



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

September 12, 2014

Camarillo

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

County of Ventura

Fillmore

**SUBJECT: SUPPORT FOR THE MALIBU CREEK WATERSHED
COORDINATED INTEGRATED MONITORING PROGRAM**

Moorpark

Dear Ms. Purdy:

Ojai

The Ventura Countywide Stormwater Quality Management Program (Program) is supportive of the Coordinated Integrated Monitoring Program (CIMP) submitted for the Malibu Creek Watershed (MCW). 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 and 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 was among the first ones in the state.

Oxnard

Port Hueneme

San Buenaventura

Santa Paula

The Ventura Countywide Stormwater Quality Management Program supports the MCW CIMP, and believes it meets the Primary Objectives for a Monitoring and Reporting Program, as specified in the 2012 LA MS4 Permit. Noteworthy elements of the CIMP include:

Simi Valley

Thousand Oaks

1. The MCW CIMP framework consists of a flexible monitoring program tailored to the needs of the Watershed Management Area. The CIMP is based on initial characterization of the water quality priorities, which will be finalized as part of the EWMP development, and therefore monitoring analyses are reach-specific. The 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. Flexibility is necessary in order for resources to be focused on water quality priorities.

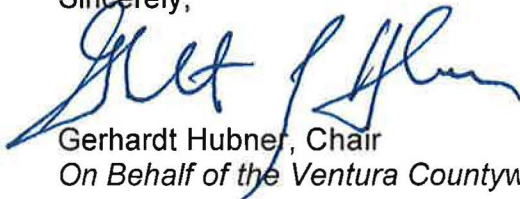
Ventura County
Watershed Protection
District



2. The MCW CIMP integrates monitoring for multiple TMDLs, including EPA TMDLs that do not include implementation plans with monitoring requirements. Monitoring location selection also took into account current monitoring locations for the Malibu Creek and Lagoon Bacteria TMDL for Ventura County co-permittees in order to avoid redundant monitoring on a watershed-scale.
3. The MCW CIMP exercised the flexibility allowed by the LA MS4 permit, by integrating TMDL and other monitoring locations into a comprehensive receiving water monitoring plan. Receiving water monitoring data will be used to assess compliance with water quality objectives, calibrate and evaluate the Reasonable Assurance Analysis model results, evaluate impacts of BMPs, and analyze spatial and temporal trends.
4. The MCW CIMP also exercised the flexibility allowed by the LA MS4 permit by selecting appropriate and representative outfall locations. In this case, one location per permittee, each in different HUC-12 areas based on drainage area land-use characteristics that were representative of the developed portion of the HUC-12. Monitoring at these outfall locations is pro-active and includes potential future requirements related to outfall monitoring in the Malibu Creek and Lagoon Bacteria TMDL. The specified monitoring will be useful to determine the potential relationships between outfalls and receiving water impairments, and to identify and prioritize the most effective compliance strategies as part of the EWMP

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. The Program recognizes and supports the crucial role an effective and adaptable coordinated integrated monitoring program plays in the continued efforts towards our goal of enhanced water quality.

Sincerely,



Gerhardt Hubner, Chair
On Behalf of the Ventura Countywide Stormwater Management Committee

Cc: Ventura Countywide Stormwater Management Committee