



February 21, 2019

Deborah J. Smith, Executive Officer
Los Angeles Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

Via email: Deborah.Smith@waterboards.ca.gov; losangeles@waterboards.ca.gov;
Man.Voong@waterboards.ca.gov; LB.Nye@waterboards.ca.gov

Re: Comments on Proposed Revisions to the Clean Water Act Section 303(d) List of Impaired Waterbodies in the Los Angeles Region Pertaining to Bacteriological Water Quality at Nine Ventura County Beaches

Dear Ms. Smith:

The City of Ventura (City) appreciates the opportunity to comment on the proposed “off cycle” revisions to the Clean Water Act Section 303(d) list of impaired waterbodies in the Los Angeles Region pertaining to bacteriological water quality at nine Ventura County beaches. The City appreciates the time and effort Los Angeles Regional Water Quality Control Board (Regional Board) staff have taken to re-evaluate the 303(d) indicator bacteria listings for Ventura County beaches. The development and implementation of Total Maximum Daily Loads (TMDLs) are important for the protection of receiving waters and their beneficial uses. It is critical 303(d) listings are based upon the most up-to-date water quality data to ensure accurate characterizations of receiving waters are being used during 303(d) listing/delisting considerations.

The City believes the Regional Board’s “Vision” priority to address the remaining 303(d) listings for fecal indicator bacteria in coastal areas of Los Angeles and Ventura Counties is appropriate at this time. 303(d) modifications and TMDL development should be a high priority for the Regional Board and the City supports this “off cycle” assessment prior to 2022 Integrated Report 303(d)/305(b) submittal by the Regional Board.

The Regional Board’s “off cycle” assessment of water quality data included data used for initial 303(d) bacteriological listings and contains both summer and winter months to address seasonality. The majority of data used for assessment was from Ventura County Environmental Health Division’s (VCEHD) weekly bacteria monitoring at Ventura County Beaches for compliance with AB411. Additional water quality monitoring is not conducted currently by the City at these beaches. This assessment uses recently adopted State Water Resources Control Board’s Bacteria Provisions (August 7, 2018) REC-1 water contact recreation water quality objectives. The City supports the use of the new six-week geometric mean objective for enterococcus and the existing objectives for fecal bacteria for this “off cycle” assessment.

The City supports Regional Board staff's recommendations to remove 303(d) list indicator bacteria impairments for the following beaches in Ventura County: Ormond Beach, Peninsula Beach, Point Mugu Beach, Port Hueneme Beach Park, Rincon Parkway Beach, San Buenaventura Beach and Surfer's Point at Seaside. The City additionally supports Regional Board staff's recommendation to not place Promenade Park Beach on the 303(d) list for indicator bacteria impairment.

As identified by data assessment, beach segments Peninsula Beach, San Buenaventura Beach, Surfer's Point at Seaside and Promenade Park Beach in City jurisdiction do not have indicator bacteria impairments. The City is committed to continuing to implement local programs that support the protection of receiving waters and their beneficial use. In the future we anticipate beaches within City jurisdiction to continue their reputation of stellar water quality¹ as the City strives to make Ventura safe and clean for both residents and visitors.

Thank you for the opportunity to provide comments. If you have any questions or concerns please contact Environmental Services Supervisor, Peter F. Shellenbarger, at (805) 652-4582 or pshellenbarger@cityofventura.ca.gov.

Sincerely,



Mary Joyce Ivers, Interim Public Works Director
City of Ventura

CC: Joe Yahner, Environmental Services Manager
Peter F. Shellenbarger, Environmental Services Supervisor

¹ 2017-2018 Heal the Bay Beach Report Card Ventura County overview stated 100% A grades during summer months, 89% A or B grades during winter dry periods, and 100% A or B grades during winter dry periods.