

Ventura County Watershed Protection District



PUBLIC WORKS AGENCY
JEFF PRATT
Agency Director

September 17, 2012

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**SUBJECT: ADMINISTRATIVE DRAFT, SAN DIEGO REGIONAL MS4 PERMIT, TENTATIVE ORDER
2012-0011**

Ms. Walsh:

As the Principal Permittee of the Ventura Countywide Stormwater Quality Management Program responsible for stormwater monitoring, we have concerns regarding the draft San Diego Region Municipal Separate Storm Sewer Systems (MS4) NPDES Permit, released as an administrative draft by the San Diego Regional Water Quality Control Board (Regional Water Board) as Tentative Order No. R9-2012-0011 (NPDES NO. CAS0109266). We share the same concerns of the San Diego County Stormwater Copermittees that the monitoring and assessment program, as contained in the administrative draft order, would require excessive expenditures of monitoring funds without clear benefits to the implementation of the stormwater management program.

In particular, we support the concept of the draft Monitoring and Assessment component (permit Provision II.D) provided by the San Diego Copermittees which is highly compatible with the SMC's Model Monitoring Program and the state's SWAMP Assessment Framework. This alternative provides several strong advantages, including:

- An emphasis on monitoring, based upon a question-driven approach
- A framework for designing monitoring programs to effectively support adaptive management within watershed management areas
- A clear and important role for source identification studies to address priority constituents
- A defined process to focus monitoring and assessment resources on activities most likely to provide useful information that will result in reduction of pollutants from MS4s

The Copermittees' alternative represents an important step in the evolution of stormwater monitoring to better address high-priority water quality problems, and provide stormwater managers with more useful information to improve stormwater management program effectiveness. We strongly encourage the Regional Water Board to adopt the concepts presented in San Diego Copermittees' Alternative Provision D.

Sincerely,

Gerhardt Hubner
Deputy Director

C: Tully Clifford, Director, Ventura County Watershed Protection District
Jeff Pratt, Director, Ventura County Public Works Agency
Ventura County Stormwater Quality Management Program