



B A S M A A

Alameda Countywide
Clean Water Program

Contra Costa
Clean Water Program

Fairfield-Suisun
Urban Runoff
Management Program

Marin County
Stormwater Pollution
Prevention Program

San Mateo Countywide
Stormwater Pollution
Prevention Program

Santa Clara Valley
Urban Runoff Pollution
Prevention Program

Vallejo
Sanitation and Flood
Control District

May 29, 2008

Ms. Tracy Egoscue, Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

**Subject: Draft Tentative Order - MS4 NPDES Permit for the Ventura
Countywide Stormwater Program**

Dear Ms. Egoscue:

Thank you for this opportunity to comment on the April 29, 2008 draft Tentative Order - MS4 NPDES Permit for the Ventura Countywide Stormwater Program (Draft Tentative Order). Please accept these comments regarding the Draft Tentative Order submitted by the Bay Area Stormwater Management Agencies Association (BASMAA) on behalf of its members.

BASMAA is a consortium of the eight areawide urban runoff programs in the San Francisco Bay Area, representing over 90 agencies, including 79 cities and 6 counties. BASMAA was started in 1989 by local municipalities to facilitate information sharing and cooperation and to develop products and programs that would assist them in meeting NPDES permit and Clean Water Act requirements.

BASMAA and its member agencies concur with the reasoning for and comments of the California Stormwater Quality Association (CASQA) regarding the Draft Tentative Order. Los Angeles Regional Water Board staff is proposing in the Ventura Draft Tentative Order for the first time in any Phase I MS4 permit in California permit design features (i.e., Municipal Action Levels (MALs), Effective Impervious Area (EIA), Best management practice (BMP) performance design criteria) that raise significant technical issues, questions, or concerns, and that if adopted could be interpreted to be precedent setting.

Accordingly, we strongly encourage the Los Angeles Regional Water Board to accept CASQA's recommendations and to work with the Ventura permittees, CASQA, and stakeholders to develop a technically solid stormwater quality management permit that will, in turn, be more effective at helping to meet water quality goals.

If you have any questions, please feel free to contact me at (925) 313-2373.

Bay Area
Stormwater Management

Agencies Association

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Sincerely,

Donald P. Freitas, Chair

cc: Bruce Wolfe, Executive Officer, San Francisco Bay Regional Water Board
CASQA Board of Directors