



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

March 30, 2017

Electronic Submission: losangeles@waterboards.ca.gov

Camarillo

County of Ventura

Fillmore

Moorpark

Ojai

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

California Regional Water Quality Control Board
Los Angeles Region
ATTN: Jun Zhu
320 W 4th Street, Suite 200
Los Angeles, CA 90013

**Subject: Comment Letter – Revisions to the Los Angeles Region
303(d) List**

Dear Dr. Zhu:

On behalf of the Ventura Countywide Stormwater Quality Management Program (Program), which includes the Watershed Protection District, the County of Ventura and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks, we thank you for the opportunity to provide input on the proposed revisions to the Clean Water Act Section 303(d) list of impaired waterbodies in the Los Angeles Region [hereinafter referred to as 303(d) list] which was distributed for public review on February 8, 2017.

The Program has many concerns with the draft 2016 Los Angeles Water Board's proposed revisions to the 303(d) list of impaired waters. Several errors and inconsistencies hampered our ability to fully vet and review the proposed 303(d) list. It is our opinion that significant review and modifications must be made before adoption and additional public review after modifications will be necessary.

Requested Action:

After full consideration of all comments, revise draft 303(D) list, and allow for another 60-day comment period prior to adoption.

It is critical that the Los Angeles Water Board's proposed revisions to the 303(d) list follow the State Water Resources Control Board (SWRCB) Listing Policy and be based on sound science and methodologies. The development and implementation of Total Maximum Daily Loads (TMDLs) is already a significant investment of resources, and the 303(d) list will drive pollutant waterbody prioritization under the potential Watershed Management Plan option in our next NPDES MS4 Permit.



Without closely following the Listing Policy, pollutants may be listed where an impairment does not exist leading to misplaced priorities and squandered resources. Focused attention should be paid to identifying beneficial uses, impairments due to natural conditions, and applicability of data.

Data from a single point in time, or which is not representative of the receiving water, should be excluded from this effort as should data with results reported below reporting limits (J-flagged). It appears the Program's outfall data was erroneously included for the Santa Clara River. This sampling location represents the runoff discharging from an MS4, not the receiving water quality, and is mostly from infrequent and short-term rain events. Of special concern is where the beneficial use MUN is driving 303(d) listings even though it should not be applied because it is identified as P* and is a conditionally applicable beneficial use.

Requested Action:

Strictly comply with the State Water Resources Control Board (SWRCB) Listing Policy on identifying beneficial uses, impairments due to natural sources, and the appropriate data to support a listing.

The Program supports the comments from the County of Ventura where a more detailed description of the issues identified here is discussed. The Program also supports the comments from the Calleguas Creek Watershed Stakeholders, as well as the Ventura County Irrigated Lands Group (VCAILG) who will be submitting separate comment letters regarding the proposed listing changes in the Calleguas Creek Watershed and VCAILG-affected waterbody segments.

Significant resources are expended when a pollutant is included on the 303(d) list. Errors in this process, and the challenges of delisting a pollutant, divert our limited funding and staff time away from improving water quality. We greatly appreciate your attention to these requests and look forward to a 303(d) list that appropriately identifies the water quality issues within Ventura County.

If you have questions, please contact me at Arne.Anselm@ventura.org or (805) 654-3942.

Sincerely,



Arne Anselm, Chair

On Behalf of the Ventura Countywide Stormwater Management Committee

Cc: Ventura County Stormwater Quality Management Committee
Glenn Shephard, Director - Ventura County Watershed Protection District

