



# *City Of Camarillo*

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May 29, 2008

*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 4/29/2008 Draft Tentative Order – Ventura County Municipal Separate Storm Sewer System (MS4) Permit (NPDES No. CAS004002)**

Dear Ms. Egoscue:

The City of Camarillo respectfully submits the following comments regarding the above referenced Draft Tentative Order for your consideration. As stated in our October 12, 2007 letter, 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.

As currently crafted, the Draft Tentative Order will place undue financial and technical requirements on our stormwater program that may ultimately not result in efficiently improving water quality which we and your agency are seeking to obtain. The City has worked cooperatively with the Regional Board and other stakeholders to develop the Calleguas Creek Watershed Management Plan and also to address water quality impairments through the development of Total Maximum Daily Loads (TMDLs). The City believes that the cooperative effort in the Calleguas Creek Watershed is unprecedented and will result in significant water quality improvements.

The City along with the other Ventura County Co-Permittees have worked together to review the Tentative Draft Order and the City is in agreement with the detailed comments submitted by Gerhardt Hubner, Chair of the Countywide Program, on behalf of all Co-Permittees (dated May 27, 2008).

**Although improvements were made in the Draft Tentative Order regarding the TMDL requirements, the City is dismayed that the Draft Tentative Order continues to be extremely prescriptive and ignores or requires duplication of much of the work that has been done to date by both the Ventura County Co-permittees and the Calleguas Creek**

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**Watershed Management Plan's stakeholders. We are also extremely concerned that many of our countywide comments submitted previously have not been addressed in this latest version of the Order. Of particular concern to our City is the Draft Tentative Order's use of Municipal Action Levels (MALs) which is inconsistent with state and federal policies, is technically flawed, results in requirements more stringent than federal law, and creates limits that are more restrictive than adopted water quality objectives contained in the Basin Plan. The MALs as currently prescribed would affect our City financially without a significant improvement to water quality.**

The City of Camarillo appreciates this opportunity to provide comments to the Draft Tentative Order and we want to reiterate our commitment to the collaborative effort in maintaining and enhancing water quality in our watershed. However, we have significant concerns about this draft Tentative Order as currently proposed.

Camarillo believes that an NPDES Permit can be developed that provides for accountability, conducts public outreach and education, supports ongoing water quality efforts, including the TMDL effort Camarillo has been very involved with, and receives broad public support. We look forward to working with the Regional Board to incorporate these changes into the draft Order. If you have any questions regarding our comments, please contact Anita Kuhlman, Stormwater Coordinator, at 805-388-5338.

Sincerely,



Jerry Bankston  
City Manager

cc: Xavier Swamikannu, LARWQCB  
Camarillo City Council  
Public Works Director, City of Camarillo  
City Attorney, City of Camarillo  
City of Camarillo Stormwater Coordinator