



**Ventura Countywide  
Stormwater Quality  
Management Program**



July 28, 2011

Participating Agencies

Camarillo

Charles R. Hoppin  
Board Chair

VIA EMAIL

County of Ventura

State Water Resources Control Board,  
P.O. Box 100, Sacramento, CA 95812-2000

Fillmore

**Subject: COMMENT LETTER ON AN AMENDMENT TO THE WATER  
QUALITY CONTROL PLAN FOR THE LOS ANGELES REGION  
TO INCORPORATE A TOTAL MAXIMUM DAILY LOAD FOR  
INDICATOR BACTERIA IN THE SANTA CLARA RIVER**

Moorpark

Dear Mr. Hoppin:

Ojai

The Ventura Countywide Stormwater Quality Management Program (Program) appreciates the opportunity to comment on the amendment to the Water Quality Control Plan to incorporate a Total Maximum Daily Load for indicator bacteria in the Santa Clara River. While the Program agrees that improving water quality in the Santa Clara River is an important goal, we find that there are procedural and policy issues with this TMDL that should be considered.

Oxnard

Port Hueneme

San Buenaventura

1. Section 303(d)(1)(A) of the Clean Water Act (CWA) requires each state to conduct a biennial assessment of its waters to identify those waters that are not achieving water quality standards. The resulting list known as the 303(d) list. The CWA also requires states to establish a priority ranking for waters on the 303(d) list for the development and implementation of TMDLs. This was done for the Santa Clara River with the exception of Reach 3. Including Reach 3 in the TMDL without this process prevented the proper stakeholder outreach and involvement necessary for a TMDL.

Santa Paula

Simi Valley

2. The data for Reach 3 depends heavily on wet-weather sampling. This is driven by the fact that the monitoring is performed under a MS4 NPDES Permit. This introduces a bias in the data because wet weather is much more likely to have high bacteria results than would dry weather when the public is likely to be using the beneficial use of recreational water contact. More dry weather data should be introduced before Reach 3 is listed as impaired.

Thousand Oaks


Ventura County  
Watershed Protection  
District



3. In the 2008-2010 Triennial Review process the Regional Board staff report recognized the challenges associated with compliance with water quality objectives during wet weather. During the process they identified high priority issues including reconsidering the application of REC-1 and REC-2 beneficial uses in specific instances, and completing work on the Design Storm project.

For the reasons stated above the Program requests that Reach 3 of the Santa Clara River is not included in the Bacteria TMDL at this time, and that water quality objectives for wet weather also be postponed until the Regional Board completes the relevant high priority issues identified in the Triennial Review.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerhard Hubner", with a small "for" written to the right of the signature.

Gerhardt Hubner  
Chair