



Ventura Countywide Stormwater Quality Management Program

July 24, 2015



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

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814
*Via email: commentletter@waterboards.ca.gov,
storm_water_comments@waterboards.ca.gov*

SUBJECT: "COMMENT LETTER – PROPOSAL TO DEVELOP A STORM WATER PROGRAM WORKPLAN AND IMPLEMENTATION STRATEGY"

The Ventura Countywide Stormwater Quality Management Program (Program) has reviewed the Stormwater Strategic Initiative Proposal to Develop a Storm Water Program Workplan and Implementation Strategy (Workplan Proposal) and would like to take this time to express our general support. Our Program includes the Ventura County Watershed Protection District, the County of Ventura and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks. These organizations operate municipal storm drain systems and discharge stormwater and urban runoff pursuant to the Ventura Countywide 2010 NPDES Stormwater Permit. All 12 of these agencies are committed to working cooperatively to improve water quality.


The Program recognizes the significant effort that the State Water Resources Control Board's (State Board) Storm Water Strategic Initiative Team has devoted to this process, especially in regards to collaborating with stakeholders to identify issues and interests in projects. The Program strongly supports the Workplan Proposal's vision to implement efficient and effective regulatory programs that incentivize multi-benefit approaches to stormwater management. The Program has also reviewed the Proposed Project List and feels many of the immediate action projects align with the Program's own stormwater management challenges and priorities. The Program is pleased to see a high number of projects and actions will provide resources and technical guidance on long-standing issues, especially the attention given to compliance costs and the need for additional funding. Efforts that reduce costs while maintaining high performing programs such as the use surrogate measures for discharge and receiving water quality suggested in Project No. 12 are encouraging.



Given the current historic drought, the Program agrees that high priority should be given to projects that promote stormwater as a resource and remove barriers to effective stormwater capture and use. However, MS4 programs throughout the state still are challenged in meeting all water quality objectives at all times. The goal of Project No. 6 to provide technical guidance, including data and modeling needs, for local storm water programs to demonstrate water quality protection will be useful in addressing water quality issues in a prioritized and watershed-based approach. It is likely Ventura County Permittees will need these tools sooner than your timeline suggests they will be available.

Overall, the Program supports the State Board's intention to develop an adaptive strategic workplan that incentivizes and assists in integrated and watershed-based stormwater management. The Program looks forward to collaborating with staff at the State Board, Regional Water Quality Control Boards, and other stakeholders on a number of projects in the Proposed Workplan in the near future. Thank you for the opportunity to provide comments on the Proposal to Develop a Storm Water Program Workplan and Implementation Strategy. Should you have any questions, please contact me at (805) 654-5051 or via email at Gerhardt.Hubner@ventura.org.

Sincerely,



Gerhardt J. Hubner, Chair
On Behalf of the Ventura Stormwater Quality Management Program