



Los Angeles Regional Water Quality Control Board

May 14, 2024

Via Email Only

Permittees of the Ventura Countywide Stormwater Quality Management Program (VCSQMP) Group¹

REVIEW OF THE VENTURA COUNTYWIDE STORMWATER QUALITY MANAGEMENT PROGRAM GROUP'S WATERSHED MANAGEMENT PROGRAM (WMP) PURSUANT TO THE REGIONAL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR THE LOS ANGELES REGION (NPDES PERMIT NO. CAS004004; ORDER NO. R4-2021-0105)

Dear Permittees of the VCSQMP Group:

The Regional MS4 Permit (Order No. R4-2021-0105) authorizes discharges from the MS4 operated by 99 municipal Permittees within the coastal watersheds of Los Angeles and Ventura Counties (hereafter, Regional MS4 Permit or Order). The Regional MS4 Permit allows the Permittee(s) the option to use a Watershed Management Program (WMP) to implement many of the permit's requirements through customized strategies, control measures, and best management practices (BMPs). Pursuant to Part IX.F.3 of the Order, the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board or Board), received the VCSQMP Group's (Group) draft WMP dated September 2023.

Public Review and Comment

On September 26, 2023, the Los Angeles Water Board provided public notice and a 62-day period to allow for public review and comment on the WMP. The Board received one joint comment letter from Heal the Bay and Los Angeles Waterkeeper. These comments were considered during staff's review of the WMPs.

Board's Review

Prior to the submittal of the draft WMP, Board staff met with Ventura County Permittees on June 15, 2022, August 25, 2022, March 15, 2023, and May 3, 2023 to discuss WMP development. After the submittal of the draft WMP, Board staff met with Ventura County

¹ Permittees of the VCSQMP Group include Ventura County Watershed Protection District (VCWPD), the County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks, and Ventura.

NORMA CAMACHO, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

Permittees on October 9, 2023, February 27, 2024, and April 30, 2024, to discuss the draft WMP.

The Los Angeles Water Board has reviewed the draft WMP and has determined that the draft WMP does not fully satisfy the requirements in Part IX of the Order. The major deficiencies in the draft WMP which prevent the Regional Board's approval of the draft WMP and associated deemed compliance for any of the eligible water body-pollutant combinations (WBPCs) include the following: a) lack of firm commitment to the implementation of structural BMPs in addition to those necessary to comply with baseline permit requirements, b) unreasonable compliance schedules, c) ambiguous implementation strategies, d) insufficient information on how the compliance metrics will be achieved for each WBPC, and e) insufficient information provided to review the Reasonable Assurance Analysis (RAA) if the Group intend to implement a combination of modeled BMPs and structural control measures for deemed compliance.

Revisions to the WMP are necessary to comply with the requirements of Part IX of the Order. To meet the WMP requirements, please revise the WMP to address the technical comments and provide the specified information for the RAA as follows:

Technical Comments

1. Per Appendix B Table 4-4 of the WMP, wet weather bacterial constituents are listed as Category 1B WBPCs for Santa Monica Bay. If the WMP intends to address these WBPCs, update Figure 1-1 of the main document and in Appendix B Figure 2-1 and Table 2-1 of the WMP to add Santa Monica Bay Beaches Bacteria TMDL (July 15, 2024 (wet weather), July 15, 2006 (summer dry weather), and November 1, 2009 (winter dry weather)). Also, clarify in the WMP that the watershed control measures proposed for the Malibu Creek Bacteria TMDL will also address the Santa Monica Bay Bacteria TMDL. Additionally, per Parts IX.B.1-2 of the Order, update the water quality characterization and source assessment to include the Santa Monica Bay Beaches Bacteria TMDL. If you do not intend to comply with this TMDL through implementation of the WMP, revise the WMP as follows:
 - a. Per Part IX.B.1 of the Order, for water quality characterization, clarify in Section 1 in Appendix B of the WMP if data from the Santa Monica Bay Beaches Bacteria TMDL monitoring site SMB MC-2 was considered relevant and why available data for this site was disregarded.
 - b. Section 3.1 in Appendix B of the WMP is missing a source assessment for the Santa Monica Bay Beaches Bacteria TMDL for receiving water monitoring site SMB MC-2. Per Part IX.B.2 of the Order, explain why any relevant available data was disregarded.
2. Per Figure 1-4 of the main document WMP and Table 1-1 in Appendix D of the WMP, Oxnard Drain 3 is not part of the Calleguas Creek Watershed assessment areas that were modeled in the RAA. Furthermore, the WMP does not propose any watershed control measures, compliance schedules, and compliance metrics for Oxnard Drain 3. Therefore, none of the WPBCs for Oxnard Drain 3 are

eligible for deemed compliance. Accordingly, in Table 1-6 of the WMP for Calleguas Creek watershed, remove Category 1D which entirely includes WBPCs for the U.S EPA established Oxnard Drain 3 Pesticides, PCBs, and Sediment Toxicity TMDL (Oxnard Drain 3 Toxics TMDL). Alternatively, if the Group wishes to pursue deemed compliance for the Oxnard Drain 3 Toxics TMDL, revise the RAA and WMP to include Oxnard Drain 3 in the assessment areas addressed in the WMP, and satisfy the requirements in Part IX of the Order by adding a water quality characterization and source assessment for Oxnard Drain 3 WBPCs, proposing watershed control measures, adding compliance metrics with interim milestones, and per Part IV.B.2.c of the Order, proposing a reasonable compliance schedule to address the TMDL.

3. Add a footnote to Table 1-6 of the WMP, column title "Appendix B Reference" to state that deemed compliance is not being pursued for any WBPCs that are not included in the assessment areas shown in Figures 1-3 through 1-8 of the WMP.
4. In Figure 1-1 and compliance timeline flowcharts in Section 4 of the main document and in Appendix B, Figure 2-1 and Table 2-1 of the WMP, the 2021 final deadlines listed for many of the past due TMDL deadlines are inaccurate. Revise all relevant, maps, tables, and flowcharts in the WMP to reflect the final compliance deadlines per the Basin Plan as follows:
 - a. Ventura River and its Tributaries Algae TMDL (June 28, 2013 (wet weather) and June 28, 2019 (dry weather))
 - b. Ventura River Estuary Trash TMDL (March 6, 2016)
 - c. Harbor Beaches of Ventura County (Kiddie Beach and Hobie Beach) Bacteria TMDL (December 18, 2013 (dry weather) and December 18, 2018 (wet weather))
 - d. Santa Clara River Nitrogen Compounds TMDL (March 23, 2004)
 - e. Calleguas Creek, its Tributaries and Mugu Lagoon Toxicity TMDL (March 24, 2008)
 - f. Revolon Slough and Beardsley Wash Trash TMDL (March 6, 2016)
 - g. Malibu Creek and Lagoon Bacteria TMDL (January 24, 2012 (dry weather) and July 15, 2026 (wet weather))
 - h. Malibu Creek Watershed Trash TMDL (July 7, 2017)
5. Table 4-2 in Appendix B of the WMP lists the Calleguas Creek Salts TMDL (chloride, TDS, sulfate, and boron) as Category 1B (WBPCs with final deadlines within the permit term). This TMDL has a final deadline of December 2, 2023 which is now past due. Revise the table to move these WBPCs to Category 1A (WBPCs with past TMDL deadlines). Additionally, Table 1-2 in Appendix B of the WMP defines Category 1A WBPCs as those past due "prior to WMP submittal date of Sept. 11, 2023". Remove this definition. Additionally, update the deemed compliance status column of Table 7-4 in Appendix D of the WMP for the Calleguas Creek Salts TMDL row to state that this is a past due TMDL; accordingly, deemed compliance cannot be granted through the WMP.
6. In Table 4-4 in Appendix B of the WMP:
 - a. Add WBPCs Enterococcus (dry), Fecal Coliform (dry), and Total Coliform (dry) for Santa Monica Bay under Category 1A.

- b. Scum is listed as Category 2C. However, the Malibu Creek Watershed Nutrients TMDL (2003) addresses the scum impairment. Accordingly, scum can be listed under Category 1B. For consistency, also update Table 2-3 in Appendix B of the WMP.
 - c. Remove Dissolved Oxygen from Category 3A because this WBPC is already under Category 1B. Also, since dissolved oxygen is the only Category 3A pollutant, also remove 3A for Malibu Creek in Table 1-6 of the main document WMP.
7. In Table 4-6 in Appendix B of the WMP:
 - a. Chloride is included as Category 1D. Per Part IV.B.2.b of the Order and Part II in Attachment M of the Order, the Santa Clara River Reach 3 TMDL for chloride has a past due deadline of September 11, 2021. Accordingly, revise Table 4-6 in Appendix B of the WMP to move chloride from Category 1D to Category 1A. Additionally, in Table 1-6 of the main WMP, for Santa Clara River, remove Category 1D since chloride is the only Category 1D WBPC and with a past due TMDL deadline, is not eligible for deemed compliance.
 - b. Toxicity and pH are included as Category 2B for Piru Creek. However, these WBPCs are not listed on the 2020-2022 303(d) list. Clarify if these constituents are included in the table because they meet the 303(d) listing policy criteria. Alternatively, remove these WBPCs from the table. For consistency, also update Table 2-4 in Appendix B of the WMP.
 - c. Chloride for Pole Creek is included as Category 1D. However, per Part II in Attachment M of the Order, the chloride WQBELs apply to Santa Clara River Reach 3 and its tributaries. The Los Angeles Region's Basin Plan lists Pole Creek as a tributary of Santa Clara River Reach 4A. Therefore, the TMDL does not apply to Pole Creek. Accordingly, remove the chloride WBPC for Pole Creek from the table. For consistency, also update Table 2-4 in Appendix B of the WMP.
8. Table 4-7 in Appendix B of the WMP includes chloride as Category 2D for Piru Creek. However, this WBPC is not listed on the 2020-2022 303(d) list. Clarify if this WBPC is included in the table because it meets the 303(d) listing policy criteria. Alternatively, remove this WBPC from the table. For consistency, also update Table 2-4 in Appendix B of the WMP.
9. In Table 4-8 in Appendix B of the WMP:
 - a. pH is included as Category 2B for Sespe Creek. However, this WBPC is not listed on the 2020-2022 303(d) list. Clarify if this WBPC is included in the table because it meets the 303(d) listing policy criteria. Alternatively, remove this WBPC from the table. For consistency, also update Table 2-4 in Appendix B of the WMP.
 - b. Chloride is included as Category 2D for Sespe Creek. However, per the Los Angeles Region's Basin Plan, Sespe Creek is a tributary of Santa Clara River Reach 3. Therefore, per Part II in Attachment M of the Order, revise Section 4.3 in Appendix B of the WMP to move chloride for Sespe Creek from Category 2D to Category 1A. For consistency, also update Table 2-4 in Appendix B of the WMP.

10. In Table 4-10 in Appendix B of the WMP, mercury is included under Category 2D but no waterbodies are selected. Correct this typographical error by removing the empty row for Mercury under Category 2D.
11. Per Figure 1-8 of the WMP, Ventura County Coastal 3 assessment area includes the Channel Islands Harbor subwatershed which is addressed by the Harbor Beaches of Ventura County (Kiddie Beach and Hobie Beach) Bacteria TMDL. Since the limiting pollutant is bacteria for the Ventura County Coastal 3 assessment area, the compliance schedule must follow the final compliance deadline for the Harbor Beaches of Ventura County (Kiddie Beach and Hobie Beach) Bacteria TMDL. Since it is a past due TMDL deadline, Ventura County Coastal 3 assessment area is not eligible for deemed compliance. Accordingly, make the following revisions:
 - a. Consistent with other similar tables, revise Table 4-16 of the WMP to yellow highlight Total Coliform for Ventura County Coastal 3 to indicate that it is limiting pollutant with a past-due final compliance deadline.
 - b. Remove Appendix D Table 11-8 (Assessment Area Ventura County Coastal 3) and update Appendix D Section 11.3 of the WMP accordingly.
 - c. Revise any assessment area maps and tables in the WMP to remove the Ventura County Coastal 3 assessment area or alternatively, clarify that Ventura County Coastal 3 assessment area was modeled in the RAA but due to the past due TMDL deadline for Kiddie Beach and Hobie Beach Bacteria TMDL, the WMP is not seeking deemed compliance for bacteria WBPCs in this assessment area.
12. Table 4-3 and Figure 4-1 of the WMP shows BMPs and the corresponding load reductions for Mercury in the Calleguas Creek Watershed which as a past due TMDL deadline. This is misleading because past due TMDL deadlines are not eligible for deemed compliance. For clarity, revise the main document of the WMP to replace or remove, as applicable, these types of table and figure examples to only present information where the final TMDL and/or receiving water limitation deadlines haven't passed. If desired, this information presented for past due TMDL deadlines can be moved from the main WMP to an appendix, noting that past due TMDL deadlines are not eligible for WMP coverage.
13. In Appendix D, under the "Milestones" section of all the watersheds addressed in the WMP, the tables with the milestones and load reductions all have titles "Potential implementation schedule if pursuing the pollutant load reduction strategy...". The 3rd column title also says "potential" implementation strategies. While it is reasonable to include potential watershed control measures in the WMP due to the uncertainty of project feasibility, there must be clarity on which control measures the WMP is committing to implement. Usage of words and phrases "potential", "if pursuing", and "example" for compliance metrics suggests that WMP is not committing to achievement of the milestones, actions, and the load reduction compliance metric. Remove such language from the WMP. The WMP must clearly reflect the milestones, actions, and compliance metrics that the WMP is committing to implement.
14. As explained in Appendix D of the WMP, the overall implementation strategy for the Calleguas Creek Watershed, Santa Clara River Watershed, Ventura River

Watershed, and Ventura County Coastal Watersheds is to use redevelopment LID and human waste source investigations to address WBPCs and then, if necessary, implement enhanced street sweeping and structural control measures. However, the State Water Resources Control Board (State Water Board) Order WQ 2020-0038 on page 80 states the following: “The purpose of the deemed compliance provisions is to encourage significant investment in collaborative regional- and watershed-based BMP implementation...” Additionally, Part IX.A.4.j of the Order states that the WMP shall implement structural watershed control measures such as multi-benefit regional projects. Accordingly, the proposed implementation strategies in the WMP are not appropriate to receive deemed compliance for WBPCs addressed in the WMP. The WMP must go beyond the baseline permit requirements to address the WBPCs. Redevelopment LID is part of baseline Planning and Land Development Minimum Control Measure (MCM) requirements and therefore, any WBPCs being addressed solely by this control measure are not eligible for deemed compliance status. Human waste source investigations, which are proposed for the Malibu Creek Subwatershed in addition to the aforementioned watersheds, is a non-modeled and non-structural control measure included in the RAA. Since the quantitative analysis is inadequate per Part IX.B.8.b of the Order, and the structural BMPs required to be implemented for each catchment area won't be determined until the source investigation is completed, any WBPCs addressed through this implementation strategy are not eligible for deemed compliance. For WBPCs to be eligible for deemed compliance, revise the WMP to include a combination of modeled BMPs and structural control measures as follows:

- a. The watershed control measures proposed in Appendix D to address TMDL WBPCs for Calleguas Creek OC Pesticides TMDL using redevelopment LID and address Malibu Creek and Santa Clara River Bacteria TMDLs using human waste source investigations are not sufficient to address TMDL WQBELs and receiving water limitations. Edit Tables 7-15 through 7-19 (for Calleguas Creek pesticides), Table 8-1 (for Malibu Creek wet weather bacteria), and Tables 9-7 through 9-9 (for Santa Clara River wet weather bacteria) in Appendix D of the WMP to also propose and commit to the implementation of modeled BMPs or structural control measures. Additionally, per Part IX.A.4.k of the Order, for any structural control measures proposed, indicate which of those, if any, capture the 85th percentile, 24-hr storm event.
- b. For Category 2/3 WBPCs, the watershed control measures proposed in Appendix D to address pesticides in Ventura River Watershed using redevelopment LID and address bacteria using human waste source investigations for Calleguas Creek Watershed, Ventura River Watershed, and Ventura County Coastal Watersheds are not sufficient to address receiving water limitations. Edit Tables 7-15 through 7-19 (for Calleguas Creek bacteria), Table 10-12 (for Ventura River pesticides), Tables 10-12 and 10-13 (for Ventura River bacteria), and Table 11-7 (for Ventura County Coastal Watersheds bacteria) in Appendix D of the WMP to also propose and commit to the implementation of modeled BMPs or structural

control measures. Additionally, per Part IX.A.4.k of the Order, for any structural control measures proposed, indicate which of those, if any, capture the 85th percentile, 24-hr storm event.

15. Be advised that WBPCs eligible for deemed compliance are dependent on the type of BMP proposed because each BMP type has its own efficacy in addressing different pollutants and weather conditions. For example, if proposing low-flow diversions (LFDs), which address dry weather flow, dry weather WBPCs would be eligible for deemed compliance. If seeking deemed compliance for all WBPCs in Table 1-6 of the WMP, consider proposing watershed control measures which address all flow, such as the structural top tier project opportunities identified in Figure 4-2 in Appendix C of the WMP.
16. The WMP proposes redevelopment LID for the Calleguas Creek OC Pesticides TMDL with a final compliance deadline of 2026 and pesticides (Category 2/3) for the Ventura River Watershed with a proposed 2025 deadline. If recent water quality monitoring data shows that these WBPCs are, for the most part, meeting the receiving water limitations and if additional BMPs aside from redevelopment LID are not needed to achieve the RAA-derived target load reductions, re-consider seeking deemed compliance for these WBPCs and revise the WMP accordingly if no longer seeking deemed compliance for these WBPCs.
17. The WMP proposes human waste source investigations for bacteria (Category 2/3 WBPCs) in Calleguas Creek (proposed 2073 deadline), Ventura River (proposed 2071 deadline), and Ventura County Coastal Watersheds (proposed 2063 deadline). If the intent is to solely use human waste source investigations as the implementation strategy, re-consider seeking deemed compliance for these WBPCs at this time and revise the WMP in the future through a WMP modification request (Part IX.C.2 of the Order) or the adaptive management process (Part IX.E.2 of the Order). You may consider seeking deemed compliance for these WBPCs when the human waste source investigation is complete, the appropriate BMPs are identified, and it is determined that additional time is needed to implement those BMPs. If choosing this option, revise the WMP accordingly.
18. The WMP proposes human waste source investigations as the sole implementation strategy for the Malibu Creek Bacteria TMDL for wet weather which has a 2026 final compliance deadline. Per Part X.B.1.b.i of the Order, interim WQBELs and receiving water limitations are eligible for deemed compliance through a WMP. However, per Part IV.A in Attachment O of the Order, the Malibu Creek Bacteria TMDL does not have interim WQBELs nor interim receiving water limitations. Only final WQBELs and receiving water limitations are applicable. Be advised that since the TMDL compliance schedule already provides time to attain the final WQBELs and receiving water limitations, seeking deemed compliance through a WMP is not necessary.
19. Appendix D is unclear if non-stormwater is part of the RAA and if there are any strategies or watershed control measures to address non-stormwater. Per Part IX.B.6.b of the Order, clarify. If yes, update the water quality characterization (Part IX.B.1 of the Order), source assessment (Part IX.B.2 of the Order),

- watershed control measure descriptions (Part IX.B.5.a.i of the Order), and RAA sections (Part IX.B.8 of the Order) in the WMP accordingly.
20. Appendix D Table 8-11 of the WMP proposes structural projects for Malibu Creek nutrients. The Malibu Creek Nutrients TMDL has a final TMDL deadline of September 11, 2026. Therefore, clarify which of the proposed structural projects listed in Appendix D Tables 8-7 and 8-9 of the WMP will be implemented to meet the nutrient load reductions in Appendix D Table 8-11 of the WMP. Provide interim milestones for that structural project(s) leading to construction completion by September 2026 (e.g., feasibility study by x date, design by x date, etc.).
 21. In Appendix D, under the “Milestones” section of all the watersheds addressed in the WMP, for all WBPCs where there are no structural BMPs proposed beyond the baseline permit requirements, there’s no explanation of how the redevelopment LID and human waste source investigation water quality effects will be measured and how that corresponds to the proposed load reductions. In Appendix D under the “Milestones” section for each of the watersheds addressed in the WMP, per Part IX.B.7.h of the Order, clarify the methods by which the proposed load reductions will be measured and demonstrated for the WBPCs being addressed.
 22. Appendix D, Attachment C of the WMP (City of Camarillo WMP Milestones) proposes Option 1, 2a, and 2b as the implementation actions to maintain deemed compliance. Option 2a, which is to solely demonstrate compliance through monitoring, is not an implementation action eligible for deemed compliance through a WMP. The Permittee can demonstrate compliance through monitoring regardless of WMP participation. Also, under Option 1 and 2b, the proposed implementation strategies of redevelopment LID, optional enhanced street sweeping, and human waste source investigations to attain the load reductions by September 2073 are not eligible for receiving deemed compliance for the reasons explained earlier in this letter. Remove Appendix D, Attachment C of the WMP and all references to Attachment C in the WMP.
 23. Per Parts IX.B.7.h and IX.B.9.c.iii.(d) of the Order, revise Appendix D, Tables 7-15 through 7-19 of the WMP for Calleguas Creek Watershed bacteria, to add an interim milestone within the permit term.
 24. Per Parts IX.B.7.h and IX.B.9.c.ii of the Order, revise Appendix D, Tables 9-7 through 9-9 of the WMP for Santa Clara River Watershed bacteria to add an interim milestone within the permit term.
 25. Per Parts IX.B.7.h and IX.B.9.c.iii.(d) of the Order, revise Appendix D, Tables 10-12 and 10-13 of the WMP for Ventura River Watershed bacteria, to add an interim milestone within the permit term.
 26. Per Parts IX.B.7.h and IX.B.9.c.iii.(d) of the Order, revise Appendix D, Table 11-7 of the WMP for Ventura County Coastal Watersheds bacteria (Assessment Area Ventura County Coastal 2) to add an interim milestone within the permit term.
 27. For Calleguas Creek, the compliance timeline flowchart in Section 4.1.1 and Appendix D Table 7-4, table note 2 in Table 7-15, and Figure 7-4 of the WMP has a 2057 milestone for Calleguas Creek Category 2/3 Pollutants (Pesticides/Organics). This appears to be a typographical error because Appendix D Tables 7-15 through 7-19 of the WMP does not have the 2057

milestone. Also, the final compliance deadline for the Calleguas Creek OC Pesticides and PCBs TMDL is March 24, 2026, so per the limiting pollutant approach, all pesticides/organics must be addressed by the TMDL final deadline. Therefore, revise the WMP to take out the 2057 milestone.

28. Section 4.1.1 and Appendix D Table 7-4, Tables 7-15 through 7-19, and Figure 7-4 of the WMP proposes a 2073 final milestone for Calleguas Creek Category 2/3 Pollutants (Indicator Bacteria). Part IX.B.9.c.iii.(c) of the Order requires a final date for achieving the receiving water limitations as soon as possible. Considering that similar bacteria TMDLs in the LA Region have compliance schedules ranging from 17 – 25 years, the 2073 milestone is too long. Revise this 2073 milestone to propose a compliance schedule that is as short as possible and aligns with similar bacteria TMDL compliance schedules in the Region while considering the size of the watersheds, urbanization of the watersheds and the magnitude and frequency of exceedances. Provide justification for the selected final milestone.
29. Section 4.1.4 and Appendix D Table 10-4, Tables 10-12 and 10-13, and Figure 10-4 of the WMP proposes a 2071 final milestone for Ventura River Category 2/3 Pollutants (Indicator Bacteria). Part IX.B.9.c.iii.(c) of the Order requires a final date for achieving the receiving water limitations as soon as possible. Considering that similar bacteria TMDLs in the LA Region have compliance schedules ranging from 17 – 25 years, the 2071 milestone is too long. Revise this 2071 milestone to propose a compliance schedule that is as short as possible and aligns with similar bacteria TMDL compliance schedules in the Region while considering the size of the watersheds, the urbanization of the watersheds and the magnitude and frequency of exceedances. Provide justification for the selected final milestone.
30. For Ventura County Coastal Watershed, the compliance timeline flowchart in Section 4.1.5 and Appendix D Figure 11-1 of the WMP proposes a 2063 milestone for Ventura County Coastal Category 1/2/3 Pollutants (Indicator Bacteria - SHELL). Other than the Hobie & Kiddie Beach bacteria TMDL in the compliance timeline flowchart, there is no other bacteria TMDL in the watershed. Therefore, revise the WMP to take out Category 1 for the 2063 milestone.
31. Section 4.1.5 and Appendix D Tables 11-4 and 11-7 and Figure 11-1 of the WMP proposes a 2063 final milestone for Ventura County Coastal Category 2/3 Pollutants (Indicator Bacteria - SHELL). Part IX.B.9.c.iii.(c) of the Order requires a final date for achieving the receiving water limitations as soon as possible. Considering that similar bacteria TMDLs in the LA Region have compliance schedules ranging from 10 – 23 years, the 2063 milestone is inappropriate. Revise this 2063 milestone to propose a compliance schedule that is as short as possible and aligns with similar bacteria TMDL compliance schedules in the Region while considering the size of the watersheds, the urbanization of the watersheds and the magnitude and frequency of exceedances. Provide justification for the selected final milestone.
32. Part IX.B.6.a.i of the Order allows MCM modification in the WMP to identify opportunities for focusing resources on the water quality priorities in each watershed. Remove the Construction MCM modifications proposed in Section

- 1.2 in Appendix E of the WMP for reduction of construction plan and review approval and frequency of inspections or explain how the modification will result in additional water quality improvement. The proposed change for Part VIII.G.5.c.i.(c) of the Order to clarify that the inspection would take place during the wet and dry “season” not “weather” is appropriate and can be kept. Accordingly, provide a rationale for the change from “weather” to “season”. Note, Part IX.B.6.a.iii of the Order states, “If the Permittee(s) proposes to eliminate in their WMP a control measure identified in Parts VIII.D through VIII.I of this Order because that specific control measure is not applicable to the Permittee(s), the Permittee(s) shall provide a rationale and appropriate documentation for its elimination. Accordingly, Permittees can propose to eliminate a MCM that is not applicable to them with appropriate documentation.”
33. In Section 1.2 in Appendix E of the WMP, remove the proposed Public Agency Activities Program MCM modification for reducing parking facilities maintenance frequency for inspection and cleaning or explain how the change will improve water quality.
34. Section 1.2 and Appendix E, Section 1 of the WMP proposes a July 1, 2024 start date for the MCM requirements in Part VIII of the WMP. See the Board’s May 13, 2024 letter clarifying the MCM requirements.

This WMP acknowledges trash TMDLs. Please be aware that trash WBPCs are not eligible for deemed compliance under the WMP. For Trash WBPCs, compliance shall be determined as outlined in Part X.C of the Order.

Additional information required for RAA Review

35. Provide GIS file/layer of the modeled assessment areas.
36. Provide a table of subbasins that fall within the assessment areas.
37. Clarify if the files in the Load Reduction Outputs folder is representative of outputs at of the assessment areas or representative of the municipal jurisdiction/drainage area that falls within the assessment area. If the outputs are representative of the assessment areas, provide the analysis used to determine the jurisdictional RAA identified pollutant reductions.
38. Provide point source text input files for the LSPC input files requiring point source information.
39. Correct error with weather file x45y74.air when running the 2025 redevelopment input file in LSPC.
40. Clarify why the input subbasins modeled and listed in card 60 differ from the subbasin number convention in the output files. Provide pre-processed outputs.
41. Provide rationale for the selected constituent outputs and why the selected output constituents for the baseline load reduction outputs differ from the constituents selected as outputs in the MCMs folder (i.e., CONCOUT vs SOQUAL).
42. Provide rationale for the selected example structural BMPs modeled in SUSTAIN and how the outputs were incorporated into the RAA/WMP to achieve the pollutant reductions.

43. Provide a separate spreadsheet of the analysis used to determine the pollutant load reduction targets starting from the LSPC outputs and assessment demonstrating the selected BMPs will attain the pollutant load reduction targets.
44. Provide rationale on the metric selected for indicator bacteria load reductions (MPN/day) and provide the analysis used to determine the milestone load reduction values/ separate spreadsheet with the Monte Carlo analysis results.
45. Provide a new table that summarizes the following information which currently exists throughout the WMP: the assessment area, jurisdiction, pollutant baseline loading, required pollutant load reductions, the selected modeled/structural BMPs, the load reductions that the modeled/structural BMPs will achieve, and applicable interim and final milestones. Include this table in the WMP document as well.
46. If additional structural control measures are going to be added to the WMP for deemed compliance, provide demonstration that the structural BMPs selected will lead to the necessary load/volume reductions required, and meet any interim milestones.

Please make the necessary revisions to the WMP as identified in this letter and submit the revised WMP no later than **August 14, 2024**. The revised WMP must be submitted electronically by uploading the files in a folder with the name of the Group to the FTP site using the following credentials:

FTP site: <https://ftp.waterboards.ca.gov>

Username: RB4MS4-Upload

Password: RB4-bmBb3Z

Until the WMP is approved by the Los Angeles Water Board, the Group shall implement the Regional MS4 Permit as specified in Part IX.F.4 of the Order.

Pursuant to Part IX.F.7 of the Order, if the necessary revisions are not made and the Group does not have an approvable WMP, the Group shall be subject to all requirements in the Order except those requirements pertaining to Watershed Management Programs upon disapproval by the Los Angeles Water Board.

If you have any questions, please contact Ms. Erum Razzak with the Municipal Stormwater Permitting Unit at Erum.Razzak@waterboards.ca.gov or by phone at (213) 620-2095. Alternatively, you may also contact Ivar Ridgeway, Municipal Stormwater Permitting Unit Supervisor at Ivar.Ridgeway@waterboards.ca.gov or by phone at (213) 620-2150.

Sincerely,

for Susana Arredondo
Executive Officer

cc: Dave Klotzle, City of Camarillo
Ken Matsuoka, City of Camarillo
Eric Maple, City of Camarillo
Fred Camarillo, City of Port of Hueneme
Roxanne Hughes, City of Fillmore
Troy Spayd, City of Fillmore
Daniel Kim, City of Moorpark
Igor Leontiy, City of Moorpark
Lindy Palmer, City of Ojai
Joseph Padilla, City of Ojai
Michael Wolfe, City of Oxnard
Badaoui Mouderrres, City of Oxnard
Heather D'Anna, City of Oxnard
Clete J. Saunier, City of Santa Paula
Ronald Fuchiwaki, City of Simi Valley
Wanda Moyer, City of Simi Valley
Wes Yates, City of Simi Valley
Clifford Finley, City of Thousand Oaks
Paul Jorgensen, City of Thousand Oaks
Jason Siegert, City of Thousand Oaks
Jeffrey Hershman, City of Thousand Oaks
Michael Devlahovich, City of Thousand Oaks
Peter Shellenbarger, City of Ventura
Joe Yahner, City of Ventura
Jeff Pratt, County of Ventura
Hayley Luna, County of Ventura
Jill Jennings, County of Ventura
Lars Zwaanenburg, County of Ventura
David Laak, VCWPD
Arne Anselm, VCWPD
Ventura Countywide Stormwater Quality Management Committee
Representatives