



City Of Camarillo

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August 31, 2005

Mr. Bruce Fujimoto, Chief
Storm Water Program
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100

Dear Mr. Fujimoto:

Subject: State Water Board Process for Development of Quantitative Measurements for Stormwater Program Compliance

The City of Camarillo recently received notice of a September 14th public meeting scheduled by the State Water Board to review the technical feasibility of including quantifiable measures or numeric limits in stormwater permits. Although we understand the importance of meeting water quality objectives, it is necessary to consider all aspects of developing quantifiable measures.

Camarillo supports the California Stormwater Quality Association's (CASQA) previous request to develop a Statewide Stormwater Policy. We appreciate the listening session that the SWRCB held on January 12, 2005 to receive input for this policy, and strongly believe that this policy should include political, legal, and public relations concerns.

Further, as CASQA stated in their August 15, 2005 letter to your office, we feel the State Water Board should consider the following when considering the feasibility of developing numeric limits:

- A work plan should be developed not only to assist with the determining if numeric limits are needed, but also to be incorporated within the overall development of a statewide stormwater policy.
- Additional expertise in statistical, economic, and stormwater program implementation should be included in the review process.
- The public and affected stakeholders should be actively engaged to ensure appropriate public process occurs. This will help ensure that a comprehensive policy for managing stormwater correctly reflects technical economical feasibility.

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- When developing this type of policy, we must take into account existing efforts to establish TMDLs that include setting numeric limits for urban runoff. The City of Camarillo participates in the Calleguas Creek Watershed Management Plan, which is a stakeholder in the watershed-led TMDL development process. The Calleguas Creek Watershed Management group is actively working with the Los Angeles Regional Water Quality Control Board and EPA in preparing TMDLs that include load allocations for wastewater, stormwater/urban runoff, and agricultural stakeholders.

Thank you for your consideration of our concerns, and we look forward to further communication on this topic. If you need further information, please contact Anita Kuhlman, City of Camarillo Stormwater Coordinator, at 805-383-5659 or Lucia McGovern, Deputy Public Works Director, at 805-388-5334.

Sincerely,



Jerry Bankston
City Manager

cc: Senator Tom McClintock
Assembly Member Audra Strickland
Camarillo City Council
League of California Cities
Gonsalves & Sons
Jeff Pratt, Ventura County Watershed Protection District
Raymond C. Miller, Southern Calif. Alliance of Publicly Owned Treatment Works
Karen Ashby, California Stormwater Quality Association