



Surfrider Foundation

Ventura County Chapter

PO Box 1028, Ventura, CA 93002 (805) 667-2222

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Ms. Tracy Egoscue
Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

Comments on Tentative Ventura County Municipal Separate Storm Sewer System Permit 2-24-2009

In our review of the Tentative MS4 permit we found that, although this regulatory approach may help improve the manner in which future development manages stormwater, it does not adequately require local government to actively address the problems caused by existing infrastructure. Therefore, it is unlikely that the permit as written will adequately address the ongoing degradation of our riparian ecosystems and coastal resources.

The permit is good in that it:

- Requires additional monitoring, including beach water quality
- Advances the requirements for Low Impact Development (LID)
- Includes performance-based BMP's

However, the Permit is inadequate in that:

1. MAL requirements based upon arbitrary outfall monitoring
2. Does not regulate existing or future flood control infrastructure
3. Excludes requirements for municipal infrastructure retrofit

1. MUNICIPAL ACTION LEVELS

The criteria for determining MAL's is inadequate. The Permit states:

In order to determine if MS4 discharges are in excess of the MALs, Permittees shall conduct outfall monitoring as required in the Monitoring and Reporting Program (MRP).

However, selection of "major outfall" monitoring stations appears to be arbitrary and not related to existing significant impacts to water bodies. For instance, the location chosen for the City of Ventura has little to no dry weather flow and does not drain directly to a listed impaired water body. Monitoring should be required at known problem areas, so that baseline data may be collected and used to monitor progress with BMP's in the future. Suggested monitoring locations for the City of Ventura are Sanjon/Prince Barranca, Stanley Drain, and Arundel Barranca.

2 & 3 FLOOD CONTROL AND MUNICIPAL INFRASTRUCTURE

The fundamental problem with urban runoff in Ventura County is the existing urban infrastructure. Research indicates that up to 80% of impervious cover is transportation-related



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(i.e. roads, highways, parking lots, driveways, etc.,) all of which is directly connected to receiving waters through flood control infrastructure (i.e. concrete channels, storm drains, etc.)

One significant omission is that the tentative stormwater permit does not require low-flow BMP retrofit with municipal maintenance activities such as storm drain repair/reconstruction, street or parking lot repaving. The time to retrofit existing infrastructure is during the IWPP/CIP planning process before ground is broken and work is being done. Post construction BMP's can be as simple as curb cuts, or as complex as implementing an Integrated Water Management Plan. So while the permit makes progress on ensuring that new and infill development will minimize its 'water footprint' through LID and other BMP's, there is no mechanism for changing the way local government does business.

We do note that the City of Ventura has taken steps in the right direction with the recent "Green Streets" initiative and some components of its 2009 CIP. Although this is a good voluntary step in the right direction, we are concerned that lack of countywide regulatory oversight will continue to allow bad municipal projects to be constructed in the future.

Sincerely,

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