

Transmitted to: iridgeway@waterboards.ca.gov

7 June 2010

To: Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

- remove Effective Impervious Area as a compliance metric
- allow biofiltration and biotreatment as allowable best management practice for low impact development
- add flexibility so that good land use planning will take precedence

If the LA RWQCB does not make these changes, the permit will:

- usurp local land use authority through rigid stormwater requirements. The lack of flexibility in the permit means that stormwater controls, not good planning, will be the deciding factor in what is built in Ventura County
- increase the cost of new public infrastructure such as fire stations, libraries, and parks
- make infill and redevelopment projects hard to build, creating conflicts with the goals of SOAR, SB375, and the principles of compact development
- stifle economic development cause business migration because of added costs to business expansion

Over the past year much work has been done on Technical Guidance Manual and it is clear that, without changes to the permit, these problems are inevitable. In fact, every MS4 permit adopted since May 2009 has rejected the Ventura MS4 permit approach. These permits, adopted in areas with more severe water quality problems than those in Ventura County, advance low impact development and will improve water quality without the inherent problems of the Tentative Permit.

I urge you to incorporate these changes before the July 8, 2010 hearing.

Signed,



Steve Perry
Ojai, CA

July082010VCMS4 - Fwd: Tentative MS4 Permit - Ventura County

From: Ivar Ridgeway
To: July082010VCMS4
Date: 6/7/2010 1:09 PM
Subject: Fwd: Tentative MS4 Permit - Ventura County

>>> Robert Lumley <RLumley@blt-enterprises.com> 6/7/2010 12:21 PM >>>

Dear Mr. Ivar Ridgeway,

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

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I urge you to incorporate these changes before the July 8, 2010 hearing.

Sincerely,

Robert Lumley
BLT ENTERPRISES

501 Spectrum Circle
Oxnard, CA 93030
Office (805) 278-8220
FAX (805) 278-8221
Cell (805) 766-4382
rlumley@blt-enterprises.com

Over the past year much work has been done on Technical Guidance Manual and it is clear that, without changes to the permit, these problems are inevitable. In fact, every MS4 permit adopted since May 2009 has rejected the Ventura MS4 permit approach. These permits, adopted in areas with more severe water quality problems than those in Ventura County, advance low impact development and will improve water quality without the inherent problems of the Tentative Permit.

I urge you to incorporate these changes before the July 8, 2010 hearing.

Signed,

Debra Tash

President, CAPR Ventura County

--
Debra Tash, Author and Property Rights Advocate
<http://www.vcpropertyrights.net/>
<http://www.debratash.com>

_____ Information from ESET NOD32 Antivirus, version of virus signature database 5173 (20100604)

_____ The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

Transmitted to: iridgeway@waterboards.ca.gov

Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

Dear Mr. Ridgeway:

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

- remove Effective Impervious Area as a compliance metric.
- allow biofiltration and biotreatment as allowable best management practices for low impact development.
- add flexibility so that good land use planning will take precedence.

If the LA RWQCB does not make these changes, the permit will:

- usurp local land use authority through rigid stormwater requirements. The lack of flexibility in the permit means that stormwater controls, not good planning, will be the deciding factor in what is built in Ventura County.
- increase the cost of new public infrastructure such as fire stations, libraries, and parks.
- make infill and redevelopment projects hard to build, creating conflicts with the goals of SOAR, SB375, and the principles of compact development.
- stifle economic development throughout the county because of added costs to business expansion.

Over the past year much work has been done on the Technical Guidance Manual and it is clear that, without changes to the permit, these problems are inevitable. In fact, every MS4 permit adopted since May 2009 has rejected the Ventura MS4 permit approach. These permits, adopted in areas with more severe water quality problems than those in Ventura County, advance low impact development and will improve water quality without the inherent problems of the Tentative Permit.

I urge you to incorporate these changes before the July 8, 2010 hearing.

Sincerely,



Steven L. Kinney, President
EDCO, the Economic Development Corporation of Oxnard

Franklin Real Estate Development, LLC

3159 Eaglewood Ave.
Thousand Oaks, Ca. 91362
805-907-5124 805-529-3480 (fax)

Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

Via E-Mail

Dear Mr. Ridgeway,

As a developer for 30 years in Ventura County and Southern California, I am very concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable and still achieve the goals of the permit, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

- remove Effective Impervious Area as a compliance metric
- allow biofiltration and biotreatment as allowable best management practice for low impact development
- add flexibility so that good land use planning can be balanced with LID principles

If the LA RWQCB does not make these changes, the permit will:

- usurp local land use authority through rigid stormwater requirements. The lack of flexibility in the permit means that stormwater controls, not good planning, will be the deciding factor in what is built in Ventura County
- increase the cost of new public infrastructure such as fire stations, libraries, and parks
- make infill and redevelopment projects very difficult and unnecessarily expensive hard to build, creating conflicts with the goals of SOAR, SB375, and the principles of compact development
- create one more impediment to provide affordable housing for working families
- stifle economic development causing business migration and job loss because of added costs to business expansion

Over the past year much work has been done on Technical Guidance Manual and it is clear that, without changes to the permit, these problems are inevitable. In fact, every MS4 permit adopted since May 2009 has rejected the Ventura MS4 permit approach. These permits, adopted in areas with more severe water quality problems than those in Ventura County, advance low impact development and will improve water quality without the inherent problems of the Tentative Permit.

I urge you to use this second chance and incorporate these changes before the July 8, 2010 hearing.

Signed,



John Franklin, Manager
Franklin Real Estate Development, LLC

HACKERBRALY, LLP *Attorneys and Counselors at Law*
26650 The Old Road / Suite 201 / Valencia, CA 91381 / Phone: (661) 259-6800 / FAX: (661) 259-6836

June 7, 2010

VIA E-MAIL [iridgewav@waterboards.ca.gov]

Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th Street
Los Angeles, CA 90013

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

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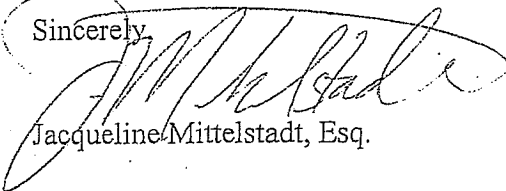
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I urge you to incorporate these changes before the July 8, 2010 hearing.

Sincerely,



Jacqueline Mittelstadt, Esq.

RECEIVED

Transmitted to: iridgeway@waterboards.ca.gov

2010 JUN 7 PM 2 10

To: Mr. Ivar Ridgeway

Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

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I urge you to incorporate these changes before the July 8, 2010 hearing.

Signed,



Lori Bruce
Environmental Mgr.
Lennar Homes



June 3, 2010

Transmitted to: iridgewav@waterboards.ca.gov

To: Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

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We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

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- Add flexibility so that good land use planning can be balanced with LID principles.

If the LA RWQCB does not make these changes, the permit will:

- Usurp local land use authority through rigid stormwater requirements. The lack of flexibility in the permit means that stormwater controls, not good planning, will be the deciding factor in what is built in Ventura County.
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I urge you to incorporate these changes before the July 8, 2010 hearing.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew J. Breiner", is written over the typed name.

Matthew J. Breiner

Vice President
Oro Vista Corp.
278 McKnight Road, Newbury Park, CA 91320

Transmitted to: iridgeway@waterboards.ca.gov

7 June 2010

To: Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

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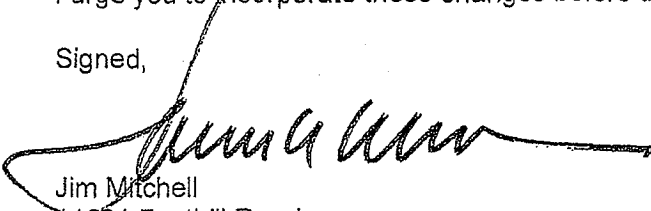
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I urge you to incorporate these changes before the July 8, 2010 hearing.

Signed,



Jim Mitchell
11381 Foothill Road
Santa Paula, CA 93060

Transmitted to: iridgeway@waterboards.ca.gov

To: Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

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I urge you to incorporate these changes before the July 8, 2010 hearing.

Signed,

Steven A. Lappin
Pacific Cove Development, Inc.
President

Pulte

Del Webb
Centex

Transmitted to: iridgeway@waterboards.ca.gov

To: Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

Dear Mr. Ridgeway:

The letter below is a form letter prepared by the BIA and I am sure you are going to receive many of these from the builders in the area. I also want to add a personal note to the technical data below. I certainly hope that you can apply some reasonableness to this process and back off the draconian steps that are being considered that will cause an onerous burden to be placed on home builders.

These draconian measures being considered are proposed mostly by people that are just looking to close the door to further home building in our communities. This is not fair to the folks who don't already own homes, it is not fair to the thousands of people that the home building industry employs and it is not fair to the good work that folks have done to clean up our water.

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

- remove Effective Impervious Area as a compliance metric
- allow biofiltration and biotreatment as allowable best management practice for low impact development
- add flexibility so that good land use planning can be balanced with LID principles

Pulte Homes Corporation
27101 Puerta Real, Suite 300
Mission Viejo, CA 92691
949-330-8600 Phone
949-330-8601 Fax
www.pulte.com

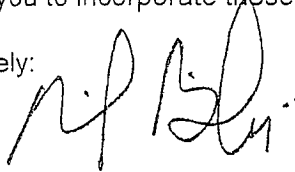
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I urge you to incorporate these changes before the July 8, 2010 hearing.

Sincerely:



Rick Bianchi
Land Development Manager
LA / Ventura Division.

Shea Homes

Caring since 1881

June 4, 2010

Mr. Ivar Ridgeway
Los Angeles Regional Water Quality Control Board
320 W. 4th St
Los Angeles, CA 90013

Re: Draft MS4 Permit

As a stakeholder in the development process in Ventura County, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

With this circulation of the draft permit we have a second chance to make this permit reasonable and workable. I urge you to fix the issues that have been raised with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

- Remove "Effective Impervious Area" as compliance metric.
- Allow biofiltration and biotreatment as allowable best management practice for low impact development.
- Add flexibility so that good land-use planning can be balanced with LID principles.

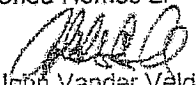
If the Los Angeles Regional Water Quality Control Board does not make changes to these sections the permit will:

- Circumvent local land use authority through rigid stormwater requirements. The lack of flexibility in the permit means that stormwater controls, not good planning, will be the deciding factor in what is built in Ventura County.
- Increase the cost of new public infrastructure such as fire stations, libraries, and parks.
- Make infill and redevelopment projects hard to build, creating conflicts with the goals of SOAR, SB375, and the principles of compact development.
- Stifle economic development causing business migration and job loss because of added costs to business expansion.

Over the past year much work has been done on Technical Guidance Manual and it is clear that, without changes to the permit, these problems are inevitable. In fact, every MS4 permit adopted since May 2009 has rejected the Ventura MS4 permit approach. A number of the permits adopted have been in areas with more severe water quality problems than those in Ventura County and have advanced low impact development. The methods adopted for water quality in covered by these adopted permits will improve water quality without the inherent problems of the Tentative Permit.

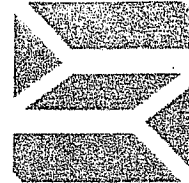
I urge you to incorporate these changes before the July 8, 2010 hearing.

Sincerely,
Shea Homes LP


John Vander Velde
Vice President

June 7, 2010

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



SIKAND

Engineering
Planning
Surveying

15230 Burbank Blvd., Suite 100
Van Nuys, CA 91411-3586

Tel: 818/787-8550
Fax: 818/901-7451
E-mail: info@sikand.com

Dear Mr. Ridgeway:

As a consultant stakeholder in the development process in Southern California, I am concerned about the tentative draft MS4 permit currently being circulated for public comment.

We have a second chance to make this permit reasonable and workable, and I urge you to fix the problems with the land development requirements in the permit. Specifically, I ask that the permit be modified to:

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I urge you to incorporate these changes before the July 8, 2010 hearing.

Signed,
Ronald R. Horn
RCE 16913