



June 20, 2022

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Ms. Renee Purdy, Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. 4th St. Suite 200
Los Angeles, CA 90013

RE: Ventura County Watershed Protection District's Statement of
Legal Authority

Dear Ms. Purdy:

In accordance with the Part VI.B.2 of the Regional Water Quality Control Board Order No. R4-2021-0105 Regional Municipal Stormwater Permit No. CAS004004, the following is the required statement of legal authority for the Ventura County Watershed Protection District:

Ventura County Watershed Protection District possesses the legal authority within its jurisdiction to implement and enforce each of the applicable requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and the Regional Water Quality Control Board Order No. R4-2021-0105 National Pollutant Discharge Elimination System (NPDES) Permit No. CAS004004 pursuant to the provisions of the Ventura County Watershed Protection District Act, California Water Code Appendix, chapter 46, and article 2 of Ventura County Watershed Protection District Ordinance No. WP-2, Protection and Regulation of Watercourses. The administrative and legal procedures available to compel compliance with the Water Code and Ordinance No. WP-2 are set forth therein and may be completed administratively.

Sincerely,

TIFFANY NORTH,
County Counsel, County of Ventura

By: Alberto Boada

ALBERTO BOADA
Principal Assistant County Counsel



Ventura County Public Works Agency - Watershed Protection
formerly Watershed Protection District
Waste Discharge Identification (WDID) No. 4 56M1000326

Annual Report

**Regional Municipal Stormwater Permit Regulating
Municipal Separate Storm Sewer System (MS4) Discharges within
Los Angeles Region**

Order No. R4-2021-0105, NPDES No. CAS004004



Reporting Year 2021-2022

**Regional Phase I MS4 NPDES Permit
Order No. R4-2021-0105
NPDES No. CAS004004**

**Watershed Management Program Progress Report Form
Reporting Period 2021-2022**

1. Watershed Management Program

Ventura County Watershed Protection District is participating in development of Ventura Countywide Watershed Management Programs due September 11, 2023, per Notice of Intent submitted to Los Angeles Regional Water Quality Control Board on May 4, 2022.

**Regional Phase I MS4 NPDES Permit
Order No. R4-2021-0105
NPDES No. CAS004004**

**Annual Report Form
Reporting Year 2021-2022**

Sections 2-8 of this form include items to be reported individually by each Permittee for this reporting year unless otherwise indicated.

Permittee Name	Ventura County Watershed Protection District
Permittee Program Contact	Arne Anselm
Title	Deputy Director
Address	800 South Victoria Ave
City	Ventura
Zip Code	93009
Phone	805 654-3942
Email	Arne.Anselm@ventura.org

2. Legal Authority and Certification

Complete the items on this page.

2.1 Answer the following questions on Legal Authority [Order – VI.B.2].

Question	Yes	No
Is there a current statement certified by the Permittee’s chief legal counsel that the Permittee has the legal authority within its jurisdiction to implement and enforce each of the requirements contained in 40 CFR § 122.26(d)(2)(i)(A-F) and the Order?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Has the above statement been developed or updated within this reporting year? If yes, attach the updated legal authority statement to this report.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.2 Complete the required certification below [Attachment D – V.B.5].

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Signature of either a principal executive officer, ranking elected official, or by a duly authorized representative of a principal executive officer or ranking elected official. A person is a duly authorized representative only if:

- The authorization is made in writing by a principal executive officer or ranking elected official.
- The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)
- The written authorization is submitted to the Regional Board.

If an authorization of a duly authorized representative is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization will be submitted to the Regional Board prior to or together with any reports, information, or applications, to be signed by an authorized representative.

Signature: _____

Name: Glenn Shephard, PE

Title: Ventura County Watershed Protection District Director

Date: _____

3. Program Expenditures

Complete the following items in this section.

3.1 Source(s) of funds used in this reporting year, and proposed for the next reporting year, to meet necessary expenditures on the Permittee's stormwater management program [Order – VI.C.2].

Implementation of Ventura County Watershed Protection District's stormwater management program as required by the Permit is funded by Benefit Assessment Program.

3.2 Complete the table below on program expenditures for this reporting year [Attachment D – VII.A.5]. Enter “0” for any fields that do not apply.

Category		Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
(1) Program Management²		N/A	N/A	\$82,840	\$25,965	\$94,953	N/A	N/A	\$203,758	\$295,775
(2) NPDES MS4 Permit Fees		N/A	N/A	N/A	N/A	N/A	N/A	\$0*	N/A	\$0*
(3) Minimum Control Measures (MCMs)	PIPP	N/A	N/A	\$35,581	\$75,163	N/A	N/A	N/A	\$110,744	\$112,062
	Industrial / Commercial Facilities Program	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Planning & Land Development Program³	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$36,313
	Construction Program 2 small (SWPCP, 1 inspection) and 2 large (SWPPP, GCP, inspections, reports) CIP projects in FY22	\$0	\$0	\$88,374	\$138,182	\$0	\$0	\$28,253	\$254,809	\$300,000
	Public Agency Activities Program Channel inspections & cleanout	N/A	N/A	\$6,782	N/A	N/A	N/A	\$712,201	\$718,983	\$800,000
	IDDE Program	N/A	N/A	\$7,000 O&M budget*	O&M budget*	O&M budget*	N/A	N/A	\$7,000 O&M budget*	\$7,000 O&M budget*

¹ Exclude land costs.

² Including but not limited to program management plans, mail, legal support, travel, conferences, printing, producing manuals and handbooks, annual/semi-annual reporting, development and maintenance of any electronic databases required by this permit including GIS, and other non-labor costs.

³ Including but not limited to environmental review, development project approval and verification, and permitting and licensing costs specific to the provisions of the Order that are beyond the scope of a normal plan review, permitting, and inspection process.

Category		Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
	Additional Institutional BMPs / “Enhanced” MCMs	N/A	N/A	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(4) Watershed Management Program Development⁴		N/A	N/A	\$50,028	\$48,391	N/A	N/A	N/A	\$98,419	\$658,436
(5) Projects⁵	Distributed Projects and Green Streets	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Regional Projects FS for CIH Beaches	N/A	N/A	N/A	\$40,230	N/A	N/A	N/A	\$40,230	N/A
	Other Structural BMPs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(6) Trash Compliance	Trash TMDL⁶ a) Full Capture Devices (FCDs) in Ramona & Las Posas Basins b) MFAC costs are included in (⁸) Others - TMDLs Monitoring & Reporting	N/A	N/A	N/A	N/A	N/A	N/A	O&M budget*	O&M budget*	O&M budget*
	Discharge Prohibitions - Trash⁷	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(7) Monitoring	Monitoring Plan Development⁸	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$117,372

⁴ Include costs for development and/or revision of Implementation Plans (e.g., TMDL Implementation Plan, Watershed Management Programs including Reasonable Assurance Analysis). Specify which plans these are in Section 3.3.

⁵ If a Permittee is implementing a project collaboratively, the Permittee should only include the portion of the project cost that it is assuming.

⁶ Includes full capture, partial capture, and institutional controls used to comply with trash TMDLs.

⁷ Includes full capture, partial capture, and institutional controls used to comply with Statewide Trash Provisions.

⁸ Includes costs to develop and/or revise monitoring plans (e.g., TMDL Monitoring Plan, IMP, CIMPs, non-stormwater screening and monitoring program). Specify which plans these are in Section 3.3.

Category	Capital Expenditures ¹	Land Costs	Personnel Cost	Consultant (s) Cost	Overhead Costs	Construction Costs	Permit(s), Operation, and Maintenance	Total Expenditures for this Reporting Year	Program Budget for Next Reporting Year
Outfall and Receiving Water Quality Monitoring	\$4,172	N/A	\$149,317	\$105,393	\$574	N/A	\$3,250	\$262,706	\$425,064
BMP Effectiveness Monitoring	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Regional Studies⁹	N/A	N/A	\$55,031	\$135,993	N/A	N/A	N/A	\$191,024	\$207,539
Special Studies¹⁰	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(8) Other¹¹ - TMDL Monitoring & Reporting	N/A	N/A	\$0	\$167,403	\$0	N/A	N/A	\$143,234	\$288,000
(8) Other – Permit renewal activities	N/A	N/A	\$12,144	\$58,467	N/A	N/A	N/A	\$70,611	\$0
TOTAL	\$4,172	N/A	\$487,097	\$771,018	\$95,527	N/A	\$743,704	\$2,101,518	\$3,247,561

3.3 Additional Information: Please add any additional comments on stormwater expenditures below.

** Additional resources including personnel and contractors were expended in FY2021-22 and budgeted for FY2022-23 (“O&M budget”), but determination of exact MS4 compliance costs is not possible as it is also mixed with response efforts to other types of public complaints and O&M activities.*

“\$0” for MS4 Permit fee; per State Water Board, Sara A. Fee Unit | Division of Administrative Services: ‘Flood control districts or other special districts named as co-permittees to MS4 permits and school districts, serving students between kindergarten and fourteenth grade, shall not pay an annual fee if the city or county within whose jurisdiction the district lies oversees the district’s storm water compliance and pays an annual fee.’

⁹ Includes costs to comply with Part X (Regional Studies) of the Attachment E-MRP.

¹⁰ Includes costs to comply with Part XI (Special Studies) of the Attachment E-MRP.

¹¹ Enter costs in this table but specify what this “Other” category consists of in Section 3.3.

4. Non-Stormwater Discharge Prohibitions

Complete the following items in this section.

4.1 Provide an assessment of the effectiveness of the Permittee’s control measures in effectively prohibiting non-stormwater discharges into the MS4 to the receiving water [Order – III.A].

Watershed Protection District works collaboratively with ten incorporated Cities and County to ensure effective discharge prohibition of non-stormwater discharges from the city and unincorporated areas.

4.2 Describe sources of non-stormwater discharges determined to be a NPDES permitted discharge, a discharge subject to CERCLA, a conditionally exempt non-stormwater discharge, or entirely comprised of natural flows [Order - III.A.2].

None in 2021-22 reporting year. In prior years, examples of the above discharge categories would include ag discharge subject to Conditional Waiver or rising groundwater.

4.3 Check all that apply [Order – III.A.4].

There has been non-stormwater discharge(s) to an ASBS	<input type="checkbox"/>
The non-stormwater discharge(s) to the ASBS caused or contributed to an exceedance receiving water limitations, WQBELs, water quality objectives in Chapter II of the Ocean Plan, or an undesirable alteration in natural ocean water quality in an ASBS	<input type="checkbox"/>
Additional BMPs were implemented to address the exceedances above	<input type="checkbox"/>

4.4 If you had non-stormwater discharge(s) to an ASBS that caused or contributed to an exceedance receiving water limitations, WQBELs, water quality objectives in Chapter II of the Ocean Plan, or an undesirable alteration in natural ocean water quality in an ASBS, describe what additional BMPs were implemented to address these exceedances. How effective were those BMPs in addressing the exceedances? [Order - III.A.4.b]

Not applicable

4.5 Did you develop and implement procedures to ensure that a discharger, if not a named Permittee in this Order, fulfilled the requirements of Part III.A.5.a.i-vi? If so, provide a link to where the procedures may be found or attach to this Annual Report [Order – III.A.5.a].

The VCWPD continued to implement a program to permit authorized discharges directly into its MS4 system. Permits are required for all direct connections to VCWPD facilities. The permit conditions require dischargers to notify the VCWPD in advance of scheduled discharges and to comply with all applicable regulations. Permit application is available at <https://vcca.ventura.org/>.

4.6 Did you organize and maintain records of all notifications, local permits, and non-stormwater discharges greater than 100,000 gallons in an electronic database? (Yes or No) [Order – III.A.5.b]

Yes

4.7 Did you determine that any of the conditionally exempt non-stormwater discharges, with the exception of essential non-stormwater discharges, identified per Part III.A.5.c of the Order is a source of pollutants that causes or contributes to an exceedance of applicable receiving water limitations and/or water quality-based effluent limitations? If so, how many of the conditionally exempt non-stormwater discharges in Part III.A.3.b of the Order did you determine to be sources of pollutants that caused or contributed to an exceedance of receiving water limitations or WQBELs? If you made that determination, which type(s) of non-stormwater discharges in Part III.A.3.b were sources of pollutants? [Order – III.A.6]

No

4.8 If you answered yes to the question 4.7 above, check all that apply [Order – III.A.6].

Effectively prohibit the non-stormwater discharge into the MS4	<input type="checkbox"/>
Impose conditions in addition to those in Table 5 of the Order, subject to approval by the Los Angeles Water Board Executive Officer, on the non-stormwater discharge such that it will not be a source of pollutants	<input type="checkbox"/>
Require diversion of the non-stormwater discharge to the sanitary sewer	<input type="checkbox"/>
Require treatment of the non-stormwater discharge prior to discharge to the receiving water	<input type="checkbox"/>

5. Non-Stormwater Outfall Screening and Monitoring

Complete the following items in this section.

5.1 Complete the tables below regarding your Non-Stormwater Outfall-Based Screening and Monitoring Program [*Attachment E – VII*].

Receiving Water	No. of Outfalls within your Jurisdiction	No. of Outfalls Screened during this Reporting Year	No. of Screening Events During This Reporting Year	Outfalls with Significant Non-Stormwater Discharges ¹²			
				Total Confirmed	Total Abated	Total Attributed to Allowable Sources ¹³	Total Being Monitored
TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD
Total	TBD	TBD	TBD	TBD	TBD	TBD	TBD

TBD – To be determined

Method of Abatement	Total No.
Low Flow Diversion (LFD)	Not applicable
Illicit Discharges Eliminated	Not applicable
NPDES Permitted	Not applicable
Retention	Not applicable
Discharge No Longer Observed	Not applicable
Other (describe in Section 5.3)	Not applicable

5.2 Los Angeles County Permittees: Not applicable

¹² “Significant Non-Stormwater Discharges” as identified by the Permittee per Part VII.B of the Attachment E - MRP.

¹³ “Allowable Sources” refers to the discharges exempt from the Prohibition of Non-Stormwater Discharges listed in Part III.A.2 of the Order.

5.3 Additional Information. If desired, provide additional information regarding Non-Stormwater Outfall Screening and Monitoring.

The County of Ventura is in the process of GIS analysis and desktop review to determine number and location of the County's and Watershed Protection District's Major Outfalls subject to non-stormwater outfall screening and monitoring as required by the Permit.

6. Minimum Control Measures (MCM) -

New minimum control measures (MCMs) as defined in the 2021 Regional MS4 Permit will become effective after the Ventura County Watershed Management Programs are approved by Los Angeles Regional Water Quality Control Board. For this reporting year, MCMs are reported in the attached 2010 Permit's Annual Report Forms.

7. Trash Reporting

Complete the following items in this section.

7.1 Trash TMDL Permittee Compliance [Order – IV.B.3]

- 7.1a) If you are subject to Trash TMDL Permittees, complete and attach the provided “Trash TMDL Permittee Reporting Forms” in Attachment I of the Order for each applicable Trash TMDL Permittee. Report your compliance with the applicable interim and/or final Effluent Limits for trash below. If compliance with the applicable interim and/or final Effluent Limits for trash has not been achieved, explain why.

Ventura County Watershed Protection District (VCWPD) is subject to Trash TMDLs in Ventura River Estuary subwatershed, Revolon Slough and Beardsley Wash subwatersheds, and upper Malibu Creek watershed. VCWPD does not have regulatory authority over land uses and meets Trash TMDL requirements through collaborative implementation of Minimum Frequency of Assessment and Collection (MFAC)/Best Management Practices (BMPs) Programs. VCWPD has two full capture devices installed in Las Posas and Ramona detention basins to achieve effective and efficient compliance for the County of Ventura with Revolon Slough and Beardsley Wash Trash TMDL.

VCWPD is responsible for performing storm drain operation and maintenance including open channel signage, open channel maintenance that includes removal of trash and debris; and implementation of activity specific BMPs, including those related to litter/debris/graffiti in compliance with the Permit (Order – IV.B.3.c.i).

- 7.1b) Mark the compliance approach you have implemented for any applicable Trash TMDL Permittees.
- Full Capture Systems
 - Mass Balance
 - Scientifically Based Alternative
 - Minimum Frequency of Assessment and Collection

- 7.1c) Complete the table below regarding the catch basins within your jurisdiction.

	Retrofitted with Full Capture Systems	Retrofitted with Partial Capture Devices	Retrofitting Infeasible	Not Retrofitted	Total Number of Catch Basins within Jurisdiction
Owned	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Not Owned	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Total	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Ventura County Watershed Protection District does not own or operate catch basins.

- 7.1d) If relying on full capture systems, are the maintenance records of the full capture systems within your jurisdiction up-to-date and available for inspection by the Los Angeles Water Board? [Order – IV.B.3.b.i.(c)]

Not applicable

- 7.1e) If implementing a Plastic Pellet Monitoring and Reporting Plan (PMRP), report any known spills (including names and locations) from preproduction plastic (i.e., plastic pellet) generating, transfer, processing, and storage facilities within this reporting year, explain the actions taken for cleanup, and describe the measures taken to prevent future incidents.

Not applicable

- 7.1f) If implementing a PMRP, how many new preproduction plastic generating, transfer, processing, and storage facilities have been added in Permittee's jurisdiction within this reporting year that have not been addressed in the PMRP?

Not applicable

7.2 Trash Discharge Prohibitions Compliance [Order – III.B]

Ventura County Watershed Protection District does not have regulatory authority over Priority Land Uses, designated land uses, or equivalent alternate land uses. As required for Trash TMDL (Order – IV.B.3.c.i), instead of compliance through installation and maintenance of full capture devices, VCWPD is responsible for performing storm drain operation and maintenance including open channel signage, open channel maintenance that includes removal of trash and debris; and implementation of activity specific BMPs, including those related to litter/debris/graffiti in compliance with the Permit.

8. Additional Information (Optional)

Provide any additional information in this section.

You may use this section to report any additional information not specified in Sections 2-7 such as information better presented outside of the report form structure, data limitations that prevented the required information from being obtained, and additional detailed summary table describing control measures.

Not applicable