

**Comments Received on draft Ventura County MS4 Permit  
December 27, 2006**

**From: Carrie Mattingly, Utility Services Director  
City of Port Hueneme**

**To: RWQCB-LA**

**Date: March 6, 2007**



# City of Port Hueneme

March 6, 2007

Mr. Jonathan Bishop  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 4<sup>th</sup> Street, Suite 200  
Los Angeles, Ca 90013

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2007 MAR - 7 AM 10:39  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

**REF: VENTURA COUNTYWIDE STORWATER PROGRAM MS4 DRAFT ORDER  
NPDES PERMIT NO. CAS004002**

Dear Mr. Bishop:

City of Port Hueneme staff wishes to submit initial comments on the Draft Waste Discharge Requirements for Storm Water Discharges from the Municipal Separate Storm Sewer System within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein letter (NPDES Permit No. CAS004002) dated December 27, 2006. These comments are in addition to the collective comments submitted on behalf of all the Ventura County Co-permittees, in a letter dated March 6, 2007. We appreciate the opportunity to provide comments on the Regional Water Quality Control Board's administrative draft as prepared and distributed by the Regional Water Quality Control Board staff.

As to the comments submitted on behalf of all the Co-permittees, the City of Port Hueneme fully supports the March 6, 2007 comment letter and associated attachments.

Some areas of specific concern to the City of Port Hueneme include: 1) the Trash and Debris study to be conducted in the Port Hueneme Harbor/Marina and Hueneme Beach Park and 2) the apparent lack of recognition that seven of the Co-permittees (Port Hueneme included) are in fact Phase II (population < 100,000) communities.

A trash and debris study for the Port Hueneme Harbor/Marina and Hueneme Beach Park would seem to be directing funds to an effort that could be better served in other areas. Neither the Harbor nor the Beach Park (nor the adjacent waters) are listed on the Clean Water Act 303(d) list for trash impairment. In fact, last year the Coastal Cleanup

**NPDES DRAFT PERMIT**

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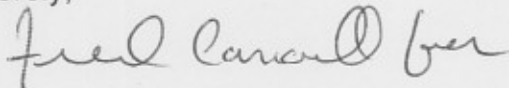
Committee did not schedule Hueneme Beach as an event site because of the minimal amounts of debris collected in the recent years.

The Board appears to have overlooked the fact that the Ventura Countywide Stormwater Program (Program) has seven Phase II communities. Port Hueneme chose to proactively address water quality issues by joining during the Phase I permitting process. In so doing, the City is now facing down a Draft Order that places extreme financial and technical requirements that may not ultimately result in enhancing, achieving, or preserving water quality. It also begs the question of whether the City should look at an alternative of separating from the Program and establishing it's own stormwater program.

The City looks forward to working collaboratively with the Regional Board and all the Co-permittees in developing a revised Draft Order that promotes the continued enhancement of the Program in a cooperative, progressive, and cost-effective manner.

We look forward to your response and again wish to thank you for the opportunity to express concerns with regard to the Draft Order. If you have any questions, please feel free to contact me at (805) 986-6506.

Sincerely,



**CARRIE MATTINGLY**  
**UTILITY SERVICES DIRECTOR**

C: City Manager  
City Attorney  
Public Works Director  
Wastewater Superintendent