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Landstone Communities, LLC
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Los Angeles, CA 90049
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June 7, 2010

Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th Street
Los Angeles, CA 90013
iridgeway@waterboards.ca.gov

Re: MS4 Permit for Ventura County

Dear Mr. Ridgeway,

Landstone Communities LLC is providing its comments to you on the proposed MS4 Permit for Ventura County (the "Proposed Order") which is to be considered at the public hearing by the Regional Board on July 8, 2010. Landstone Communities is involved with a sizeable development project in Ventura County.

We are particularly concerned about the ambiguity surrounding the "grandfather" provisions of the Proposed Order. We ask you to consider including within the Proposed Order a "blue line" test which would allow those development projects which are, at the time of the adoption of the Proposed Order, within the unexpired term of a Development Agreement to be exempt from the provisions of Section E. While it is possible that the projects which are within the unexpired term of a Development Agreement may be "grandfathered" in any event because there are no discretionary approvals remaining, we believe that such a clear and unambiguous test will be enormously helpful to give guidance to existing, large scale development projects, and avoid the possibility of litigation that may result from the distinction the Proposed Order seeks to create between discretionary and non-discretionary approvals.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Albert Z. Praw', written in a cursive style.

Albert Z. Praw
Chief Executive Officer

cc: Bryce Brunsting
Lauren Boro, Esq.
Charles Schetter
Jim Welsh
Lance Mellring