Attachment A to Resolution No. R4-2007-XXX

Proposed Amendment to the Water Quality Control Plan – Los Angeles Region

to Incorporate the

Total Maximum Daily Load for Boron, Chloride, Sulfate, and TDS (Salts) in the Calleguas Creek Watershed

Proposed for adoption by the California Regional Water Quality Control Board, Los Angeles Region on October 4, 2007

Amendments

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Chapter 7. Total Maximum Daily Loads (TMDLs)
Calleguas Creek Watershed Salts TMDL

This TMDL was adopted by:

The Regional Water Quality Control Board on [Insert date].

This TMDL was approved by:

The State Water Resources Control Board on [Insert date].
The Office of Administrative Law on [Insert date].
The U.S. Environmental Protection Agency on [Insert date].

This TMDL is effective on [Insert Date]

The elements of the TMDL are presented in Table 7-22.1 and the Implementation Plan in Table 7-22.2

Table 7-22.1. Calleguas Creek Watershed Salts TMDL: Elements

<table>
<tr><th>TMDL Element</th><th>Key Findings and Regulatory Provisions</th></tr>
<tr><td>Problem Statement</td><td>Eleven of fourteen reaches in the Calleguas Creek Watershed (CCW) are identified on the 2002 Clean Water Act Section 303(d) list of water-quality limited segments as impaired due to elevated levels of boron, chloride, sulfate, or TDS (salts). Salts primarily impact two beneficial uses: agricultural supply and groundwater recharge.

The segment of Reach 4 below Laguna Road is tidally influenced and therefore not impaired for chloride, boron, sulfate, and TDS. Consequently, the waste load and load allocations developed for Reach 4 in this TMDL do not apply below Laguna Road.

The goal of this TMDL is to protect and restore the water quality in the Calleguas Creek watershed by controlling the loading and accumulation of salts.</td></tr>
<tr><td>Numeric Targets</td><td>Numeric targets are based on the site-specific numeric water quality objectives (WQOs) provided in the Basin Plan.

1. <u>Surface Water Quality Objectives</u>

Site-specific surface water quality objectives for the Calleguas Creek watershed are applicable upstream of Potrero Road. Site specific objectives have not been determined for Calleguas Creek below Potrero Road because the reach is tidally influenced. Below are WQOs for Calleguas Creek upstream of Potrero Road.

<table>
<tr><th>Constituent</th><th>Water Quality Objective Upstream Potrero Road (mg/L)</th></tr>
<tr><td>Boron</td><td>1</td></tr>
<tr><td>Chloride</td><td>150</td></tr>
<tr><td>Sulfate</td><td>250</td></tr>
<tr><td>TDS</td><td>850</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>TMDL Element</th><th>Key Findings and Regulatory Provisions</th></tr>
<tr><td></td><td>2. Groundwater Quality Objectives

<table>
<tr><th>Groundwater Basin</th><th>Boron (mg/L)</th><th>Chloride (mg/L)</th><th>Sulfate (mg/L)</th><th>TDS (mg/L)</th></tr>
<tr><td>Arroyo Simi/Simi Valley</td><td>1.0</td><td>150</td><td>600</td><td>1200</td></tr>
<tr><td>Arroyo Simi/South Las Posas</td><td>3.0</td><td>400</td><td>1200</td><td>2500</td></tr>
<tr><td>Arroyo Las Posas/South Las Posas</td><td>1.0</td><td>250</td><td>700</td><td>1500</td></tr>
<tr><td>Arroyo Las Posas/North Las Posas</td><td>1.0</td><td>150</td><td>250</td><td>500</td></tr>
<tr><td>Arroyo Santa Rosa and Conejo/Arroyo Santa Rosa</td><td>1.0</td><td>150</td><td>300</td><td>900</td></tr>
<tr><td>Arroyo Santa Rosa/Tierra Rejada</td><td>0.5</td><td>100</td><td>250</td><td>700</td></tr>
<tr><td>Arroyo Conejo/Thousand Oaks</td><td>1.0</td><td>150</td><td>700</td><td>1400</td></tr>
<tr><td>Arroyo Conejo/Conejo Valley</td><td>1.0</td><td>150</td><td>250</td><td>800</td></tr>
<tr><td>Conejo and Calleguas/Pleasant Valley</td><td>1.0</td><td>150</td><td>300</td><td>700</td></tr>
</table>
</td></tr>
<tr><td>Source Analysis</td><td>Sources of salts in the watershed include water supply (water imported from the State Water Project or Freeman Diversion and deep aquifer groundwater pumping), water softeners that discharge to publicly owned treatment works (POTWs), POTW treatment chemicals, atmospheric deposition, pesticides and fertilizers, and indoor water use (chemicals, cleansers, food, etc.). These salts are then transported through POTW discharges and runoff to surface water, shallow groundwater, and/or stranded on the watershed in the soils. Salts transported in the surface water to the ocean are currently the only salts that are exported from the watershed. While the concentration of salts in the introduced water is usually below the Basin Plan Objectives, the quantity of water brought into the watershed is sufficient to rank introduced water as the greatest source of salts to the watershed.

Salts are transported during dry weather to the surface water are quantified via the following mechanisms: groundwater pumping, groundwater exfiltration, POTWs, dry weather urban and agricultural runoff. Wet weather loadings from each of these sources have the potential to be significant, but tend to be lower in concentration and do not occur during the critical conditions for salts. Wet weather loads are significant from the perspective of transporting stranded salts off the watershed.</td></tr>
</table>

TMDL Element	Key Findings and Regulatory Provisions
Linkage Analysis	The linkage analysis for salts focuses on the surface water concentrations of salts. However, surface water concentrations are only one component of the watershed salts issue. Because it is difficult to model other aspects of the salt problem (i.e. surface water and groundwater interactions, stranded salts), two simplified approaches have been used to demonstrate that salts will be removed from the watershed, which should have a correspondingly positive impact on surface water and groundwater salts concentrations. First, a surface water model was developed to provide a linkage between sources and surface water quality and to demonstrate the impact of projects on receiving water quality in the watershed. Second, a salt balance was developed to quantify the removal of salts from the watershed with the goal of achieving a mass balance in which the mass of boron, sulfate, TDS and chloride imported into Calleguas Creek subwatersheds is no more than the mass of boron, sulfate, TDS and chloride exported from the Calleguas Creek subwatershed. Achieving a salt balance in the watershed will prevent additional build-up of salts in any medium in the watershed and protect ground water supplies from increasing in salt concentrations. The Calleguas Creek Modeling System is a mass balance based model that was developed for the surface water to provide a linkage between sources and surface water quality. To estimate the salts balance in the watershed, a simple chloride mass balance was developed by the Camrosa Water District (Hajas, 2003a) and modified to address the other salts.
Waste Load Allocations	**A. POTWs** The TMDL includes waste load allocations (WLAs) for five POTWs in the Calleguas Creek watershed: Simi Valley Water Quality Control Plant (WQCP), Hill Canyon Wastewater Treatment Plan (WWTP), Moorpark WWTP, Camarillo Water Reclamation Plant (WRP), and Camrosa Water Reclamation Facility (WRF). At the end of the implementation period, only SVWWTP and the Hill Canyon WWTP are expected to discharge to surface waters. Moorpark WWTP and Camrosa WRF currently discharge directly to ponds under dry weather conditions. As part of the TMDL implementation, (the Renewable Water Resources Management Program (RWRMP)) will introduce treated wastewater from the Camarillo WRP into the Camrosa recycled water storage and distribution system. Surplus treated wastewater from Camarillo WRP and Camrosa WRF will be discharged at a point downstream of Potrero Road Bridge to Calleguas Creek. Dry weather WLAs are included for the case when Camarillo WRP, Camrosa WRP, and Moorpark WWTP need to discharge to the stream (for example, if

TMDL Element	Key Findings and Regulatory Provisions
	there is insufficient recycled water demand during the wet season). Including WLAs for these POTWs ensures that water quality objectives are not exceeded as a result of their discharge. POTW mass-based WLAs are calculated as the POTW effluent flow rate multiplied by the water quality objective and include a mass-based adjustment factor (AF) that is subtracted from the product of the flow-rate and the water quality objective. The adjustment factor is used to link POTW allocations to the required reductions in background loads. The adjustment factors are implemented through mechanisms that export salts out of the subwatershed, such as groundwater pumping, to meet the salt balance requirements. To ensure that the loading capacity is achieved in surface water and the reductions in background loads are achieved, minimum salt exports shown below are required for POTWs and are included in WLAs as a component of the adjustment factors. If the background load reductions are not achieved, POTWs shall be responsible for providing additional load reductions to achieve water quality standards. The AF is set equal to the difference between the minimum salts export requirement to attain a salt balance in the subject reaches and the actual salts export. If the calculated annual dry weather salt exports from the subwatershed to which the POTW discharges are less than the minimum required exports for the previous year and the annual average receiving water concentration at the base of the subwatershed to which the POTW discharges exceeds water quality objectives for the previous year, the POTW allocations will be reduced using the adjustment factor. The adjustment factors are also used to address unusual conditions in which the inputs to the POTWs from the water supply may challenge the POTWs ability to meet the assigned WLAs. The adjustment factor allows for the additional POTW loading only when the water quality objectives are met in the receiving waters. POTW allocations can be adjusted upwards when imported water supply chloride concentrations exceed 80 mg/L and discharges from the POTW exceed the WLA. In order to apply the AF to the assigned WLAs, the POTW is required to submit documentation of the water supply chloride concentrations, receiving water chloride concentration, the effluent mass, and evidence of increased salt exports to offset the increased discharges from the POTW to the RWQCB for approval. WLAs shown in table below apply to POTWS during dry weather when the flows in the receiving water are below the 86th percentile flow. During wet weather, the loading capacity of the stream is significantly increased by stormwater flows with very low salt concentrations. Any discharges from the POTWs during wet weather would be assimilated

TMDL Element	Key Findings and Regulatory Provisions

by these large storm flows and would not cause exceedances of water quality objectives.

Boron is only listed in the Simi and Pleasant Valley (Revolon) subwatersheds and exceedances of boron do not occur in other portions of the watershed. Therefore, boron allocations are only included for the Simi Valley WQCP.

Interim limits are included to allow time for dischargers to put in place implementation measures necessary to achieve final waste load allocations. The monthly average interim limits are set equal to the 95th percentile of available discharge data.

1. Minimum Salt Export Requirements for Adjustment Factor [a]

POTW	Minimum Chloride Export (lb/day)	Minimum TDS Export (lb/day)	Minimum Sulfate Export (lb/day)	Minimum Boron Export (lb/day)
Simi Valley WQCP	460	3220	9120	3.3
Moorpark WWTP	460	3220	9120	3.3
Hill Canyon WWTP	1060	7920	4610	0
Camrosa WRF	1060	7920	4610	0
Camarillo WRP	1060	7920	4610	0

[a] Minimum export requirements include a 10% Margin of Safety.

2. Interim Monthly Average WLAs for POTWs

POTW	Chloride (mg/L)	TDS (mg/L)	Sulfate (mg/L)	Boron (mg/L)
Simi Valley WQCP	183	955	298	N/A
Hill Canyon WWTP	189	N/A	N/A	N/A
Moorpark WWTP	171	N/A	267	N/A
Camarillo WRP	216	1012	283	N/A
Camrosa WRF*	N/A	N/A	N/A	N/A

* Camrosa WRF has not discharged to surface water during the period under which interim limits were calculated. When effluent data are available, the Regional Board may adopt interim WLAs for Camrosa WRF.
N/A: The 95th percentile concentration is below the Basin Plan objective so interim limits are not necessary.

TMDL Element	Key Findings and Regulatory Provisions

3. Final WLAs for POTWs[a,d]

POTW	Chloride (lb/day) [c]	TDS (lb/day) [c]	Sulfate (lb/day) [c]	Boron (lb/day) [c]
Simi Valley WQCP	150*Q-AF	850*Q-AF	250*Q-AF	1.0*Q-AF
Hill Canyon WWTP	150*Q-AF	850*Q-AF	250*Q-AF	N/A
Moorpark WWTP[b]	150*Q-AF	850*Q-AF	250*Q-AF	N/A
Camarillo WRP[b]	150*Q-AF	850*Q-AF	250*Q-AF	N/A
Camrosa WRF[b]	150*Q-AF	850*Q-AF	250*Q-AF	N/A

a. The allocations shown only apply during dry weather (as defined in this TMDL). During wet weather discharges from the POTWs do not cause exceedances of water quality objectives.

b. These POTWs are not expected to discharge after the end of the implementation period.

c. AF is the adjustment factor and equals the difference between the minimum salts export requirement and the actual salts export.

d. Q represents the POTW flow at the time the water quality measurement is collected and a conversion factor to lb/day based on the units of measurement for the flow.

N/A Boron is not listed in the reaches to which the POTW discharges. No WLA is required.

B. Urban Runoff

Permitted stormwater dischargers that are responsible parties to this TMDL include the Municipal Stormwater Dischargers (MS4s) of the Cities of Camarillo, Moorpark, Thousand Oaks, County of Ventura, Ventura County Watershed Protection District, and general industrial and construction permittees. Permitted stormwater dischargers are assigned a dry weather wasteload allocation equal to the average dry weather critical condition flow rate multiplied by the numeric target for each constituent. Waste load allocations apply in the receiving water at the base of each subwatershed. Because wet weather flows transport a large mass of salts at low concentrations, these dischargers meet water quality objectives during wet weather. Dry weather allocations apply when instream flow rates are below the 86th percentile flow and there has been no measurable precipitation in the previous 24 hours.

Interim limits are assigned for dry weather discharges from areas covered by NPDES stormwater permits to allow time to implement appropriate actions. The interim limits are assigned as concentration based receiving water limits set to the 95th percentile of the discharger data as a monthly average limit except for chloride. The 95th percentile for chloride was 267 mg/L which is higher than the recommended criteria set forth in the Basin Plan for protection of sensitive beneficial uses including aquatic life. Therefore, the interim limit for chloride for

TMDL Element	Key Findings and Regulatory Provisions

Permitted Stormwater Dischargers is set equal to 230 mg/L to ensure protection of sensitive beneficial uses in the Calleguas Creek watershed.

1. Interim Dry Weather WLAs for Permitted Stormwater Dischargers

Constituent	Interim Limit (mg/L)
Boron Total	1.3
Chloride Total	230
Sulfate Total	1289
TDS Total	1720

2. Final Dry Weather WLAs for Permitted Stormwater Dischargers

Subwatershed	Critical Condition Flow Rate (mgd)	Chloride Allocation (lb/day)	TDS Allocation (lb/day)	Sulfate Allocation (lb/day)	Boron Allocation (lb/day)
Simi	1.39	1,738	9,849	2,897	12
Las Posas	0.13	157	887	261	N/A
Conejo	1.26	1,576	8,931	2,627	N/A
Camarillo	0.06	72	406	119	N/A
Pleasant Valley (Calleguas)	0.12	150	850	250	N/A
Pleasant Valley (Revolon)	0.25	314	1,778	523	2

C. Final WLAs for Other NPDES Dischargers

Concentration-based WLAs are assigned at the Basin Plan objectives for other NPDES dischargers.

Constituent	Allocation (mg/L)
Chloride	150
TDS	850
Sulfate	250
Boron[a]	1.0

Other NPDES dischargers include, but are not limited to, permitted groundwater cleanup projects that could have significant salt concentrations as a result of the stranded salts in the shallow groundwater basins being treated. To facilitate the cleanup of the basins prior to alternative discharge methods (such as the brine line) being available, interim limits for other NPDES dischargers will be developed on a case-by-case basis and calculated as a monthly average

<table>
<tr><th>TMDL Element</th><th>Key Findings and Regulatory Provisions</th></tr>
<tr><td></td><td>using the 95th percentile of available discharge data.</td></tr>
<tr><td>Load Allocations</td><td>Dry weather load allocations are assigned as a group allocation to irrigated agricultural discharges. The load allocation is equal to the average dry weather critical condition flow rate multiplied by the numeric target for each constituent. Load allocations apply in the receiving water at the base of each subwatershed. Because wet weather flows transport a large mass of salts at a typically low concentration, these dischargers should meet water quality objectives during wet weather. Dry weather allocations apply when instream flow rates are below the 86th percentile flow and there has been no measurable precipitation in the previous 24 hours.

Interim limits are assigned for dry weather discharges from irrigated agricultural areas to allow time to implement appropriate actions. The interim limits are assigned as concentration based receiving water limits set to the 95th percentile of the discharger data as a monthly average limit except for chloride. The 95th percentile for chloride was 499 mg/L which is higher than the recommended criteria set forth in the Basin Plan for protection of sensitive beneficial uses including aquatic life. Therefore, the interim limit for chloride for Irrigated Agricultural Dischargers is set equal to 230 mg/L to ensure protection of sensitive beneficial uses in the Calleguas Creek watershed.

I. Interims Load Allocations for Irrigated Agricultural Dischargers

<table>
<tr><th>Constituent</th><th>Interim Limit (mg/L)</th></tr>
<tr><td>Boron Total</td><td>1.8</td></tr>
<tr><td>Chloride Total</td><td>230</td></tr>
<tr><td>Sulfate Total</td><td>1962</td></tr>
<tr><td>TDS Total</td><td>3995</td></tr>
</table>

II. Final Load Allocations for Irrigated Agricultural Dischargers

<table>
<tr><th>Subwatershed</th><th>Chloride Allocation (lb/day)</th><th>TDS Allocation (lb/day)</th><th>Sulfate Allocation (lb/day)</th><th>Boron Allocation (lb/day)</th></tr>
<tr><td>Simi</td><td>641</td><td>3,631</td><td>1,068</td><td>4</td></tr>
<tr><td>Las Posas</td><td>2,109</td><td>11,952</td><td>3,515</td><td>N/A</td></tr>
<tr><td>Conejo</td><td>743</td><td>4,212</td><td>1,239</td><td>N/A</td></tr>
<tr><td>Camarillo</td><td>59</td><td>336</td><td>99</td><td>N/A</td></tr>
<tr><td>Pleasant Valley</td><td>305</td><td>1,730</td><td>509</td><td>N/A</td></tr>
<tr><td>Revolon</td><td>7,238</td><td>41,015</td><td>12,063</td><td>48</td></tr>
</table>
</td></tr>
</table>

TMDL Element	Key Findings and Regulatory Provisions
Margin of Safety	A margin of safety for the TMDL is designed to address uncertainties in the analysis that could result in targets not being achieved in the waterbodies. The primary uncertainties associated with this TMDL include the impact of implementing a salt balance on receiving water quality. The effect of the salt balance is estimated by the mass-balance and subject to the following uncertainties: 1) the flow rates used to determine the loading capacity may change due to TMDL implementation, 2) the use of a daily load for determining allocations and an annual mass balance to attain water quality objectives, and 3) the sources of salts may not be completely known. Both implicit and explicit MOS are included for this TMDL. The implicit MOS stems from the use of conservative assumptions made during development of the TMDL. The mass of salts transported out of the watershed during wet weather is on average over 15% of the annual mass of salts introduced to the watershed for all constituents. The salt export during wet weather ranges from 7% to 41% for TDS, 9% to 48% for chloride, and 13% to 89% for sulfate of the export required to meet a salt balance in the watershed. This mass is not used to determine compliance with the salt balance and represents a significant implicit margin of safety. The model also contains a component that serves to model the impact of "stranded" salts in the watershed. The component assumes low irrigation efficiencies and the ability of all salts applied as irrigation water anywhere in the watershed to be discharged to receiving water in critical years. This likely overestimates the impact of "stranded" salts and results in a higher concentration of salts due to irrigation in the receiving water. An explicit MOS of 10% is applied to the adjustment factors for the POTWs to account for the uncertainties in the TMDL analysis. By applying the margin of safety to the adjustment factor, more salts are required to be exported than are necessary to offset the background loads in the watershed. This additional salt export provides a margin of safety on the salt balance to address uncertainties that the salt balance will result in compliance with water quality objectives. The 10% explicit MOS is determined sufficient to address the uncertainties associated with the estimated impact of the salt balance on receiving water loadings.
Future Growth	Ventura County accounts for slightly more than 2% of the state's residents with a population of 753,197 (US Census Bureau, 2000). GIS analysis of the 2000 census data yields a population estimate of 334,000 for the CCW, which equals about 44% of the county population. According to the Southern California Association of Governments (SCAG), growth in Ventura County averaged about 51% per decade from 1900-2000; with growth exceeding 70% in the 1920s, 1950s, and

TMDL Element	Key Findings and Regulatory Provisions
	1960s. Significant population growth is expected to occur within and near present city limits until at least 2020. Increased growth requires additional water. Therefore, future growth could result in increased loads of salts being imported into the watershed. However, the TMDL implementation plan is designed to maintain a salts balance in the watershed. If additional salts are imported into the watershed, a larger volume of salts will also be exported out of the watershed to maintain the balance. Consequently, increased imports from future growth are not expected to result in higher concentrations in receiving waters.
Seasonal Variations and Critical Conditions	The critical condition for salts is during dry weather periods. During wet weather, stormwater flows dilute the salt discharges and receiving water concentrations are significantly lower than water quality objectives. Dry weather, defined as days with flows lower than the 86th percentile flow and no measurable precipitation, is a critical condition regardless of the dry weather flows in the stream. The driving conditions for exceedances of water quality objectives are the concentrations in the water supply (which is driven by surface water concentrations in Northern California) and the previous year's annual precipitation and corresponding flows. Elevated salts concentrations during dry weather occur when stranded salts are discharged into the surface water after higher than average rainfall years. The elevated concentrations occur during years when the previous annual flow is greater than the 75th percentile of the annual flows for the watershed (critical year). The higher concentrations occur during the dry periods of critical years regardless of whether the annual flow for the critical year is an average flow year, higher than average year, or lower than average year. The key parameter determining a critical year is the total annual flow volume for the previous year. Based on model results, four critical years were defined based on modeled results that resulted in receiving water concentrations greater than the 99th percentile concentration during at least 10% of the dry period. The critical years identified from the model occur with conditions similar to what occurred in 1978, 1979, 1983 and 1998.
Special Studies and Monitoring Plan	**<u>Special Studies</u>** Several special studies are planned to improve understanding of key aspects related to achievement of WLAs and LAs for the Salts TMDL. ***1. Special Study #1 (Optional) – Develop Averaging Periods and Compliance Points*** The TMDL technical report has provided information that shows instantaneous salts objectives may not be required to protect

TMDL Element	Key Findings and Regulatory Provisions
	groundwater recharge and agricultural beneficial uses. It is possible that the beneficial uses will be protected and a salt balance achieved without achieving instantaneous water quality objectives in all reaches of the watershed. This optional special study is included to allow an investigation of averaging periods for the salts objectives in the CCW. Additionally, this study will investigate the locations of beneficial uses and the possibility of identifying compliance points for the salts objectives at the point of beneficial use impacts. The use of compliance points would alleviate the need to develop site-specific objectives for the reaches of the watershed upstream of the POTW discharges (described in Special Study #3) while still ensuring the protection of beneficial uses. Sensitive beneficial uses are not present in the upper reaches and POTW discharges dilute the salts from the upper reaches and may allow compliance with the objectives at the point of groundwater recharge downstream. This is an optional special study to be conducted if desired by the stakeholders or determined necessary or appropriate by the Executive Officer. ***2. Special Study #2 (Optional) – Develop Natural Background Exclusion*** Discharges of groundwater from upstream of the Simi Valley (Reaches 7 and 8) and Hill Canyon WWTPs (Reaches 12 and 13) and downstream of the Camrosa WRP (Reach 3) contain high salts concentrations. Natural marine sediments may contribute to the high concentrations in those discharges. This special study would evaluate whether or not the groundwater discharges in these areas would qualify for a natural sources exclusion. The special study could follow a 'reference system/anti-degradation approach' and/or a 'natural sources exclusion approach' for any allocations included in this TMDL that are proven unattainable due to the magnitude of natural sources. The purpose of a 'reference system/anti-degradation approach' is to ensure water quality is at least as good as an appropriate reference site and no degradation of existing water quality occurs where existing water quality is better than that of a reference site. The intention of a 'natural sources exclusion approach' is to ensure that all anthropogenic sources of salts are controlled such that they do not cause exceedances of water quality objectives. These approaches are consistent with state and federal anti-degradation policies (State Board Resolution No. 68-16 and 40 C.F.R. 131.12). This is an optional special study to be conducted if desired by the stakeholders or determined necessary for establishing a natural sources exclusion by the Executive Officer.

TMDL Element	Key Findings and Regulatory Provisions
	3. Special Study #3 (Optional) – Develop Site-Specific Objectives The TMDL implementation plan provides for actions to protect the agricultural and groundwater recharge beneficial uses in the CCW. As shown in the linkage analysis, some downstream reaches may not achieve the water quality objectives through implementation of this TMDL because of the transport of salts out of the watershed through those reaches. Consequently, an optional special study is included to allow the CCW stakeholders to pursue development of site-specific objectives for salts for reaches upstream of the Hill Canyon WWTP and Simi Valley WQCP (Reaches 7, 8, 12, and 13), Calleguas Creek Reach 3, Revolon Slough (Reach 4) and Beardsley Wash (Reach 5). These alternative numeric water quality objectives would be developed based on the beneficial uses to be protected in a reach and the attainability of the current water quality objectives. This is an optional special study to be conducted if desired by the stakeholders or determined necessary or appropriate by the Executive Officer. ***4. Special Study #4 (Optional) – Develop Site-Specific Objectives for Drought Conditions*** During drought conditions, the load of salts into the watershed increases as a result of increasing concentrations in imported water. Stakeholders in the CCW cannot control the increased mass entering the watershed from the water supply. However, the stakeholders do have the ability to manage the salts within the watershed to protect beneficial uses and export the additional mass of salts out of the watershed. If necessary, site-specific objectives may be developed to address situations that result in higher imported water salt concentrations to allow management of the salts and protection of beneficial uses. This special study may be combined with Special Study #3 if desired. This is an optional special study to be conducted if desired by the stakeholders or determined necessary or appropriate by the Executive Officer of the Regional Board. ***5. Special Study #5 (Optional) – Develop Site-Specific Objectives for Sulfate*** Sulfate is a necessary nutrient for plant growth and sulfate containing products are often applied to agriculture as fertilizers and pesticides. Therefore, site-specific objectives may be investigated and developed for sulfate that more accurately protects agricultural supply beneficial uses. Additionally, this study could evaluate whether or not a sulfate balance is necessary to maintain in the watershed. This special study may be combined with Special Study #3 and/or #4 if desired.

TMDL Element	Key Findings and Regulatory Provisions
	This is an optional special study to be conducted if desired by the stakeholders or determined necessary or appropriate by the Executive Officer of the Regional Board. **<u>Monitoring Plan</u>** To ensure that the goal of a salts balance in the watershed is being achieved and water quality objectives are being met, a comprehensive method of tracking inputs and outputs to the watershed will be developed. A monitoring plan will be submitted to the RWQCB for Executive Officer approval within six months of the effective date of the CCW Salts TMDL. Monitoring will begin one year after Executive Officer approval of the monitoring plan to allow time for the installation of automated monitoring equipment. ***1. Input Tracking*** Inputs to the watershed are tracked through four mechanisms:1) Information on the import of State Water Project water is readily available and provides information on the mass of salts brought into the watershed; 2) Groundwater pumping records provide information on the mass of salts imported into the watershed from deep aquifer pumping; 3) Import records of water supply form the Santa Clara River can be obtained to determine the mass of salts imported through this source; 4) Monitoring data on imported water quality can be compared to monitoring of effluent quality to estimate the amount of salts added through human use of the water. ***2. Output Tracking and Determining Compliance with Water Quality Objectives*** Outputs from the watershed will be tracked through surface water monitoring at key locations in the watershed and monitoring of discharges to the brine line. Monitoring will include both flow and quality. Compliance with water quality objectives will be determined at key locations where beneficial uses occur in the watershed. The stations used for output tracking will also be used to determine compliance with water quality objectives. The monitoring program will determine if the TMDL compliance points are protective of the beneficial uses for the subwatershed. If the monitoring determines that the compliance points are not protective of beneficial uses, an alternative compliance point will be selected. The Executive Officer may revise the TMDL compliance point based on the result of the monitoring. Additionally, if other places in the watershed are identified where sensitive beneficial uses occur, water quality monitoring stations can be added to determine

TMDL Element	Key Findings and Regulatory Provisions
	compliance with water quality objectives. For the RWRMP, three new or upgraded automated flow measuring and sample collection stations will be installed at three points on the stream system to continuously record flow and various water quality parameters during dry weather. Preliminary monitoring locations include Arroyo Conejo in Hill Canyon, Conejo Creek at Baron Brothers Nursery and Calleguas Creek at University Drive. For the NRRWMP, one new or upgraded automated flow measuring and sample collection station will be added downstream of Simi Valley at the point at which groundwater recharge begins. A preliminary monitoring location is at Hitch Blvd. where an existing flow gauging station exists. However, the amount of groundwater recharge upstream of this site will need to be evaluated to determine the exact monitoring location. For Revolon Slough, the existing monitoring station at Wood Road. will be used to monitor quality and flow on Revolon Slough to determine the outputs from the Revolon portion of the Pleasant Valley subwatershed. Additional land use monitoring will be conducted concurrently at representative agricultural and urban runoff discharge sites as well as at POTWs in each of the subwatersheds and analyzed for chloride, TDS, sulfate, and boron. The location of the land use stations will be determined before initiation of the Calleguas Creek Watershed TMDL Monitoring Program (CCWTMP). All efforts will be made to include at least two wet weather sampling events during the wet season (October through April) during a targeted storm event. ***3. Reporting and Modification of the Calleguas Creek Watershed TMDL Monitoring Program*** A monitoring report will be prepared annually within six months after completion of the final event of the sampling year. An adaptive management approach to the CCWTMP will be adopted as it may be necessary to modify aspects of the CCWTMP. Results of sampling carried out through the CCWTMP and other programs within the CCW may be used to modify this plan, as appropriate. These modifications will be summarized in the annual report. Possible modifications could include, but are not limited to the, following: ▪ The inclusion of additional land use stations to accurately characterize loadings; ▪ The removal of land use stations if it is determined they are duplicative (*i.e.,* a land use site in one subwatershed accurately characterize the land use in other subwatersheds); ▪ The inclusion of additional in-stream sampling stations; and ▪ The elimination of analysis for constituents no longer identified in land use and/or instream samples. If a coordinated and comprehensive monitoring plan is developed and

TMDL Element	Key Findings and Regulatory Provisions
	meets the goals of this monitoring plan that plan should be considered as a replacement for the CCWTMP. ***4. Other Monitoring*** Other surface water and groundwater monitoring will be implemented as necessary to assess the impacts of the implementation actions and adjust the activities as necessary to protect beneficial uses and achieve the salts balance. Examples of additional monitoring that may be conducted include: ▪ Monitoring under Phase 2 and 3 of the RWRMP to evaluate the effects of replenishment water releases and groundwater treatment and releases. ▪ Monitoring to assess the impacts of management of the Simi Basin groundwater dewatering wells under Phase 1 of the NRRWMP.
Implementation Plan	The identified implementation actions provided in this TMDL will result in a salt balance in the stream and are expected to result in compliance with the allocations. The implementation plan is comprised of actions that directly impact discharges to the receiving water and actions that will indirectly impact discharges to receiving water. Responsible agencies and jurisdictions shall consider minimum flow requirements that may be imposed by federal or state regulatory agencies when implementing actions to comply with this TMDL. Should the proposed implementation actions not result in compliance with objectives and site-specific objective are not adopted, additional implementation actions may be required to achieve the water quality objectives. The implementation actions described in the TMDL represent a range of activities that could be conducted to achieve a salts balance in the watershed. Future considerations may result in other actions being implemented rather than the options presented. However, any proposed actions will be reviewed using the salt balance model to ensure the action does not adversely impact other implementation actions in the watershed or the salt balance of a downstream subwatershed. Currently, the implementation plan is presented in phases with a tentative schedule for each phase. The implementation of projects may occur earlier than planned or begin during an earlier phase. Additionally, many of the implementation actions require the use of the Regional Salinity Management Conveyance (RSMC or brine line). As such, the implementation schedule for those actions will be linked the construction schedule for the RSMC.

TMDL Element	Key Findings and Regulatory Provisions
	The implementation plan for the Salts TMDL includes regional and subwatershed specific implementation actions. There are four key structural elements to the regional implementation: Regional Salinity Management Conveyance (RSMC), Water Conservation, Water Softeners, and Best Management Practices for Irrigated Agriculture. Subwatershed implementation includes Renewable Water Resource Management Program (RWRMP) for the Southern Reaches and Northern Reach Renewable Water Management Plan (NRRWMP). Detailed discussion for each implementation element including description of the action, status and schedule for implementing the action, and a summary of the expected contribution to achievement of the salts balance are provided in the Staff Report and Technical for this TMDL. Proposed implementation actions in the watershed, responsible agencies, and the estimated completion date based on the effective date of the TMDL are summarized below.

Summary of Proposed Implementation Actions

Action	Responsible Agency/ies	Schedule for Completion
Water Conservation	POTWs, Permitted Stormwater Dischargers, and Other NPDES Permittees	3 years
Water Softeners	POTWs and Permitted Stormwater Dischargers	10 years
Best Management Practice for Agricultural Dischargers	Agricultural Dischargers	2 years
RMSC Phase 1	Calleguas MWD	2 year
RMSC Phase 2	Calleguas MWD	5 year
RMSC Phase 3	Calleguas MWD	10 years
RWRMP Phase 1	Camrosa WD, CamSan	3 years
RWRMP Phase 2	Camrosa WD, TO	6 years
RWRMP Phase 3	Camrosa WD, TO	10 years
RWRMP Phase 4	To Be Determined	15 years
NRRWMP Phase 1	Calleguas MWD, Simi Valley, Moorpark WWTP	3 years
NRRWMP Phase 2	Calleguas MWD, VCWW, Camarillo	7 years
NRRWMP Phase 3	Camarillo, Simi Valley	10 years
NRRWMP Phase 4	To Be Determined	15 years
Final Completion Date		15 years

The sections below provide discussion of the application of the final WLAs for POTWs, specific permitted stormwater discharges, other NPDES dischargers, and agricultural dischargers.

TMDL Element	Key Findings and Regulatory Provisions
	I. POTWs, permitted stormwater discharges, and other NPDES discharges The final WLAs will be included for permitted stormwater discharges, POTWs, and other NPDES discharges in accordance with the compliance schedules provided in Table 7-22.2. The Regional Board may revise these WLAs based on additional information developed through special studies and/or monitoring conducted as part of this TMDL. ▪ **POTWs** WLAs established for the POTWs in this TMDL will be implemented through NPDES permit limits. Compliance will be determined through monitoring of final effluent discharge as defined in the NPDES permit. The proposed permit limits will be applied as end-of-pipe mass-based monthly average effluent limits. Daily maximum effluent limit is not required because chloride is not expected to have an immediate or acute effect on the beneficial uses. Compliance with the minimum salt export requirements for POTWs will be based on the salt export from the subwatershed to which they discharge. The mechanisms for meeting the minimum salt export requirements and for monitoring progress towards meeting those requirements will be included in the monitoring program work plan and approved by the Executive Officer. At the end of each year, the amount of salt exported will be compared to the minimum required salt export. POTW allocations will be reduced using the adjustment factor if both of the following conditions occur: • The annual dry weather salt exports from the subwatershed to which the POTW discharges are below the minimum required exports for the previous year; and • The water quality objectives were exceeded in the receiving water at the base of the subwatershed The POTW allocations will be reduced for the following year by the difference between the minimum required salt export and the actual amount exported. The discharger shall be notified by the Regional Board that the assigned WLAs are reduced and the reduced effluent limits shall be applied for the next year. If the POTW allocations are reduced, the POTW will need to increase the amount of salt export or reduce the mass of salts discharged from

TMDL Element	Key Findings and Regulatory Provisions
	the POTW before the end of the following year when the adjustment will be evaluated again. POTWs can only request to adjust the assigned WLAs upwards using the adjustment factor under limited conditions provided below: • Water quality objectives are met in the receiving waters; • Imported water supply chloride concentrations exceed 80 mg/L; and • Discharges from the POTW exceed the allocation. When imported water supply chloride concentrations exceed 80 mg/L, the POTW will monitor the effluent to determine if the wasteload allocation is exceeded. If the wasteload allocation is exceeded and the POTW desires an adjustment to the allocation, the POTW will submit documentation of the water supply chloride concentrations, the receiving water chloride concentration, the effluent mass, and the evidence of increased salt exports to offset the increased discharges from the POTW to the Regional Board for approval. The adjustment factor will apply for three months and the POTW must submit the evidence outlined above every three months to keep the adjustment factor active. As long as the required information is submitted, the adjustment factor will be in effect upon notification in writing from the RWQCB. If needed, replenishment water will be released in the City of Thousand Oaks to maintain in-stream beneficial uses. Studies will be conducted to identify the discharge locations and volumes needed to maintain in-stream beneficial uses. This element ensures protection of beneficial uses if the Hill Canyon WTP effluent discharge is terminated and /or the flows from the North and South Forks of the Arroyo Conejo are converted to the brine line. ▪ **Urban Stormwater Discharger** A group mass-based dry weather WLA has been developed for all permitted stormwater discharges, including municipal separate storm sewer systems (MS4s), and general industrial and construction stormwater permits. USEPA regulation allows allocations for NPDES-regulated stormwater discharges from multiple point sources to be expressed as a single categorical WLA when the data and information are insufficient to assign each source or outfall individual WLAs (40 CFR 130). The grouped allocation

TMDL Element	Key Findings and Regulatory Provisions
	will apply to all NPDES-regulated municipal stormwater discharges in the CCW. MS4 WLAs will be incorporated into the NPDES permit as receiving water limits measured in-stream at the base of each subwatershed. ▪ **Other NPDES Dischargers** WLAs established for other NPDES permitted dischargers in this TMDL, including minor non-stormwater permittees (other than Camrosa WRP) and general non-stormwater permittees, will be implemented through NPDES permit limits. The proposed permit limits will be applied as end-of-pipe concentration-based effluent limits, and compliance determined through monitoring of final effluent discharge as defined in the NPDES permit. **II. Agriculture** Load allocations for salts will be implemented through Conditional Waiver of Discharges from Irrigated Lands (Conditional Waiver Program) adopted by the LARWQCB on November 3, 2005. Compliance with LAs will be measured in-stream at the base of the subwatersheds and will be achieved through the implementation of BMPs consistent with the Conditional Waiver Program. The Conditional Waiver Program requires the development of an agricultural water quality management plan (AWQMP) to address pollutants that are exceeding receiving water quality objectives as a result of agricultural discharges. Therefore, implementation of the load allocations will be through the development of an agricultural management plan for salts. Implementation of the load allocations will also include the coordination of BMPs being implemented under other required programs to ensure salts discharges are considered in the implementation. Additionally, agricultural dischargers will participate in educational seminars on the implementation of BMPs as required under the Conditional Program. Studies are currently being conducted to assess the extent of BMP implementation and provide information on the effectiveness of BMPs for agriculture. This information will be integrated into the AWQMP that will guide the implementation of agricultural BMPs in the Calleguas Creek watershed. After implementation of these actions, compliance with the allocations and TMDL will be evaluated and the allocations reconsidered if necessary based on the special studies and monitoring plan section of the implementation plan.

TMDL Element	Key Findings and Regulatory Provisions
	As shown in Table 7-22.2, implementation of LAs will be conducted over a period of time to allow for implementation of the BMPs, as well as coordination with special studies and implementation actions resulting from other TMDL Implementation Plans (Nutrient, Historic Pesticides and PCBs, Sediment, Metals, Bacteria, etc.).

Table 7-22.2 Calleguas Creek Watershed Salts TMDL: Implementation Schedule

Item	Implementation Action	Responsible Party	Completion Date
1	Effective date of interim Salts TMDL waste load allocations (WLAs)	POTWs, Permitted Stormwater Dischargers[1] (PSD), and Other NPDES Permittees	Effective date of the amendment
2	Effective date of interim Salts TMDL load allocations (LAs)	Agricultural Dischargers	Effective date of the amendment
3	Responsible jurisdictions and agencies shall submit compliance monitoring plan to the Los Angeles Regional Board for Executive Officer approval.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	6 months after effective date of the TMDL
4	Responsible jurisdictions and agencies shall begin monitoring as outlined in the approved monitoring plan.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	1 year after monitoring plan approval by Executive Officer
5	Responsible jurisdictions and agencies shall submit workplans for the optional special studies.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	Within 10 years of effective date of the TMDL
6	Responsible jurisdictions and agencies shall submit results of the special studies.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	2 years after workplan approval by Executive Officer
7	Re-evaluation of the interim WLAs and interim LAs for boron, chloride, sulfate, and TDS based on new data. Responsible jurisdictions and agencies shall demonstrate that implementation actions have reduced the boron, sulfate, TDS, and chloride imbalance by 20%.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	3 years after effective date of the TMDL
8	Re-evaluation of the interim WLAs and interim LAs for boron, chloride, sulfate, and TDS based on new data. Responsible jurisdictions and agencies shall demonstrate that implementation actions have reduced the boron, sulfate, TDS and chloride imbalance by 40%.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	7 years after effective date of the TMDL
9	Re-evaluation of the interim WLAs and interim LAs for boron, chloride, sulfate, and TDS based on new data. Responsible jurisdictions and agencies shall demonstrate that implementation actions have reduced the boron, sulfate, TDS, and chloride imbalance by 70%.	POTWs, Permitted Stormwater Dischargers (PSD), Other NPDES Permittees, and Agricultural Dischargers	10 years after effective date of the TMDL
10	The Los Angeles Regional Board shall reconsider this TMDL to re-evaluate numeric targets, WLAs, LAs and the implementation schedule based on the results of the special studies and/or compliance monitoring.	The Regional Board	12 years after effective date of the TMDL
11	Responsible jurisdictions and agencies shall demonstrate that the watershed has achieved an annual boron, sulfate, TDS, and chloride balance.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	15 years after effective date of the TMDL
12	The POTWs and non-storm water NPDES permits shall achieve WLAs, which shall be expressed as NPDES mass-based effluent limitation specified in accordance with federal regulations and state policy on water quality control.	POTWs and Other NPDES Permittees	15 years after effective date of the TMDL

[1] Permitted stormwater dischargers that are responsible parties to this TMDL include the Municipal Stormwater Dischargers (MS4s) of the Cities of Camarillo, Moorpark, Thousand Oaks, County of Ventura, Ventura County Watershed Protection District, and general industrial and construction permittees.

Item	Implementation Action	Responsible Party	Completion Date
13	Irrigated agriculture shall achieve LAs, which will be implemented through the Conditional Waiver for Irrigated Lands as mass-based receiving water limits.	Agricultural Dischargers	15 years after effective date of the TMDL
14	The permitted stormwater dischargers shall achieve WLAs, which shall be expressed as NPDES mass-based limits specified in accordance with federal regulations and state policy on water quality control.	Permitted Stormwater Dischargers	15 years after effective date of the TMDL
15	Water quality objectives will be achieved at the base of the subwatersheds designated in the TMDL.	POTWs, PSD, Other NPDES Permittees, and Agricultural Dischargers	15 years after effective date of the TMDL