

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

**From: Theresa Jordan  
Resident of the City of Simi Valley**

**To: RWQCB-LA**

**Date: March 6, 2007**

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Simi Valley, CA 93063  
March 6, 2007

Dr. Xavier Swamikannu  
LARWQCB  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

2007 MAR -7 PM 12:23

RECEIVED

Re: Public Workshop on Proposed Changes to the Waste  
Discharge Requirements for Municipal Storm Water  
Discharges Within the Ventura County Watershed  
Protection District, County of Ventura and the  
Incorporated Cities Therein, (NPDES NO. CAS004002).

Dear Dr. Swamikannu:

I am opposed to the draft Ventura County Municipal  
Separate Storm Sewer System(MS4) Permit for the following  
reasons.

- #1 - To date the County and the Watershed Protection District have not responded to my comments on the Draft Multi-Jurisdiction Hazard Mitigation Plan and the Flood Mitigation Plan which are interrelated to this "Order".
- #2 - To date the Federal Emergency Management Agency and the County of Ventura, and the City of Simi Valley have not responded to my comments on the Draft Preliminary Flood Insurance Study(FIS) and Preliminary Flood Insurance Rate Maps(FIRMs) which are interrelated to this "Order".
- #3 - While the California DWR and the LARWQCB deal with regional water management aspects:
  - 1. Urban Water Management Plan(UWMP), and
  - 2. Integrated Regional Water Management(IRWM) Plan,

this "Order" does not incorporate the Boeing Rocketdyne Santa Susana Field Laboratory's NPDES program permit--even though it is a

separate "Order" the area's runoff significantly impacts the Arroyo Simi part of the Calleguas Watershed Area, and the City of Simi Valley's Municipal Separate Storm Sewer System Permit for which the citizenry is being burdened with fee increases to cover programs and projects to comply with State and Federal government regulations.

- #4 - This next 5-years permit is considerably improved from the previously issued ones, but even though the word "shall" appears practically everywhere there are no guarantees that certain requirements will not be made flexible, waived, deferred, or deleted--as exemplified by the Board's recent decision for the Boeing Rocketdyne Santa Susana Field Laboratory requirements.
- #5 - Instead of phasing--first, second, third, fourth, and fifth year--requirements as previously done, the draft "Order" allows for meeting them within the 5-years period.
- #6 - The City of Simi Valley to date has not responded to my comments on the FY 2006-2007 Preliminary Base Budget which includes State and Federal government funding for the current and updated Municipal and NPDES permit projects.
- #7 - The cities of the County of Ventura asked the Watershed Protection District to act as the official body in changing the Ventura County Watershed Protection District Act in order to be able to levy property-related fees to cover the costs of NPDES permit program related projects(California legislator Nava). No public hearings took place at the County and Cities level on this matter.
- #8 - To date the resolutions from the County's cities related to the Nava legislative bill have not been adopted to date as required by the Ventura County Board of Supervisors. The IRWM related Coalition will not do.
- #9 - To date, the City of Simi Valley has constructed only 1 of 6 to 11 regional stormwater detention

basins that it said it needed to mitigate runoff for its NPDES permit since 1992, even though the Federal Emergency Management Agency allocated the funding toward that project about 5+ years ago.

- #10 - To date, the County of Ventura has not rescinded the existing NPDES permit related fees even though they are illegal--there were no public hearings, which is why they cannot be increased since this matter would have to be disclosed to the voters.
- #11 - The Los Angeles Regional Water Quality Control Board is not accepting facsimiles for comments from "interested parties" for this Public Workshop on Proposed Changes to the Waste Discharge Requirements for Municipal Storm Water Discharges Within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein, (NPDES NO. CAS004002). Such directive was non-existent when addressing the State's Water Plan update, and Mr. Lester Snow has accepted my facsimiles relative to public input on the IRWM program and funding. Many a document had to be cross-referenced in order to address this draft. The Los Angeles Regional Water Quality Control Board's staff assists the "Permittees", members of the public don't have that luxury. By excluding facsimile submittals, the LARWQCB's stance is not in keeping with Governor Arnold Schwarzenegger's "open government" policy with regards to the public participation process.

#### QUESTIONS

1. Page 1 of 118 - A.1: Why does the first sentence state "Permittee" and "Permittees" in the Draft document--Mr. Jonathan S. Bishop's December 27, 2006 letter to Mr. Jeff Pratt refers to the entities as "Co-Permittee" and "Co-Permittees"?
2. Why is this MS4 Permit ("Order") update 1½ years overdue?
3. Is there a list with the County and/or its Cities

relative to the "State and Federal facility" mentioned under A.1.3, "an entity"?

4. Does the word "substances" under B.4 cover only the pollutants mentioned under B.1 and 2, or does it cover other items (cars, shopping carts, furniture, etceteras)?
5. Are the words "products of combustion" one and the same as "combustion engine operation" under B.2?
6. The last sentence under "8.", Page 4 of 118, states "This Order includes requirements to conduct bioassessments of natural streams and waterways." What about man-made streams and waterways?
7. Our Recreation and Parks District empties the water from the duck ponds in one of its parks into the city sewer system. Is the District required to obtain a special permit for this activity?

Dr. Swamikannu, please note that Ginn Doose concurs with my comments.

Sincerely,



Mrs. Teresa Jordan