



A COOPERATIVE STRATEGY FOR RESOURCE MANAGEMENT & PROTECTION

March 2, 2015

Electronic Submission: losangeles@waterboards.ca.gov

Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, CA 90013
Attention: Dr. Celine Gallon

Subject: Comments on Triennial Review of Water Quality Standards in the Water Quality Control Plan for the Los Angeles Region

Dear Dr. Gallon:

The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed (Stakeholders) appreciate the opportunity to provide comments on the Los Angeles Regional Water Quality Control Board's (Regional Board) Triennial Review of Water Quality Standards in the Water Quality Control Plan for the Los Angeles Region (Basin Plan). As required by the Clean Water Act, the Regional Board reviews the water quality standards within its Basin Plan and requests the public to provide input on possible revisions or additions to the Basin Plan. Potential revisions and additions are prioritized, developed and implemented via Basin Plan Amendments in the future.

The Stakeholders consist of agricultural, wastewater, and MS4s that are responsible parties to six effective TMDLs in the Calleguas Creek Watershed (CCW). The Stakeholders provide the following comments on the Triennial Review for your consideration.

Comment #1:

Submitting Organization: The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed

Contact Person: Lucia McGovern, Deputy Director of Public Works, City of Camarillo, (805) 388-5334, lmcgovern@ci.camarillo.ca.us

Order of Priority: First Priority

Affected Water Quality Objective: Copper within the Total Maximum Daily Load for Metals and Selenium in the Calleguas Creek, its Tributaries and Mugu Lagoon

Affected Waterbody and Watershed: Calleguas Creek, Calleguas Creek Watershed

Affected Beneficial Use: Aquatic Life

Concise Summary of Data, Information, or Evidence:

The Stakeholders request that a reconsideration of the CCW Metals and Selenium TMDL be included as a triennial review priority. The receiving water is meeting objectives for copper in most reaches of the watershed, however some of the TMDL allocations are not being met. This indicates that the assumptions that were used to develop the allocations need to be reevaluated and modifications to the TMDL are needed. In addition, other modifications, such as alternatives for addressing potential natural sources of selenium should be considered during the reevaluation. The reconsideration of the TMDL needs to occur by March 2016 to ensure that modifications are in place prior to the final deadline for compliance with the allocations in March 2017.

Concise Summary of Suggested Revisions: Reconsideration of CCW Metals and Selenium TMDL

Supporting Data, Information, or Evidence: Monitoring data submitted to Regional Board previously.

Comment #2:

Submitting Organization: The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed

Contact Person: Lucia McGovern, Deputy Director of Public Works, City of Camarillo, (805) 388-5334, lmcgovern@ci.camarillo.ca.us

Order of Priority: First Priority

Affected Water Quality Objective: Total Maximum Daily Loads (TMDLs) for Organochlorine (OC) Pesticides, Polychlorinated Biphenyls (PCBs) and Siltation in Calleguas Creek, Its Tributaries, and Mugu Lagoon

Affected Waterbody and Watershed: Calleguas Creek, Calleguas Creek Watershed

Affected Beneficial Use: Aquatic Life

Concise Summary of Data, Information, or Evidence:

A TMDL reconsideration is needed to address the siltation portion of the TMDL. Mugu Lagoon was found to not be impaired by sediment through a required TMDL special study submitted to the Regional Water Board in March 2014. As there is no impairment, the stakeholders should not be required to reduce sediment loadings, and thus the TMDL needs to be modified. The reconsideration needs to occur as soon as possible as the sediment allocations become final in March 2015. It is also recommended that delisting Mugu Lagoon and potentially all of the remaining 303(d) listings for sediment/siltation in the watershed be discussed during the reconsideration process.

Concise Summary of Suggested Revisions: CCW Siltation TMDL Reconsideration

Supporting Data, Information, or Evidence: TMDL special sediment study submitted to the Regional Water Board in March 2014.

Comment #3:

Submitting Organization: The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed

Contact Person: Lucia McGovern, Deputy Director of Public Works, City of Camarillo, (805) 388-5334, lmcgovern@ci.camarillo.ca.us

Order of Priority: First Priority

Affected Water Quality Objective: Revolon Slough and Beardsley Wash Trash TMDL

Affected Waterbody and Watershed: Revolon Slough and Beardsley Wash, Calleguas Creek Watershed

Affected Beneficial Use: Aquatic Life, REC-2

Concise Summary of Data, Information, or Evidence:

Two reaches of the Calleguas Creek watershed are covered by a trash TMDL. The Stakeholders request a TMDL reconsideration for the incorporation of the proposed statewide trash plan that would provide the MS4 dischargers with a consistent compliance pathway for areas covered by a TMDL and those not covered by a TMDL.

Concise Summary of Suggested Revisions: Reconsideration of Revolon Slough and Beardsley Wash Trash TMDL.

Supporting Data, Information, or Evidence: Statewide Trash Amendments scheduled for adoption on April 5, 2015

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Comment #4:

Submitting Organization: The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed

Contact Person: Lucia McGovern, Deputy Director of Public Works, City of Camarillo, (805) 388-5334, lmcgovern@ci.camarillo.ca.us

Order of Priority: Second Priority

Affected Water Quality Objective: Multiple

Affected Waterbody and Watershed: Calleguas Creek, Calleguas Creek Watershed

Affected Beneficial Use:

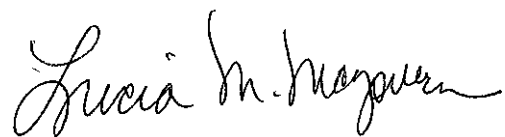
Concise Summary of Data, Information, or Evidence:

The Stakeholders encourage the Regional Board to maintain the priority from the 2011-2013 Triennial Review to develop technical guidance for making natural source determinations. The technical guidance is needed to support development of studies that will focus limited resources on addressing sources of pollutants that are within the control of the responsible parties to the TMDL.

Supporting Data, Information, or Evidence: 2011-2013 Triennial Review Staff Report

Thank you for your time and consideration of these comments. If you have questions, please contact me at (805) 388-5334 or lmcgovern@ci.camarillo.ca.us.

Sincerely,



Lucia McGovern
Chair Stakeholders Implementing TMDLs in the Calleguas Creek Watershed

Cc: celine.gallon@waterboards.ca.gov