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AMY L. GLAD
Senior Vice President, Governmental Affairs

June 4, 2010

Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th Street
Los Angeles, CA 90013

Subject: Ventura County Municipal Separate Storm Sewer System Permit

Dear Mr. Ridgeway:

As a long time master planned community developer, home builder and land owner in Ventura County, Pardee Homes is very concerned about the tentative Ventura County MS4 permit currently being circulated for public comment.

With our decades of experience in land development in Ventura County, we believe there are several steps that can be taken to improve the effectiveness of the permit in a manner beneficial to water quality and to gain critical public and private sector support. The proposed permit's emphasis upon retention of stormwater and requiring infiltration on a lot-by-lot basis is inappropriate and counter-productive.

Pardee Homes supports site-appropriate low impact development that promotes storm-water infiltration in locations over groundwater recharge areas and more appropriate biofiltration and biotreatment of runoff using best management practices in other areas.

We strongly oppose the proposed use of Effective Impervious Area as a compliance approach with very high costs and more negative public policy impacts than water quality benefits. The Board should remove the Effective Impervious Area requirements from the final MS4 permit.

As we attempt to balance the need for housing in Ventura County with the requirements of AB 32, SB 375 and the Clean Water Act, the LA RWQCB should adopt an MS4 permit that provides greater flexibility to land owners and local governments to ensure good land use planning while improving water quality.

As currently proposed, the permit would:

- impose stormwater requirements as a higher priority than any other land use planning objective

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- increase the cost of new public infrastructure
- make infill and redevelopment projects harder to build, creating conflicts with the goals of SOAR, SB375, and the principles of compact development
- stifle economic development, encourage business out-migration and increase job losses in Ventura County.

Over the past year much work has been done on the Technical Guidance Manual and it is clear that, without changes to the permit as proposed above, these problems are inevitable. In fact, every MS4 permit adopted since May 2009 has rejected the Ventura MS4 permit approach. These permits, adopted in areas with more severe water quality problems than those in Ventura County, advance low impact development and will improve water quality without the inherent problems of the Tentative Permit.

I urge you to incorporate these recommended changes before the July 8, 2010 hearing.

Sincerely,

/signed Amy Glad