CITY OF
VENTURA

April 10, 2009

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

Via Email: VenturaMS4Comments041009@waterboards.ca.gov

SUBJECT: Comments on NPDES No. CAS004002 – Ventura County MS4 Tentative Order

Dear Ms. Egoscue,

Thank you for working collaboratively to develop a progressive municipal stormwater permit that builds on the success of the Ventura program and meets our mutual water quality goals. The subject Tentative Order (Permit) is a precedence-setting permit that will create a high standard for municipal stormwater programs. While the City of Ventura appreciates the importance of such a permit, we also recognize the challenges of implementing the more than 70 required program activities at a time when our City and our community, like the rest of the country, is dealing with a serious economic downturn.

As major sources of revenue to the City's General Fund such as sales and property taxes continue to fall, Ventura, like most governmental agencies, is expected to face a serious budget imbalance for at least the next two years. Our Stormwater Quality Program does not have existing enterprise funding available, as do water and sanitary sewer service programs, and would need significant community support to obtain a funding source. This less well-known program must compete with other needs funded through the General Fund such as public safety (fire and police services), libraries, parks, and community programs for elderly, children and the needy. Recently, our City has attempted to develop additional revenue sources, which have been to date unsuccessful with Ventura residents. Therefore, we ask that your Board carefully consider the cost implications of this permit along with current and future TMDLs before making any modifications to its requirements.

We support the April 10, 2009 letter and technical comments submitted by the Ventura County Watershed Protection District on behalf of all co-permittees.

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The City of Ventura continues to strive to be a "leaner and greener" organization. As a coastal community, bordered by two of the largest rivers in Southern California, our community supports environmental stewardship and understands the critical importance of improving our water quality, now and in the future.

We look forward to implementing practical and effective measures to improve water quality and protect the environment, within our available resources. If you have any questions, please contact me or Vicki Musgrove at (805) 340-1875 or vmusgrove@ci.ventura.ca.us

Sincerely,

Rick Cole

Rick Cole
City Manager

c: Gerhardt Hubner, Ventura County Watershed Protection District