



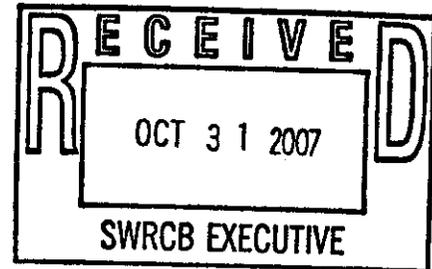
# City of Camarillo

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October 31, 2007

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



RE: Comment Letter – Beardsley Wash and Revolon Slough Trash TMDL

Dear Ms. Townsend:

The City of Camarillo appreciates the opportunity to provide comments on the *Amendments to the Water Quality Control Plan – Los Angeles Region for the Revolon Slough and Beardsley Wash Trash TMDL Basin Plan Amendment (BPA)*.

As a stakeholder in the Calleguas Creek Watershed, Camarillo has actively participated in the development of multiple TMDLs for the watershed and has been actively working with Regional Board staff to develop a Trash TMDL for Revolon Slough and Beardsley Wash that will result in a mechanism for reducing trash discharges and also maintain the ability of the stakeholders in the watershed to coordinate and effectively implement the TMDLs.

During the development of the TMDL, the Regional Board staff recognized that the Revolon Slough watershed varied significantly from the Los Angeles River watershed. The Revolon Slough watershed consists primarily of open space and agricultural land uses and has relatively small amounts of urban contributions. Urban land area makes up less than 20 percent of the Revolon Slough watershed. As a result, a different mechanism of compliance was necessary to address trash discharges to the waterbody. Just installing full capture devices on the urban discharges will not result in the trash targets being met in the watershed. Installing full capture devices on all of the urban land uses that flow into the Slough would not address what we feel is the primary source of trash to the watershed, nonpoint sources from litter and agriculture.

To address this situation, the TMDL included a mechanism of compliance with the TMDL called the Minimum Frequency of Assessment and Collection (MFAC)/Best Management Practice (BMP) program. That program requires responsible parties to install BMPs and conduct regular trash pickups in the drains discharging to the waterbody and in the waterbody itself to reduce the amount of trash in the waterbody. As stakeholders, we fully support this approach to

addressing trash in waterbodies without significant point source discharges and feel it is the best mechanism for addressing trash in Revolon Slough and Beardsley Wash. A combined MFAC/BMP program allows responsible parties to install BMPs to address areas that are generating the largest amount of trash and address the other, smaller sources through cleaning up drainages and the receiving water.

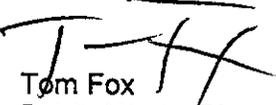
However, our support for the TMDL was tempered by actions taken at the Regional Board hearing on the TMDL. At the hearing, the ability of point sources to comply using a MFAC/BMP program was diminished by adding additional requirements that must be met in order to comply with the TMDL using the MFAC/BMP program. Although we recognize the reasoning behind the change, we feel that the State Board should understand that the MFAC/BMP program is an essential part of compliance for our agencies. In the TMDL the City of Camarillo is listed as a responsible party for point and non-point source discharges. As a nonpoint source, our only mechanism of compliance is through the MFAC/BMP program. Our agency needs to be able to coordinate our point and nonpoint requirements so that resources are not wasted and trash discharges are effectively addressed. The changes to the TMDL during the Regional Board hearing made it unclear whether or not this will be possible.

Based on conversations with the Regional Board staff, it is our understanding that additional language will be proposed that clarifies the mechanisms for compliance in the TMDL. We understand that the language changes will address some of the inconsistencies within the Basin Plan Amendment that resulted from the changes that occurred in the Regional Board hearing and clarify that point sources can comply with the TMDL through any mechanism that achieves the required reductions. With those language clarifications, we feel that the City will be able to determine the most effective way to address trash discharges and continue to work with nonpoint source dischargers, such as agriculture, to meet the TMDL requirements.

Additionally, we have concerns about the potential future implications of being named as a nonpoint source in this TMDL. We would like to state that we do not consider the City to be a nonpoint source for other pollutants and do not feel that the trash TMDL designation should be used as precedent for any other TMDLs.

In summary, we would like to provide support for the MFAC/BMP approach in the BPA, and support for adoption of the BPA if our understanding of the additional language clarifications is included. If the additional language clarifications are not included, we would like consideration of the attached clarifications that were discussed with Regional Board staff. We appreciate the State Board's consideration of the comments presented in this comment letter. If you have any questions on this letter or the attachment, please contact Anita Kuhlman, Stormwater Coordinator, at 805-383-5659.

Sincerely,

  
Tom Fox  
Public Works Director

Attachment – Proposed BPA Clarification Language

cc: Sam Unger & Eric Wu, LARWQCB  
Lucie McGovern, Deputy Public Works Director  
Anita Kuhlman, Stormwater Coordinator

**Changes to the Basin Plan Amendments Discussed with RWQCB on 10/26/07**

The discussed changes would be the same for both the Ventura River Estuary and Revolon Slough Trash TMDLs.

**Under Implementation for Point Sources, third paragraph:**

"In certain circumstances (if approved by the Executive Officer), point source dischargers may alternatively comply with WLAs by implementing a program for minimum frequency of assessment and collection in conjunction with best management practices (MFAC/BMPs)."

Deleted: also

**In Table 7-24.2a and Table 7-25.2a, change the title as follows:**

"Implementation Schedule for Point Sources"

Deleted: Full Capture System

**Change the text those same tables as follows:**

3	Submit results of Trash Monitoring and Reporting Plan, recommend trash baseline WLA, and propose <u>prioritization of Full Capture System installation or implementation of other measures</u> to attain required trash reductions.
4	Installation of Full Capture Systems <u>or other measures</u> to achieve 20% reduction of trash from Baseline WLA*.
5	Installation of Full Capture Systems <u>or other measures</u> to achieve 40% reduction of trash from Baseline WLA*.
6	Evaluate the effectiveness of Full Capture Systems <u>or other measures</u> , and reconsider the WLA.
7	Installation of Full Capture Systems <u>or other measures</u> to achieve 60% reduction of trash from Baseline WLA*.
8	Installation of Full Capture Systems <u>or other measures</u> to achieve 80% reduction of trash from Baseline WLA*.
9	Installation of Full Capture Systems <u>or other measures</u> to achieve 100% reduction of trash from Baseline WLA*.

Deleted: Full Capture System

\*Compliance with percent reductions from the Baseline WLA will be deemed wherever full capture systems are installed in corresponding percentages of the conveyance discharging to...

Deleted: assumed

**Table 7-24.2b and Table 7-25.2b, the second sentence of the footnote language was changed as follows:**

"At Task 4, all Responsible Jurisdictions must demonstrate full compliance and attainment of the zero trash target's requirement that trash is not accumulating in deleterious amounts between the required trash assessment and collection events."

Deleted: including