

RR

# Ventura County Agricultural Association

916 W. VENTURA BLVD., CAMARILLO, CALIFORNIA 93010  
PHONE (805) 388-2727 • FAX (805) 388-2767

September 18, 2007

Ms. Francine Diamond, Chair  
Los Angeles Regional Water Quality Control Board  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Re: Proposed Ventura County Municipal Storm Water Permit

Dear Chairwoman Diamond and Regional Board Members:

On behalf of the Ventura County Agricultural Association, we appreciate the opportunity to express our views and concerns with the recently released revised draft of the Ventura County Municipal Storm Water Permit (MS4). Many of our members operate commercial vegetable and fruit processing facilities that may be subject to the proposed permit.

We join the Regional Board in supporting efforts to achieve cleaner water in Ventura County. We believe that through a comprehensive approach, utilizing best management practices that are adaptable to differing communities, we will be better able to impact water quality in our region.

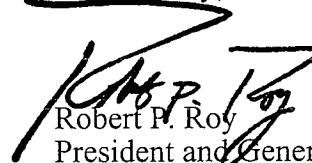
We strongly oppose the inclusion of numeric effluent limits in the MS4 permit. We believe the Board should address water quality regionally rather than site-by-site as recommended in the revised draft. The site-specific approach not only will be extremely costly, but also will not lead to increased water quality in our basin.

In Ventura County we value redevelopment and infill projects. Through redevelopment of properties we are able to take advantage of existing infrastructure, such as roads and highways. Therefore we request that you not place restrictions on redevelopment projects. We also request that you not place unnecessary burdens on the development of new residential, commercial and industrial properties through grading restrictions that are not likely to lead to increase water quality. Again, water quality needs to be addressed regionally and not on a site-specific basis.

In closing let me express our concern that a cost-benefit analysis has not been provided on the revised draft MS4 permit. While we strongly support cleaner water, we believe that regulations must be practical, therefore obtainable and without undue burdens on our residents, cities and businesses. By most estimates, the financial costs associated with the revised draft MS4 permit are very high. These costs will ultimately be bourn by homeowners and the business community.

Again, we appreciate the opportunity to express our concerns. We look forward to working with the Regional Board in achieving an MS4 that will enhance water quality in Ventura County without negatively impacting our residents, local governments, and our economy.

Respectfully,



Robert P. Roy  
President and General Counsel

BOARD OF DIRECTORS

Bill Reiman, Chairman • Bryan Fiscalini, Vice Chairman • Roy Nishimori, Secretary • Steve Fujimoto, Treasurer  
Rob Hiji • Sam Mayhew • Ken Tanaka