



Ventura Countywide Stormwater Quality Management Program



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

June 2, 2015

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board

**SUBJECT: COMMENTS TO A-2236(A)-(KK); IN RE PETITIONS
CHALLENGING 2012 LOS ANGELES MUNICIPAL SEPARATE
STORM SEWER SYSTEM PERMIT (ORDER R4-2012-0175)**

Dear Ms. Townsend:

On behalf of the Ventura County Watershed Protection District, County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks and Ventura who have joined together to form the Ventura Countywide Stormwater Quality Management Program (Program) thank you for providing this opportunity to provide comments on the State Water Resources Control Board's (State Water Board) revisions to the Proposed Order *In the Matter of Review of Order No. R4-2012-0175, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County, Except those Discharges Originating from the City of Long Beach MS4* (Revised Draft Order).

The Revised Draft Order is important to the Program since it provides guidance on the structure and implementation of receiving water language provisions in California permits, and more specifically Ventura County is also in the Los Angeles Regional Board's jurisdiction, and currently has the identical receiving water limitation (RWL) language in our MS4 stormwater permit.

The Program largely support the Revised Draft Order, and generally support the State Water Board's revisions contained in the Revised Draft Order. The State Water Board's recognition of alternative compliance pathways as expressed in the Revised Draft Order acknowledges the challenges municipal agencies face in trying to comply with receiving water limitations. Regardless of MS4 efforts to comply with their stormwater permits in good faith, and to the extent their available resources allow (including through the use of adaptive management) it is inevitable that MS4 permittees will find themselves in violation of current receiving water limitation provisions found in most MS4 permits. There are no easy solutions that can be implemented in one year, or even one permit cycle that will change this. Creating solutions to address water quality challenges requires significant



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investments in public programs and infrastructure, which must be established, supported, and funded. This can only happen over time, and with constant evaluation and refinement to improve results.

Today, we are not providing specific comments on the Revised Draft Order in this letter, but do want to indicate our support for the comments made in the California Stormwater Quality Association's (CASQA) June 2, 2015 letter on the same subject.

The Program is very proud of its efforts and believes it has one of the best stormwater quality programs in the state. We can boast the best beach water quality in Southern California among many accomplishments. Data generated by our stormwater monitoring program show that 99% of the over 200 constituents analyzed are of little concern to our local receiving water. Only two constituents, aluminum and bacteria, with both human and non-human sources present continuing compliance issues. The Revised Draft Order appears to recognize this difficulty, and accordingly, seeks to provide Regional Water Boards discretion on how to permit MS4s. The Program is in support of that effort, however, we also consider this as just one step forward as municipalities continue to struggle to comply with receiving water limitations and other water quality standard based limitations written into MS4 permits. VCSQMP encourages the State Water Board, Regional Water Boards, MS4s, and other interested stakeholders to continue discussions with respect to how water quality standards should be applied to municipal stormwater, and work together to seek reasonable solutions that protect water quality and balance municipal funding constraints.

Thank you for your consideration of our comments. If you have any questions, please contact me at (805) 654-5051.

Sincerely,



Gerhardt Hubner

On behalf of the Ventura Countywide Stormwater Quality Management Program

cc: Ventura County Stormwater Quality Management Committee