

Ventura County Watershed Protection District



PUBLIC WORKS AGENCY
JEFF PRATT
Agency Director

March 5, 2018

Mr. Samuel Unger
Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, California 90013

Glenn Shephard, Director
Watershed Protection District

Arne Anselm
Water Resources

Gerard Kapuscik
Strategic Resiliency Group

Karl Novak
Operations & Maintenance

Bruce Rindahl
Watershed
Resources & Technology

Peter Sheydayi
Design & Construction

Sergio Vargas
Watershed
Planning & Permits

SUBJECT: REQUEST TO REMOVE FECAL COLIFORM MONITORING FROM
ORDER NO. R4-2010-0108, MONITORING PROGRAM NO. CI 7388

Dear Mr. Unger:

The Ventura County Watershed Protection District (District), as Principal Permittee and on behalf of the Ventura Countywide Stormwater Quality Management Program (VCSQMP), is requesting the removal of fecal coliform from the monitoring requirements for Order No. R4-2010-0108 (Permit). The water quality objective for fecal coliform in fresh waters designated for water contact recreation (REC-1) was removed from the Los Angeles Basin Plan (BP) effective December 5, 2011 (Amendment No. R10-005). The change was made in order to maintain consistency with EPA's recommendation that *E. coli*¹ replace fecal coliform as a more appropriate indicator of the presence of pathogens in fresh water, and to remove unnecessary regulatory and monitoring requirements that arise from having objectives for both indicators².

The mass emission and major outfall stations are all located on waterbodies that are designated for both REC-1 and REC-2 beneficial uses, so while the BP still includes a fecal coliform objective for REC-2 waters, the more stringent and protective REC-1 BP criteria take precedence, in this case *E. coli* as the indicator of pathogens in fresh water.

The Permit Monitoring Program and Attachments were developed prior to the removal of fecal coliform from the Basin Plan, therefore fecal coliform is listed as a Pollutant of Concern (POC) for all watersheds in Attachment B (Calleguas Creek Watershed, Santa

¹ *E. coli* is a subset of the fecal coliform group found to be more strongly correlated with illnesses associated with swimming in sewage contaminated water as determined by the EPA through epidemiological studies.

² Also supported by the strong linear correlation between log-transformed *E. coli* and fecal coliform concentrations seen in major outfall data collected under the Permit, as shown on page 4-5 of the VCSQMP Report of Waste Discharge (January 2015).

Clara River Watershed, and Ventura River Watershed Pollutants of Concern) and as a Stormwater Monitoring Program Constituent with an Associated Minimum Level in Attachment G. Monitoring Program section A.I.11 requires that each mass emission station analyze for all of the Pollutants of Concern (POC) in its specific watershed listed in Attachment B, and Monitoring Program sections A.I.12 and B.I.8 require each mass emission and major outfall station, respectively, be screened for all constituents listed in Attachment G.

Since fecal coliform is no longer recommended as an indicator of the presence of pathogens in fresh water, the District is requesting its removal from both Attachment B and G of the Order. The District would continue to monitor for *E. coli* in fresh waters, in compliance with the Permit and as required by Attachment B and Attachment G of the Monitoring Program.

Thank you for reviewing and considering this request. Should you have any questions, please contact me at (805) 654-3942 or via email at Arne.Anselm@Ventura.org.

Sincerely,



Arne Anselm
Deputy Director

Copy via email:

Ms. Renee Purdy, Section Chief, Regional Programs, RWQCB-LA
Mr. Ivar Ridgeway, Stormwater Unit Chief, RWQCB-LA
Ms. Erum Razzak, Stormwater Permitting, RWQCB-LA
Mr. Glenn Shephard, Director, VCWPD
Ventura Countywide Stormwater Program Permittees