Response to Comments
Revisions to the 303(d) List of Impaired Waterbodies for Indicator Bacteria in Ventura County Beaches
Comment due date: February 25, 2019

1.	City of Oxnard
2.	City of Ventura
3.	City of Port Hueneme (late comment)
4.	County of Ventura
5.	Ventura Countywide Stormwater Management Program
6.	Craig Carlisle
7.	Heal the Bay

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1.1	City of Oxnard	The City of Oxnard (City) appreciates the opportunity to comment on the revisions to the Clean Water Act Section 303(d) list of impaired waterbodies pertaining to bacteriological water quality at nine coastal beaches in Ventura County. The City agrees with the proposed off-cycle removal of the beaches before the next update to the 303(d) list in 2022. The City supports Regional Board staff's recommendations to remove the 303(d) list for indicator bacteria impairments for seven of nine Ventura County beaches including 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 also supports Regional Board staff's recommendation to not place Promenade Park Beach on the 303(d) list for indicator bacteria. The City endorses Regional Board staff's analysis of available data from samples collected by the County of Ventura Environmental Health Division (VCEHD) over a 19-year period. VCEHD collected weekly water quality samples for total coliform, fecal coliform, and *enterococcus* for compliance with	Comment noted.

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		AB411 regulations. The data showed that the seven beaches met the Water Quality Objective conditions to delist according to the Listing Policy. The City also supports the staff's recommendations to categorize the beaches in the Integrated Report Category as Category 1, "*All assessed beneficial uses supported and no beneficial uses known to be impaired*".	
2.1	City of Port Hueneme	The City of Port Hueneme (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 [hereinafter referred to as 303(d) list]. The City appreciates the time and effort the staff of the California Regional Water Quality Control Board – Los Angeles Region (Regional Board) has taken to re-evaluate the 303(d) indicator bacteria listings for Ventura County Beaches as part of the Regional Board's "Vision" prioritization plan. The development and implementation of Total Maximum Daily Loads is a significant investment of resources and it is critical the 303(d) list be based on sound science and methodologies. The City fully supports the Regional Board staff's analysis to accurately characterize beach conditions 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 Regional Board staff's data assessment, the City supports the Regional 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,	Comment noted.

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		Port Hueneme Beach Park, Rincon Parkway Beach, San Buenaventura Beach, and Surfer's Point at Seaside. The City additionally supports the Regional Board staff's recommendation to not place Promenade Park Beach on the 303(d) list for indicator bacteria. As evidenced by the data assessment by the Regional Board staff, the previously mentioned Ventura County Beaches do not have indicator bacteria impairments and the City is committed to continuing to support programs that offer protection of the recreational beneficial uses at Ventura County Beaches. We anticipate high water quality at Port Hueneme Beach Park will continue well into the future. Weekly bacteria monitoring will continue to be performed by VCEHD for compliance with AB411 regulations and provide opportunities for early identification of any potential future concerns with water quality.	
3.1	City of Ventura	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/de listing considerations.	Comment noted.

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		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 AB4ll. 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.**	

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		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 quality as the City strives to make Ventura safe and clean for both residents and visitors.	
4.1	County of Ventura	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	Comment noted.

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		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. 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.	
5.1	Ventura Countywide Stormwater Management Program	On behalf of the Ventura Countywide Stormwater Quality Management Program (Program), which includes the 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, we thank you for the opportunity to provide comment on the proposed off-cycle revisions to the Clean Water Act Section	Comment noted.

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		303(d) list of impaired waterbodies in the Los Angeles Region [hereinafter referred to as 303(d) list].	
		Based on the results of the Los Angeles Water Board staff's data assessment, the Program 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 Program additionally supports the Los Angeles Water Board staff's recommendation to not place Promenade Park Beach on the 303(d) list for indicator bacteria.	
		In addition, the Program also supports the separate comment letters regarding the proposed listing changes submitted by the City of Ventura dated February 21, 2019, and submitted by the County of Ventura, City of Oxnard, and City of Port Hueneme, dated February 25, 2019.	
		The Program respects the Los Angeles Water Board staff's analysis to accurately characterize beach conditions 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.	
		Weekly bacteria monitoring will continue to be performed by VCEHD for compliance with AB411 regulations. Results and trends from this weekly monitoring allow the Program to	

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		identify and direct our programs to address any changes in the water quality at our beaches in a proactive manner. Additionally, per Ventura County's NPDES Permit No. CAS004002 (Order R4-2010-0108), if funding from state and federal sources is not available for VCEHD to perform beach water quality monitoring, the Program is required to conduct weekly year-round sampling and analysis at 10 locations including San Buenaventura Beach, Surfers Point at Seaside and Promenade Park. The Program is committed to continuing to implement stormwater quality programs countywide to protect the recreational beneficial use at Ventura County Beaches.	
6.1	Craig Carlisle	Please consider this as a comment on the subject item. It is unacceptable for a public hearing on this important water quality and human health topic to be held so far away from the stakeholders. This greatly limits the public's ability to attend, hear the information in person, and provide oral comments.

I know several interested parties that live in Ventura near these beaches and they are very disappointed that the hearing will be in Long Beach. They were hoping to attend in person to hear the discussion and potentially provide oral comments. What is behind the decision to have the meeting so far from Ventura where presumably the majority of the stakeholders reside? | The Los Angeles Water Board's area of authority covers most of both Ventura and Los Angeles Counties. During its monthly meetings, the Board typically considers items that affect stakeholders in many different parts of the region. At the upcoming meeting on March 14, 2019, the Board will be considering items that affect stakeholders in areas including the LA/Long Beach Harbors, San Gabriel Valley, San Fernando Valley, Santa Monica Bay coast, and Ventura County coast. As a result, the meeting location cannot be selected based on one agenda item.

To increase the opportunity for stakeholders to observe and listen to Board meetings, the Board's meetings are webcast. The March 14, 2019 Board meeting can be viewed at the following |

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			link: Live video broadcast of March 14, 2019 Board meeting
7.1	Heal the Bay	Heal the Bay is an environmental organization with over 30 years of experience and 15,000 members dedicated to making the coastal waters and beaches of California safe, healthy, and clean. We appreciate the opportunity to provide comments on removing nine Ventura County beaches from the Clean Water Act Section 303(d) List. We have reviewed the Regional Board Staff Report dated January 2019 (hereafter called Staff Report) and determined that these beaches should remain on the 303(d) list until more rigorous monitoring and data analysis is done and until water quality improvement programs have been implemented. Heal the Bay has monitored beach water quality and advocated for improved recreational water quality along California's coastline for over 30 years through our Beach Report Card and NowCast programs. We support the Regional Board's overall Vision Plan to address listed waterbodies through TMDL development or to delist impaired waterbodies when appropriate. However, we do not support the delisting of these nine Ventura County beaches until the following comments are addressed: • Appropriate delisting criteria need to be used for bacteria water quality objectives where recreational uses apply. • Delisting decisions must be made with up-to-date data. • Data analysis errors in the Staff Report must be corrected.	Comments noted. Responses to the specific comments listed are below.

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		• *Enterococcus* single sample limit data should be presented alongside geometric mean data for comparison. • Beaches should only be delisted if there have been observable improvements in water quality. These comments are discussed in further detail below.	
7.2	Heal the Bay	**Appropriate delisting criteria need to be used for bacteria water quality objectives where recreation uses apply.** The analysis in the Regional Board's Staff Report states that bacteria exceedance rates are low enough to be delisted according to table 4.2 of the Listing Policy.[1] However, section 4.3 of the Listing Policy clearly states that the table in section 4.2 should not be used for bacteria objectives. Section 4.3 of the Listing Policy states that a table specific to AB411 beaches (hereafter called AB411 Table) should be used for delisting instead. When table 4.2 is incorrectly used to assess delisting status, 8 of the 9 beaches meet the delisting criteria. However, when the correct AB411 table is used, Peninsula Beach, Port Hueneme Beach, Surfer's Point Beach, San Buena Ventura Beach 19000, and Rincon Beach 1050 do not meet delisting criteria (see Table 1 at the end of this letter). The delisting analysis in the Staff Report must be updated using the AB411 Table before any listing decisions are made.	The Los Angeles Water Board used the appropriate delisting criteria from the Listing Policy. Section 4.3 of the Listing Policy states that a waterbody shall be delisted if the numeric water quality objectives or standards for bacteria are not exceeded using the binomial distribution as described in section 4.2. Section 4.2 states, "waters shall be removed from the section 303(d) list if the number of measured exceedances supports rejection of the null hypothesis *as presented in Table 4.2*" (emphasis added). While Section 4.3 of the Listing Policy contains a hyperlink to a Microsoft Excel workbook that includes a coastal beaches table ("AB411" delisting table), that table includes clear direction at the top that it is to be used solely for beaches that only have data from April 1 to October 31. (See also Section 3.3 of the Listing Policy, which states that "...*if water quality monitoring*

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			*was conducted April 1 through October 31 **only*** [emphasis added]*…"* then the *"…binomial table specific for coastal beaches* [AB411 table]*…"* shall be applied.)
			The Los Angeles Water Board evaluated both winter and summer data for the beaches in this impairment assessment. It is not consistent with the Listing Policy to compare data that include winter sampling for all or part of the dataset to the binomial table specific for AB 411 beaches (sampled only from April 1 to October 31).
			In Table 1 of the Heal the Bay comment letter, Heal the Bay has incorrectly compared the allowable number of exceedances in the AB411 table to the observed exceedances in both winter and summer. This approach is not consistent with section 4.3 of the Listing Policy.
			The Los Angles Water Board has reviewed the summer only data for all the beaches including Peninsula Beach, Port Hueneme Beach, Surfer's Point Beach, San Buena Ventura Beach 19000, and Rincon Beach 1050 (see attached tables to this response to

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			comments). When the data are broken out into summer data only, in comparison to the AB411 table, all stations at all the beaches recommended for delisting (i.e. all beaches except Rincon Beach) still have exceedance rates less than the allowable frequency in the AB411 table such that delisting is the appropriate recommendation.
7.3	Heal the Bay	**Delisting decisions must be made with up-to-date data.** Some of the temporal representation requirements for delisting are not met in the Staff Report. Section 6.1.5.3 of the Listing Policy states "Samples should be representative of the critical timing that the pollutant is expected to impact the water body." The latest data presented in the Staff Report is from October 2017 (with some exceptions). To meet the temporal representation requirements of the Listing Policy, the most up-to-date data should be used in the Staff Report. We ask that the Staff Report include data through 2018 as we have observed Fecal Coliform/*E. coli*. and *Enterococcus* exceedances at Promenade Beach, Ormond Beach, Rincon Beach, San Buena Ventura Beach, Surfer's Point Beach, and Port Hueneme Beach since October 2017 (Table 2). For Rincon Parkway Beach, Promenade Park Beach 16000, Rincon Beach 1001 & 1050 the latest data presented in the Staff Report is from 2008. There is no evidence to suggest that fecal indicator bacteria have not impacted these beaches in the 10+ years since 2008 when they were last monitored. Monitoring must be reinstated at these stations and data analysis must be	The Los Angeles Water Board disagrees that the temporal representation requirements for delisting have not been met in the delisting decisions. Temporal representation refers to the "critical timing" that the pollutant is expected to impact the water, e.g. sampling waters in the season when the pollutant is most likely to be in the water. The latest data is not necessarily the most representative of the critical timing. Samples evaluated for this action are inclusive of the critical timing of bacteria at coastal beaches because all time periods were sampled including both summer and winter and wet and dry weather. The most up-to-date data, as practicable, was used in the Staff Report. A cut-off point for data analysis will always be

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		completed on the latest data before any delisting decisions are made.	necessary and was appropriate in this situation. Based on the data presented in Heal the Bay's comment letter, the listing decision would not have been different with these additional data; i.e., the number of exceedances would still not exceed the allowable frequencies listed in table 4.2 of the Listing Policy. In addition, staff solicited and gathered all data available for the purpose of assessment. As documented, data analysis for stations with more recent data has showed a downward trend in bacteria counts, especially in the summer. However, because several of these beaches do not have recent data in the wintertime (Peninsula and Point Mugu have no recent winter data, and Rincon Parkway North has no recent data), Los Angeles Water Board staff intend to comprehensively review the beaches in Ventura County to determine if additional winter monitoring should be required pursuant to sections 13267 or 13383 of the California Water Code. These data can be considered during the next comprehensive preparation of the Integrated Report and 303(d) list for the Los Angeles Region scheduled for 2022.

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7.4	Heal the Bay	**Data analysis errors in the Staff Report must be corrected.** We have found a number of inconsistencies in the data analysis for Ormond Beach in the Staff Report. The Staff Report states that there were no Fecal Coliform/*E. coli* exceedances at Ormond Beach (see Table 5 of the Staff Report); however, we found 29 exceedances (Table 3) in the raw data provided on the California Water Board Website.[2] The large amount of missing exceedances in the Staff Report suggests that there was a major data analysis error. In addition to Ormond Beach, we also identified higher numbers of exceedances than what were reported in the Staff Report at Peninsula Beach, Surfer's Point Beach, Point Mugu Beach, Rincon 1001, and San Buena Ventura Beach 19000 (Table 4). If there was a method for removing samples from the Staff Report analysis it must be provided in writing. We were unable to discern any method or justification for removing samples from the Staff Report. For example, Ormond 43000 was sampled twice on 10/28/2003 (Table 3), and both samples exceeded the objective for Fecal Coliform/*E. coli*. Both of those samples appear to have been removed from the Staff Report analysis. The discrepancies between the raw data provided and the Staff Report, particularly at Ormond Beach, must be addressed before any delisting decision is made. We also noticed that Tables 4-13 of the staff report incorrectly list the REC-1 Bacteria Objectives. All Fecal Coliform/*E. coli* tables list 35 cfu/100ml as the geometric mean objective when it should be 200 cfu/100ml. The correct objectives must be used in the Staff Report before any delisting decision is made.	Los Angeles Water Board staff have reviewed the data and made some corrections, which are reflected in the revised Staff Report. No data were removed; however, when more than one sample was collected on the same day, these data were averaged before determining if an exceedance occurred. Per the Listing Policy, samples must be temporally independent and samples collected on the same day cannot be considered temporally independent. For Tables 4 through 13 of the Staff Report, the typographical error has been corrected and the tables now show 200 as the fecal coliform 30-day geometric mean.
7.5	Heal the Bay	***Enterococcus* single sample limit data should be presented alongside geometric mean data for comparison.**	The fecal coliform single sample data were included as part of the delisting analysis because the State Water

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		While the REC-1 Bacteria Water Quality Objectives only require a geometric mean analysis for listing and delisting decisions, we ask that the Regional Board include *Enterococcus* Single Sample Limit data in their delisting analysis (as they did for Fecal Coliform/*E. coli*). The REC-1 Bacteria Water Quality Objectives state "The applicable STV shall not be exceeded by more than 10 percent of the samples collected in a CALENDAR MONTH, calculated in a static manner." If a beach is sampled weekly under AB411 regulations, it would only take one exceedance to not meet this water quality objective (approximate 25% exceedance rate). Conversely, the geometric mean objective is more lenient because one exceedance will not necessarily lead to a violation of the objective. This creates a situation where a beach can meet one objective yet simultaneously be in violation of another. Therefore, we ask that the Staff Report include the Single Sample Limits analysis for *Enterococcus* alongside the geometric mean analysis even though the geometric mean analysis takes precedence for listing decisions.	Board's newly adopted bacteria provisions for the Ocean Plan have maintained the existing water quality objectives for fecal coliform, which require the application of both a single sample and geometric mean limit. According to the bacteria provisions, the STV for *enterococcus* is used for listing decisions only when there is insufficient data to calculate a geometric mean. (Amendment to the Water Quality Control Plan for Ocean Waters of California – Bacteria Provisions and a Water Quality Standards Variance Policy § II.B.a.1.) If a beach is sampled weekly under AB411 regulations, it is likely that there will be sufficient samples to calculate a rolling 6-week geometric mean and, per the newly adopted provisions, when a geometric mean can be calculated, the STV is not used. The STV was developed by statistical evaluation of the geometric mean in order to provide a standard which would be equivalent but could be used when there are insufficient data to calculate a geometric mean. There will not be a situation where a beach will meet the geometric mean

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			objective yet simultaneously be in violation of the STV objective, because when a geometric mean can be calculated the STV evaluation is unnecessary.
7.6	Heal the Bay	**Beaches should only be delisted if there have been observable improvements in water quality.** We believe delisting decisions should only be made after steps are taken to manage and improve water quality. The Regional Board seeks to delist these beaches based on a change in bacteria objectives and not on an observable change in water quality. These beaches were originally listed as impaired to help protect the public from illness. We ask that the Regional Board stay committed to that goal and implement projects that will improve the water quality at these 9 beaches in order to keep the public safe. We ask that the 303(d) listed Ventura County beaches remain listed until more rigorous data analysis is completed with the most up-to-date data and water quality projects are implemented at these 9 beaches.	It is appropriate and required by the Listing Policy to reevaluate the impairment status of a waterbody if the water quality standard has changed. Pursuant to section 4 of the Listing Policy, "[t]he listing of a segment shall be reevaluated if the water quality standard has been changed." If the water body meets the revised objective, then "the water segment *shall be removed* from the section 303(d) list." (Listing Policy § 4) (emphasis added.) The seven beaches recommended for delisting meet the requirements for delisting per the Listing Policy and the newly adopted objectives. In addition, tables were included in the appendix to the Staff Report comparing the data to the previous water quality objectives. All the decisions would remain the same whether comparing the data to the previous objectives or the newly adopted objectives except for Surfer's Point for which the total

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			coliform exceedance rate was exceeded.
			The Ventura County MS4 Permit contains requirements for shoreline monitoring at beaches and minimum control measures to address stormwater and non-stormwater discharges to Ventura County Beaches. The Ventura County MS4 Permit (anticipated to be renewed as a regional MS4 permit), other NPDES permits, and other regulatory tools such as WDRs and Investigative Orders provide additional opportunities to require appropriate monitoring and water quality improvement where necessary. All beaches, whether listed on the 303(d) list or not, are protected.
			The beaches will continue to be monitored and data will be reviewed during listing cycles in the future.

Attachment to the Response to Comments:
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Summer Exceedances for *enterococcus*

	Peninsula Beach							
	23000 (No winter data since 2008)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2008-2017	23	7	237	2.95%	19	0	196	0.00%
1998-2017	52	17	535	3.18%	47	21	481	4.37%

	Point Mugu Beach							
	45000 (No winter data in 1999 and 2005 to 2017)							
	Single Sample				olling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2006-2017	34	2	355	0.56%	30	0	315	0.00%
1998-2017	51	3	521	0.58%	46	0	478	0.00%

	Port Hueneme Beach							
	41000 (No winter data in 1999, 2005-2008, 2013-2014)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2006-2017	34	6	351	1.71%	31	4	317	1.26%
1998-2017	53	8	547	1.46%	49	6	506	1.19%

	Rincon Parkway North Beach							
	6000 (No winter data in 1999, 2003-2008)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2008	14	1	149	0.67%	12	0	132	0.00%
1998-2008	27	2	278	0.72%	25	0	260	0.00%

	Surfer's Point Beach							
	13000 (No winter data in 1999 and 2008)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
1998-2017	54	14	554	2.53%	52	18	536	3.36%

*Allowable Exccedances are referenced in the AB411 Delist Table in the Listing Policy

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Summer Exceedances for *enterococcus*

		Single Sample			Six-Week Rolling Geometric Mean			
Ormond Beach								
42000 (No winter data in 1999, 2004-2008)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**68**	3	411	0.73%	**64**	0	388	0.00%
1998-2017	**90**	5	543	0.92%	**85**	2	515	0.39%
43000 (No winter data in 1999, 2004-2008, 2013-2014)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**62**	2	379	0.53%	**57**	0	345	0.00%
1998-2017	**85**	10	517	1.93%	**77**	7	466	1.50%
44000 (No winter data in 1999, 2004-2008, 2013-2014)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**36**	0	376	0.00%	**34**	0	349	0.00%
1998-2017	**49**	0	506	0.00%	**45**	0	469	0.00%

		Single Sample			Six-Week Rolling Geometric Mean			
Promenade Beach								
14000 (No winter data in 1999, 2008)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
1998-2017	**53**	9	543	1.66%	**52**	14	531	2.64%
15000 (No winter data in 1999, 2004-2017)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**37**	12	386	3.11%	**31**	2	322	0.62%
1998-2017	**51**	13	522	2.49%	**44**	5	454	1.10%
16000 (No winter data in 1999, 2004-2017)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**14**	5	147	3.40%	**12**	2	131	1.53%
1998-2017	**27**	7	285	2.46%	**25**	5	263	1.90%
17000 (No winter data in 1999, 2005-2017)								
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2005-2017	**34**	9	355	2.54%	**29**	4	297	1.35%
1998-2017	**51**	13	525	2.48%	**45**	12	460	2.61%

*Allowable Exceedances are referenced in the AB411 Delist Table in the Listing Policy

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Revisions to the 303(d) List of Impaired Waterbodies for Indicator Bacteria in Ventura County Beaches
Summer Exceedances for *enterococcus*

	Rincon Beach							
	1000 (No winter data in 1999, 2005-2008)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2005-2017	**38**	16	391	4.09%	**35**	38	360	10.56%
1998-2017	**56**	37	576	6.42%	**51**	81	524	15.46%
	1001 (No winter data in 1999, 2004, and 2008-2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2004-2017	**11**	86	115	74.78%	**8**	86	86	100.00%
1998-2017	**22**	188	235	80.00%	**19**	203	204	99.51%
	1050 (No winter data in 1999, 2004, and 2008-2017)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2008-2017	**18**	3	187	1.60%	**14**	0	147	0.00%
1998-2017	**44**	13	454	2.86%	**38**	33	397	8.31%
	1100 (No winter data in 1999 and 2004-2017)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2004-2017	**22**	2	235	0.85%	**20**	7	206	3.40%
1998-2017	**36**	7	372	1.88%	**33**	10	338	2.96%

	San Buenaventura Beach							
	18000 (No winter data in 1999 and 2005-2017)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2005-2017	**22**	11	385	2.86%	**17**	10	315	3.17%
1998-2017	**51**	16	526	3.04%	**43**	12	446	2.69%
	19000 (No winter data in 1999 and 2005-2008)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2004-2017	**38**	12	389	3.08%	**35**	18	361	4.99%
1998-2017	**55**	21	566	3.71%	**51**	23	522	4.41%
	20000 (No winter data in 1999, 2004-2017)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	**Allowable Exceed***	Exceed Count	Sample Count	Percentage
2004-2017	**38**	5	389	1.29%	**31**	0	321	0.00%
1998-2017	**51**	7	525	1.33%	**44**	7	453	1.55%

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Revisions to the 303(d) List of Impaired Waterbodies for Indicator Bacteria in Ventura County Beaches
Summer Exceedances for *enterococcus*

	21000 (No winter data in 1999, 2004-2017)							
	Single Sample				Six-Week Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	37	3	385	0.78%	31	0	321	0.00%
1998-2017	50	6	519	1.16%	44	2	451	0.44%

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Revisions to the 303(d) List of Impaired Waterbodies for Indicator Bacteria in Ventura County Beaches
Summer Exceedances for fecal coliform

	Peninsula Beach							
	23000 (No winter data in 2008 to 2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2009-2017	23	2	238	0.84%	10	0	107	0.00%
1998-2017	52	11	537	2.05%	38	0	389	0.00%

	Point Mugu Beach							
	45000 (No winter data in 1999 and 2005 to 2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2006-2017	34	2	354	0.56%	19	0	200	0.00%
1998-2017	50	2	519	0.39%	33	0	340	0.00%

	Port Hueneme Beach							
	41000 (No winter data in 1999, 2005-2008, and 2013-2014)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2006-2017	34	4	353	1.13%	30	0	307	0.00%
1998-2017	53	5	550	0.91%	47	0	489	0.00%

	Rincon Parkway North							
	6000 (No winter data in 1999 and 2003-2008)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	14	1	149	0.67%	11	0	118	0.00%
1998-2008	26	2	279	0.72%	22	0	225	0.00%

	Surfer's Point Beach							
	13000 (No winter data in 1999 and 2008)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
1998-2017	92	11	555	1.98%	82	1	498	0.20%

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Revisions to the 303(d) List of Impaired Waterbodies for Indicator Bacteria in Ventura County Beaches

Summer Exceedances for fecal coliform

	Ormond Beach							
	42000 (No winter data in 1999 and 2004-2008)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**40**	2	410	0.49%	**35**	0	366	0.00%
1998-2017	**53**	2	543	0.37%	**46**	0	479	0.00%
	43000 (No winter data in 1999, 2004-2008, and 2013-2014)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**37**	1	379	0.26%	**24**	0	251	0.00%
1998-2017	**50**	2	517	0.39%	**35**	0	367	0.00%
	44000 (No winter data in 1999, 2004-2008, and 2013-2014)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**36**	1	376	0.27%	**22**	0	230	0.00%
1998-2017	**49**	2	506	0.40%	**32**	0	332	0.00%

	Promenade Beach							
	14000 (No winter data in 1999 and 2008)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
1998-2017	**53**	9	542	1.66%	**47**	0	481	0.00%
	15000 (No winter data in 1999 and 2004 to 2017)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**37**	1	385	0.26%	**22**	0	235	0.00%
1998-2017	**51**	4	522	0.77%	**34**	0	353	0.00%
	16000 (No winter data in 1999 and 2004 to 2017)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***	**Exceed Count**	**Sample Count**	**Percentage**
2004-2017	**14**	5	147	3.40%	**10**	0	106	0.00%
1998-2017	**27**	7	282	2.48%	**21**	0	221	0.00%
	17000 (No winter data in 1999 and 2005 to 2017)							
	Single Sample				**30-Day Rolling Geometric Mean**			
	Allowable Exceed*	**Exceed Count**	**Sample Count**	**Percentage**	**Allowable Exceed***			**Percentage**
2005-2017	**34**	1	356	0.28%	**20**	0	206	0.00%
1998-2017	**51**	5	525	0.95%	**34**	0	352	0.00%

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Summer Exceedances for fecal coliform

	Rincon Beach							
	1000 (No winter data in 1999 and 2005-2008)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2005-2017	38	12	391	3.07%	34	6	350	1.71%
1998-2017	56	31	579	5.35%	51	7	526	1.33%
	1001 (No winter data in 1999, 2004, and 2008 to 2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	8	48	92	52.17%	3	35	39	89.74%
1998-2017	23	144	236	61.02%	12	109	126	86.51%
	1050 (No winter data in 1999, 2004, and 2008 to 2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	18	3	187	1.60%	10	0	110	0.00%
1998-2017	44	11	455	2.42%	34	1	354	0.28%
	1100 (No winter data in 1999 and 2004 to 2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	23	4	236	1.69%	16	0	167	0.00%
1998-2017	36	5	373	1.34%	27	0	282	0.00%

	San Buenaventura Beach							
	18000 (No winter data in 1999 and 2005 to 2017)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2005-2017	37	5	385	1.30%	22	0	233	0.00%
1998-2017	51	10	525	1.90%	34	0	351	0.00%
	19000 (No winter data in 1999 and 2005-2008)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	38	7	391	1.79%	34	2	352	0.57%
1998-2017	55	16	567	2.82%	50	2	510	0.39%
	20000 (No winter data in 1999 and 2004)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	38	5	391	1.28%	23	0	244	0.00%
1998-2017	51	6	527	1.14%	35	0	363	0.00%

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Summer Exceedances for fecal coliform

	21000 (No winter data in 1999 and 2004)							
	Single Sample				30-Day Rolling Geometric Mean			
	Allowable Exceed*	Exceed Count	Sample Count	Percentage	Allowable Exceed*	Exceed Count	Sample Count	Percentage
2004-2017	37	2	386	0.52%	22	0	233	0.00%
1998-2017	51	4	522	0.77%	34	0	348	0.00%

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