



City of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

Department of Public Works
(805) 388-5380
Fax (805) 389-9524/419-7820

June 7, 2010

Via Electronic Mail

Ms. Sam Unger
Interim Executive Officer
Los Angeles Regional Water Quality Control Board
320 Fourth Street, Suite 200
Los Angeles, CA 90013

Subject: Comments on Reconsideration of Ventura County Municipal Separate Storm Sewer System Permit (NPDES No. CAS004002) – Tentative Order 10-xxxx.

Dear Ms. Egoscue:

The City of Camarillo respectfully submits the following comments regarding the above referenced Tentative Order for your consideration. As stated in our October 12, 2007, May 29, 2008, and April 10, 2009 letters, the City of Camarillo has been a co-permittee under the Ventura Countywide Municipal Permit since its adoption in 1994. Although our population of fewer than 66,000 classifies us as a Phase II municipality, Camarillo chose to join the countywide effort toward improving water quality in a proactive manner. We feel the collaborative countywide program has been very successful toward meeting that goal.

We appreciate the Regional Board's staff efforts over the past year to meet and consider our interpretations with the currently effective permit, Order No. 09-0057. The City of Camarillo supports the comments submitted in the Ventura Countywide Stormwater Management Program letter dated June 4, 2010 signed by Gerhardt Hubner. As stated in the countywide comment letter, we encourage the Regional Board to carefully consider the implications associated with any future modifications to the Permit. As highlighted in the letter, those concerns include the modifications made to the following areas in the Tentative Order:

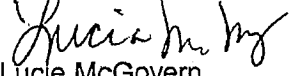
- i. **Annual Reporting Program** – We appreciate the Regional Board's consideration of an alternative reporting format rather than the Tentative Order's current recommended format in Attachment I.
- ii. **Total Maximum Daily Loads (TMDLs)** – Camarillo concurs with the Countywide letter recommended edits to this section of the Tentative Order that provides further clarifications that the Waste Load Allocations in the TMDLs will be achieved through Best Management Practices (BMPs) and to provide a mechanism for making adjustments to the BMPs to ensure their adequate performance. We also encourage the Regional Board to adopt the recommended edits to the TMDL section of the Tentative Order to bring it in line with the adopted TMDL Basin Plan Amendments.

Mr. Sam Unger, LARWQCB
June 7, 2010
Page 2

- iii. **Monitoring Program** – Camarillo concurs with the Countywide letter recommendation to delete the duplicative language in Part 4.B.2 regarding the Southern California Regional Bioassessment Study since it also appears in Attachment F of the Order.

As stated in the Countywide Program letter, the comprehensive nature of Order 09-0057 as well as the Tentative Order sets a high bar for our municipal stormwater program and it has significantly increased Camarillo's as well as our residents' cost to implement the program. We look forward to our continued work with the Ventura Countywide Stormwater Program and the Regional Board in implementing the requirements of the Permit and encourage the Regional Board to carefully consider the implications associated with any future modifications. If you have any questions regarding our comments, please contact Anita Kuhlman, Stormwater Program Manager, at 805-383-5659.

Sincerely,


Lucie McGovern
Deputy Public Works Director

cc: Sam Unger, Ivar Ridgeway, LARWQCB
Jerry Bankston, City Manager
Camarillo City Council Members
City Attorney
Gerhardt Hubner, Ventura Countywide Stormwater Management Program Chair