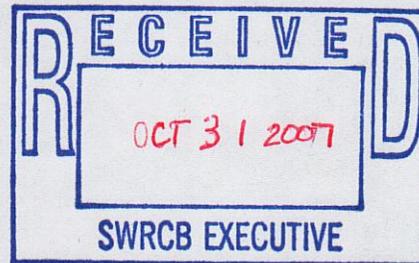


Public Works Department • Water Resources Division - Wastewater Section  
6001 South Perkins Rd. • Oxnard, CA 93033-9047 • (805) 488-3517 • Fax (805) 488-2036



October 31, 2007

Jeanine Townsend, Acting Clerk to the Board  
State Water Resources Control Board  
1001 I. Street  
Sacramento, CA 95814

**COMMENTS ON THE PROPOSED TRASH TMDL FOR REVOLON SLOUGH  
AND BEARDSLEY WASH IN VENTURA COUNTY**

Dear Ms. Townsend:

We have received the Notice of Public Workshop for the *Proposed Amendment to the Water Quality Control Plan for The Los Angeles Region (Basin Plan) to Incorporate a Total Maximum Daily Load (TMDL) for Trash in Revolon Slough and Beardsley Wash*, and thank you for the opportunity to comment prior to the workshop. While the City of Oxnard submitted comments on the draft document in our letter of May 3, 2007, to the Regional Board, we would like to take this opportunity to reiterate our major concern, voiced in the comment letter as well as the Regional Board hearing on the proposed amendment. This is that the City of Oxnard should not be listed in the TMDL as a non-point source of trash to Revolon Slough / Beardsley Wash.

Background

The City of Oxnard has a population of approximately 200,000, and is a co-permittee under the municipal stormwater permit for urban runoff in Ventura County. The City includes all of the major land uses, but in the eastern portion of the City that discharges to Revolon Slough / Beardsley Wash, the land uses are predominantly commercial / industrial, transportation, and agriculture, as seen on the following graphic where our City limit is in teal, and Revolon Slough is the adjacent yellow line:



This stormwater permit, first adopted in 1994, has many program elements that address trash from the municipality that have evolved and been enhanced over the years. These enhancements have not only addressed trash issues, but also other problematic pollutants that potentially discharge to impaired waterbodies.

#### Current Management Practices

The City has put in place an extensive maintenance and monitoring program for catch basins, post-construction devices, and open channels prior to the urban runoff entering the agricultural drains or Watershed Protection District channels – there are no direct MS4 discharges from the City to Revolon Slough / Beardsley Wash. There is also no possibility for trash to enter Revolon Slough / Beardsley Wash by means of non-point source discharge (i.e., outside of our NPDES permit for urban runoff).

The study of trash in open channels (both inside and outside City limits) is the focus of an on-going study that began in 2001, and partners with Oxnard City Corps. The findings of this program were the subject of a presentation by City of Oxnard staff at a SWRCB-sponsored conference on trash and debris in 2005 (<http://conference.plasticdebris.org/whitepapers.shtml>). The City's trash program is very much in line with the MFAC program of the TMDL, and we support the continued removal and assessment of trash.

#### Issue

The City of Oxnard is a potential discharger of trash to Revolon Slough / Beardsley Wash through the municipal storm drain system, covered under NPDES permit (BOARD ORDER No. 00-108; NPDES PERMIT No. CAS004002). Although urban runoff is also considered a non-point source under the Coastal Zone Act Reauthorization Act (CZARA), our urban runoff permit states that "Section 6217(g) of the Coastal Zone Act Reauthorization Amendments of 1990 (CZARA) requires coastal states with approved coastal zone management programs to address non-point pollution impacting or threatening coastal water quality. CZARA addresses five sources of non-point pollution: agriculture, silviculture, urban, marinas, and hydromodification. This NPDES permit addresses the management measures required for the urban category, with the exception of septic systems. The Regional Board addresses septic systems through the administration of other programs."

The proposed trash TMDL contains Load Allocations (LA) for non-point sources and Wasteload Allocations (WLA) point sources. The City of Oxnard is erroneously listed as a point and non-point contributor of trash to Revolon Slough / Beardsley Wash, with requirements for full capture of trash from our MS4 and measurement and removal of trash from nearby agricultural drains. The TMDL source analysis correctly states that "Litter from adjacent land areas, roadways and direct dumping and deposition are sources of trash to Revolon Slough and Beardsley Wash. Point sources such as storm drains are also sources of trash discharged to Revolon Slough and Beardsley Wash." The City is only in disagreement about our capability to directly dump or deposit trash to Revolon

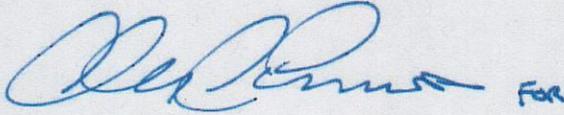
Slough / Beardsley Wash, because our only adjacent land or roadways are agricultural and Caltrans, as seen in the graphic:



Conclusion

The proposed TMDL, as currently written, is very confusing, contradictive, and difficult to determine compliance status. We do not support the inclusion of the City of Oxnard as a non-point source of trash to Revolon Slough / Beardsley Wash, but do support the use of an MFAC program and TMDL implementation plan to address trash and other pollutants of concern in the watershed.

We appreciate the Board's consideration of the comments presented in this letter. If you have any questions, please feel free to call me at (805) 271-2205, or contact Mark Pumford, Technical Services Manager, at (805) 271-2220.



Mark S. Norris  
Assistant Public Works Director