

Ventura County Watershed Protection District



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Agency Director

February 25, 2019

Glenn Shephard, Director
Watershed Protection District

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Water Resources

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Operations & Maintenance

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Watershed
Resources & Technology

Peter Sheydayi
Design & Construction

Sergio Vargas
Watershed
Planning & Permits

VIA EMAIL

California Regional Water Quality Control Board
Los Angeles Region
ATTN: Man Voong
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
losangeles@waterboards.ca.gov

**Subject: Comment Letter – Off-cycle Revisions to the Los Angeles
Region 303(d) List**

Dear Mr. Voong:

The County of Ventura (County) 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 [hereinafter referred to as 303(d) list]. The County appreciates the time and effort that the staff of the California Regional Water Quality Control Board – Los Angeles Region (Los Angeles Water Board) has taken to re-evaluate the 303(d) indicator bacteria listings for Ventura County Beaches as part of the Los Angeles Water Board's "Vision" prioritization plan. The development and implementation of Total Maximum Daily Loads are a significant investment of resources and it is critical that the 303(d) list be based on sound science and methodologies.

The County strongly supports the Los Angeles Water Board staff's analysis to characterize beach conditions accurately by evaluating recent water quality data in addition to the underlying data used in the original 303(d) listings. The inclusion of weekly bacteria data collected by the Ventura County Environmental Health Division (VCEHD) provides a more complete, up-to-date representation of indicator bacteria conditions at Ventura County Beaches.

Based on the results of the Los Angeles Water Board staff's data assessment, the County supports the Los Angeles Water Board staff's recommendations to remove the indicator bacteria impairments from the 303(d) list 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 County additionally supports the Los Angeles Water Board staff's recommendation not to place Promenade Park Beach on the 303(d) list for indicator bacteria.

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As evidenced by the data assessment by the Los Angeles Water Board staff, the previously mentioned Ventura County Beaches do not have indicator bacteria impairments, and the County is committed to continuing to implement programs that support protection of the recreational beneficial use at Ventura County Beaches. As a result, we anticipate that the water quality at these beaches will continue to be high quality in the future. Weekly bacteria monitoring will continue to be performed by VCEHD for compliance with AB411 regulations and will provide opportunities for early identification of any potential future concerns with water quality.

The County appreciates the opportunity to comment on the off-cycle revisions to the 303(d) list. Thank you for your time and consideration of these comments. If you have any questions or need additional information, please contact Ewelina Mutkowska with Ventura County Public Works Agency, at (805) 645-1382 or Ewelina.Mutkowska@ventura.org.

Sincerely,



Glenn Shephard, PE
Director
Ventura County Watershed Protection District

CC: LB Nye, California Regional Water Quality Control Board – Los Angeles Region
Jeff Pratt, Ventura County Public Works Agency
Arne Anselm, Ventura County Watershed Protection District
Ewelina Mutkowska, Ventura County Watershed Protection District