



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

September 1, 2006

Camarillo

County of Ventura

Fillmore

Moorpark

Ojai

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

State Water Resources Control Members
Attention: Ms. Song Her, Clerk of the Board
State Water Resource Control Board
P.O. Box 100
Sacramento, CA 95812-0100

SUBJECT: COMMENT LETTER - STORM WATER PANEL RECOMMENDATIONS TO THE CALIFORNIA STATE WATER RESOURCES CONTROL BOARD, "THE FEASIBILITY OF NUMERIC EFFLUENT LIMITS APPLICABLE TO DISCHARGES OF STORM WATER ASSOCIATED WITH MUNICIPAL, INDUSTRIAL AND CONSTRUCTION ACTIVITIES, JUNE 19, 2006"

Dear Chair Doduc and State Board members:

Thank you for this opportunity to provide our comments on behalf of the Ventura Countywide Storm Water Program on the above listed the report: *The Feasibility of Numeric Effluent Limits Applicable to Discharger of Storm water Associated with Municipal, Industrial and Construction Activities, June 19, 2006* (Panel Report). We have been following your process for the development of quantifiable measures, including numeric limits for storm water as described by our September 13, 2005 comment letter.

As provided for in your public notice, *"the purpose of the workshops was solicit comment from the public on the State Board can use these findings to improve the National Pollutant Discharge Elimination System Storm Water program. The purpose of these workshops is to gather policy and technical input"*.

As a matter of introduction the Ventura Countywide Storm Water Quality Management Program (Program) was established back in 1992. The Program, and Co-permittees under the currently issued MS4 NPDES storm water permit, include the Ventura County Watershed Protection District, the County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, San Buenaventura, Santa Paula, Simi Valley, and Thousand Oaks for discharges of storm water and urban runoff into the receiving waters of the Santa Clara River, Ventura River, Calleguas Creek, Malibu Creek and other coastal watersheds within Ventura County.

In 2003, the Program received the U.S. EPA Clean Water Act Award for MS4 Storm Water Programs. We believe our award-winning Program



demonstrates our commitment to a very proactive and effective Storm Water program. Our Storm water Management Plant is specifically designed to develop, achieve, and implement a timely, comprehensive, and cost-effective storm water pollution control program. Furthermore, we believe our Program has proven to be effective by utilizing the U.S. EPA's well-established, logical and iterative MEP approach to obtaining storm water and urban runoff water quality protection.

Municipal Activities

We concur with the finding contained on page 9 of the Panel Report, Municipal Recommendations which state: *"It is not feasible at this time to set enforceable numeric effluent criteria for municipal BMPs and in particular urban discharges"*.

Similarly, we recognize the significance of a rigorous new development structural BMP design and maintenance program, and concur with the Panel Report's recommendation concluding, *"...it can be presumed that these facilities will continue to deliver effluent qualities that are reasonably close to design effluent concentrations over the life of the facility"*. Through a comprehensive program of low impact development coupled with increased attention to pollutant specific structural BMPs in new development, we are confident that measurable reductions in the County's pollutants of concern will result.

However, for those catchments not afforded treatment by way of structural BMPs, we are concerned with the concept of using an "upset" value or *Action Level* as the Panel Report recommends. Our primary concern lies in the possible methods utilized to establish these levels. The term *action level* could be construed by some as a *numerical effluent limit* in itself; therefore caution should be taken in ensuring these levels are appropriately and rationally determined.

Success Stories:

At your July 28, 2006 workshop in Los Angeles, several representatives of the Ventura Countywide Program were in attendance, and heard State Board member Wolff request success stories. In respond to that request we offer the following success stories from our Program:

Heal the Bay 2005 Report Card for Ventura County Beaches - We feel that the success of our Program can partially be attributed to the excellent water quality at Ventura County Beach Report, as described below in Heal the Bay's Report Card: For the sixth year in a row, overall AB411 water quality at Ventura County beaches in 2005 was excellent, and proved to be the best water quality in Southern California for that year. Of the 56 water quality-monitoring locations during summer dry weather, 55 (98%) locations received good-to-excellent water quality marks. The only Ventura County beach to receive a summer dry weather grade lower than a B was San Buenaventura Beach south of the drain at San Jon Rd. For the second year

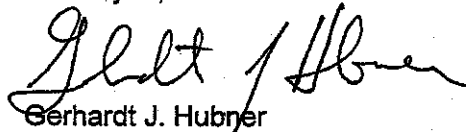
in a row, the Hobie/Kiddie Beach monitoring locations in Channel Islands Harbor have seen improved water quality (Source Heal the Bay)

Mobile Satellite City Hall, City of Oxnard: The City of Oxnard (one of the Program's Co-Permittees) continues to host their Helen Putnam award winning Mobile Satellite City Hall events in centralized city locations in an ongoing effort to educate a greater number of local residents in storm water pollution prevention methods and in the importance of taking ownership of their local environment. These events provide the Oxnard residents with the opportunity to voice their water quality concerns to the city's department/division appointed representatives, the citywide enhancement staff, city council members, neighborhood council executive boards, and business community representatives. This innovative approach of providing educational outreach to the general public has been extremely successful in promoting a positive environmental awareness, sound storm water pollution prevention practices, and illicit discharge identification/abatement throughout the city's targeted demographic areas.

CASQA Comments: We also concur with previous submitted policy comments on this document by the California Storm Water Quality Association (CASQA). We recommend that your Board consider CASQA's process diagram in lieu of using the diagram found on page 11 of the Panel Report. We believe this approach to be more effective.

We appreciate the efforts of the assembled panel of experts, your Board, CASQA and the regulated the storm water community at large, and look forward to the Board's decision in this important matter. If you have any questions regarding this comment letter, feel free to contact me at (805) 654-5051.

Thank you,



Gerhardt J. Hubner
Program Chair

Ventura Countywide Storm Water Quality Management Program