



# City of Camarillo

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Department of Public Works  
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April 10, 2009

Via Electronic Mail

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

Subject: **Comments to 02-24-09 Tentative Order – Ventura County Municipal Separate Storm Sewer System Permit (NPDES No. CAS004002)**

Dear Ms. Egoscue:

The City of Camarillo respectfully submits the following comments regarding the above referenced Tentative Order for your consideration. As stated in our October 12, 2007 and May 29, 2008 letters, the City of Camarillo has been a co-permittee under the Ventura Countywide Municipal Permit since its adoption in 1994. Although our population of fewer than 66,000 classifies us as a Phase II municipality, Camarillo chose to join the countywide effort toward improving water quality in a proactive manner. We feel the collaborative countywide program has been very successful toward meeting that goal.

We appreciate the Regional Board's efforts in meeting with Camarillo and other co-permittees in working through several technical issues contained in prior draft permits. These meetings were productive and we feel they resulted in a better permit. The City of Camarillo supports the comments submitted in the Ventura Countywide Stormwater Program letter dated April 10, 2009 signed by Gerhard Hubner. As stated in the Countywide Program letter, the Tentative Order sets a high bar for our municipal stormwater program. It will require Camarillo to substantially revise our existing stormwater program and, as a result, costs associated with implementation of the program will also increase substantially, without the ability for us to increase or impose new fees.

**Total Maximum Daily Loads (TMDLs)** – As reiterated in the Countywide letter, the TMDLs have been correctly incorporated in the Tentative Order consistent with 40 C.F.R. § 122.44(d)(1)(vii)(B). We appreciate that the Regional Board has been supportive of the Calleguas Creek Watershed stakeholder process and is not willing to accept arbitrary comments to deviate from the collaborative efforts that have gone into development of the TMDLs.

We look forward to working with the Ventura Countywide Stormwater Program and the Regional Board in implementing the new requirements in the Tentative Order and further improving water quality in the region. If you have any questions regarding our comments, please contact Anita Kuhlman, Stormwater Program Manager, at 805-383-5659.

Sincerely,

Tom Fox  
Public Works Director

cc: Tracy Woods, Sam Unger, LARWQCB  
Jerry Bankston, City Manager  
Camarillo City Council Members  
City Attorney  
Gerhardt Hubner, Ventura Countywide Stormwater Program Chair