "Draft Strategic Plan Update: 2008-2012"(Version 3).

Dear Members of the Board:

Because additional information that verifies and validates my comments on the public participation process has surfaced, I am writing this letter to supplement my E-mailed January 28, 2008 letter.

WORKFORCE PLAN FRAMEWORK(May 15, 2007)

#1 - It is stated on Page 5, under "OVERVIEW", that "Though dis-equilibrium is experienced by those WRCB/WQCB employees participating in the Workforce Analysis, they also clearly indicated that the context in which the WRCB/WQCB currently exists exhibits characteristics similar to those described above for professional service organizations moving towards a new business model. Their message was: ... public participation is necessary for solution to non-point source pollution, control of emerging contaminants and the future use of water by an exploding population."

Whether or not the "holistic approach"--Page 5("holistic expression", Page 4)--is implemented in order to supposedly better deal with complex regulations and rules, complex stakeholders, and complex State agencies' employee pools and job problems, the public participation process must include all of the public comment submittal historical tools(hand delivery, mail, facsimile, and courier service) along with E-mail for Boards' meetings and workshops agenda items.

- #2 - It was interesting to read that many State and Regional Boards' employees' heart strings are being pulled by the culture of engineering and non-engineering titles and duties. The historical culture of the State water resources control process need not change all together--throwing the baby with the bathwater. Both types of employees can work in conjunction with each other. Engineers can be like scientists, but they can learn to co-exist. Without the engineering expertise, the alternative would be to leave everything up to consulting firms through contracts, and this is a recipe for disaster financially, and conflicts of interest--leading to insurmountable problems of greed, power, and prestige, with the government and the people being victimized instead of being helped. I need only take into consideration something disturbing mentioned in the Workforce Plan Framework report. (Refer to Comment #3.)
- #3 - It is stated on Page 5, 2nd bullet point at the top, relative to a new business model for the State and Regional Water Boards operations that the "opportunity to intentionally customize and segment service offerings" exists. Also, it is stated in the 2nd paragraph that the disequilibrium "created by" the "tensions" mentioned --such as "a prioritization of enforcement/ regulation versus a prioritization of facilitating public participation"--provides the "WRCB/WQCB the opportunity, at this time in its history, to proactively and intentionally develop the business model that assures the future delivery of the value the WRCB/WQCB brings to the people of California." Then, too, it is stated in the last paragraph that "At this point in the history of the WRCB/WQCB, an intentional exploration of the options available for an operative business model is opportune." Consulting firms are snatching up government employees, and government employees are leaving their positions to take up jobs with firms they have developed a rapport/alliances with, and/or are forming their own consulting businesses.

- #4 - Non-engineering State employees are not the only ones having difficulties with the complexity of regulations/rules, and stakeholders. The public does too. I for one try my best to understand as many aspects of an issue to be discussed by the State Water Board, or the Los Angeles Regional Water Quality Control Board as it relates to the Santa Susana Field Laboratory, the City of Simi Valley's Municipal Permit, and the Ventura Countywide MS4(NPDES) Permit. I may not address every single point, but I connect as many dots as possible. Yet, I don't complain. I see the work through even though I don't get paid because I am committed to seeing that the parties involved remain true to their word, and are aboveboard.
- #5 - Streamlining the way State agencies interact with each other is key to making the State and Regional Water Boards functions, policies, and programs, as well as employees run more efficiently instead of jumping to the conclusion that "the WRCB/WQCB can not be the sole policeman of water quality for the future". (Page 5, last bullet point.)
- #6 - Another key to smoother operation by the Boards and their employees is consistency. The report lends lip service to the concept, but the authors were inconsistent. The State Water Resources Control Board's Website and documents mention "SWB". The report refers to the "WRCB". The consultant should have consulted with the Board's staff for the proper abbreviation, or checked the agency's Website. There is no excuse for a consultant not to know its customer inside out.
- #7 - Page 3, "b)" reads "SMEs provide information for entry into the position and KSA acquired through one-the-job training." It should have read "on-the-job training."
- #8 - Page 5, the comment "a 'we ca do everything asked of us' approach versus a 'we are doing nothing really well because of responding to brush fires'" was insensitive, and irresponsible. If

the consultant arrived at this conclusion, shame on the firm. If agencies personnel made the comment, then they need to be immersed in what the agencies jurisdictional responsibilities are.

- #9 - It is difficult to fathom unresolved either-or tensions involving "a program approach versus a watershed approach". (Page 5, 2nd bullet point in the paragraph reading "Consciously or unconsciously the WRCB/WQCB is operating out of a business model...") While there are many watersheds up and down California, there are also numerous grant funding programs to help local governments, and businesses. A problem exists in allowing, or better yet, requiring entities to form coalitions that sometimes involve several parties, thus leading to the loss of control over scrutiny of individual project applications.

JANUARY 28, 2008 LETTER

- #1 - Clarification of last sentence on Page 5: "Dishonesty in grant applications keeps small, and economically strapped communities and dischargers from achieving compliance." As it reads it seems that I am implying that the small communities and dischargers are dishonest. Far from it. These applicants are shortchanged when larger communities and dischargers who are flush with money are not aboveboard in their grant fund program project applications.

FEBRUARY 1, 2008 LETTER TO VC BOARD OF SUPERVISORS

- #1 - Please refer to the enclosed copy because it speaks volumes about egregious violations of the public participation process by elected government officials.

Sincerely,

Mrs. Teresa Jordan

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

State Water Resources Control Board
1001 E Street
Sacramento, CA 95814

Re: "Draft Strategic Plan Update: 2008-2012"(Version3).

Dear Members of the Board:

This is my final letter on the aforementioned subject, and is a continuation of my comments on the May 15, 2007 Workforce Plan Framework report in my February 10, 2008 letter. Due to overseeing the health matters of a family member for a month, my concentration and my follow-through have been impeded, thus I fully understand State and Regional Water Boards' staff input with regards to situations impacting job performance and personal lives. My work gets done after 10:00 pm and into the am hours.

WORKFORCE PLAN FRAMEWORK(May 15, 2007)

- #10 - Page 65, APPENDIX F reads "WATER BOARD TRAINING ACADEMY 2006-06 CURRICULUM EVALUATION DATA". The title should have read "2005-06" to correspond with Page 66 "2005-06 WATER BOARD TRAINING ACADEMY CURRICULUM AND EVALUATIONS".
- #11 - APPENDIX G, Page 72, under MISSION FOCUS, the trend "Professionally competent staffed replaced by generalists" should have read "Professionally competent staff replaced by generalists".
- #12 - Page 77, out of the 12 staff positions listed on the "Trends Input" chart almost half were noted under the "Basin Plans are increasingly being used in ways beyond which they were originally designed - no thorough review process" trend.
- #13 - Page 77, eight staff positions were noted under the "TMDLs have taken far more resources than

originally anticipated - more time to create, more sophisticated stakeholders, increasing public participation and need for peer review. Complexity not understood by leadership" trend.

- #14 - Page 77, nine staff positions were noted under the "TMDL implementation was not prepared for in an adequate way, i.e. expense, monitoring, management, etc" trend.
- #15 - The agency call letters WRCB(State Water Resources Control Board) were confusing because of the staff position call letters WRCE(Water Resources Control Engineer).
- #16 - While pay parity was covered under the Retention Input related sections, no attempt was made to compare side by side ES(Environmental Scientist), EG(Engineering Geologist), and WRCE(Water Resources Control Engineer) work descriptions to determine pay parity inconsistencies. Salary ranges were not given for the ES, EG, and WRCE.
- #17 - Terms "responding to brush fires"(Page 5), and "putting out fires"(Page 81) must be clarified. Page 75, "responding to...fires" is also mentioned.

QUESTIONS

1. Is there a pay disparity between State Water Resources Control Board staff, and the staff of the Regional Water Quality Control Boards?
2. Is the term "employee separations" common in the business community, or a norm in government only?
3. Did the State Legislature get copies of the report, or was at least a summary presented at an Assembly and/or Senate committee meeting?

Sincerely,

Mrs. Teresa Jordan

3152 Shad Court
Simi Valley, CA 93063
February 13, 2008

State Water Resources Control Board
1001 E Street
Sacramento, CA 95814

Re: "Draft Strategic Plan Update: 2008-2012"(Version 3).

Dear Members of the Board:

I am writing once again on the aforementioned subject because Ms. Caren Trgovcich forwarded an E-mail today about my February 10, 2008 letter to you--that was E-mailed on February 11, 2008 along with a copy of my February 1, 2008 letter to the Ventura County Board of Supervisors--in which she states "Please note that the second letter attached to this e-mail, addressed to the Ventura County Board of Supervisors, was misdirected to the Water Boards."

Members of the Board, attachment 020108MCO.doc was not misdirected because in my February 10, 2008 letter I clearly reference my February 1, 2008 letter to the Ventura County Board of Supervisors on Page 4:

"FEBRUARY 1, 2008 LETTER TO VC BOARD OF SUPERVISORS

#1 - Please refer to the enclosed copy because it speaks volumes about egregious violations of the public participation process by elected government officials."

Thus, my February 1, 2008 letter to the Ventura County Board of Supervisors is evidentiary support for the 2008-2012 Strategic Plan Update's *public input* issue and trend.

Members of the Board, I am grateful for Ms. Trgovcich's E-mail. I was leery over the fact that to date no verification of receipt of my 3 E-mails/letters--1st January 29, 2008 (012808MCA.doc, 060507MSF.doc, 062207MCA.doc), 2nd February 11, 2008(021008MCA.doc, 020108MCO.doc), and 3rd February 12, 2008(021208MCA.doc)--has come from your staff.

Members of the Board, even though I stated in my February 12, 2008 letter that it was my final one on the "Draft Strategic Plan Update: 2008-2012"(Version 3), I am taking the opportunity opened up by Ms. Trgovcich's E-mail to submit timely corrections on my February 11 and 12, 2008 letters. I was going to incorporate the corrections in my letter to you on the proposed NPDES Permit Compliance Schedules statewide policy even though this item's public comment deadline of February 20, 2008 followed the 2008-2012 Strategic Plan Update's February 15, 2008 deadline.

CORRECTIONS

FEBRUARY 11, 2008 LETTER

- #1 - Page 1: WORKFORCE PLAN FRAMEWORK(May 15, 2007) should have read "WORKFORCE PLANNING FRAMEWORK (May 15, 2007)".
- #2 - Page 2, #2: Workforce Plan Framework should have read "Workforce Planning Framework".

FEBRUARY 12, 2008 LETTER

- #1 - Page 1: Paragraph, Workforce Plan Framework should have read "Workforce Planning Framework".
- #2 - Page 1: WORKFORCE PLAN FRAMEWORK(May 15, 2007) should have read "WORKFORCE PLANNING FRAMEWORK (May 15, 2007)".

Sincerely,

Mrs. Teresa Jordan