



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

Camarillo
County of Ventura
Fillmore
Moorpark
Ojai
Oxnard
Port Hueneme
San Buenaventura
Santa Paula
Simi Valley
Thousand Oaks
Ventura County
Watershed Protection
District

January 23, 2020

Electronic Submission: losangeles@waterboards.ca.gov

California Regional Water Quality Control Board

Los Angeles Region

Attention: Dr. Céline Gallon

320 West 4th Street, Suite 200

Los Angeles, CA 90013

Submitted via email: Celine.Gallon@waterboards.ca.gov

**Subject: 2020-22 Triennial Review of the Water Quality Standards
in the Los Angeles Region**

Dear Dr. Gallon:

On behalf of the Ventura Countywide Stormwater Quality Management Program (Program), which includes the Ventura County Watershed Protection District, the County of Ventura, and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks, thank you for the opportunity to provide stakeholder input on the Los Angeles Regional Water Quality Control Board's (Regional Board) Notice of the 2020-22 Triennial Review of Water Quality Standards in the Los Angeles Region (Notice), dated December 20, 2019. Collectively, the Program agencies operate the municipal storm drain system in Ventura County and discharge stormwater and urban runoff pursuant to the Ventura Countywide 2010 NPDES Municipal Stormwater Permit¹. All 12 agencies are committed to working cooperatively to improve water quality in our local waterways and beaches.

The Triennial Review determines and prioritizes issues regarding water quality standards to be addressed by revisions to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in the coming years. The Program has reviewed the 2020-2022 Evaluation of New or Revised Recommended Section 304(a) Criteria for Incorporation into the Basin Plan as Water Quality Objectives (Staff Report) and would like to take this opportunity to submit the following comment on projects of importance to Ventura County Permittees.

¹ Order No. R4-2010-0108



Comment #1:

Submitting Organization:

The Members of the Ventura Countywide Stormwater Quality Management Program

Contact Person:

Arne Anselm, Deputy Director, Watershed Protection District, County of Ventura, (805) 654-3942, arne.anselm@ventura.org

Affected Water Quality Objective:

Indicator Bacteria

Affected Waterbodies and Watersheds:

Santa Clara River Estuary and Reaches 3, 5, 6, 7; Santa Clara River Watershed
Malibu Creek, Malibu Lagoon; Malibu Creek Watershed
Harbor Beaches; Ventura Harbor subwatershed

Affected Beneficial Use:

REC-1, REC-2

Concise Summary of Data, Information or Evidence:

The Program's members are currently implementing bacteria TMDLs in Malibu Creek², Santa Clara River³, and the Harbor Beaches of Coastal Ventura⁴. The Program has been implementing actions to address these TMDLs for many years and has made progress in improving water quality. However, the stormwater permit for Ventura County is under development and will include an option to develop comprehensive watershed management plans to address all the water quality challenges in these watersheds. The plans will provide the opportunity to think holistically about water resource management in these watersheds, but additional time is needed to develop the plans and implement projects that result from the planning effort. Additionally, there is a significant amount of new science and information regarding the risk to human health from different sources of bacteria that may impact the decisions on which control measures are the most effective to address the remaining impairments. Finally, the existing Bacteria TMDL requirements are not aligned with the recently adopted Statewide Bacteria Provisions.

Concise Summary of Suggested Revisions:

Allocate staff resources to modify the compliance schedules for all Bacteria TMDLs in Ventura County, including the Santa Clara River Bacteria TMDL, the Harbor Beaches of Ventura County Bacteria TMDL, and the Malibu Creek Bacteria TMDL.

² Malibu Creek TMDL – Resolution No. 2004 – 019R. Effective January 24, 2006. And Reconsideration of Certain Technical Matters of the TMDL for Bacteria Indicator Densities in Malibu Creek and Lagoon. Basin Plan amendment – Resolution No. R12-009. Effective July 2, 2014.

³ Santa Clara River Bacteria TMDL – Resolution No. R10-006. Effective March 21, 2012.

⁴ Harbor Beaches of Ventura Program Bacteria TMDL – Resolution No. 2007-017. Effective December 18, 2008.

Supporting Data, Information, or Evidence:

As detailed in the December 2019 Triennial Review Staff Report, the “Los Angeles Water Board is currently preparing to update the Basin Plan to incorporate the statewide Bacteria Provisions adopted by the State Water Board”. However, these updates do not include modifications to the existing bacteria TMDLs to align them with the Statewide Bacteria Provisions. The new Bacteria Provisions revise the indicators of concern and the objectives associated with those indicators, setting up a situation where different indicators will be used to evaluate compliance with TMDLs than those being used to evaluate compliance with receiving water limitations. Time is needed to modify the TMDLs to align them with the Statewide Bacteria Provisions.

Additionally, through implementing the bacteria TMDL requirements, the Program has identified significant time and resource needs to construct the projects necessary to meet the TMDL allocations. The Program’s members have identified that the best mechanism to obtain those funds are through the development of multi-benefit projects that address additional water resource, transportation, or recreation needs in the community. Development of these project opportunities and obtaining the funding take time, and deadlines for several of these bacteria TMDLs have either passed or will occur during the triennial review period.

Additionally, information developed in California specific epidemiological studies, such as the Surfer Health Study in the San Diego Region, have shown that the EPA criteria upon which the Statewide Bacteria Provisions are based may not appropriately reflect the risk to human health from recreating in California’s waterbodies. A number of efforts are underway to further evaluate the standards and identify ways to better target sources, such as human waste, that are most likely to pose a risk to recreators. These efforts are likely to modify the control measures that the Program would implement to address the remaining impairments in these watersheds. As a result, the Program would like additional time to align its watershed planning efforts that will be required under the new permit to facilitate project funding and incorporate the new science and objectives into the Bacteria TMDLs. As such, the Program’s members respectfully request for the Regional Board to ensure adequate resources for modifying the compliance schedules for all Bacteria TMDLs in Ventura County.

Comment #2:

Submitting Organization:

The Members of the Ventura Countywide Stormwater Quality Management Program

Contact Person:

Arne Anselm, Deputy Director, Watershed Protection District, County of Ventura,
(805) 654-3942, arne.anselm@ventura.org

Affected Water Quality Objective: E. Coli

Affected Waterbody and Watershed: Calleguas Creek and Tributaries, Calleguas Creek Watershed

Affected Beneficial Use: Recreation

Concise Summary of Data, Information or Evidence:

In 2003, when the Regional Water Board adopted a Basin Plan Amendment for High Flow Suspension in the Los Angeles Region, the amendment was limited to engineered channels in Los Angeles County. In 2018, the State Water Resources Control Board adopted the Statewide Bacteria Provisions. The Statewide Bacteria Provisions included an implementation option to adopt seasonal suspensions for all types of waterbodies in California. The Program requests that Basin Planning resources be made available to extend the High Flow Suspension into Ventura County for both engineered and natural channels and to consider the possibility of adopting a low flow suspension for waterbodies with insufficient flow for recreation.

Concise Summary of Suggested Revisions:

The Program requests that waterbodies in Ventura County that meet the definitions outlined in the 2003 Basin Plan Amendment for “engineered channels” be included in the Basin Plan as waterbodies to which a High Flow Suspension applies. Additionally, the Program requests that Basin Planning resources be allocated to conduct a Use Attainability Analysis, as required by the Statewide Bacteria Provisions, to determine other waterbodies in Ventura County to which a seasonal (high or low flow) suspension would apply.

Supporting Data, Information, or Evidence:

Following rainfall events, southern California rivers and streams experience high flow conditions that can be dramatically larger than the dry weather flows experienced in the same reaches. High flows are experienced in both concrete-lined and natural channels and are due to the natural rainfall pattern in southern California’s Mediterranean climate, as well as development and other modifications, to some extent. The water volume and velocities experienced in rivers and streams during storm flows are such that water contact recreational uses are inherently unsafe in these conditions. Non-contact recreational uses related to the swimmable goal in the Clean Water Act are also unsafe during high flows. Because of these physical characteristics, REC1 and REC2 beneficial uses do not exist in rivers and streams during high flow conditions, regardless of whether such flows occur in a natural or engineered channel.

Several waterbodies in Ventura County meet the original requirements of the Basin Plan Amendment for High Flow Suspensions (i.e., engineered channels) and should at a minimum be included in Table 2-1a of the Basin Plan. The Engineered channels (which are a total of 131 miles) in the Ventura County watersheds are listed and illustrated in Attachment A.

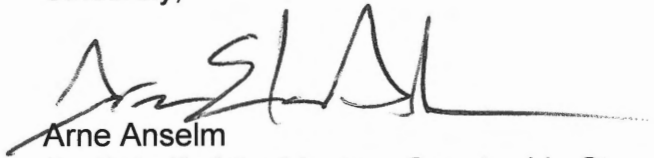
Additionally, certain sub-watersheds in the County have physical flow conditions that are generally not conducive to recreational uses. In these water bodies, the water is too shallow to support either immersion or the likely potential for ingestion. These types of

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water bodies cannot support REC1 beneficial uses and should not be designated as REC1. Similar to a High Flow Suspension which has already been adopted in the region, a Low Flow Suspension may be an appropriate mechanism for these waterbodies that do not support REC1 beneficial uses. This approach would not completely remove the recreational use; rather, it would apply only in instances where flows are adequate to support use. The U.S. Fish and Wildlife and U.S. Geological Survey references could provide a quantitative approach to defining when the uses should be suspended (e.g., when depths are below four inches).

The Program recognizes the large amount of work that goes into each Triennial Review period and appreciates the opportunity to comment. If you have questions, please contact me at (805) 654-3942, arne.anselm@ventura.org.

Sincerely,



Arne Anselm
On Behalf of the Ventura Countywide Stormwater Management Program

Attachment A: List and Map of Engineered Channels in Ventura County

ATTACHMENT A

**Engineered Channels Defined As:
Inland, Flowing Surface Water Bodies with a
Box, V-Shaped or Trapezoidal Configuration
That Have Been Lined On The Sides And/Or Bottom With Concrete**

| <i>Channel Name</i> | <i>Feet</i> | <i>Miles</i> | <i>Channel Name</i> | <i>Feet</i> | <i>Miles</i> |
|--|-------------|--------------|--|-------------|--------------|
| Adams Barranca | 180 | 0.03 | Grimes Canyon | 2,628 | 0.50 |
| Alamos Canyon | 40 | 0.01 | Groves Place Drain | 118 | 0.02 |
| Anacapa Drain | 47 | 0.01 | Haines Barranca | 211 | 0.04 |
| Arneill Drain | 1,242 | 0.24 | Happy Camp Canyon | 4,745 | 0.90 |
| Arroyo Conejo | 21,562 | 4.08 | Happy Valley Drain | 5,571 | 1.06 |
| Arroyo Conejo N. Fork | 2,212 | 0.42 | Harmon Barranca | 1,731 | 0.33 |
| Arroyo Conejo N. Fork Tributary | 83 | 0.02 | Hemlock St Trib to Oxnard West Drain | 1,083 | 0.21 |
| Arroyo Santa Rosa | 2,364 | 0.45 | Hemlock St Tributary to Harbor | 196 | 0.04 |
| Arroyo Santa Rosa Tributary | 3,119 | 0.59 | Home Acres Drain | 153 | 0.03 |
| Arroyo Simi | 16,899 | 3.20 | Hueneme Drain | 550 | 0.10 |
| Arundell Barranca | 17,751 | 3.36 | Hueneme Road Tributary to Industrial Drain | 171 | 0.03 |
| Bajo Aqua Tributary to Camarillo Hills Drain | 1,725 | 0.33 | Hummingbird Creek | 3,809 | 0.72 |
| Bardsdale Ditch | 3,391 | 0.64 | Jepson Wash | 1,459 | 0.28 |
| Barlow Barranca | 3,102 | 0.59 | Kadota Fig Drain | 2,552 | 0.48 |
| Beardsley Wash | 14,953 | 2.83 | Kalorama | 721 | 0.14 |
| Black Canyon | 393 | 0.07 | Katherine Street Secondary # 3 | 48 | 0.01 |
| Blanchard Rd Drain Secondary | 134 | 0.03 | Keefe Ditch | 1,651 | 0.31 |
| Brea Canyon | 3,812 | 0.72 | Kenewa St Secondary | 570 | 0.11 |
| Brown Barranca | 1,736 | 0.33 | Knolls Park Drain | 543 | 0.10 |
| Buena HS Tributary to Telephone Rd Drain | 4,628 | 0.88 | Laguna Rd Tributary to Mugu Drain | 1,008 | 0.19 |
| Bus Canyon | 7,591 | 1.44 | Lake Canyon | 39 | 0.01 |
| Bus Canyon Tributary | 5,049 | 0.96 | Lake Eleanor Creek | 450 | 0.09 |
| Camarillo Hills Drain | 15,902 | 3.01 | Lang Creek | 8,660 | 1.64 |
| Camino Dos Rios Secondary (#104) | 230 | 0.04 | Las Lajas Canyon | 1,646 | 0.31 |
| Canada de San Joaquin | 1,970 | 0.37 | Las Posas Estates Drain | 5,497 | 1.04 |
| Canada Larga | 1,343 | 0.25 | Las Posas Rd Tributary to Edgemore Drain | 251 | 0.05 |
| Castano Channel | 40 | 0.01 | Lewis Road Drain | 10,193 | 1.93 |
| Castro-Williams | 278 | 0.05 | Lindero Creek | 1,001 | 0.19 |
| Central Ave Drain | 448 | 0.08 | Marr Diversion | 4,745 | 0.90 |
| Clark Barranca | 9,917 | 1.88 | Mesa School Tributary | 6,234 | 1.18 |
| Clubhouse Dr Tributary to Los Angeles Drain | 52 | 0.01 | Miller Py Tributary to Arroyo Simi | 34 | 0.01 |
| Conejo Mountain Creek | 3,154 | 0.60 | Mills Road Drain | 947 | 0.18 |
| Conejo Mountain Creek Det.B.# 1 | 54 | 0.01 | Mission Drain | 5,129 | 0.97 |
| Conejo Mountain Creek Det.B.# 2 | 41 | 0.01 | Mission Oaks Drain | 14 | 0.00 |
| Conejo Mountain Creek Det.B.# 3 | 78 | 0.01 | Moon Ditch | 12,458 | 2.36 |
| Conejo Mountain Creek Det.B.# 5 | 75 | 0.01 | Moorpark Strom Drain No. 1 | 1,262 | 0.24 |
| Conejo Valley Secondary | 614 | 0.12 | Newbury Park Storm Drain No. 1 | 68 | 0.01 |
| Crestview Drain | 4,600 | 0.87 | Newbury Park Storm Drain No. 2 | 1,578 | 0.30 |
| Del Norte Tributary to Beardsley Channel | 8,780 | 1.66 | No. 2 Canyon | 1,619 | 0.31 |
| Doris Ave Drain | 3,327 | 0.63 | North Fork Arroyo Conejo Tributary | 334 | 0.06 |
| Dry Canyon | 11,189 | 2.12 | North Ramona Place Drain | 186 | 0.04 |
| Dry Canyon E. Tributary | 3,000 | 0.57 | North Simi Drain | 7,818 | 1.48 |
| Dry Canyon West Fork | 413 | 0.08 | Nyeland Drain | 5,765 | 1.09 |
| Duval Rd Drain Secondary | 31 | 0.01 | Oak Canyon | 1,207 | 0.23 |
| East Camarillo Drain | 2,984 | 0.57 | Oak View Drain | 352 | 0.07 |
| Edgemore Drain | 3,263 | 0.62 | Olsen Channel | 3,557 | 0.67 |
| Edgemore Tributary Secondary | 477 | 0.09 | Ondulando Barranca | 389 | 0.07 |
| Edwards Canyon | 408 | 0.08 | Ondulando Drain Project | 81 | 0.02 |
| El Rio Drain | 6,618 | 1.25 | Ondulando NPDES Basin | 5 | 0.00 |
| Encinas Canyon | 2,472 | 0.47 | Ormond Lagoon Waterway | 4,129 | 0.78 |
| Erbes Road Drain | 703 | 0.13 | Other | 3,013 | 0.57 |
| Erringer Road Drain | 5,405 | 1.02 | Oxnard Industrial Drain | 17,415 | 3.30 |
| Fagan Canyon | 3,445 | 0.65 | Oxnard West Drain | 15,877 | 3.01 |
| Fifth St Drain | 178 | 0.03 | Park Drain | 545 | 0.10 |
| Fifth St Tributary to Beardsley Channel | 5,419 | 1.03 | Paso Flores Canyon | 984 | 0.19 |
| Figuroa St Drain | 1,814 | 0.34 | Patterson Drain | 6,376 | 1.21 |
| Fox Canyon | 3,557 | 0.67 | Peach Hill Wash | 9,344 | 1.77 |
| Franklin Barranca | 6,486 | 1.23 | Peck Road Drain | 4,641 | 0.88 |
| Fresno Canyon | 642 | 0.12 | Piedra Canyon | 289 | 0.05 |
| Gabbert Canyon | 8,930 | 1.69 | Pierpont | 1,513 | 0.29 |
| Grande Vista St Secondary | 91 | 0.02 | Pleasant Valley Drain | 2,305 | 0.44 |

ATTACHMENT A

**Engineered Channels Defined As:
Inland, Flowing Surface Water Bodies with a
Box, V-Shaped or Trapezoidal Configuration
That Have Been Lined On The Sides And/Or Bottom With Concrete
(cont'd)**

| <i>Channel Name</i> | <i>Feet</i> | <i>Miles</i> |
|---|----------------|--------------|
| Pole Creek | 3,826 | 0.72 |
| Ponderosa Drain | 3,040 | 0.58 |
| Potrero Creek | 2,778 | 0.53 |
| Potrero Road West Dam | 37 | 0.01 |
| Prince Barranca | 7,005 | 1.33 |
| Ramona Tributary to Las Posas Estates Drain | 201 | 0.04 |
| Real Canyon | 4,041 | 0.77 |
| Reservoir Barranca | 1,339 | 0.25 |
| Revolon Slough | 14,718 | 2.79 |
| Rice Road Drain | 22,297 | 4.22 |
| Ridgeview Tributary to Conejo Creek | 2,368 | 0.45 |
| Rose Lane Drain Secondary | 334 | 0.06 |
| Runkle Canyon | 8,871 | 1.68 |
| Russell Creek | 1,658 | 0.31 |
| San Jon Barranca | 1,806 | 0.34 |
| Sand Canyon | 715 | 0.14 |
| Santa Clara Ave Drain | 2,392 | 0.45 |
| Santa Clara Diversion | 7,089 | 1.34 |
| Santa Clara Drain | 3,382 | 0.64 |
| Santa Rosa East Tributary | 99 | 0.02 |
| Santa Susana West Drain | 8,095 | 1.53 |
| Schoolhouse Canyon | 7,267 | 1.38 |
| Sexton Canyon | 57 | 0.01 |
| Simi Valley Landfill Canyon | 45 | 0.01 |
| Skeleton Canyon | 680 | 0.13 |
| Somis Drain | 8,716 | 1.65 |
| South Branch Arroyo Conejo | 14,557 | 2.76 |
| St. Johns Drain | 3,028 | 0.57 |
| Stewart Canyon | 5,232 | 0.99 |
| STH126 - Victoria to Main | 6,994 | 1.32 |
| STH126 Crossings - Telephone Rd Drain | 573 | 0.11 |
| Strathern Canyon | 2,746 | 0.52 |
| Stroube Drain | 1,219 | 0.23 |
| Sudden Barranca | 9,287 | 1.76 |
| Sycamore Canyon | 10,382 | 1.97 |
| Tapo Canyon | 16,398 | 3.11 |
| Tapo Hills Diversion | 5,103 | 0.97 |
| Tapo Hills Diversion D.B. # 1 | 194 | 0.04 |
| Telephone Rd & USH 101 off-ramp | 13 | 0.00 |
| Telephone Rd Drain | 11,199 | 2.12 |
| Thousand Oaks North Drain | 8,223 | 1.56 |
| Trib to Stroube Drain | 5,510 | 1.04 |
| Tributaries to Oxnard West Drain | 10,443 | 1.98 |
| Tributary to Arroyo Conejo | 385 | 0.07 |
| Tributary to Los Angeles Avenue Drain | 1,016 | 0.19 |
| Tributary to Nyeland Drain | 125 | 0.02 |
| Tributary to Peck Road Drain | 2,389 | 0.45 |
| Tsumas Creek | 12,123 | 2.30 |
| Victoria Trib to Fifth St Drain | 984 | 0.19 |
| Walnut Canyon | 13,676 | 2.59 |
| Warring Wash | 3,710 | 0.70 |
| Wason Barranca | 1,361 | 0.26 |
| Waverly Channel | 5,163 | 0.98 |
| Weldon Canyon | 432 | 0.08 |
| West Camarillo Hills Drain | 4,074 | 0.77 |
| West Fork Potrero Creek | 73 | 0.01 |
| West Fork Sycamore Canyon | 202 | 0.04 |
| West Wooley Rd Drain | 7,231 | 1.37 |
| White Oak Creek | 5,556 | 1.05 |
| Woodridge Fire Tributary to Lang Creek | 302 | 0.06 |
| Wooley Rd Tributary to Oxnard West Drain | 1,588 | 0.30 |
| TOTAL | 692,259 | 131 |

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That Have Been Lined On The Sides And/OR Bottom With Concrete**

- LEGEND**
- Engineered Channels with Concrete
 - Other Drainage/Waterbodies
 - - - City Boundaries
 - ▭ County Boundary

PUBLIC WORKS
VENTURA COUNTY

KASRAIE CONSULTING

Date: January 2020

