

Ventura Coastkeeper's Watershed Monitoring Program Playing a Critical Role in Enabling the Enforcement and Implementation of the Receiving Water Limitations Provisions of the Ventura MS4¹ Permit

Ventura Coastkeeper's ("VCK's) Watershed Monitoring Program is designed to better enable the implementation and enforcement of the Receiving Water Limitations provisions of Ventura County's new stormwater permit ("MS4 Permit") that aims to improve stormwater quality discharged from existing stormwater infrastructure.

The receiving water limitations provisions of the MS4 Permit requires municipalities to implement urban runoff pollution prevention best management practices ("BMPs") if their stormwater or dry weather urban runoff discharges to MS4s persistently cause or contribute to a violation of water quality standards in receiving waterbodies, such as rivers, lakes, streams, or coastal waters. While the MS4 Permit requires each municipality to monitor from one of their MS4s, the municipalities are not required to monitor in the receiving waterbodies directly downstream from the confluence of their MS4 and the MS4's receiving waterbody to determine if the MS4 discharge is causing or contributing to an exceedance of water quality standards in the MS4's receiving waterbody. Instead, the permittees are only required to monitor water quality from one mass emissions station in each of the Calleguas Creek, the Santa Clara River, and the Ventura River watersheds, which are located far downstream from most of the municipalities' MS4 discharges required to be monitored under the MS4 Permit. Thus, absent VCK's Monitoring Program that monitors water quality monthly in dry and wet weather events from at least one of every permittees' MS4 discharges, and then in the receiving waterbody immediately downstream of the MS4's discharge, the MS4 Permit may not be able to fully prevent MS4 discharges derived from existing stormwater infrastructure from impairing coastal and inland waterbodies. Furthermore, VCK's stormwater monitoring program 1.) has the capability of producing more frequent monitoring reports to enable faster implementation of the receiving water limitations provisions and 2.) monitors: MS4 discharges and receiving waters with no monitoring requirements under the MS4 Permit, such as MS4 discharges into the Ormond Beach Wetlands; MS4 discharges into coastal waters; MS4 discharges not required to be monitored under the MS4 Permit; and receiving water locations in coastal marine waters.

¹ An MS4 is a system of conveyances that include catch basins, curbs, gutters, ditches, man-made channels, pipes, tunnels, or storm drains that discharges into waters of the United States. An MS4 moves water away from an area into a local water body, such a river, stream, lake, estuary, wetlands, lagoon, or marine waters.