

# county of ventura

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May 16, 2002

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Mr. Craig Wilson  
 Monitoring and TMDL Listing Unit  
 Division of Water Quality  
 State Water Resources Control Board  
 P.O. Box 100  
 Sacramento, CA 95812-0100

Subject: PROPOSED REVISIONS TO THE 303 (D) LIST

Dear Mr. Wilson:

Thank you for the opportunity to review the proposed revisions to the 303(d) List and to provide you with comments. We appreciate the effort that has gone into this document and we look forward to working cooperatively towards ensuring realistic and attainable water quality standards.

Ventura County Flood Control District (VCFCD) is dedicated to protecting the health and safety of our residents, enhancing natural resources and improving water quality. As the Principal Permittee of the Ventura Countywide Stormwater Quality Management Program, we have worked diligently to identify water quality concerns and to address them proactively. Additionally, VCFCD is in the midst of changing its name to the Ventura County Watershed Protection District to more accurately reflect our current responsibilities as well as our community's values. VCFCD supports the development of reasonable water quality goals and objectives providing they are based on appropriate beneficial use designations, sufficient data and sound science.

After reviewing the documents associated with the proposed revisions to the 303(d) List, VCFCD has the following comments and suggestions:

- To comprehensively evaluate "impairment" to a water body, one should first ensure the appropriate beneficial use designations have been assigned to the location. The existing basin plan beneficial use designations appear to have been established in
- 1994. VCFCD believes a re-evaluation of the beneficial use designations should occur *prior* to consideration of water quality data that may ultimately lead to modifications to the 303(d) List.

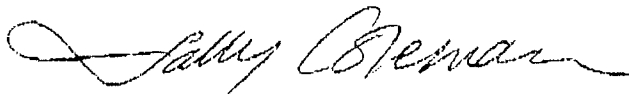


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- Use and interpretation of monitoring data compiled in response to the request for information relevant to the development of this proposed list is critical. VCFCD believes care should have gone into Quality Control and Quality Assurance of the data collected and it is not clear from the staff reports that this was accomplished. For this particular effort, it appears that data has been gathered from numerous sources. Variability in sample handling, preservation techniques and laboratory methods can greatly influence results. Research indicates inconsistency in testing protocol can lead to difficulty in comparing and integrating data. At a minimum, each group and/or agency contributing data for the 303(d) List process should be operating under the guidelines and protocols of a QA/QC Plan for their monitoring programs. Collection of a grab sample as opposed to a composite sample and collection of a time-weighted or flow-proportional sample should have been considered, with the data qualified accordingly. Grab samples should not be relied upon or weighted as heavily as composite, flow proportional samples.
- Upon review of the documents associated with the proposed revisions, it was evident in some cases, "impairment" determinations have been made based on very limited data. For example, in the case of Calleguas Creek R9A, 111 water samples were collected, 15 samples exceeded Basin Plan water quality objectives, and the site will now be listed as "impaired" for nitrate. A similar case exists for Calleguas Creek R9B where foam was identified in *one* photograph and this site is now being placed on the "watch list" and possibly considered for listing. VCFCD believes state-wide standardized protocol should be developed and followed for the evaluation of data and the consideration for 303 (d) listing/de-listing.
- Finally, any pollutant included on the 303 (d) List will likely lead to the development of a TMDL. VCFCD supports efforts to improve water quality through TMDLs providing waste load allocations and implementation schedules are realistic and achievable.

Again, we appreciate the opportunity to provide comments on this matter. We hope you will take our viewpoint into consideration. If you have any questions or if you need additional information, please call me at (805) 654-5051.

Sincerely,



Sally Coleman  
 Water Quality/Environmental Services  
 Division Manager  
 Ventura County Flood Control District