



Ventura Countywide Stormwater Quality Management Program

Participating Agencies January 27, 2020

Camarillo

California Regional Water Quality Control Board
Los Angeles Region

County of Ventura

Attn: Dr. Ginachi Amah
320 W. 4th Street, Suite 200
Los Angeles, CA 90013

Fillmore

Subject: Comment Letter – Update to Basin Plan REC-1 Bacteria Water Quality Objectives (Tentative Resolution No. R20-00X)

Moorpark

Dear Dr. Amah:

Ojai

The Ventura Countywide Stormwater Quality Management Program (Program) 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. These Agencies operate municipal storm drain systems and discharge stormwater and urban runoff pursuant to the Ventura Countywide 2010 NPDES Municipal Stormwater Permit Order No. R4-2010-0108. All 12 of these agencies are committed to working cooperatively to improve water quality in Ventura County watersheds.

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

The Program has reviewed the proposed Amendments to the *Water Quality Control Plan for the Los Angeles Region* (Basin Plan) to Update the Bacteria Objectives for Fresh, Estuarine and Marine Waters Designated for Water Contact Recreation, based on the Statewide Bacteria Provisions (proposed Basin Plan amendments). The Program supports the efforts of the California Regional Water Quality Control Board, Los Angeles Region's [hereinafter referred to as the Los Angeles Water Board] to align the Basin Plan with the Statewide Bacteria Provisions.

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

The intent of this comment letter is to express support for comments and requests provided by the Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed (CCW) in a comment letter dated January 27, 2020; specifically, to request revisions of the implementation provisions in the proposed Basin Plan amendment to:



1. Allow implementation of natural source approaches outside of a TMDL if they are adopted through a Basin Plan amendment;
2. Allow application of reference reach approaches to the geometric mean objective, in addition to the single sample objectives; and
3. Include the Bacteria Provisions' third implementation provision as written in the proposed Basin Plan amendment to clarify the option and process for developing High Flow Suspensions for Ventura County waterbodies.

Details and justifications for the above requests regarding the implementation provisions were discussed in the comment letter submitted by the Stakeholders Implementing TMDLs in CCW (January 27, 2020).

Thank you for the opportunity to provide comments on the Proposed Basin Plan amendment. Should you have any questions, please contact Ewelina Mutkowska at (805) 645-1382 or via email at Ewelina.Mutkowska@ventura.org

Sincerely,



Arne Anselm, Chair

On Behalf of the Ventura Stormwater Quality Management Program