

# Ventura County Watershed Protection District



PUBLIC WORKS AGENCY  
JEFF PRATT  
Agency Director

May 15, 2017

ELECTRONIC SUBMISSION: [LOSANGELES@WATERBOARDS.CA.GOV](mailto:LOSANGELES@WATERBOARDS.CA.GOV)

Mr. Sam Unger, Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 W 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

**Subject: Tentative Time Schedule Order for Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit (NPDES) Las Virgenes Municipal Water District, Tapia Water Reclamation Facility (NPDES Permit No. CA005614, CI #4760)**

Glenn Shephard, Director  
Watershed Protection District

Arne Anselm  
Water Resources

Gerard Kapuscik  
Strategic Resiliency Group

Karl Novak  
Operations & Maintenance

Bruce Rindahl  
Watershed  
Resources & Technology

Peter Sheydayi  
Design & Construction

Sergio Vargas  
Watershed  
Planning & Permits

Dear Mr. Unger:

The intent of this letter is to support comments provided by Las Virgenes – Triunfo Joint Powers Authority (JPA) regarding the lower chloride limit of 150 mg/L proposed in the tentative Time Schedule Order (TSO) for the Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit (NPDES) – Las Virgenes Municipal Water District, Tapia Water Reclamation Facility (NPDES Permit No. CA005614, CI #4760). Particularly, the Ventura County Watershed Protection District (VCWPD) is concerned with the JPA decision to suspend plans to collaborate with local municipalities such as County of Ventura (County), towards Total Maximum Daily Load (TMDL) compliance, due to JPA's concern with proposed TSO requiring lower chloride limit of 150 mg/L.

The County and VCWPD are subject to Bacteria TMDL in the upper Malibu Creek Watershed. The feasibility study and multiple analyses of alternatives indicated that the most effective treatment towards dry weather Bacteria TMDL compliance can be accomplished by diversion of low-flow urban runoff to the sanitary sewer system. Reopening dialog with JPA regarding low flow diversion in upper Malibu Creek is of high priority to the County and VCWPD.

Thank you for your time and consideration. If you have questions or need additional information, please contact me at (805) 654-2040 or [Glenn.Shephard@ventura.org](mailto:Glenn.Shephard@ventura.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Shephard".

Glenn Shephard, P.E.  
Director

EAM/cs/K:\Projects\Zone4\MultiBenefitBMPs\40540\_Oak\_Park\_Green\_Streets\_Urban\_Retrofit\Administration\Correspondence\  
2017-05\_JPA Support\2017\_05\_JPA Support.docx