

City of Port Hueneme

October 15, 2007

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

**REF: VENTURA COUNTYWIDE MUNICIPAL SEPARATE STORM SEWER
SECOND DRAFT ORDER NPDES PERMIT NO. CAS004002**

Dear Ms. Egoscue:

Thank you for the opportunity to submit comments on the Second 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 (NPDES Permit No. CAS004002). These comments are in addition to the collective comments submitted on behalf of all the Ventura County Co-Permittees in a letter dated October 12, 2007. The City of Port Hueneme supports the October 12, 2007 comment letter and associated attachments.

The City of Port Hueneme, with a population of 22,000, continues to be fully supportive of maintaining clean beaches and high water quality in Ventura County. We are proud of our Hueneme Beach Park and strive to make it a safe, inviting place to enjoy. We have demonstrated we are progressive, innovative, and cost-effective in our efforts to keep our City clean and attractive, free of litter and debris.

There are items in the Second Draft Order of serious concern to the City because of the extreme impact they have on our strained fiscal and limited human resources. As a group, the small communities in Ventura County (six communities have populations under 100,000) requested extended implementation time frames that differentiated from those proposed for the larger communities. We also requested alternative or reduced requirements, especially in the area of trash excluders and trash receptacles. As an example, the estimated capital cost for our City to purchase (not including labor to install or maintain) trash excluders and receptacles as required in the Second Draft Order tops \$100,000 – this equates to \$4.55 for every person in our City. To allocate our resources

in this manner when we already have an effective, successful trash management program does not make sense.

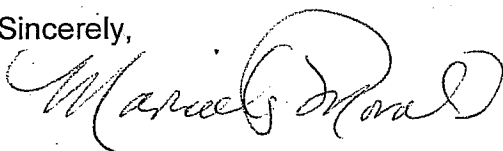
The duplicative permitting process in the Second Draft Order requiring Public Agency routine and long-term maintenance activities to be covered under the Construction Activities General Stormwater Permit would, in our opinion, ultimately be detrimental to the overall effectiveness of our City's stormwater program. The additional fees and administrative work that would be required for the permits would be much better spent on implementation activities. There is no water quality benefit achieved by requiring duplicative permitting. This should be removed from the permit.

I encourage you to direct your staff to meet with the Ventura County Co-Permittees and engage in a meaningful, collaborative exchange of ideas on how to most cost-effectively address not only the issues detailed in the Small Communities Issue Paper, but also those comments detailed in the collective letter. We all desire clean water.

The City looks forward to working collaboratively with the Regional Board, its staff, and all the Co-Permittees in developing a stormwater permit that promotes the continued enhancement of the Ventura Countywide Stormwater Program in a cooperative, progressive, and cost-effective manner.

We look forward to your response and again thank you for the opportunity to express concerns with regard to the Second Draft Order.

Sincerely,



**MARICELA P. MORALES
MAYOR**

c: City Council
David Norman, City Manager
Mark Hensley, City Attorney
Carrie Mattingly, Utility Services Director
Fred Camarillo, Wastewater Superintendent
Ventura Countywide Program Co-Permittees
Xavier Swamikannu, Senior – Stormwater Permitting LARWQCB