

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

**From: Marty Melvin, District Manager
Ventura County Resource Conservation District**

To: RWQCB-LA

Date: March 2, 2007



Ventura County Resource Conservation District

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March 2, 2007

Ron Coons
Public Works Agency Director
County of Ventura
800 S. Victoria Avenue
Ventura CA 93009

Dear Mr. Coons:

The Ventura County Resource Conservation District administers the Hillside Erosion Control Ordinance No. 3539 [HECO] for the County Ventura. This ordinance deals with issues related to grading of agricultural land within the county. The ordinance has provided an effective process whereby Ag users can grade their hillside property and still comply with water quality and erosion BMPs.

The Board of Directors and staff of the VCRCDD would like to lend their voice to the comments and objections to the new NPDES Permit for the Regional Water Quality Control Board [RWQCB]. The draft document from the RWQCB is unclear and contradictory of existing water conservation measures, BMPs, and other agency standards.

It appears that agricultural grading is exempt [see pages 11/118 Section D/1 and 7/118 paragraph 15], however, the RCD requests that the RWQCB:

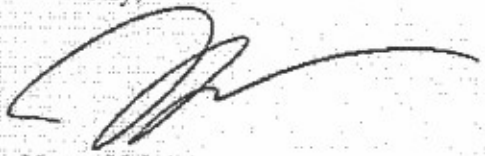
- Provide specific written confirmation of the exemption for agricultural grading and clearing for agricultural purposes within the permit document.
- Eliminate any proposed restrictions of land clearing and grading during the months from October to April. This requirement will put undue strain on annual agricultural operations and create an additional economic hardship on the Ag community/business in Ventura County. For example, orchard planting, normally performed in March, April, or May will require several months of land preparation work, which will involve grading and land clearing.
- Recognize that the Hillside Erosion Control Ordinance drives Best Management Practices that greatly curtail agricultural grading and clearing sediment into the watersheds. The RWQCB already has direction on irrigated lands and Ag through the TMDL effort.

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The Ventura County RCD is a strong advocate and service agency committed to best practices in agriculture and throughout the District. Please include this letter with the County of Ventura's specific NPDES draft permit comments. We do not support the proposed NPDES draft permit as it written for the reasons stated in this letter.

Please direct any questions about the Hillside Erosion Control Ordinance or the Resource Conservation District to me at 805-386-4685.

Sincerely,



Marty Melvin
District Manager

