



Ventura Countywide Stormwater Quality Management Program

April 30, 2020

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

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95814

Submitted via email to: commentletters@waterboards.ca.gov

SUBJECT: COMMENT LETTER – 303(d) PORTION OF THE 2018 CALIFORNIA INTEGRATED REPORT

Dear Ms. Townsend:

On behalf of Ventura Countywide Stormwater Quality Management Program (Program), which includes the 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 303(d) portion of the 2018 California Integrated Report. Collectively, these agencies operate the municipal storm drain system in Ventura County and discharge stormwater and urban runoff pursuant to the 2010 Ventura Countywide Stormwater Permit NPDES Permit No. CAS004002. All 12 agencies are committed to working cooperatively to improve water quality in our local waterways and beaches.

Section 303(d) of the Clean Water Act requires each state to identify waters that do not meet, or are not expected to meet by the next listing cycle, applicable water quality standards and to prioritize those waters for total maximum daily load development, unless other corrective action is appropriate (commonly referred to as the “303(d) list”). Section 305(b) of the Clean Water Act requires each state to report on the overall condition of its surface waterbodies (commonly referred to as the “305(b) report”). California combines its 303(d) lists and 305(b) reports into a single “California Integrated Report.”

For the 2018 California Integrated Report, the Los Angeles Regional Water Quality Control Board (LA Board) conducted an “off-cycle” assessment. The LA Board evaluated bacteria data collected at nine beaches in Ventura County that had previously been identified as impaired (Ormond Beach, Peninsula Beach, Point Mugu Beach, Port



Hueneme Beach Park, Rincon Parkway Beach, San Buenaventura Beach, Surfer's Point at Seaside, Promenade Park Beach, and Rincon Beach). The bacteria data were evaluated against the statewide bacteria objectives for water contact recreation (REC-1) beneficial use. Based on this evaluation, the LA Board staff determined that the REC-1 beneficial use is supported in eight of the nine beaches. Based on this data the LA Board staff proposed removing seven beaches, and not listing one beach, from the 2014/2016 303(d) list.

LA Board staff's analysis to accurately characterize beach conditions by evaluating recent water quality data in addition to the underlying data used in the original 303(d) listings is greatly appreciated. The Program has reviewed the draft 2018 California Integrated Report and would like to take this opportunity to submit the following comments of support for the LA Regional Board's efforts which are of particular importance to Ventura County Permittees.

The Program supports the following:

1. The LA Board's "off-cycle" 303(d) assessment determination of fully delisting the following seven Ventura County beaches: Ormond Beach, Peninsula Beach, Point Mugu Beach, Port Hueneme Beach Park, Rincon Parkway Beach, San Buenaventura Beach, and Surfer's Point at Seaside.
2. The LA Board's determination to not place Promenade Park Beach on the 303(d) list for indicator bacteria.
3. The LA Board determination that assessing available bacteria data against the shellfish standard is inappropriate at this time. The Program further supports the LA Board's decision that the shellfish standard should not be considered for final 303(d) listing decisions at this time.
4. The original delisting determination by the LA Board remain and requests the seven beaches be removed completely from the 303(d) list for all beneficial uses as adopted at the March 14, 2019 LA Board hearing
5. The recommendation from the 2019 Final Staff Report and Work Plan for 2019 Ocean Plan Review (Staff Report). Based on the understanding that the shellfish objectives for California are outdated and currently under review the Staff Report states in Issue H: Shellfish Harvesting Beneficial Uses and Water Quality Objectives: ***"State Water Board staff recommends undertaking a project to consider amending the Ocean Plan to (1) separate the shellfish harvesting beneficial use into recreational shellfish harvesting, commercial shellfish harvesting beneficial uses, and potentially tribal shellfish harvesting beneficial uses; and (2) revise the existing shellfish harvesting total coliform objective, develop a fecal***

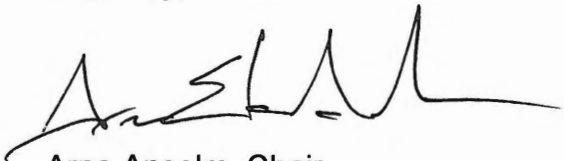
coliform objective, or both.; and (3) assess alternative pathogen indicators to best account for risk to human health as related to shellfish harvesting and consumption, commercial, or sport purposes.”

Adopting a fecal coliform standard for shellfish harvesting areas and separating the shellfish harvesting beneficial use into recreational and commercial shellfish beneficial uses were also identified as a high priority in Issue 5 of the Ocean Plan Triennial Review Workplan in 2011.

The Program is committed to implementing stormwater quality programs countywide to protect all beneficial uses at Ventura County Beaches. Weekly ocean water bacteria monitoring is performed by Ventura County Environmental Health Department (VCEHD) for compliance with AB411 regulations and TMDLs, this includes weekly year-round sampling and analysis at San Buenaventura Beach, Surfers Point at Seaside and Promenade Park. The Program feels applying the current shellfish harvesting bacteria water quality objective to determine 303(d) impairments during this assessment is problematic. As identified in the 2011 and 2019 Ocean Plan Work Plan, the shellfish harvesting beneficial use and objective are outdated and need to be revised. Because of this, the Program asks that REC-1 standard be applied during this assessment period as applied by the LA Board.

On behalf of the Ventura Countywide Stormwater Quality Management Program, I would like to thank you for your time and opportunity to submit these comments. If you have questions, please contact me at (805) 654-3942, or via email at Arne.Anselm@Ventura.org.

Sincerely,



Arne Anselm, Chair

On Behalf of the Ventura Countywide Stormwater Quality Management Program.

cc: Ventura County Stormwater Program Permittees