



CITY OF OJAI

401 SOUTH VENTURA STREET
P.O. BOX 1570 / OJAI, CA 93024
TELEPHONE (805) 646-5581
FAX (805) 646-1980

October 15, 2007

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

SUBJECT: Second Draft Order of the Ventura County Municipal Separate Storm
Sewer System (MS4) Permit

Dear Ms. Egoscue;

Thank you for the opportunity to comment on the subject Second Draft Order of the Ventura County MS4 Permit (NPDES Permit No. CAS004002).

Countywide Program

Ojai has participated in the Ventura Countywide Stormwater Program (Ventura Program) and supports the detailed comments being submitted by the Ventura Program to the Regional Board on this same subject dated October 12, 2007. Furthermore, Ojai urges the Regional Board to conduct technical sessions with a facilitator to resolve the very important differences between the 2nd Draft Permit and what the Co-Permittees see will be effective for our local conditions.

Benefit Cost of Proposed Regulations

The citizens of Ojai are concerned about having requirements of this draft enacted without a benefit/cost appraisal of how the requirements will benefit the quality of the stormwater and the effects on the environment. For example, the proposed requirements for trash excluders on storm drains would be beneficial in areas of high trash, if other less expensive options have been found deficient. We suggest adding Trash Excluders as a BMP only if the current or less costly options are deficient.

Ojai has a population of less than 9,000 people. It is truly a small city in the Phase II EPA category of NPDES Permits. Unlike other areas such as Los Angeles County the small communities in Ventura County truly meet the EPA definition of Phase II communities because they are separated by large green belts. Small cities have a small population base to distribute costs of compliance to regulations, and must carefully evaluate cost/benefits to its citizens. The City of Fillmore, another small city in Ventura County, recently estimated the annual cost of implementing the 2nd Draft Permit would be approximately \$800 per household compared to their current annual cost of less than \$10 household.

NPDES Permit

Page 2

If the huge increase in stormwater costs is not justified by a benefit – cost analysis, we can not reasonably expect our citizens to support the new regulations and we will not be helping our citizens or our environment.

Hydrologic Controls

Another area of the new permit that still needs your technical staff attention is the combined effect of the hydrologic controls being proposed for Low Impact Development, Water Quality Mitigation, and Hydromodification. All of these affect the other and have created sediment hungry water that is causing loss of habitat. We can not support the 2nd Draft Permits duplication of hydrologic controls that are already degrading channels in our creeks and streams. We support and have our City Engineer involved with the Southern California Monitoring Coalition (SMC) Hydromodification study and request the Board to not implement interim Hydromodification measures until the SMC study is completed.

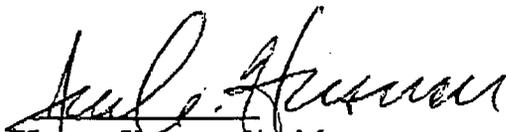
Recommendations

The City of Ojai urges the following:

- Revise the trash excluder provisions in the new permit to focus on areas that are deficient in meeting trash standards only after less expensive efforts have been attempted.
- Provide a benefit cost analysis of the main provisions of the permit before the next draft.
- During this permit cycle work on the SMC Hydromodification study and develop standards only after SMC has developed methods for estimating impacts of development on channel scour and deposition.
- Conduct technical sessions with a facilitator to resolve the very important differences between the 2nd Draft Permit and what the Co-Permittees see will be effective for our local conditions

Very Truly Yours

CITY OF OJAI



Jere A. Kersnar, City Manager

cc:

Ojai City Council

Xavier Swamikannu, Storm Water Permitting, Regional Water Quality Control Board

Ventura Countywide Program Permittees