

2014-2015 Permit Year

Ventura Countywide Stormwater Quality Management Program Annual Report

Attachment E 3 Proposed
Revision to the Trash Monitoring and
Reporting Program for the Revolon
Slough and Beardsley Wash Trash TMDL



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Ventura County Watershed Protection Distric



A COOPERATIVE STRATEGY FOR RESOURCE MANAGEMENT & PROTECTION

July 23, 2014

Mr. Samuel Unger, Executive Officer Regional Water Quality Control Board, Los Angeles Region 320 West Fourth Street, Suite 200 Los Angeles, CA 90013

Subject: Proposed Revision to the Trash Monitoring and Reporting Program for the Revolon Slough and Beardsley Wash Trash TMDL

Dear Mr. Unger:

The County of Ventura, Ventura County Watershed Protection District, City of Camarillo, Ventura County Agricultural Irrigated Lands Group, and Caltrans, as Responsible Parties to the Revolon Slough and Beardsley Wash Trash TMDL (Trash TMDL), are submitting this letter to propose a revision to the approved Trash Monitoring and Reporting Plan (TMRP) for the Trash TMDL. Findings from monitoring during the past four years have demonstrated that an alternate monitoring method is needed to improve the Minimum Frequency of Collection and Assessment/ Best Management Practice (MFAC/ BMP) Program and more effectively utilize resources in the Revolon Slough/ Beardsley Wash watershed. As such, the responsible parties propose to utilize a visual assessment method, consistent with the revised trash monitoring and report program submitted by the responsible parties to the Ventura River Estuary Trash TMDL. This letter serves as a request to Los Angeles Regional Water Quality Control Board staff to utilize the alternate monitoring method outlined below. The alternate monitoring method will only address non-point sources as point sources are, and will be, addressed through the installation of full capture devices.

Proposed New TMRP and MFAC/BMP Program Approach

The current TMRP approach assesses the amount of trash present in Revolon Slough/Beardsley Wash through collecting and counting the number of pieces of trash and measuring the weight of the trash found in several representative locations throughout

July 23, 2014 Page 2 of 4

Revolon Slough/ Beardsley Wash. The responsible parties are proposing to modify this approach to conduct a streamlined monitoring of trash levels at select sites in Revolon Slough/ Beardsley Wash. Selection of these sites is based on the past four years of monitoring data showing presence of trash, namely Sites 1, 3a-d, 5 and 8 (Figure 1). The proposed approach is to utilize the methods and monitoring procedures outlined in the Ventura River Estuary Trash TMDL revised TMRP/ MFAC which received preliminary approval by the Los Angeles Regional Water Quality Control Board staff in June 2014.

The visual monitoring will utilize a three-point scoring system based on the "Level of Trash" scoring category discussed in the Surface Water Ambient Monitoring Program (SWAMP) Protocol to estimate the presence of litter in a specific area. Training will be provided for individuals who will conduct visual trash monitoring to ensure consistency. The trained monitors will score each monitoring site by rating the amount of litter observed as follows:

- Category 1 represents the SWAMP Category "Optimal"
- Category 2 represents the SWAMP Category "Suboptimal"
- Category 3 represents the SWAMP Category "Poor"

The definition of Category 1 is:

"On first glance, no trash visible. Little or no trash (<10 pieces) evident when streambed and stream banks are closely examined for litter and debris, for instance by looking under leaves."

The definition of Category 2 is:

"On first glance, low to medium levels of trash are evident (10-100 pieces). Stream, bank surfaces, and riparian zone contain some litter and debris. Possible evidence of site being used by people: scattered cans, bottles, food wrappers, blankets, and clothing."

The definition of Category 3 is:

"Trash distracts the eye on first glance. Stream, bank surfaces, and immediate riparian zone contain substantial levels of litter and debris (>100 pieces). Evidence of site being used frequently by people: scattered cans, bottles, food wrappers, blankets, and clothing."

The goal of the MFAC Program is to ensure the selected sites within Revolon Slough/Beardsley Wash are in Category 1.

Visual monitoring will be conducted quarterly for each designated site in Revolon Slough/ Beardsley Wash (see Figure 1). The monitoring results will be used to evaluate the accumulation of trash between visual monitoring events and to determine which areas to target during the clean-up events.

The proposed TMRP approach will be directly connected and supportive of the MFAC/BMP program to clean-up non-point sources of trash in Revolon Slough/ Beardsley Wash. The MFAC/BMP program includes implementation of the existing BMPs as outlined in the TMRP.

July 23, 2014 Page 3 of 4

Results of the monitoring will be used to evaluate the effectiveness of the proposed MFAC/BMP program and to support any necessary modifications to the proposed program. The MFAC/BMP program will be continuously evaluated and modified using an adaptive management approach consistent with the procedures outlined in the Ventura Estuary Trash TMDL Revised TMRP as summarized below:

- 1. Monitoring Sites classified in Category 1 during the visual monitoring event will be noted and any trash observed will be collected during the visual monitoring event.
- 2. Monitoring sites classified in Category 2 will be evaluated to determine if and what type of additional BMPs are needed to reduce the accumulation of trash between visual monitoring events with intent to move these sites to Category 1.
- 3. Monitoring sites classified in Category 3 for two (2) consecutive quarterly visual monitoring events will be targeted for more frequent clean-ups until the site reaches Category 1 for two (2) consecutive visual monitoring events.

We would like to begin the new visual monitoring program as soon as possible but no later than October 2014 and would like to meet to discuss our proposed approach. Additionally, at the meeting the City of Oxnard would like to explore the possibility of joining this TMRP and MFAC/BMP program rather than implementing their own program. If you have any comments or questions, please contact Anita Kuhlman, at akuhlman@cityofcamarillo.org or 805-383-5659 or Ewelina Mutkowska at ewelina.mutkowska@ventura.org or 805-645-1382. We will contact you shortly to discuss the proposed meeting date and transition process.

Sincerely,

Lucia McGovern

Chair, Stakeholders Implementing TMDLs in the Calleguas Creek Watershed

cc: Renee Purdy, LARWQCB
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July 23, 2014 Page 4 of 4

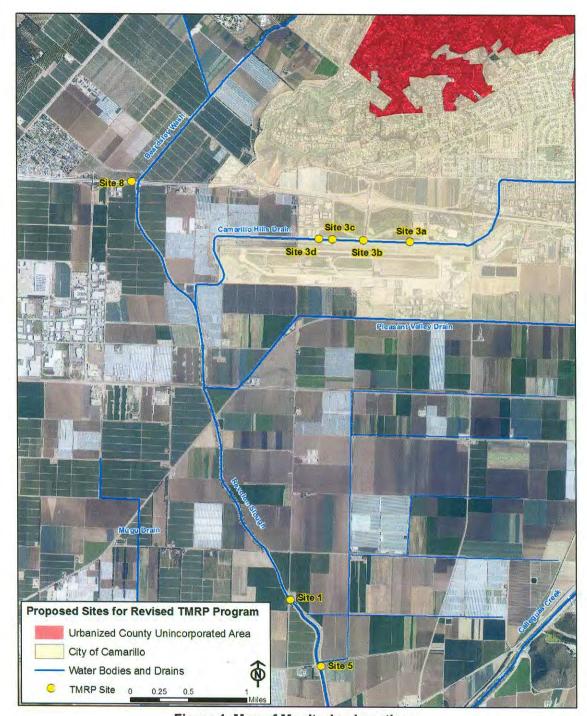


Figure 1. Map of Monitoring Locations