



City of Port Hueneme

April 9, 2009

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

**REF: 02-24-09 TENTATIVE 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**

Dear Ms. Egoscue:

City of Port Hueneme staff wishes to take this opportunity to express our appreciation of the Regional Water Board's staff efforts to meet and consider our concerns with the previous draft tentative orders. We believe the latest Tentative Order is comprehensive and provides a solid framework for us to assess the effectiveness of our program within our jurisdiction.

That being said, there is still major concern with the inclusion of MAL's within this permit. Although the Tentative Order revises the use of MAL's from being a determination of MEP to being an assessment tool, discharges that exceed the MAL's require the Permittees to prepare and implement a MAL Action Plan. The requirements and potential costs of the action plan are unknown and could be quite significant.

The City of Port Hueneme also supports all comments detailed in a letter dated April 10, 2009 from the Ventura Countywide Stormwater Program on behalf of all the co-permittees.

In closing, we once again thank you and your staff for the time and effort in meeting with the MS4s to work through the many issues in the previous draft permits.

NPDES DRAFT TENTATIVE ORDER

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Sincerely,



DAVID J. NORMAN
CITY MANAGER

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