



CITY OF SIMI VALLEY

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April 10, 2009

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

SUBJECT: TENTATIVE ORDER OF THE VENTURA COUNTY MUNICIPAL
SEPARATE STORM SEWER SYSTEM PERMIT (NPDES PERMIT NO.
CAS004002)

Dear Ms. Egoscue:

The City of Simi Valley respectfully submits the following comments regarding the above referenced Tentative Order. The City acknowledges and appreciates the significant Regional Water Quality Control Board (Board) staff efforts. They collaborated over a series of meetings with the Ventura Countywide Stormwater Program staff to develop a Tentative Order that better protects water quality and is more flexible and affordable than previously proposed. In addition, the City supports and concurs with the Ventura Countywide Stormwater Program (Program) comment letter dated April 10, 2009.

As expressed in greater detail in the April 10, 2009, Program letter, the Municipal Action Levels (MALs) and Best Management Practice (BMP) Performance Standards, as well as other permit elements, set a standard for stormwater permitting, perhaps nationally. The Tentative Order would require Permittees to perform many new duties and construct many new programs, resulting in a significant implementation cost increase. While we have worked well together to reduce some cost impacts, the Tentative Order would still result in nearly doubling average costs from \$35 per household per year to over \$60. Particularly considering the current economy and the financial stress our City is under, such a substantial cost increase is difficult to accommodate. While the City in general supports the Tentative Order, it is imperative the Board continue to seek alternative approaches and schedules and remain open to the Permittees suggestions for alternatives to provide the Permittees the flexibility to protect water quality as cost effectively as possible.

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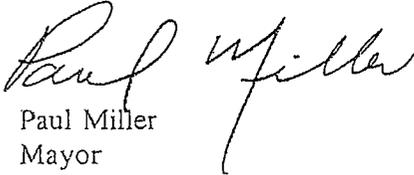
Paul Millier, Mayor Barbara Williamson, Mayor Pro Tem Glen T. Becerra, Council Member Steven T. Sojka, Council Member Michelle S. Foster, Council Member

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If you have any questions, please call Mr. Mike Sedell, City Manager, at (805) 583-6701 or Mr. Joe Deakin, Assistant Director of Public Works, at (805) 583-6401.

Sincerely,



Paul Miller
Mayor

cc: City Council
City Manager
Assistant City Manager/L. Behjan
Assistant City Manager/D. Paranick
Director of Public Works
Assistant Director of Public Works