

Ventura County Watershed Protection District



PUBLIC WORKS AGENCY
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Mr. Samuel Unger
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

Via Email

SUBJECT: REQUEST TO CONFIRM LEVEL OF EFFORT PRESCRIBED IN ORDER NO. R4-2010-0108, ATTACHMENT F, SECTION I.1.a.1.A.i, IN ACCORDANCE WITH NEW FIVE YEAR STUDY DESIGN FOR SMC REGIONAL BIOASSESSMENT PROGRAM

Dear Mr. Unger:

Since 2009, the Ventura County Watershed Protection District (District), as Principal Permittee for the Ventura Countywide Municipal Separate Storm Sewer System Permit, Order No. R4-2010-0108 (Permit), has participated in the Stormwater Monitoring Coalition's Southern California Regional Bioassessment Program (Regional Program), as required by the Permit (Attachment F, Section I.1.a).

The original Regional Program five-year study design (2009-2013) has been completed. After analysis of the first five years of data the Regional Program has been extended and modified. These modifications are in conflict with the level of effort per watershed described in the Permit, although the overall level of effort is slightly increased.

The level of effort prescribed in the Permit, based on the original Regional Program, allocated six sites to each participating southern California watershed per year. This was detailed as six sites in the Ventura River Watershed, six sites in the Calleguas Creek Watershed, and three sites in the Santa Clara River Watershed (three sites were sampled by Los Angeles County in their portion of the watershed.)

The District proposes to continue to monitor 15 sites to meet the requirement of participating in the Regional Study, but requests that the allocation of sites to specific watersheds be adapted to allow for the change in study design. This reallocation would not change the overall sampling effort, nor would it reduce required effort at integrator sites. It will allow the District to include the Santa Monica Bay watershed.

During the original five-year study, monitoring of probabilistic sites in the Santa Monica Bay watershed within Ventura County was exclusively conducted by the Los Angeles Regional Water Quality Control Board, using Surface Water Ambient Monitoring Program (SWAMP) funds. This area includes Big Sycamore Canyon, Medea Creek, and Las Virgenes Creek, among other streams. We have learned the Regional Board may discontinue sampling this watershed and instead support the survey by paying for the analysis of constituents of interest (e.g. bioanalytic screens).

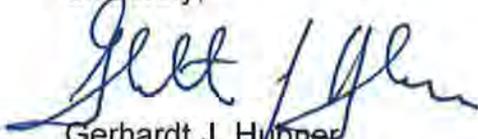
The new Regional Monitoring design splits the effort between condition sites and trend sites. Condition sites are new probabilistic sites that are surveyed once, similar to the previous study design. Trend sites are sites that were previously sampled and will be revisited annually during the study. The number of condition sites is based on watershed, however the number of trend sites is based on land use, and therefore might not be evenly split between watersheds.

Based on the extent of stream-miles in each of the four watersheds within Ventura County, the Regional Study proposed that the 15 sites sampled by the District be distributed as follows: three in the Ventura River Watershed, three in the Santa Clara River Watershed, three in the Calleguas Creek Watershed, and one in the Santa Monica Bay Watershed. The remaining five sites would be distributed among all the watersheds as specified in the SMC work plan (two open land use sites and three developed land use sites, not watershed specific), to estimate trends in condition.

The District intends to participate in the Program in accordance with the new study design, however Regional Board permission will be required as the level of effort per watershed is currently detailed in the Permit. Site reconnaissance has already begun in preparation for monitoring during the index period which is February through July according to the new study design. Regional Board permission for the reallocation of effort is needed within 30 days otherwise only sites based on the allocations in the current Permit will be considered.

Thank you for reviewing and considering this request. Should you have any questions, please contact Arne Anselm at (805) 654-3942 or via email at Arne.Anselm@Ventura.org.

Sincerely,



Gerhardt J. Hubner
Deputy Director

CC: Ventura Countywide Stormwater Quality Management Committee