



City of Port Hueneme

May 29, 2008

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
DRAFT TENTATIVE ORDER NPDES PERMIT NO. CAS004002**

Dear Ms. Egoscue:

City of Port Hueneme staff wishes to submit comments on the Draft Tentative Order 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 therein (NPDES Permit No. CAS004002) which was released for public comment by the Regional Water Board on April 29, 2008. These comments are in addition to the collective comments submitted on behalf of all the Ventura County Co-permittees, in a letter dated May 27, 2008.

As to the comments submitted on behalf of all the Co-permittees, the City of Port Hueneme fully supports the May 27, 2008 comment letter and associated attachments.

In addition to the Program's corporate concerns, some areas of specific concern to the City of Port Hueneme include: 1) the requirement to GIS the storm drain system, 2) the trash excluder/collection requirements and, 3) the short time frames for implementation.

GIS REQUIREMENT

The GIS requirement provides no benefit to receiving water quality improvement. The City of Port Hueneme does not have a revenue source to fund activities such as GIS. Currently its utility maps are in AutoCAD, which meets the City's needs. The City understands the importance of having a well-mapped system, but to require it to use GIS, a mapping system that is labor intensive and expensive to set up and maintain, is overly prescriptive and does not allow the City to make the best use of severely limited resources available to improve receiving water quality.

Please remove the requirement to GIS the storm drain system from the permit.

TRASH EXCLUDERS AND TRASH RECEPTACLES

The requirement to install both trash excluders and additional trash receptacles in areas of high trash generation is excessive. This requirement creates a lack of flexibility that does not give the City the ability to determine which option (if either) would work best for individual situations. It also does not allow alternatives such as trash management plans or trash collection at the end of a drainage area rather than at individual points. The City has historically worked hard to prevent trash from entering the receiving water and has been successful in its efforts.

It is especially disappointing, despite testimony to the Board, written requests, and much verbal dialogue on this subject Regional Board staff has not included the use of alternative trash management plans in the permit, at least for the use of the small communities in Ventura County. Meeting the goal of reducing trash entering receiving waters should be the focus. To prescribe how this must be done, especially when the receiving water is not impaired for trash, is unreasonable.

Staff is estimating it will cost \$300,000 (including labor and capital expenses) to fund this requirement over the next five years. The City of Port Hueneme is already faced with a serious budget deficit over this same time period – there are currently insufficient revenues coming into the City to maintain existing critical services and programs. It is not logical or reasonable to focus significant resources on a prescriptive requirement that could be met, we believe, just as effectively through a less costly alternative.

Trash management plans should be added as an alternative to installing trash excluders and trash receptacles (if this requirement stays in the permit).

IMPLEMENTATION TIME FRAMES

Many of the implementation time frames throughout the draft tentative permit simply do not take into account municipal approval processing logistics. These logistics (e.g. Council authorization, bidding procedures, contract award, delivery of merchandise) combined with the need to secure a funding source, most likely through the reduction or elimination of existing critical programs and services, makes many of the permit timelines infeasible.

The Program has submitted, in writing, reasonable time frames for your consideration for each of the areas of significant concern. The recommended time frames are not an attempt to stall implementation of permit requirements. The time frames proposed by the Co-permittees will still push the City hard to complete all that is required in the permit.

In our small city it takes combined efforts from several City departments to meet the requirements of the stormwater program. A single department does not have the

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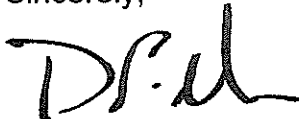
resources to do all that is required. Coordinating these efforts and getting through the public process, as you are well aware, is a time-consuming endeavor.

Please review the prior comments on time frame adjustments once again and incorporate these adjusted time frames into the permit.

The City looks forward to working collaboratively with the Regional Board and all the Co-permittees in developing a revised Draft Tentative Order that promotes the continued enhancement of the Program in a cooperative, progressive, and cost-effective manner.

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

Sincerely,



**DAVID J. NORMAN
CITY MANAGER**

- c: City Council
 City Attorney
 Public Works Director
 Utility Services Director
 Wastewater Superintendent
 Ventura Countywide Program Permittees
 Gerhardt Hubner, Ventura County Watershed Protection District