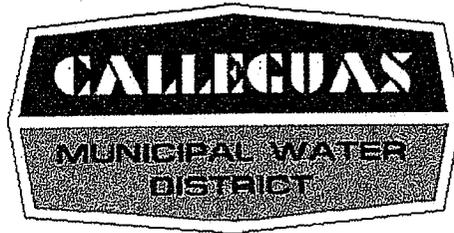


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October 15, 2007

Dr. Xavier Swamikannu
Chief, Storm Water Permitting Program
California Regional Water Quality Control Board, Los Angeles

Transmitted electronically to seconddraftVCMS4@waterboards.ca.gov

Comments Regarding Second Draft Ventura County MS4 Permit – NPDES No. CAS004002

Dear Dr. Swamikannu:

Thank you for the opportunity to comment on the second draft of the Ventura County MS4 Permit. As the imported water wholesale agency serving Ventura County, our primary interest is delivering a safe drinking water supply to our customers. We appreciate the Regional Board staff's revision in the second draft permit to eliminate the 100,000 gallon per year limitation for potable water discharges. This assists us in maintaining our water system to meet California Department of Public Health drinking water standards. We also appreciate the Regional Board staff's efforts to work with drinking water system operators to develop regulations that both allow us to continue to operate so as to protect public health while fulfilling your mandate to protect the quality of water discharges.

As written, the second draft of the Ventura County MS4 Permit prohibits flushing of water supply and distribution mains, and dewatering or draining of reservoirs or water storage facilities (p. 26, footnote 1). While Regional Board staff has discussed developing a General Permit suitable to cover such potable water discharges with best management practices to protect surface water quality, there is no such General Permit in place at this time. We respectfully request that the draft permit language be amended to allow for releases of potable water associated with drinking water system protection and maintenance subject to best management practices until a new General Permit can be developed to address these issues.

If you have any questions regarding this comment, please feel free to contact Henry Graumlich, Manager of Special Projects, at (805) 579-7127 or hgraumlich@calleguas.com. Thank you for your consideration.

Very truly yours,

Donald R. Kendall, Ph.D., P.E.
General Manager