

# Ventura County Watershed Protection District



PUBLIC WORKS AGENCY  
JEFF PRATT  
Agency Director

August 16, 2013

Mr. Sam Unger  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 4th Street, Suite 210  
Los Angeles, CA 90013

Tully Clifford, Director  
Watershed Protection District  
Gerhardt Hubner  
Water/Environmental Resources  
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Design/Construction  
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Planning/Regulatory

**Subject: RESPONSE TO YOUR LETTER DATED JULY 3, 2013 REQUESTING SUBMITTAL OF SUMMARY TMDL MONITORING DATA AND INFORMATION ON PERMITTEES' COMPLIANCE WITH TMDL WASTE LOAD ALLOCATIONS AS PART OF ANNUAL REPORT FOR NPDES PERMIT FOR DISCHARGES FROM THE MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s) WITHIN THE VENTURA COUNTY WATERSHED PROTECTION DISTRICT, COUNTY OF VENTURA, AND THE INCORPORATED CITIES THEREIN, ORDER NO. R4-2010-0108 (NPDES NO. CAS004002)**

Dear Mr. Unger:

In response to your letter dated July 3, 2013, we are attaching with this letter electronically all available final TMDL monitoring reports and monitoring data submitted by the MS4 Responsible Party(s) for those TMDLs identified in Order R4-2010-0108, NPDES Permit No. CAS004002 (Permit). These reports summarize the programs and measures currently approved by the Regional Board and implemented by the Permittees, their compliance status, and the monitoring data collected during the reporting periods.

Monitoring for the Harbor Beaches Bacteria TMDL is performed by the Ventura County Environmental Health Department who report the results on their web page. TMDL reports for the Santa Clara River Chloride and Nitrogen TMDLs<sup>1</sup> were not found. However, stormwater monitoring suggested by the Basin Plan Amendment for those MS4s was performed and the data submitted as part of the Ventura Countywide Stormwater Program's Annual Report. The Program's Annual Report also includes detailed inventory and discussion of the programs and measures implemented by the Permittees to comply with the Permit and applicable TMDLs.

<sup>1</sup> Santa Clara River Nutrient TMDL states MS4 Monitoring will be in accordance with Work Plans to be submitted by MS4 permittees and initial monitoring may be provided by existing mass emission monitoring stations and selected storm drains.



Please note, even though the current Permit identifies the Ventura County Watershed Protection District (District) as the Principal Permittee, the District may not or does not collect monitoring data for many TMDLs. In fact, the District is not even named as a Responsible Party under several TMDLs. Furthermore, many of the Permittees operate under separate implementing legal instruments (Memorandums of Agreement or a Joint Powers Authority such as the Calleguas Creek Watershed TMDL Parties do) for common sharing of costs and collection of data and studies. The District has no authority to compel the Permittees to provide this information.

We would also like to point out that in the TMDLs cited in the July 3<sup>rd</sup> letter, the Permit states that reporting shall be submitted independently by the MS4 Permittees or in conjunction with other stakeholders to the TMDL. It does not identify the Principal Permittee as responsible to collect, analyze, and report the information regarding TMDL compliance. The TMDL Responsible Parties do not expect the District to describe their compliance status with the TMDLs, nor is it appropriate for the District to assume that responsibility.

As you know all TMDL monitoring and plans are prepared by various Responsible Parties and submitted to the Regional Board for approval. These plans detail both the monitoring effort involved and how the results are to be reported to the Regional Board. In adoption of the TMDLs by the Regional Board as Basin Plan Amendments, schedules for submittal of data and reports were established. In many cases, the dates for TMDL Annual Report and monitoring data submittal do not correspond to our Countywide Stormwater Permit Annual Report due date of December 15th. Regarding the later, we have initiated discussions with the Calleguas Creek Watershed TMDL Parties in hope of producing a better, more integrated report for both programs. Your staff assistance in facilitating this integrated approach across at least two water quality programs (even better if integrated with POTW and Irrigation Lands Program monitoring data) would be much appreciated.

Thank you for your time to consider our comments and suggestions. If you have any additional questions or further clarification, please contact me at 805-654-5051 or Arne Anselm at (805) 654-3942.

Sincerely,



Gerhardt Hubner  
Deputy Director

Attachments: (all provided electronically)

1. Calleguas Creek Watershed TMDL Compliance Monitoring Program Third Year Annual Monitoring Report
2. Calleguas Creek Watershed: Revolon Slough/Beardsley Wash 2011-2012 Trash TMDL Annual Report
3. City of Oxnard: Revolon Slough and Beardsley Wash Trash TMDL Monitoring Annual Report – 2012
4. Malibu TMDL Monitoring Reports July 2011 – June 2012
5. Ventura River Estuary Trash TMDL 2011-2012 Annual Report

cc: Renee Purdy, Regional Program Section Chief  
Ivar Ridgeway, Stormwater Permitting Chief  
Ventura Countywide Stormwater Quality Management Program MS4 Permittees