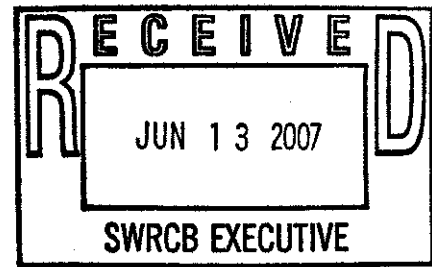


6/28/07 Workshop  
WQ Enforcement  
Deadline: 6/14/07 Noon

June 12, 2007  
State Water resources Control Board  
Miss Song Her, Clerk to the Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, Ca. 95814  
Fax No. 916/ 341-5620



**Re;** Revised Public Workshop to receive information regarding policy direction on, Water Quality Enforcement. Comments on items 1-6 for discussion in the Workshop, on June 28, 2007, participants comments due on June 14, 2007.

My comments will address items 1-6, detailed suggestions on stronger enforcement tools will be lengthier and more direct.

**1. Recommendations on modifications are;**

- Adopt stronger wording for all State Water Resource Project/programs, to include the National Flood Insurance Program, (NFIP) within the State of California.
- Enact and enforce legal consequences for violations of; Title 42 U.S.C. sec. 4001-4128 under the Authority of the Executive Order no.12127 issued March 31, 1979 Title 44, CFR, Ch.1 sec.59-77 of the NFIP.

In particular an example would be; "violations of any, or part of the adopted Water Ways/Flood Plains, or Flood Ways SHALL cause litigation to be filed on behalf of the Federal Government, and its citizens, or a citizen of the State who has been harmed or property damaged by the violation". Authority under Title 44 CFR, sec. 60.25 duty of State coordinating agency..

**2. Suggestions on factors to consider in prioritizing enforcement would be;**

- Any reported violations, and or detected violations of any kind,[no matter how controversy] should be the SWR top priority.
- Enforcement must be your first consideration, under adopted Waters within the State of California.
- Human safety , public loss from damages caused by noncompliance as sighted under; Title 44,CFR, sec 60.3 (a)(2)which speaks directly to the cover-up at the Rocketdyne Missal site, that the City of Simi Valley is and was responsible to monitor as Water Works no. 8 (Previously no. 17) as overseers.
- Enforce Authority under sec. 404 of the Federal Water Pollution Control Act, Amendment of 1972, 33 U.S.C. 1334, and (3) review "ALL" permits to assure site is safe from flooding.

**3. Red flags to look for in measuring the effectiveness of the Water Quality Enforcement Program are as follows;**

- Report noncompliance, especially incidences that have gone on undetected/covered-up by the Communities/Cities, or State Agencies for their own personal gain.

An example is the Rocketdyne facility/site where the three melt downs weren't made public until; a) the 1959 melt down in October of 2005, b) the 1963, and the 1969 melt downs on April 9, 2007 at the public Rocketdyne meeting in Simi Valley, Ca.

- The State, and or the Federal Government needs to take action filing a criminal suit against the City of Simi Valley, and the owners of the Rocketdyne Missal site, under sec. 404 of the Federal Water Pollution Control Act on behalf of the citizens of the San Fernando Valley and Ventura County. As dictated under Title 44, CFR, Ch.1, sec. 60.3 (a)(2) of the NFIP.

**4. Steps to achieving a better informed public, regarding enforcement of Statues and State Water Resources Regulations.**

- To set up and utilize a community "Watch Dog", (as we are commonly called), that would be required to attend City Council Meeting, etc., who would be the community voice who would report on information acquired from the public input on proposed projects/ or violations on existing sites.
- Written reports would go directly to the SWRB, regarding violations of Statues, Laws and adopted Regulations.
- Make all Laws, Statues and Adopted Regulations available to the public on line that are germane /relevant to proposed projects for review. As sited under the E.O. 12127 of March 31, 1979 under Title 44, FR 19367, 3 CFR 1979.

**5. Suggestions on becoming a more effective Water Quality Board.**

- Stronger enforcement of the adopted Statues, Regulations and Laws on violations, and criminal acts committed against the public.
- File suit on behalf of the citizens of the State/Community who has suffered damages by the noncompliance of the Cities/Communities who have failed to enforce and have dropped the ball in their failure to administer the State Water Recourses and National Flood Insurance programs with the State.
- Take an active role in assisting in resolving the violation.

**6. Your NONCOMPLIANCE, is the most "significant inconsistence" of the State Water Resources Board.**

- The SWRCB failure to administer and enforce the NFIP, The Clean Water Act, Federal Funded Programs, within the designated flood way/ flood plain etc., for Low Income Residents under the authority of Title 44, and 42 Health and Safety.
- The failure to enforce Housing and Urban Development Act of 1969, approved Dec. 1969, and Title XIII of the Housing and Urban Development Act of 1968, allows noncompliance to fester and develop into further violations.

P. 3


June 12, 2007

SWRCB

P.7, item III entitled, Determining "Priority" Violations states; "all violations subject to mandatory minimum penalties pursuant to California Water Code 13385". Clearly with Statues, Regulations and Laws having been adopted the Rocketdyne fiascos should never have taken place. The State Water Resources failure to step up to the plate has violated its own Statues, Laws and regulations adopted to prevent Water contamation of its drinking water. Please refer to May 23, 2007 comments, as well as the June 4, 2007 comments regarding Riparian Rights. Attachments enclosed to provide assistance.

Sincerely,

Ginn Doose  
4922 Alta Street  
Simi Valley. Ca.  
93063  
c/o P.O.Box 2310  
Clearlake, Ca.  
95422

A handwritten signature in black ink that reads "Ginn Doose". The signature is written in a cursive, slightly slanted style.

cc; Mr. Dennis White, IGO DHS/FEMA

## Attachments

A. City of Simi Valley,  
Items 4A & 4D,

B. Oppositer to S.A Water  
Quality Control Board M.S.W.D  
Dated ~~April~~ March 6, 07

C. May 23, 07 Water Rights  
enforce ment Workshop

Copy

City of Simi Valley  
City council  
2929 Tapo Canyon Road  
Simi Valley ,Ca.  
93063  
fax. 805/ 526-2489

Re; Item **4A, and 4D**, AGENDA SUMMARY CITY COUNCIL VENTURA  
COUNTY WATERWORKS DISTRICT NO. 8 SIMI VALLEY  
COMMUNITY DEVELOPMENT AGENDA REGULAR  
MEETING FOR JUNE 11,2007

Dear Mayor, and City Council Members,

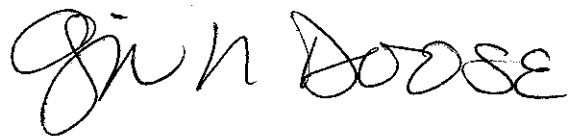
My concerns with both item 4A and 4D steam from personal knowledge that would indicate they are related. A review of the June 11, 2007 agenda raise the questions;

First, What are the actual names involved , or related to the Stearns LLC, that is referenced under item 4A?

And, secondly I thought that the tie between the Gillibrand Rock Quarry , located just west of the Las llajas and Chivo's Channels, was that Gillibrands effluent is pumped into the Las Llajas Channel that is diverted through the Golf Course on Alamo Street to the piping that runs down Stearns Street which is pumped up to the Rocketdyne site.

Therefore, shouldn't item 4A and 4D be lumped together? If this is the case could the City Council please explain your reasoning behind not making that information public.

Sincerely,



Ginn Doose  
4922 Alta Street  
Simi Valley Ca., 93063  
c/o P.O.Box 2310  
Clearlake, Ca. 95422

cc; Mr. Dennis White, DHS/FEMA IGO  
Miss Song Her, State Water Resources Control Board

attachment A

In opposition

March 6, 2007

Los Angeles Water Quality Control Board  
Attn: Dr. Xavier Swarnikannu,  
320 W. 4<sup>th</sup> Street, no. 200  
Los Angeles, California  
90013-2343

Re: Comments; on WDR for Municipal Storm Water Discharge within the Ventura County Water Protection District (NPDES) No. CAS 004.

Dear Dr. Swarnikannu,

At first glance the current document appears to look improved from the last few years. However, my concern is that if you have waived regulations for the SSFL, Santa Susana Field Laboratory NPES that presents a problem.

First, since you have waived regulations for the Rocketdyne Missile Site NPES (SSFL) I question will there be a continued monitoring station down stream of the Nuclear site? The report that was just released to the public in October of 2006 shows that there was a 459% greater contamination from the 1959 melt down at the missile site than was ever reported. Was that data taken into consideration when this document was prepared?

Secondly; and probably more important if my memory serves me correctly the discharge into/within the Ventura County Water Shed is directly influenced by;

- The Master Drainage Plan /Master Water Plan that would include the influence of the Rocketdyne Missile Site,
- The sphere of influence from Angeles County line to Ventura County to include the LasLajas and Chivo's Channels and canyons run off, that are some how always left off the studies due to lack of funding.

If this current plan is to be consistent, than a complete review of the 1990-1992 Master Drainage Plans/Water Plans must be done to assure its accuracy. My review of the 1990-1992 Water Plan shows that it was based on the 1986 plan that was never adopted, or accurate. Therefore, I question the validity, and or creditability of this 2005-2007 plan being proposed. A review of your files should show that my colleague Mrs. Teresa Jordan and I filed an opposition to the 1992 up-dated plan being presented for several viable reasons.

attachment B

Page 2  
 March 6, 2007  
 Dr. Swamikannu/ Doose

It is our opinion that to continue to build on a house of cards will cost us the tax payers more in the long run, not to mention the health hazard that would go undetected. You can't keep preparing water/ or drainage plans on false incomplete information hoping that a catastrophic event never occurs.

In conclusion, leaving out streams and tributaries that greatly effect the influence of the water flow down stream simply isn't good sound management of our Water ways, or the water resources they provide. To leave out data and facts of the health hazard from the Rocketdyne melt is criminal. It is my contention that something is very wrong when valid concerns over, false facts and incomplete data being presented is not taken seriously. Clearly this is nothing more than a case of "Noncompliance".

And, interesting enough, I contacted the State Water Resources and Federal Agencies about the noncompliance of Ventura County and the City of Simi in December of 1989, and filed a suit for noncompliance against the State and Federal Government for non-compliance in December of 1991. The falsifying information regarding the influence of the Rocketdyne site water discharge and (FEMA) flood Plain has caused my family undue hardship. The cover-up of accurate information will only cause further health hazards for the citizens of Simi Valley and the down stream Communities if not addressed.

Therefore, I must in all good conscience reject this plan and request that the aforementioned data be made part of this proposal in order to have a true and correct picture of the Storm Water Discharge within Ventura County.  
 Sincerely,



Jim Doose  
 4922 Alta Street  
 Simi Valley, Ca.  
 93063  
 c/o P.O.Box 2310  
 Clearlake, Ca.  
 95422

cc: Mr. Dennis White, IGO DHS/FEMA, fax. 1/202/254-4294  
 Ms. Janet Reno The A. J. S, fax. 1/515/279-3090  
 Ms. Teresa Jordan, 1/805/522-5016

P.S. Teresa Please Submit on my behalf, Sincerely  
 3/6/7 Jim Doose

May 23, 2007  
Miss Song Her-Clerk of the Board  
State Water Control Board  
1001 I Street  
Sacramento, California  
95814

fax. No. 916/341-5620  
Electronics copy

Attachments enclosed are;

**Re: Water Rights Enforcement Work Shop, (dead line of June 6, 2007 for filing)**

A review of the; State Water Resources Control Board Strategic Plan, prepared for the March 12-13, 2007 Stakeholders Summit, has caused me grave concerns. Several of the sited categories for the Water Board History are very disturbing. It would appear to me that adopted measures were in place to monitor toxic discharge into community's drinking water that weren't enforced by the State of California. Other adopted public health safe guards for waters within the designated flood way were also deliberately violated placing the public in harms way for several decades.

Therefore, I take issue with the water contamination from the Rocketdyne Missal site melts downs that weren't made public until decades after the melt downs took place.

. The Water Board own accounting of its own history shows that when the Rocketdyne melt down of **November 1959** took place the California Doctrine had only established two existing Rights Riparian and Appropriative [ under P.8, 1<sup>st</sup> col., 1886]. A review of the Riparian and Appropriative Rights indicate that all tributaries, streams and arroyos down stream from the Missal Facility should have been monitored.

. The **1963** and **1969** Rocketdyne melts downs weren't only made known at the last Rocketdyne public meeting held April 9, 2007. The State Water Resource's own history shows that P.8, 3<sup>rd</sup> col., 1963 Industrial Waste Control were adopted. P.8, 3<sup>rd</sup>.col., 1969 Porter Cologne Quality Control Act was in place.

Since 1969 several other measures were enacted,

. P. 10, 2<sup>nd</sup> col., 1996 Grown Water -Cleanup and Contamination Zone Policy was adoption. P.10, 2nd col., 1997 Title 27, Regulations for discharge/to streamline permitting process for "Non-hazardous" Land fills was adopted. P. 10, 3<sup>rd</sup> col., 2000 USEPA issued California's Toxic Rule (CTR).

In 1966, prior to the above adoption of measures, Ventura County requested to be included into the National Flood Insurance Program. Simi Valley followed requesting inclusion into the regular NFIP in 1976. Therefore in my opinion the State of California has dropped the ball placing its residents in Simi Valley, Moorpark, Thousands Oaks, Camario, Oxnard as well as the San Fernando Valley whose drinking water was contaminated, in harms way.

The State of California appropriated/set apart tributaries, streams and arroyos within Simi Valley as flood ways when Ventura County, requested to be included in the National Flood Insurance program. The State Water resources further violated its citizen's rights when it failed

*attch mat c*



Page 2

May 23, 2007

Doose/ Miss Her for State Water Resources

to enforce protection measures adopted to regulate toxic chemicals from its drinking water. I personally find that "Criminal" to say the least.

I have personal experience having contacted the State Water resources in 1988 regarding the noncompliance of Simi Valley to administer and enforce the NFIP. Therefore, I was forced to file suit in December of 1991 and consequently was illegally removed from my home and property in an attempt to quash the Law suite. To date the illegal development with in the FEMA flood plain, and the fraudulent transfer of my home and property have never been heard in a Court of Law. In attempt to resolve the dilemma State Water Resources employee Ms. Ruth Dudley/Lambert set up a one-on-one meeting with a member of the State Water Board at the Water Resources Offices on J Street to reiterate the same on going violations...to no avail!

My home and property I have riparian water rights through the La Placentia Water Co., previously LDS-139/ Parcel 100, sec. F, Lands of Santa Susana Land and Water Co. AKA, the Santa Susana Water Co. In January of 1993 a notice was posted in the local newspaper inquiring as to the owners of the 1966 series H Water Bonds that had matured. On February 15, 1993 I filed in Superior Court in Los Angeles, Ca. 90012 asserting my rights on behalf of myself and 100 doe defendants on case no. BC093597. However, because I had been illegally removed from my home and property a month prior to the notice being posted I was blocked from court. The 50,000,000. Million Dollars value of the 1966 series H Water Bonds caused greed and fraud to rear its ugly head, and gave way to me being allowed my rights to assets due from the riparian rights attached to my home and property to be denied.

The point being, if the State had preformed the job of monitoring the Water Ways, Streams, Tributaries and Arroyo that have been dedicated under the NFIP I wouldn't still be block from moving back into my home and property,(that was ordered delivered by an E.O). And it goes to saying if riparian rights had been upheld the crimes and violations against my family wouldn't have taken place, and it goes without saying I wouldn't be homeless today! Clearly the three melts down at the Rocketdyne site have influence our drinking water and our riparian rights as well.

My suggestion for better Water management would be;

- . **Enforce the already adopted Laws, Regulations and Statues for the Water Ways, Streams, Tributaries and Arroyos.**
- . **Take a more active role in the required Community Assistance Visits, commonly referred to as, C.A.V.'s.**
- . **Listen to the community input regarding violations of Water Ways, Streams, Tributaries and Arroyos within the surrounding communities, as well as the community effected by the violation.**

Page 3  
May 23, 2007

- . And, when reported take affective action to correct the existing violation, as dictated by the Laws, Statues and Regulations of the National Flood Insurance Program, (NFIP) under Title 44, CFR Ch. 1, 59-75.**

The State Water Resourced failure to administer and enforce the NFIP for Ventura County in particular Simi Valley has caused me undue hardship and suffering since the December 12, 1991 filing in Central District Court, in Los Angeles, Ca. against the State Water Resources. Please refer to this page(2), 1<sup>st</sup> Paragraph. 1-7 , the harm that was done could have been avoided if the State Water Board had done their job, of monitoring the State Water Resources.  
Sincerely,

A handwritten signature in black ink that reads "Ginn Doose". The signature is written in a cursive, flowing style with a large initial "G".

Ginn Doose  
c/o P.O.Box 23 10  
Clearlake, Ca.  
95422

cc; Mr. Dennis White IGO/DHS