

To Whom it May Concern:,

I'm writing to express my concerns about the proposed Municipal Stormwater Permit (e.g. the MS4 Permit), currently being reviewed by the Los Angeles Regional Water Quality Control Board. This permit is considered by many to be the most onerous in the State of California, and it has serious implications for the region.

One of the most outrageous components of the permit is that it prohibits construction during the "wet season," defined as the six-and-a-half months between October 1 and April 15. On average, it rains fewer than 30 days within that six-and-a-half-month period. In fact, In Southern California, the wet season is relatively devoid of precipitation.

The most obvious victim of such a mandate is the region's vital construction industry, which would suffer as high-paying construction jobs are lost due to construction workforces being idle for more than six months each year. That could prove to be a significant setback to an industry that is an important cog in the economic engine that drives this state. And it's not just home builders that would suffer – this permit threatens business expansion and the local economy by negatively impacting schools, roads, libraries, fire stations, hospitals, churches and other vital community resources via construction limitations and costs.

The proposed Grading Ban would also cost between \$62,500 and \$125,000 per acre to implement during the "wet season" because of significant land carrying costs. At the same time, it would only achieve better water quality control on the limited days where there is actually rainfall, and only for sites that are not already using appropriate sediment and erosion controls, as required by the General Construction Permit.

The bottom line is that this Stormwater Permit uses a "one-size-fits-all" approach that doesn't consider Ventura County's unique climate, geology, hydrogeology or terrain. Instead, it forces cities to spend their money on the Regional Water Quality Control Board's specific, unfunded mandates rather than on their local priorities.

The proposed stormwater permit doesn't work for Ventura County and it doesn't work for Southern California. I urge you to reject the current MS4 proposal and focus on developing a stormwater program that benefits the region and truly addresses the very important issue of water quality.

Sincerely,

Terra Donlon
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