



City of Moorpark

CITY ENGINEER/PUBLIC WORKS DEPARTMENT

799 Moorpark Avenue, Moorpark, California 93021 (805) 517-6256 fax (805) 532-2555

October 12, 2007

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

Subject: Comments to 8/28/2007 Second Draft Order – Ventura County Municipal
Separate Storm Sewer System (MS4) Permit (NPDES No. CAS004002)

Dear Ms. Egoscue:

In reference to the above subject, the City of Moorpark (City) wishes to inform you that we have completed our review and offer the following comments. The City supports the October 12, 2007 Ventura Countywide Stormwater Program (Ventura Program) Chair, Gerhardt Hubner, letter addressed to Ms. Tracy Egoscue, Executive Officer of the Los Angeles Regional Water Quality Control Board (Regional Board) and the attachments thereof. We further emphasize that:

- The City is one of the sister cities within the County of Ventura and has worked in close collaboration with the entire Ventura Program while maintaining and improving regional water quality. The City is concerned that as drafted, the TMDL language in the Second Draft Order undermines this collaboration and could nullify Board-approved TMDLs.
- The trash excluder requirement as written in the Second Draft Order is unsafe as a large part of the City lies within a flood plain – trash excluders would pose a great and significant risk to public safety by causing flooding to virtually all homes and businesses within the flood plain.
- The Second Draft Order goes well beyond the requirements of the Clean Water Act's unfunded mandate making the cost of compliance untenable for the Phase II cities.
- The City agrees with the request for Regional Board staff's Position Papers and Technical memos as described in the Hubner letter.
- The City also agrees with the request to give the Permittees more time to meet with Regional Board staff in facilitated meetings prior to Board staff issuing the Tentative Permit, as described in the Hubner letter.

PATRICK HUNTER
Mayor

KEITH F. MILLHOUSE
Mayor Pro Tem

ROSEANN MIKOS
Councilmember

JANICE PARVIN
Councilmember

MARK VAN DAM
Councilmember

October 15, 2007

Page 2

The City looks forward to your response to these comments and the comments in the Hubner letter and attachments thereof. The City would again like to emphasize its commitment to the collaborative effort in maintaining and enhancing water quality in our watersheds. Please feel free to contact me at (805) 517-6255 if you have any questions regarding these comments. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Yugal K. Lall", written over a horizontal line.

Yugal K. Lall
Public Works Director

C: Xavier Swamikannu