



City of Thousand Oaks

**PUBLIC WORKS DEPARTMENT
MARK D. WATKINS, DIRECTOR**

October 15, 2007

Via electronic mail

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

Re: Second Draft Order of the Ventura County Municipal Separate Storm Sewer System Permit (NPDES No. CAS004002) for the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein

Dear Ms. Egoscue:

The City of Thousand Oaks appreciates the opportunity to provide comments on the second draft Ventura County Municipal Separate Storm Sewer System Permit for the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities.

As background information, Thousand Oaks is a community of approximately 127,000 residents in eastern Ventura County. Incorporated in 1964, Thousand Oaks is a well-planned community that includes 15,000 acres of publicly owned open space within its incorporated boundaries. The City is committed to environmental excellence, an integral part of which includes an effective stormwater quality management program.

Thousand Oaks has been an active and supportive member of the Ventura Countywide Stormwater Quality Management Program since its inception in 1992. The Countywide program has an exemplary record as an effective stormwater quality management plan. In 2003, the U.S. Environmental Protection Agency awarded the Ventura Countywide Program with its National Clean Water Act Recognition Awards Program, Storm Water Management Excellence Award. The intent of the awards is to "recognize municipalities and industries that are demonstrating their commitment to protect and improve the quality of the nation's waters by implementing outstanding, innovative and cost-effective Storm Water control programs and projects". The award reflects the Program's, and the City's, commitment to improve and protect water quality in Ventura County through a comprehensive and constructive best management practice (BMP) based program using an iterative process to guide our efforts.

In addition, for many years, and at significant cost, the City has worked cooperatively with the Regional Board and other stakeholders to develop the Calleguas Creek

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Watershed Management Plan and also to address water quality impairments through the development of Total Maximum Daily Loads (TMDLs). The City believes that the cooperative effort in the Calleguas Creek Watershed is unprecedented and will result in significant water quality improvements.

Given the above, the City is dismayed that the second draft permit continues to be extremely prescriptive and ignores or requires duplication of much of the work that has been done to date. Many significant elements in the proposed permit are unfocused, counter-productive and contrary to the progress and good-faith efforts established in the watershed management and TMDL processes.

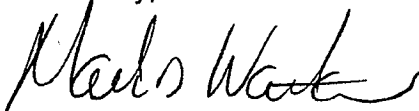
The City participated with the other agencies in the county in developing the comments regarding the second draft permit submitted to the Regional Board on October 12, 2007 by the Ventura County Watershed Protection District on behalf of the Permittees. The City supports and agrees with these comments.

As stewards of scarce and limited public funds, we must ensure that the actions and expenditures driven by regulatory requirements are consistent with each other, are cost-effective and capable of achieving the goals for which those expenditures are intended. The second draft stormwater quality permit is inconsistent with those goals. Although we disagree with much of the proposed approach being used by the Regional Board, we are in agreement with the need to continue and enhance our award-winning stormwater management program, which will lead to water quality protection and improvement and provide for adequate accountability.

To that end, we request and look forward to working with Board staff through a series of facilitated meetings in order to craft a revised permit that supports this need.

If you have any questions or need additional information, please feel free to contact me at (805) 449-2399 at your convenience.

Sincerely,



Mark D. Watkins
Public Works Director

c: Scott Mitnick, City Manager
Amy Albano, City Attorney
Ventura County Stormwater Permittees

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