



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

September 12, 2014

Camarillo

County of Ventura

Fillmore

Moorpark

Ojai

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

Renee Purdy
Los Angeles Regional Water Quality Control Board
320 W. Fourth Street, Suite 200
Los Angeles, CA 90013

**SUBJECT: SUPPORT FOR THE DRAFT UPPER SANTA CLARA RIVER
WATERSHED MANAGEMENT GROUP COORDINATED
INTEGRATED MONITORING PROGRAM**

Dear Ms. Purdy:

The Ventura Countywide Stormwater Quality Management Program (Program) is supportive of the draft Coordinated Integrated Monitoring Program (CIMP) submitted by the Upper Santa Clara River Watershed Management Group. Our partner agencies include the Watershed Protection District, the County of Ventura, and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks. These organizations operate municipal storm drain systems, discharge stormwater, and urban runoff pursuant to the Ventura Countywide 2010 NPDES Stormwater Permit. The Program is committed to working cooperatively to improve water quality, and has been monitoring water quality in both receiving waters and outfalls since 2009. Our MS4 outfall monitoring program is among one of the first ones in the state.

The Ventura Countywide Stormwater Quality Management Program supports the draft CIMP, and believes it meets the Primary Objectives for a Monitoring and Reporting Program, as specified in the 2012 LA MS4 Permit. In addition, two elements of the draft CIMP are of great interest to our Program:

1. We strongly support the draft CIMP framework, i.e. a flexible monitoring program tailored to the needs of the Watershed Management Area. The draft CIMP is based on the water quality priorities for each reach and builds on at least 10 years-worth of data. The draft CIMP outlines an adaptive management process, ensuring cost-effectiveness of the monitoring program. A certain degree of flexibility in monitoring stations, frequencies, parameters and methods are a requisite for the adaptive management process, and resources should be allowed to be focused on water quality priorities.



2. We strongly support the wet weather sample collection trigger based on conditions known to increase receiving water flow with at least 20 percent compared to baseflow; in this case predicted rainfall of 1 inch or greater. Collecting receiving water and outfall samples when the receiving water is at baseflow conditions does not allow assessment of compliance with receiving water limitations during wet weather, and should therefore be avoided.

It is the mission of the Ventura Countywide Stormwater Quality Management Program to enhance, protect, and preserve water quality in Ventura County using proactive and innovative ideas for preservation of biodiversity, ecological viability, and human health. An effective coordinated integrated monitoring program has an important role to play.

Sincerely,



Gerhardt Hubner, Chair

On Behalf of the Ventura Countywide Stormwater Quality Management Committee

Cc: Ventura Countywide Stormwater Quality Management Committee