



VENTURA COUNTY

PUBLIC WORKS AGENCY
RONALD C. COONS
Agency Director

WATERSHED PROTECTION DISTRICT

September 13, 2005

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

Jeff Pratt
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Water Quality/Environmental

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Operations/Maintenance

Lowell Preston, Ph.D.
Water Resources Division

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

Dear Mr. Fujimoto:

On behalf of the Ventura Countywide Stormwater Quality Management Program, which includes the County of Ventura, its ten cities and the Ventura County Watershed Protection District, we offer these comments regarding the State Board's process to evaluate the feasibility of developing quantifiable measures, including numeric limits for stormwater compliance. Besides these comments, we note that we concur with the comments provided by the California Stormwater Quality Association (CASQA) in their August 15, 2005 letter.

In addition, we support CASQA's previous request to develop a Statewide Stormwater Policy. We appreciate the listening session that the State Board held on January 12, 2005 to receive input for this policy, and strongly believe that this policy should include political, legal, economic and public concerns.

We strongly concur with CASQA's suggestion for a work plan for answering the "Question", as it has become to be known. We share CASQA's concerns that without a work plan and coordination of this process with the development of a Statewide Stormwater Policy, consideration of the Question risks being a piecemeal effort that would attract justifiable criticism and concern.

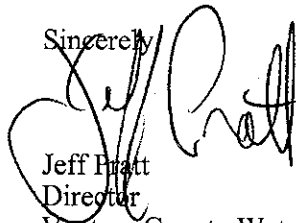
Our understanding is that the State Board has selected several individuals to participate on a Blue Ribbon Panel to address the Question. While we believe that these individuals are likely well qualified, we strongly believe that this process would be well served by the addition of expertise in municipal stormwater program implementation, statistics, and, in particular, civic economics.

In addition, we strongly believe that the process must be independently facilitated by an individual who has a broad understanding of stormwater, water quality and policy development issues. This process also must be inclusive. The State Board should ensure that the process is transparent and impartial. All meetings should be open and noticed. The public should have every opportunity to provide comments and input on this significant, far-reaching process.

Mr. Bruce Fujimoto
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Thank you for your consideration of our concerns, and we look forward to working with you and the State Board. If you need additional information, please contact Paul Tantet, Water Quality Compliance Manager, at 805-662-6737.

Sincerely,



Jeff Pratt
Director

Ventura County Watershed Protection District

cc: Ventura Countywide Stormwater Program Co-permittees