

## VENTURA MS4 - May 7, 2009

### Water Code Section 13241 Considerations

Section 13241 of the California Water Code lists factors that must be considered by Regional Boards when adopting or modifying water quality objectives. Although this permit does not adopt or modify water quality objectives, this analysis responds to comments submitted on the Tentative Order for MS4 discharges. The following discussion summarizes information applicable to each of the subsections of Section 13241 in connection with the Revised Tentative MS4 permit.

***Past, present and probable future beneficial uses.*** See the relevant watershed sections in the Region's Watershed Management Initiative Chapter as well as available State of the Watershed reports for a description of beneficial uses. The reports are available on the Board's website at: [http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/regional\\_program/index.shtml#Watershed](http://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/index.shtml#Watershed) Additionally, Chapter 2 of the Basin Plan, which identifies designated beneficial uses for waterbodies in the Los Angeles Region, is hereby incorporated by reference to address this factor.

***Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto.*** The environmental setting of the Ventura River watershed, Santa Clara River watershed, the Calleguas Creek watershed and miscellaneous Coastal watershed and environmental factors affecting water quality and beneficial uses in these watersheds are discussed in the Region's Watershed Management Initiative Chapter as well as available State of the Watershed reports. These documents also contain information on the water quality of the applicable waterbodies in relation to specific beneficial uses.

\* Ventura River Watershed

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/regional\\_program/wmi/ventura\\_river\\_watershed/ventura\\_river\\_watershed.doc](http://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/wmi/ventura_river_watershed/ventura_river_watershed.doc)

\* Calleguas Creek Watershed

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/regional\\_program/wmi/calleguas\\_creek\\_watershed/calleguas\\_creek\\_watershed.doc](http://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/wmi/calleguas_creek_watershed/calleguas_creek_watershed.doc)

\* Miscellaneous Ventura Coastal

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/regional\\_program/wmi/misc\\_ventura\\_coastalWMA/misc\\_ventura\\_coastalWMA.doc](http://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/wmi/misc_ventura_coastalWMA/misc_ventura_coastalWMA.doc)

\* Santa Clara River

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/regional\\_program/wmi/santa\\_clara\\_river\\_watershed/santa\\_clara\\_river\\_watershed.doc](http://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/wmi/santa_clara_river_watershed/santa_clara_river_watershed.doc)

\*The Channel Islands

[http://www.waterboards.ca.gov/losangeles/water\\_issues/programs/regional\\_program/wmi/channel\\_islandsWMA/channel\\_islandsWMA.doc](http://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/wmi/channel_islandsWMA/channel_islandsWMA.doc)

Additionally, Chapters 1 through 3 of the Basin Plan are hereby incorporated by reference to address this factor.

***Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area.***

Staff uses existing water quality standards contained in Chapters 2 and 3 of the Basin Plan as the baseline or benchmark for water quality conditions that could reasonably be achieved through the coordinated control of all factors that affect water quality in the affected waters. The "Beneficial Uses" and "Water Quality Objectives" chapters (Chapters 2 and 3) of the Basin Plan are incorporated by reference to address this factor.

This MS4 Permit is designed to reduce pollutant loading to waterbodies within Ventura County from discharges from the Ventura County municipal separate stormwater system to attain existing water quality objectives. Available information on the quality of stormwater in the region and its cumulative impacts with other wastewater discharges on the water quality of these waterbodies is limited. This permit however is designed to increase monitoring requirements so the stormwater system pollutant loading can be quantified. The permit also requires the implementation of BMPs to reduce pollutant loading, and implementation of established TMDL. Overall improvements in stormwater quality may be expected to occur over time with ongoing implementation of the Region's Municipal Storm Water NPDES Permits and TMDLs.

**Economic considerations.** The municipalities and County discharging to these waterbodies through the MS4 are expected to be the primary parties involved in compliance with the revised objectives. Economic considerations of implementing this permit, with increased monitoring requirements, are described in the accompanying "economic Considerations of the Proposed (February 25, 2008) State of California Regional Water Quality Control Board Los Angeles Region, Order 08 Regional Water Quality Control Board Los Angeles Region Order 08-xxx, NPDES Permit No. CAS004002, Waste Discharge Requirements for Stormwater (Wet Weather) and Non-Stormwater (Dry Weather) Discharges from the Municipal Separate Storm Sewer Systems within the Ventura County Watershed Protection District, County of Ventura and the Incorporated Cities Therein. The economic impact to public agencies was estimated based on the cost of executing the seven basic programs required by the storm water permit. The total annual cost to the stormwater permittees ranged from \$7.15 to \$10.9 million (2008\$), depending on the averaging method applied. This translated to an annual cost per household that ranged from \$27.60 to \$42.00 (2008 \$).

**Need for developing housing within the region.** The Ventura County MS4 permit adoption is reasonably considered to address the need for housing because control of pollutants in stormwater would improve the quality of water available for recycling and re-use. This in turn may reduce the demand for imported water thereby increasing the region's capacity to support continued housing development.

**Need to develop and use recycled water.** The Ventura County MS4 permit adoption is reasonably considered to address the need for recycled water because control of pollutants in stormwater will result in water of improved quality with a greater potential for recycling or reuse.