

May 29, 2008

Tracy Egoscue, Executive Officer
California Regional Water Quality Control Board, Los Angeles Region
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Subject: Tentative Order - MS4 NPDES Permit for the Ventura Countywide Stormwater Program

Dear Ms. Egoscue:

Thank you for this opportunity to comment on the April 29, 2008 draft Tentative Order - MS4 NPDES Permit for the Ventura Countywide Stormwater Program (Draft Tentative Order). The Draft Tentative Order has the potential to be precedent setting in the absence of a statewide stormwater policy and, consequently, the County of Orange has been closely following its development. Los Angeles Regional Water Board staff is proposing to establish requirements (i.e., Municipal Action Levels (MALs), Effective Impervious Area (EIA), Best management practice (BMP) performance design criteria) that present significant technical issues and which run counter to expert opinion, such as the State Board's Blue Ribbon Panel, in key areas.

County of Orange staff have participated in the development of CASQA's comment letter and we strongly encourage the Los Angeles Regional Water Board to accept its recommendations and to direct staff to work collaboratively with stakeholders to develop revisions to the stormwater quality management permit in the key areas.

Please direct any questions regarding this letter to Richard Boon at (714)973-3168.

Very truly yours,


Chris Crompton, Manager
Environmental Resources

cc: Orange County Permittees
CASQA Board of Directors