



# City of Moorpark

CITY ENGINEER/PUBLIC WORKS DEPARTMENT

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May 29, 2008

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

Subject: Comments to 4/29/2008 Draft Tentative 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 it has completed its review and offers the following comments. The City supports the May 27, 2008 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. The City further emphasizes that:

- Although improvements were made in the Draft Tentative Order regarding the TMDL requirements, the City is dismayed that the Draft Tentative Order continues to be extremely prescriptive and ignores or requires duplication of much of the work that has been done to date by both the Ventura County Co-permittees and the Calleguas Creek Watershed Management Plan's stakeholders.
- The City is concerned with the Draft Tentative Order's use of Municipal Action Levels (MALs) which is inconsistent with state and federal policies, is technically flawed, results in requirements more stringent than federal law, and creates limits that are more restrictive than adopted water quality objectives contained in the Basin Plan.
- The Draft Tentative Order includes a requirement for the installation of trash excluders on or in catch basins in commercial areas, industrial areas, and near educational institutions. This is a great expense for a problem that does not exist at all of these locations. Rather, it would be better for the Co-permittees to be given discretion to identify and prioritize the high trash areas in their jurisdictions that would benefit from structural BMP implementation.

PATRICK HUNTER  
Mayor

JANICE PARVIN  
Mayor Pro Tem

ROSEANN MIKOS  
Councilmember

KEITH F. MILLHOUSE  
Councilmember

MARK VAN DAM  
Councilmember

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 its watersheds. Please feel free to contact me at (805) 517-6255 if you have any questions regarding these comments. Thank you.

Sincerely,



Yugal K. Lall  
City Engineer/Public Works Director

C: City Council  
City Manager  
Shaun Kroes, Management Analyst  
Gerhardt Hubner, VCWPD  
Xavier Swamikannu, LARWQCB