



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

August 14, 2017

Camarillo

County of Ventura

Fillmore

Moorpark

Ojai

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

The Honorable Julia Brownley
U.S. House of Representatives
Washington, D.C. 20515

Subject: Support for Amendment to the Water Quality Improvement Act of 2017 (H.R. 465) Extending NPDES Permit Terms to Ten Years

Dear Representative Brownley:

On behalf of the Ventura Countywide Stormwater Management Committee, I am writing to request your sponsorship of an amendment to the Water Quality Improvement Act of 2017 (H.R. 465) when the Committee on Transportation and Infrastructure marks up the bill. Specifically, we request that as part of this bill, USEPA be authorized to allow ten year terms for National Pollutant Discharge Elimination System (NPDES) permits. This change would allow for enhanced planning and efficient permitting of local wastewater facilities such as ours, and give us the time needed to comply with existing regulatory requirements before imposition of new mandates.

The County of Ventura, Ventura County Watershed Protection District, City of Camarillo, City of Fillmore, City of Moorpark, City of Ojai, City of Oxnard, City of Port Hueneme, City of San Buenaventura, City of Santa Paula, City of Simi Valley, and the City of Thousand Oaks support the five-year extension for permits because, in addition to the stormwater program and the wastewater plant, the Co-permittees have also recycled water (RW) permits with use of the Regional Stormwater Monitoring Program (RSMP) as an amendment onto the RW permit.

As part of compliance, meeting the water quality limits and implementation actions of the NPDES permit requires extensive monitoring and infrastructure improvements. The extensive monitoring and infrastructure improvements take additional time to complete and can exceed five years to implement. This means continuous change in the Co-permittees' programs which can lead to new infrastructure being obsolete.



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When the Clean Water Act was adopted in 1972, Congress authorized USEPA, or a delegated state, to grant waste discharge permits for a period of no more than five years. At the time, this was an appropriate timeframe for renewal to ensure significant progress toward basic water quality improvements. However, much has changed over the last 45 years.

The stormwater quality needs of today require new ways of doing business to bring innovation to the way we make water quality improvements. Requirements in NPDES permits are becoming more restrictive, and the treatment technologies necessary to meet those limits become more expensive and time intensive to implement. Local public agencies have often not yet completed the upgrades necessary to comply with their prior permit when they are hit with new terms and requirements.

In order to ensure that our federal, state, and local resources are efficiently allocated to address the most pressing water quality issues, we urge you to support the amendment of H.R. 465 as follows:

*Section 402(b)(1)(B) of the Federal Water Pollution Control Act (as amended)
is amended by striking the word "five" and inserting in lieu thereof "ten."*

Again, we strongly request that you support this commonsense approach to protecting our lakes, streams, rivers, coastal and near coastal waters. If you have any questions, please feel free to contact me at (805) 659-3942 or arne.anselm@ventura.org.

Sincerely,



Arne Anselm

On Behalf of the Entire Ventura Countywide Stormwater Management Program

cc: Ventura County Stormwater Permittees