

May 29, 2008

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

Transportation Department
Wm. Butch Britt, Director

Central Services Department
Lane B. Holt, Director

Water & Sanitation Department
R. Reddy Pakala, Director

Watershed Protection District
Jeff Pratt, Director

Engineering Services Department
Alec T. Pringle, Director

**SUBJECT: COMMENTS ON DRAFT TENTATIVE ORDER - VENTURA
COUNTYWIDE MUNICIPAL SEPARATE STORM SEWER
SYSTEM (MS4) STORMWATER PERMIT**

Dear Ms. Egoscue:

On behalf of the County of Ventura Incorporated Area Stormwater Program (County), we appreciate this opportunity to provide written comments concerning the Regional Water Quality Control Board's (Regional Board) Draft Tentative Ventura County Municipal Separate Storm Sewer System MS4 NPDES Permit (Draft Tentative Order). We wish to acknowledge Regional Board staff for responding to a few of our previous comments, specifically the Jurisdictional Areas issue. Nevertheless, we continue to have serious concerns with the lack of response to many of the Ventura Countywide Stormwater Quality Management Program's collective concerns, and comments submitted by the County in three previous letters dated March 6, October 12 and October 15, 2007 (Attachments Nos. 1, 2 and 3). It was our hope to see more substantial changes made in this Draft Tentative Order.

The County along with the other Ventura County Permittees have worked together to review the Draft Tentative Order, and the County is in agreement with the detailed comment letter dated May 27, 2008 submitted by the Ventura Countywide Stormwater Program.

Although we understand the Regional Board staff's desire to uphold the requirements of the Draft Tentative Order, we must continue to emphasize the importance of duly addressing our comments. We believe it is imperative that our future permit be mutually protective of water quality *and* economically reasonable, while not creating *an undue burden* to the County for potential non-compliance with its provisions. As currently written, the Draft Tentative Order falls exceedingly short in meeting these fundamental criteria.

Since our first comment letter in March of 2007, it was our hope that we could work together to forge a protective yet feasible approach. However, we are troubled that our

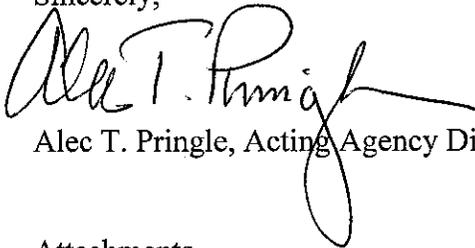


countless efforts have apparently been either overlooked or possibly ignored, and we ask for your help in addressing our continued concerns.

In conclusion, we acknowledge the efforts of Regional Board staff for the work done thus far. However, as with the First and Second Draft Orders, we remain concerned with the approach being taken with the most recent Draft Tentative Order. We strongly urge Regional Board staff to consider and respond to *all* concerns voiced in our March and October 2007 comment letters, and as submitted by the Ventura Countywide Stormwater Quality Management Program. Furthermore, we encourage you to continue working with County staff to more effectively draft a Countywide Municipal Stormwater Permit that is both mutually protective of water quality, economically reasonable, while not creating an undue burden to the County.

Again, thank you for this opportunity to comment.

Sincerely,



Alec T. Pringle, Acting Agency Director

Attachments

1. County of Ventura, Public Works Comment Letter dated March 6, 2007
2. County of Ventura, Public Works Comment Letter dated October 12, 2007
3. County of Ventura, Public Works Supplemental Comment Letter dated October 15, 2007

cc: Chris Stephens, Director of RMA
Wm. Butch Britt, Director of Transportation
R. Reddy Pakala, Director of Water & Sanitation
Jeff Pratt, Director of Watershed Protection District
Gerhardt Hubner, Deputy Director, Watershed Protection District
Paul Tantet, Engineering Manager, Watershed Protection District