**Comment Summary and Responses**
**Administrative Update to Chapter 3 of the Basin Plan**

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| 1. County Sanitation Districts of Los Angeles County (Sanitation Districts) |
| 2. Calleguas Creek Watershed Management Plan (Calleguas WMP) |

**Comment Summary and Responses**
**Administrative Update to Chapter 3 of the Basin Plan**

| No. | Author | Comment | Response |
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| 1.1 | Sanitation Districts | The County Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to submit comments on the California Regional Water Quality Control Board, Los Angeles Region's (Regional Board's) proposed non-regulatory amendments to administratively update Chapter 3, "Water Quality Objectives," of the Water Quality Control Plan for the Los Angeles Region (Basin Plan).<br><br>The Sanitation Districts are a confederation of 23 special districts, which operate and maintain regional wastewater and solid waste management systems for over 5 million people who reside in 78 cities and unincorporated areas of Los Angeles County. The Sanitation Districts operate 11 wastewater treatment plants and maintain approximately 1,400 miles of sewer lines, which convey flows from industries and municipalities within service areas to the aforementioned wastewater treatment plants. Sanitation<br><br>Districts' water reclamation facilities discharge into inland surface waters and waters of the state, including groundwater. As such, the Sanitation Districts' operations may be affected by the Basin Plan amendments and their implementation. | Comment noted. |
| 1.2 | Sanitation Districts | The Sanitation Districts strongly support the Regional Board's efforts to administratively update the Basin Plan. We appreciate the effort to update Chapter 3 of the Basin Plan by: incorporating the language of sixteen previously adopted amendments to water quality objectives; updating the water quality objectives in Tables 3-5, 3-6, 3-7, and 3-9 to reflect current maximum contaminant levels (MCLs)<br><br>specified in Title 22 of the California Code of Regulations; and reconciling the grouping and nomenclature of the groundwater basins and sub-basins contained in Table 3-10 with the revised grouping and nomenclature from the 2011 administrative update to Chapter 2 of the Basin Plan. | Comment noted |

| No. | Author | Comment | Response |
|---|---|---|---|
| 1.3 | Sanitation Districts | While the Sanitation Districts believe that the updated Chapter 3 will provide clarity and be more useful than the current version, our review of the proposed updates indicates that there are several proposed amendments that appear to have regulatory implications and are not solely administrative. A number of errors or oversights were also discovered, which should be corrected prior to adoption in order to avoid making unintentional substantive changes or mistakes during this update. Detailed comments and recommended corrections are provided below | The purpose of the proposed Regional Board action is to adopt non-regulatory amendments to administratively update Chapter 3 of the Basin Plan. Where warranted, the Regional Board has revised the tentative documents to ensure that the updates are purely administrative and do not have any unintended regulatory implications. Also, any errors or oversights identified by the Sanitation Districts, where confirmed by Regional Board staff, have been corrected in the revised tentative documents. Responses to specific comments are provided below in the responses to Comments 1.4 through 1.24 below. |
| 1.4 | Sanitation Districts | **Geographic Information and Maps**<br>During the 2011 Chapter 2 update of the Basin Plan, Regional Board staff implemented an updated set of groundwater basin and sub-basin boundaries. However, due to this update, several subbasins with differing water quality objectives in Table 3-13 (formerly Table 3-10) are no longer delineated. This impacts application of the objectives in Table 3-13 because the Basin Plan no longer incudes maps indicating where the sub-basins are and, thus, where the water quality objectives in Table 3-13 apply. One particular example of this is the San Gabriel Basin, which is made up of a number of subbasins and areas where differing water quality objectives apply (i.e., Main San Gabriel Basin – Western Area, Main San Gabriel Basin – Eastern Area, Puente Basin, Live Oak Area, Claremont Heights Area, Pomona Area, and Spadra Area). Without making reference to the maps in the 1994 Basin Plan, it is impossible to tell where the various objectives apply. | The Regional Board agrees that delineating the groundwater sub-basins on the updated maps will provide greater consistency and clarity in determining where water quality objectives apply. Greater visual clarity for the updated groundwater basin maps has been provided (in the form of overlays for inclusion in Appendix 2 of the Basin Plan) to allow for the easy identification of sub-basins. The overlays were distributed for public review and comment prior to the Regional Board's consideration of the administrative update to Chapter 3. |
| 1.5 | Sanitation Districts | **Geographic Information and Maps**<br>Regional Board staff recognized a similar issue when updating Chapter 2, and addressed the potential for unintended changes in beneficial uses to sub-basins by | See Response to Comment No.1.4 |

| No. | Author | Comment | Response |
|---|---|---|---|
| | | including a change sheet delineating sub-basins from the 1994 dataset in cases where beneficial uses might be changed with the use of the updated geographical information. The Chapter 2 change sheet added a map depicting the sub-basin boundaries for the Eastern Santa Clara groundwater basins (Figure A2-14), and addition of a similar map delineating the sub-basins of the San Gabriel Valley Basin as part of an attachment for Chapter 3 would resolve the Sanitation Districts' concerns regarding this basin. While we did not perform a comprehensive review of all of the basins and sub-basins listed in Table 3-13, we did notice that a similar map is needed for the area in the vicinity of the Acton Valley and Antelope Valley Basins (formerly referred to as the Upper Santa Clara groundwater basins). | |
| 1.6 | Sanitation Districts | **Radioactive Substances Detection Levels**<br><br>Proposed Tables 3-12a and 3-12b include both MCLs and detection levels (DLRs) for certain radionuclides. The Sanitation Districts request that the DLRs be removed from these tables and that the titles of the tables be revised accordingly (i.e., delete "and Detection Levels for the Purposes of Reporting (DLRs)" from the titles). It is inappropriate to include the DLRs in the Basin Plan because the DLRs have not been adopted by the Regional Board.<br><br>The 1994 Basin Plan Radioactive Substances section incorporated by reference only "the limits specified in Table 4 of Section 64443 (Radioactivity) of Title 22 of the California Code of Regulations." It did not incorporate any associated monitoring requirements or specifications, and although the current version of Title 22 includes DLRs in the tables that present the MCLs, the Regional Board has not adopted the DLRs nor provided justification as to why the DLRs should be adopted. | The current Chapter 3 of the Basin Plan contains an earlier version of the maximum contaminant levels (MCL) tables as they were provided for in Title 22 of the California Code of Regulations in 1994. At that time, the MCL tables did not include detection levels for purposes of reporting (DLRs). However, the amended Title 22 MCL tables now include DLRs along with the MCLs. Since the Basin Plan prospectively incorporates "future changes to the incorporated provisions as the changes take effect," it is appropriate for the Regional Board to include the updated tables in their entirety, including the DLRs, to preserve the non-regulatory nature of this administrative update to Chapter 3 of the Basin Plan.<br><br>Inclusion of the DLRs in the Title 22 MCL Tables in the Basin Plan does not in-and-of itself prescribe any monitoring requirements or specifications. Such requirements are established in Board orders, such as permits. For NPDES permits, the Board's Permitting Program generally relies on the Code of Federal Regulations and other appropriate authorities in establishing monitoring and reporting |

| No. | Author | Comment | Response |
|---|---|---|---|
| | | By including detection levels in Tables 3-12a and 3-12b, it could be mistakenly implied that sampling must be conducted using the detection levels listed in the tables. Conducting sampling at these detections limits could be more costly and the Regional Board must conduct a cost analysis if the additional burden of meeting particular detection levels is placed on dischargers. Because this moves beyond the scope of the current Basin Plan, inclusion of DLRs in Tables 3-12a and 3-12b would be a non-regulatory amendment. | requirements. The Board also notes that the MCLs and DLRs in sections 64442 and 64443 of Title 22 of the California Code of Regulations are largely consistent with the federal MCLs and detection limits contained in Part 141 of Title 40 of the Code of Federal Regulations.<br><br>Therefore, it is appropriate to include the DLRs in the Title 22 MCL Tables. |
| 1.7 | Sanitation Districts | **Other Corrections**<br><br>In addition to the comments discussed in this letter, the Sanitation Districts recommend that a number of other corrections be made. These corrections are detailed in Appendix A. | These errors will be corrected, as appropriate, in revised documents prior to consideration by the Regional Board. |
| 1.8 | Sanitation Districts | **Ammonia Objectives**<br>• Regional Board Resolution No. R05-014 amended previously adopted ammonia objectives. Attachment A to proposed Resolution No. R13-0XX (Attachment A), correctly captured these amendments. However, the proposed revised text for Basin Plan Chapter 3 (Revised Chapter 3 Text) did not include all of the amendments specified in Resolution No. R05-14. The following changes to the Revised Chapter 3 Text should be made so as to be consistent with language in Resolution No. 05-014:<br><br>The third paragraph under "Ammonia" on page 3-4:<br><br>The ~~freshwater~~ one-hour average objective is dependent on pH and fish species (salmonids present or absent), but not temperature. It is assumed that salmonids may be present in waters designated in the Basin Plan as "COLD" or "MIGR" and that salmonids are absent in waters not designated in the Basin Plan as "COLD" or "MIGR", in the absence of | Staff has corrected the Basin Plan language for the Ammonia objectives as noted by the commenter. However, the inclusion of the term "freshwater" directly preceding the phrase "one-hour average" was deliberate and is being included for the purpose of providing grater clarification. Without this inclusion, it is unclear which objective (marine or freshwater) is being referred to once the amendment language is inserted into the Basin Plan. This is an administrative clarification that serves no other purpose than to make clear which "one-hour average" is being referred to.<br><br>This clarification was inadvertently left off the summary of the Basin Plan amendment language that was sent out for public review on February 19, 2013. It will be included in the revised document prior to consideration by the Regional Board. |

| No. | Author | Comment | Response |
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| | | additional information to the contrary. The ~~freshwater~~ 30-day average objective is dependent on pH, temperature, and the presence or absence of early life stages of fish (ELS). Implementation of the ELS Provision is described under "Implementation", subparagraph 3. ~~and temperature. At lower temperatures, the freshwater 30-day average objective also is dependent on the presence or absence of early life stages of fish (ELS). Water bodies with a Basin Plan designation of "SPWN" support high quality aquatic habitats suitable for reproduction and early development of fish and, therefore, these water bodies are designated as ELS present waters.~~ The ~~freshwater~~ four-day average objective is about 2.5 times the 30-day average objective. | |
| 1.9 | Sanitation Districts | **Ammonia Objectives**<br>Table 3-2 Title:<br>Table 3-2. 30-day Average Objective for Ammonia-N for Freshwaters ~~Designated SPWN~~ Applicable to Waters Subject to the "Early Life Stage Present" Condition (mg N/L)<br><br>Table 3-2 Footnote 2:<br>For freshwaters subject to the "Early Life Stage Present" condition ~~designated SPWN~~, the thirty day average concentration of total ammonia as nitrogen (in mg N/L) shall not exceed the values described by the following equation…<br><br>Table 3-3 Title:<br>Table 3-3. 30-day Average Objective for Ammonia-N for Freshwaters ~~Not Designated SPWN~~ Applicable to Waters Subject to the "Early Life Stage Absent" Condition (mg N/L)<br><br>Table 3-3 Footnote *: | These errors will be corrected, as appropriate, in revised documents prior to consideration by the Regional Board. |

| No. | Author | Comment | Response |
|---|---|---|---|
| | | At 15˚C and above, the 30-day average objective for waters subject to the "Early Life Stage Absent" condition ~~not designated SPWN~~ is the same as that for waters subject to the "Early Life Stage Present" condition ~~designated SPWN~~.<br><br>Table 3-3 Footnote 3:<br>For freshwaters subject to the "Early Life Stage Absent" condition ~~not designated SPWN~~, the thirty-day average concentration of total ammonia as nitrogen (in mg N/L) shall not exceed the values described by the following equation…<br><br>• Page 3-14 is missing the "Implementation" heading.<br><br>• Table 3-5 should be changed as follows in both the Revised Chapter 3 Text as well as Attachment A to be consistent with the recently adopted Chapter 2 and Table A2-1 of the Basin Plan:<br>- Calleguas Creek Reach 2 (Estuary to Potrero Rd)<br>- ~~Beardsley Wash~~ Reach 5 – Beardsley Channel (above Central Ave.)<br>- Los Angeles River Reach 1 (Estuary to Carson St.), Los Angeles River Reach 2(Carson St. to Rio Hondo Reach 1), and Los Angeles River Reach 2 (Rio Hondo Reach 1 to Figueroa St.) are all listed twice in Table 3-5. | |
| 1.10 | Sanitation Districts | **Ammonia Objectives**<br>• In Table 3-5, the Hydrologic Unit Codes (HUCs) are consistent with those shown in the recently adopted Table A2-1 of the Basin Plan. However, for several water body segments, the numbers are not consistent with the HUCs shown in the recently adopted Table 2-1 of the Basin Plan. The Regional Board should resolve the inconsistencies between Table 2-1 and Table A2-1 of the Basin Plan and | The inconsistencies have been corrected and will be reflected in revised documents prior to consideration by the Regional Board. However, since this action is limited to Chapter 3 of the Basin Plan, any necessary revisions to the Chapter 2 tables as a result of the corrections will be addressed separately and not as part of this proposed action. |

| No. | Author | Comment | Response |
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| | | make any necessary corrections to Table 2-1, Table A2-1, and Table 3-5 for the following segments:<br>- Revolon Slough (Calleguas Creek Rch 2 to Pleasant Valley Rd.). Table 2-1 shows180701030107; Table A2-1 shows 180701030106.<br>- Revolon Slough (Pleasant Valley Rd. to Central Ave.). Table 2-1 shows 180701030106; Table A2-1 shows 180701030107.<br>- Arroyo Conejo (Conejo Creek to North Fork Arroyo Conejo). Table 2-1 shows180701030105; Table A2-1 shows 180701030107.<br>- Arroyo Las Posas (Calleguas Creek Rch 3 to Long Canyon). Table 2-1 shows180701030103; Table A2-1 shows 180701030105.<br>- Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.). Table 2-1 shows180701050402; Table A2-1 shows 180701050210.<br><br>• The equation in Step 2b of "Translation of Objectives into Effluent Limits" on page 3-18 of the Revised Chapter 3 Text and page 15 of Attachment A would be clearer if the parameter definitions (P, T, $pK_a$, i, and S) were aligned to the same left margin. | |
| 1.11 | Sanitation Districts | **Bacteria, Coliform**<br>• Page 3-22 of the Revised Chapter 3 Text is missing "January 1986" at the end of Footnote 9. | This oversight will be corrected in revised documents prior to consideration by the Regional Board. |
| 1.12 | Sanitation Districts | **Bacteria, Coliform**<br>• The last paragraph prior to "In Waters Designated for Non-contact Water Recreation (REC-2)" on page 3-23 of the Revised Chapter 3 Text should be changed as follows to reflect Resolution No. R02-022:<br>These implementation procedures may only be implemented within the context of a TMDL addressing municipal storm | The paragraph of concern is consistent with the language in the attachment to Regional Board Resolution No. R02-022. Therefore, the. requested modification is unnecessary. |

| No. | Author | Comment | Response |
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| | | water (i.e. MS4), including the MS4 municipal storm water requirements…. | |
| 1.13 | Sanitation Districts | Pages 22 and 23 of Attachment A:<br>- Aluminum MCL should be changed from "1" to "1."<br><br>- The second antimony line with the MCL should be removed.<br><br>- "*" should be added both following "7 MFL" on the asbestos line of the table as well as prior to the text of the footnote.<br><br>- Barium MCL should be changed from "1" to "1."<br><br>- Fluoride MCL should be changed from "2" to "2.0".<br><br>- Nitrate (as NO3) MCL should be changed from "45" to "45."<br><br>- Nitrate + Nitrite (sum as nitrogen) MCL should be changed from "10" to "10."<br><br>- Change "Nitrite (as Nitrogen))" to "Nitrite (as nitrogen)"<br><br>- Nitrite (as nitrogen) MCL should be changed from "1" to "1."<br><br>- The text of the footnote should be changed as follows: (MFL = million fibers per liter; MCL for fibers >10 microns long)<br><br>• Table 3-9 of both the Revised Chapter 3 Text and Attachment A should include a footnote reference "*" on the MCL for Xylenes. The footnote should read "* MCL is for either a single isomer or the sum of isomers." | These errors will be corrected, as appropriate, in revised documents prior to consideration by the Regional Board. |

| No. | Author | Comment | Response |
|---|---|---|---|
| | | • Table 3-9 is missing the MCL for dinoseb in both the Revised Chapter 3 Text as well as Attachment A. The MCL should be "0.007". | |
| 1.14 | Sanitation Districts | **Mineral Quality**<br>• The table referenced in the first line on page 3-29 of the Revised Chapter 3 Text should be Table 3-10 instead of Table 3-12.<br><br>• The table referenced in the first paragraph on page 30 of Attachment A should be Table 3-10 instead of Table 3-8.<br><br>• Per Resolution No. R97-002, the sulfate water quality objective for the "Los Angeles River-between Sepulveda Flood Control Basin and Figueroa Street. Includes Burbank Western Channel only" under the Los Angeles River Watershed in Table 3-10 on page 3-31 of the Revised Chapter 3 Text and page 27 of Attachment A should be 300 mg/L instead of 350 mg/L.<br><br>• Table 3-10 in the Revised Chapter 3 Text is missing the "San Gabriel River Watershed" heading on page 3-32.<br><br>• In Table 3-10 of both the Revised Chapter 3 Text as well as Attachment A, per Resolution No. R97- 002, Reach 4 of the Santa Clara River "Between Blue Cut gaging station and A Street, Fillmore" should be listed as two separate reaches, Reach 4A and Reach 4B. These should be labeled as "Between Blue Cut gaging station and Piru Creek" and "Between Piru Creek and A Street, Fillmore." For the purposes of Table 3-10, the objectives for the two reaches would be the same as currentlylisted for "Between Blue Cut gaging station and A Street, Fillmore." | These errors will be corrected, as appropriate, in revised documents prior to consideration by the Regional Board. |
| 1.15 | Sanitation | **Mineral Quality** | These errors will be corrected, as appropriate, and any |

| No. | Author | Comment | Response |
|---|---|---|---|
| | Districts | The footnote in Table 3-10 for "All other minor San Gabriel Mountain streams tributary to San Gabriel Valley" should be changed for "ii" to "i" in the Revised Chapter 3 Text.<br><br>• In Table 3-13, it is strongly recommended that the symbol "- -" be used where there is no objective for a particular basin or sub-basin, to avoid confusion. For example, the boron objectives for the Claremont Heights Area and the Chino Area of the Upper Santa Ana Valley/San Gabriel Valley Basin should be listed as "- - " rather than leaving them blank.<br><br>• Similarly, in Table 3-13 it is confusing to have certain sub-headings from the 1994 Basin Plan put into the table as apparent entries. With this formatting, it is difficult to tell that the sub-heading is meant as a sub-heading. Instead, it appears to be an entry in the table with no objectives assigned. Using the Simi Valley as an example, the 1994 Basin Plan lists two basins in this area: Simi Valley Basin and Gillibrand Basin. However, the Simi Valley Basin consists of confined aquifers and unconfined aquifers, which have different objectives, but Table 3-13 does not reflect this information well. Instead, in Table 3-13 it appears as if there are four separately regulated areas: "Simi Valley Basin," "Confined Aquifers," "Unconfined & Perched Aquifers," and "Gillibrand Basin." Of these, it appears that there are no objectives for the "Simi Valley Basin" or for "Unconfined & Perched Aquifers." The easiest way to resolve this would be to remove the line for "Simi Valley Basin" and change the 1994 Basin Name descriptions for the sub-areas to read "Simi Valley Basin – Confined<br>Aquifers" and "Simi Valley Basin – Unconfined Aquifers." Similar changes would have to be made for other various sub-headings (Upper Ojai Valley, Santa Clara-Piru Creek | clarifications will be provided in revised documents prior to consideration by the Regional Board. |

| No. | Author | Comment | Response |
|---|---|---|---|
| | | Area, Santa Clara-Sespe Creek Area, Santa-Clara-Santa Paula Area, Oxnard Plain, South Las Posas Area, San Fernando Basin, Raymond Basin, and Main San Gabriel Basin). | |
| 1.16 | Sanitation Districts | **Mineral Quality**<br>On pages 3-43 through 3-46 of Table 3-13 in the Revised Chapter 3 Text, footnote "k" in the "Objectives" column should be changed to footnote "m".<br><br>• In Table 3-13 on page 3-43 of Revised Chapter 3 Text and page 36 of Attachment A, the 1994 Basin Name "Acton Valley" should be updated to "Antelope Valley." | These errors will be corrected and the requested clarifications provided, as appropriate, in revised documents prior to consideration by the Regional Board.<br><br>DWR Bulletin 118 (2003 Update) does not include the Antelope Valley Basin as part of the Los Angeles Region. Therefore this update cannot be made. |
| 1.17 | Sanitation Districts | • The "Upper Bouquet Canyon," "Green Valley," and "Lake Elizabeth-Lake Hughes Area" basins on Page 3-43 of the Revised Chapter 3 Text and page 36 of Attachment A are renamed to "Acton Valley" in Table 3-13, however, Figure 2-13 in Chapter 2 no longer shows groundwater basins in these areas. Additionally, these sub-basins are no longer depicted in the Chapter 2 maps. Since they have differing water quality objectives, a map should be created distinguishing their boundaries. Furthermore, Chapter 2, Figure 2-13 refers to these sub-basins as "Upper Santa Clara" and not "Acton Valley" as labeled in Table 3-13. | Supplementary maps depicting these groundwater basins have been provided (in the form of overlays for inclusion in Appendix 2 of the Basin Plan) The overlays were distributed for public review and comment prior to the Regional Board's consideration of the administrative update to Chapter 3. |
| 1.18 | Sanitation Districts | • On both page 3-46 of the Revised Chapter 3 Text and page 39 of Attachment A, footnote "f" appears to be incorrect. It states that the Acton Valley Basin was formerly the Upper Santa Clara Basin. However, examination of maps indicates that the Acton Valley Basin now covers the area that was formerly called the Upper Mint Canyon and Sierra Pelona Valley Basins. | The Upper Mint Canyon and the Sierra Pelona Valley Basins (both now Acton Valley) are a part of what was formerly the Upper Santa Clara Basin. Footnote f is therefore correct. |

| No. | Author | Comment | Response |
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| 1.19 | Sanitation Districts | **Mineral Quality**<br>• On both page 3-45 of the Revised Chapter 3 Text and page 38 of Attachment A, footnote "f" for the "Western Area" and "Eastern Area" basins should be changed to footnote "g". Additionally, the proposed text of this footnote does not correctly reflect the information in the 1994 Basin Plan, which needs to be carried forward to avoid changes to the areas in which the groundwater quality objectives apply. To correctly capture the boundaries where groundwater objectives apply, the language in the footnote from the 1994 Basin Plan should be included, such that the footnote reads "All of the groundwater in the Main San Gabriel Basin is covered by the objectives listed under Main San Gabriel Basin – Eastern Area and Western Area. Walnut Creek, Big Dalton Wash, and Little Dalton Wash separate the Eastern Area from the Western Area (see the dashed line on Figure XXXX in Appendix 2). Any ground water upgradient of these areas is subject to downgradient beneficial uses and objectives, as explained in Footnote a.", where Figure XXXX would delineate the current boundaries of the various sub-basins in the San Gabriel Valley Basin.<br><br>• On page 3-45 of the Revised Chapter 3 Text and page 38 of Attachment A, the Monk Hill sub-basin is listed as part of the San Fernando Basin. However, examination of Figure 2-17 in the updated Chapter 2 and in the 1994 Chapter 2 indicates that Monk Hill sub-basin is actually located in the Raymond Basin. Associated changes should be made to Table 3-13 , including: change the updated basin name from "San Fernando Valley" to "Raymond"; change the updated basin number from 4-12 to 4-23; and change the basin heading from "San Gabriel Valley/Raymond/San Fernando Valley" to "San Gabriel Valley/Raymond." | These errors will be corrected, as appropriate, and any clarifications will be provided in revised documents prior to consideration by the Regional Board. |

| No. | Author | Comment | Response |
|---|---|---|---|
| 1.20 | Sanitation Districts | **Nitrogen (Nitrate, Nitrite)**<br>• The table referenced in the last sentence of this section on page 3-29 of the Revised Chapter 3 Text should be Table 3-10 instead of Table 3-8. | This error will be corrected in revised documents prior to consideration by the Regional Board. |
| 1.21 | Sanitation Districts | **Pesticides**<br>• The table referenced in the last paragraph of this section on page 3-35 of the Revised Chapter 3 Text should be Table 3-9 instead of Table 3-8. | This error will be corrected in revised documents prior to consideration by the Regional Board. |
| 1.22 | Sanitation Districts | **Radioactive Substances**<br>• The reference to "section 44442" in the fourth paragraph on page 12 of the Draft Staff Report should be changed to "section 64442".<br><br>• The reference to "Table 6442 in section 6443" on the last line in the fourth paragraph on page 12 of the Draft Staff Report should be changed to "Table 64442 in section 64443."<br><br>• Language in the last paragraph on page 3-36 of the Revised Chapter 3 Text should be changed as follows: "…Title 22 of the California Code of Regulations which is are incorporated by reference into this plan." | These errors will be corrected in revised documents prior to consideration by the Regional Board. |
| 1.23 | Sanitation Districts | **Radioactive Substances**<br>• In both the Revised Chapter 3 Text and Appendix A, the column labeled "DLR" should be removed from Tables 3-12a and 3-12b. Additionally, the words "and Detection Levels for Purposes of Reporting (DLRs)" should be removed from the titles of both of these tables. | See response to Comment No. 1.6 |
| 1.24 | Sanitation Districts | In conclusion, the Sanitation Districts appreciate the Regional Board's continuing efforts to complete an | Comment noted |

| No. | Author | Comment | Response |
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| | | administrative update of the Basin Plan, and we support the update of Chapter 3 of the Basin Plan, as long as the update is solely administrative and does not include policy or regulatory amendments. | |
| 2.1 | Calleguas WMP | The Stakeholders in the Calleguas Creek Watershed appreciate the opportunity to review and comment on the proposed amendments to Chapter 3 of the Basin Plan. While most of these updates are administrative in nature, it is critical that the changes are reflective of previous Basin Plan Amendments and capture all Of the technical nuances accurately. We respectfully submit the following comments for your consideration. | Comment noted |
| 2.2 | Calleguas WMP | **Ammonia Water Quality Objectives**<br>Table 3-5: Water Bodies Subject to 30-day Average Objective Applicable to "ELS Absent" Condition. The heading for Column 1 should be "HUC 12 No. (Watershed Boundary Dataset)" since the HUC 12 identification numbers are used in the table. | Comment noted and addressed. See response to Comment No. 1.7 |
| 2.3 | Calleguas WMP | **Ammonia Water Quality Objectives**<br>Table 3-5. Water Bodies Subject to 30-day Average Objective Applicable to "ELS Absent" Condition. When developing the Basin Plan Amendment to Revise the Early Life Stage Provision of the Freshwater Ammonia Objectives for Inland Surface Waters in 2005, the Technical Advisory Committee was surveyed to determine the locations of fish that reproduce below 15 degrees Celsius in the Los Angeles Region (see Staff Report, Appendix B, September 22, 2005): The results of this survey demonstrated that only reaches 2 and 3 of the. Calleguas Creek Watershed were potentially subject to the "ELS Present" objectives: Based on the findings, Table 3-5 included the major remaining hydrologic units in the watershed, but did not specifically | The 2011 update to Chapter 2 did not impact the hierarchy of the waterbodies in the Calleguas Creek watershed. The issue being raised by the commenter predated the update and should have been put forward during the adoption of the Regional Board Resolution No. R05-014. The lack of specificity in the reaches listed in Table 3-5 is not exclusive to the Calleguas Creek Watershed and may have to be addressed by a separate action specific to Resolution No. R05-014. |

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<tr><td></td><td></td><td>identify hydrologic units that were not separately listed in Table 2-1 (i.e. were indented below one of the major reaches as a tributary). However, when the administrative updates were done to Chapter 2 of the Basin Plan, the ways in which the waterbodies were listed was changed. As a result, we feel that there are some areas of the watershed that have not been included in the Chapter 3 update that should be included in Table 3-5 to be consistent with the ELS Basin Plan Amendment. These areas are listed in the table below:<br><br>
<table>
<tr><td>HUC 12 NO.</td><td>Waterbody</td></tr>
<tr><td colspan="2">CALLEGUAS CONEJO CREEK WATERSHED</td></tr>
<tr><td>180701030105</td><td>Reach 11 – Arroyo Santa Rosa (above confl. With Conejo Creek)</td></tr>
<tr><td>18070103010</td><td>Reach 12 – North Fork Arroyo Conejo (above confl. With Arroyo Conejo)</td></tr>
<tr><td>18070103010</td><td>Reach 8 Tapo Canyon Creek</td></tr>
<tr><td>18070103010</td><td>Gillibrand Canyon Creek</td></tr>
</table></td><td></td></tr>
<tr><td>2.4</td><td>Calleguas WMP</td><td>Ammonia Water Quality Objectives<br>In reviewing this Basin Plan Amendment, we noted that an error was made in the adoption of Resolution 2005-014, ELS Implementation Provisions for Ammonia: According to the information provided in Appendix B and C of Staff Report, Calleguas Creek Hydrologic Unit 403.11, which corresponds to Calleguas Creek Reach 2, should have been ELS present while Calleguas Creek Hydrologic Unit 403.12, which corresponds to Calleguas Creek Reach 3, should have been listed in Table 3-5 as ELS absent. As this appears to be an administrative error given the technical documentation provided for the ELS Basin Plan Amendment, we request that it be corrected during this update to Chapter 3 of the Basin Plan. To correct this error, we request the following: modifications to Table 3-5:</td><td>The requested change is as a result of inconsistencies in the documents related to Regional Board Resolution No. R05-0014 and should have been raised at the time of the adoption. Since the requested modifications may have regulatory implications with respect to the application of water quality objectives, it is outside the scope of this administrative update, and may have to be addressed through a separate Board action.</td></tr>
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<tr><td>HUC 12 NO.</td><td>Waterbody</td></tr>
<tr><td colspan="2">CALLEGUAS CONEJO CREEK WATERSHED</td></tr>
<tr><td>180701030107</td><td>Calleguas Creek Reach ~~2~~ 3</td></tr>
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<tr><td>2.5</td><td>Calleguas WMP</td><td>Ammonia Water Quality Objectives<br>The formulas on Pages 3-18 and 3-19 are incorrect. Formulas for ECA, MDEL, and AMEL Multipliers do not include parentheses in several places. Failure to include the parentheses may result in inaccurate calculations of these factors.</td><td>These oversights will be corrected, as appropriate, in revised documents prior to consideration by the Regional Board.</td></tr>
<tr><td>2.6</td><td>Calleguas WMP</td><td>Bacteria Water Quality Objectives<br>An update to the geometric mean calculation methodology was included in revisions to the Bacteria TMDLs adopted f'or Santa Monica Bay Beaches, Ballona Creek, Marina del Rey, Cabrillo, and Malibu. These were adopted by the Regional Water Quality Control Board, Los Angeles Region, on June 7, 2012. While we recognize that the Basin Plan. Amendments have not completed the State and USEPA approval processes, we feel it would be prudent to amend the language in Chapter 3 regarding the geometric mean calculations to reflect the most recently adopted policies. Consistent with Attachment D to Resolution No. R12-007, we request: that the text of Chapter 3 of the Basin Plan be amended as follows:<br><br>Chapter 3. "Water Quality Objectives" of the Basin Plan, delete strikeout: text and add underline text to the first and third paragraph under "Implementation Provisions for Water Contact Recreation Bacteria Objectives" as follows:<br><br>"The geometric mean values ~~should~~ <u>shall</u> be calculated based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over ~~a 30 day~~ <u>the calculation</u> period).</td><td>As the commenter noted, Resolution No. R12-007 is still going through the approval process and hence is not yet in effect. Therefore, the requested modifications cannot be considered at this time. However, all future amendments (including Resolution No. R12-007) will be physically incorporated into the Basin Plan upon final approval and without further Regional Board action.</td></tr>
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| No. | Author | Comment | Response |
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| | | *If any of the single sample limits are exceeded, the Regional Board may require repeat sampling on a daily basis until the sample falls below the single sample limit in order to determine the persistence of the exceedance.*<br><br>*When repeat sampling is required because of an exceedance of any one single sample limit, values from all samples collected during that ~~30 da~~y calculation period shall be used to calculate the geometric mean."* | |
| 2.7 | Calleguas WMP | **Bacteria Water Quality Objectives**<br>The incorporation of the Reference System/Antidegradation Approach (RSAA)and the Natural Sources Exclusion Approach (NSEA) provides additional flexibility to dischargers in developing and meeting required waste load and load allocations within the context of TMDLs. Inclusion of these options within the Basin Plan is appropriate and appreciated.<br><br>However, the language currently included in the additions to Chapter 3 only allows implementation of these options within the context of a TMDL. This does not address the need to allow for the implementation of these options within a TMDL alternative consistent with State Guidance) One example may be to address an identified water quality problem via a Watershed Management Plan or an Enhanced Watershed Management Plan, options provided in the recently adopted NPDES MS4 Permit and WRDS for Stormwater and Non-stormwater Discharges from the MS4 within the Coastal Watersheds of Los Angeles County, R4-2012-0175.<br><br>In order to allow for implementation of the RSAA and/or NSEA **in** other contexts, the text included on Page 3-23 should be modified as follows: | This update to Chapter 3 of the Basin Plan is intended to be non-regulatory in nature. The modified language requested by the commenter has regulatory connotations and is outside the scope of this proposed amendment. |

| No. | Author | Comment | Response |
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| | | *"The appropriateness of these approaches and the specific exceedance frequencies to be permitted under each will be evaluated within the context of TMDL development for a specific waterbody, or within the context of a TMDL alternative regulatory program developed for a specific waterbody, at which time the Regional Board may select one of these approaches, if appropriate.*<br><br>*These implementation procedures may only be implemented within the context of a TMDL, or a TMDL alternative regulatory program, addressing municipal stormwater, including municipal stormwater requirements…"* | |
| 2.8 | Calleguas WMP | **Chloride Policy**<br>The updates to the Basin Plan to incorporate Resolution 97-02 do not include some important language regarding the establishment of objectives in the Calleguas Creek and Santa Clara River watersheds. Although the Basin Plan update acknowledges that the variances expired in 2001 and are no longer applicable, the language regarding the studies to be conducted and the establishment of future water quality objectives for the watersheds are still applicable and should be included in the Basin Plan updates, Additionally, Resolution 97-02 was clear that the intent of the Basin Plan Amendment was to renew the variance if the issues were not resolved during the initial three-year period. Although the variance did not continue to be renewed, TMDLs were utilized to address the concerns and include provisions to allow for consideration of many of the factors that were provided for in Resolution 97-02.<br><br>These considerations should not be removed simply because the variance has expired. We therefore request the following language from Resolution 97-02 be included in | The Regional Board appreciates the commenter's desire to maintain the historical context of the Chloride Policy established by the Board in Resolution No. 97-02. However, the Regional Board deems the language unnecessary, particularly as it relates to stakeholder and/or Regional Board actions to be taken during or after a variance period that has long since expired.<br><br>As the commenter correctly states, TMDLs that include provisions to allow for consideration of many of the factors that were provided for in Resolution 97-02 have since been developed to address chloride concerns in the Santa Clara and Calleguas Creek watersheds. The administrative records of these TMDLs document the history of Regional Board considerations of chloride issues in these watersheds, including those contained in the Chloride Policy. The administrative record of this proposed administrative update to Chapter 3 will also contain the policy in its entirety.<br><br>The purpose of this update is to provide a current Basin Plan document for stakeholders, staff, and any other interested persons. Inclusion of outdated information defeats this |

| No. | Author | Comment | Response |
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| | | the Basin Plan update along with introductory language to explain the purpose of the language (see suggested language in red below).<br><br>*However, the following provisions of the Policy continue to be applicable and are being considered during TMDL implementation rather* than *through continuation* of *the variances.*<br><br>*During the variance period; the Regional Board expected that the group of local agencies; municipalities, representatives of the agricultural community, and other interested parties which have commented upon this policy will work together to (i) clarify water quality objectives needed to protect waters used for irrigation in the Santa Clara River and Calleguas Creek watersheds, (ii) assess significant sources of chloride loading and (iii) contingent upon results of the chloride loading assessment, identify cost-effective* ways *to protect beneficial uses of waters in the Santa Clara and Calleguas Creek watersheds,*<br><br>*At the end of the variance period, the Regional Board may consider revisions to water quality objectives for chloride in the Santa Clara River and Calleguas Creek watersheds. Future revisions of water quality objectives will consider chloride levels in supply waters, including fluctuations that may be due to future drought conditions, reasonable loading factors during beneficial use and treatment of supply water's and wastewaters, methods to control chloride loading and the associated costs and effectiveness of the various loading control methods.* | purpose. Therefore, the commenter's suggested language will not be included in the proposed amendment. |
| 2.9 | Calleguas WMP | **Compliance Schedules**<br>The State Water Resources Control Board Resolution No. 2008-0025, Final Staff Report, acknowledges that the *Policy for Compliance Schedules in NPDES Permits* allows for compliance | The State Water Board's Policy for Compliance Schedules in NPDES Permits specifically states "*This Policy supersedes all existing provisions authorizing compliance schedules in Basin Plans, except for existing compliance schedule provisions in* |

| No. | Author | Comment | Response |
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| | | schedules to be established for all types of TMDLs (see discussion of recommended alternative 4.c. on page 53). The policy does not limit the applicability of the TMDL compliance schedules to those TMDLs that were present prior to the adoption of the Policy, but rather specifically does not supersede the TMDL compliance schedules in effect prior to adoption of the Policy. For these reasons, compliance schedules established in TMDLs both prior to and after the adoption of the policy are authorized. Additionally, compliance schedules adopted in any TMDLs, whether as single regulatory actions or as Basin Plan Amendments are allowed per the Policy. Therefore; the date cited on Page 3-50 of the proposed Chapter 3 text is irrelevant and should be deleted and the language should be broad enough to include all types of TMDLs. We *therefore* request that the text be revised as follows.<br><br>*State Water Resources Control Board No. 2008-0025 superseded all existing provisions authorizing compliance schedules in Basin Plans, including Regional Board Resolution 2003-01, except for ~~existing~~ compliance schedule provisions in TMDLs ~~implementation plans that are in effect as of the effective date of Resolution No. 2008-0025~~".* | *TMDL implementation plans that are in effect as of the effective date of this Policy*" The language provided on page 3-50 of the proposed Chapter 3 text was taken directly from this statement. This language is therefore consistent with the State Water Board's Policy for Compliance Schedules in NPDES Permits. Therefore, the language will remain as is. |
| 2.10 | Calleguas WMP | Thank you for the opportunity to provide comments related to the .proposed _amendments to Chapter 3 of the Basin Plan. We feel that the comments included above will serve to provide accuracy and clarity to the Chapter as well as streamline some of the regulatory processes involved in updating the Basin Plan. We appreciate your consideration of these comments. | Comment noted. |