



"Citrus Capital of the World"

# City of Santa Paula

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October 25, 2007

Tracy Egoscue  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

RECEIVED  
2007 OCT 31 PM 3 37  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

**Re: Second Draft Order of the Ventura County Municipal Separate Storm Sewer System Permit (NPDES No. CAS004002) for the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein**

Dear Ms. Egoscue,

The City of Santa Paula appreciates the opportunity to provide comments on the second draft Ventura County Municipal Separate Storm Sewer System Permit for the Ventura County Watershed Protection District, County of Ventura and the incorporated cities.

As background information, Santa Paula is a community of approximately 29,000 residents in eastern Ventura County. Incorporated in 1902, Santa Paula is an older community that resides along the Santa Clara River. The City is committed to environmental excellence, an integral part of which includes an effective stormwater quality management program.

Santa Paula has been an active and supportive member of the Ventura Countywide Stormwater Quality Management Program since it's inception in 1992. The Countywide program has an exemplary record as an effective stormwater quality management plan. In 2003, the U.S. Environmental Protection Agency awarded the Ventura Countywide Program with its National Clean Water Act Recognition Awards Program, Storm Water Management Excellence Award. The intent of the awards is to "recognize municipalities and industries that are demonstrating their commitment to protect and improve the quality of the nation's waters by implementing outstanding, innovative and cost-effective Storm Water control programs and projects". The award reflects the Program's and the City's commitment to improve and protect water quality in Ventura County through a comprehensive and constructive best management practice (BMP) based program using an iterative process to guide our efforts.

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Given the above, the City is concerned that the second draft permit continues to be extremely prescriptive and ignores or requires duplication for much of the work that has been done to date. Many significant elements in the proposed permit are unfocused, counter-productive and contrary to the progress and good-faith efforts established in the watershed management and TMDL processes.


The City participated with the other agencies in the county in developing the comments regarding the second draft permit submitted to the Regional Board on October 12, 2007 by the Ventura County Watershed Protection District on behalf of the Permittees. The City supports and agrees with these comments.

As stewards of scarce and limited public funds, we must ensure that the actions and expenditures driven by regulatory requirements are consistent with each other, are cost-effective and capable of achieving the goals for which those expenditures are intended. The second draft stormwater quality permit is inconsistent with those goals. Although we disagree with much of the proposed approach being used by the Regional Board, we are in agreement with the need to continue and enhance our award-winning stormwater management program, which will lead to water quality protection and improvement and provide for adequate accountability.

To that end, we request and look forward to working with Board staff through a series of facilitated meetings in order to craft a revised permit that supports this need.

If you have any questions or need additional information, please feel free to contact me Cliff Finley, Director of Public Works at (805) 933-4212, ext. 304.

Sincerely,

  
Wally Bobkiewicz  
City Manager

Cc: Clifford G. Finley, Public Works Director  
Karl Berger, City Attorney  
Ventura County Stormwater Permittees