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October 13, 2010

Arne Anselm
Manager, Water Quality Monitoring Section
Ventura County Watershed Protection District

Transmitted via pdf attachment to e-mail,
Arne.Anselm@Ventura.org with subject line "Technical Guidance Manual Comments"

Subject: Comments on Ventura County Technical Guidance Manual for Stormwater Quality Control Measures, Manual Update 2010 (September 27, 2010 Draft for Stakeholder Review)

Dear Mr. Anselm:

On behalf of the Calleguas Municipal Water District, I am submitting the following comments regarding the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures (September 27, 2010 Draft for Stakeholder Review). The District has an ongoing interest in integrated approaches to managing water resources and water quality, particularly as they enhance and protect the reliability of local water supplies.

1. Integrated Water Resource Management (IWRM): The District has been an active proponent of integrated water resource management in its participation in the Calleguas Creek Watershed Management Plan and in the Watersheds Coalition of Ventura County's Integrated Regional Water Management Plan. We support the incorporation of IWRM principles as they have been included in the technical guidance manual Section 1.4 Stormwater Management Principles, Section 4.6 Apply LID at Various Scales "Regional/Watershed," and Section 4.7 Implement Integrated Water Resource Management Practices.

We also request continued involvement in partnership with the Ventura Countywide Stormwater Quality Management Program to identify regional opportunities for offsite mitigation projects that will best promote water supply reliability.

2. Section 6.2 General Considerations, Maintenance Responsibility: As noted in my public comments at the September 29, 2010 stakeholder meeting to review the technical guidance manual, I believe the third full paragraph beginning, "The primary purpose of Biofiltration BMPs . . .," (page 6-2), confuses takings under the federal Endangered Species Act with federal Clean Water Act provisions concerning discharges to the Waters of the United States. Maintenance of stormwater facilities will necessarily need to comply with applicable federal and

state law. The technical guidance manual does not need to prescribe how those laws will apply. As discussed at the stakeholder meeting, this paragraph may be eliminated from the manual without changing the effectiveness of the program or affecting maintenance practices in compliance with the Endangered Species Act and Clean Water Act. I recommend removing the paragraph from the manual.

Thank you for the opportunity to comment on the draft technical guidance manual. You may contact me by telephone at (805) 579-7127, or by e-mail at hgraumlich@calleguas.com, if you have any questions regarding these comments.

Sincerely,



Henry Graumlich
Manager of Special Projects

cc: Susan Mulligan, General Manager