

ADDITIONAL
Comment Summary and Responses
from the Calleguas Creek Watershed Management Plan
Administrative Update to Add Chapter 7 to the Basin Plan
Comment Due Date: November 14, 2011

No.	Author	Comment	Response
1	Calleguas Creek Watershed Management Plan	<p>The public agencies and private parties implementing TMDLs on the Calleguas Creek Watershed (Parties) would like to take this opportunity to provide comments on the Los Angeles Regional Water Quality Control Board's (Regional Board) <i>Notice of Proposed Non-Regulatory Amendments to Add Chapter 7 "Total Maximum Daily Loads" to Administratively Update the Basin Plan</i>, dated September 30, 2011. This letter provides a discussion of specific comments regarding the incorporation of Chapter 7 "Total Maximum Daily Loads" as it pertains to the Calleguas Creek Watershed Management Plan.</p> <p>The Parties submit the following comments regarding the proposed Chapter 7 non-regulatory amendments:</p>	Comment noted.
2	Calleguas Creek Watershed Management Plan	<p>1. Chapter Organization Chapter 7 "Total Maximum Daily Loads" is 389 pages long and contains 30 adopted and approved TMDLs that are currently ordered by the table numbers that were dictated by adoption date. Although we recognize the organization is based on the numbering in the adopted Basin Plan Amendments, the ordering makes it challenging to find TMDLs in the chapter. Based on both the length of the document and the inclusion of TMDLs for multiple watersheds, the Parties request that the following organizational changes be made for consistency throughout</p>	Regional Board staff appreciates the editorial suggestions by the commenter. Staff agrees to add page numbers to the table of contents and the list of figures, tables and inserts. Staff also agrees to add "Figure A" to the list of figures, tables, and inserts. The Executive Officer has prepared a change sheet making these non-substantive changes to the administrative update. The other proposed changes are not necessary for the purpose of improving the clarity of Chapter 7. Please

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		<p>the document, as well as to facilitate use of the document:</p> <ul style="list-style-type: none"> • Include page numbers in the “Table of Contents” to allow reader to easily find a desired section or TMDL. • Include the full name of each TMDL, as specified in the corresponding final Basin Plan Amendment, in the “Table of Contents.” • Within the document and the “Table of Contents,” reorder the TMDLs by watershed, then list the watersheds and TMDLs in alphabetical order. For example, using the current page numbers: <table style="margin-left: 40px; border: none;"> <thead> <tr> <th style="text-align: left;">TMDL Summaries</th> <th style="text-align: right;">Page</th> </tr> </thead> <tbody> <tr> <td colspan="2">Calleguas Creek Watershed</td> </tr> <tr> <td>7-7 Calleguas Creek Nitrogen Compounds and Related Effects TMDL</td> <td style="text-align: right;">7-83</td> </tr> <tr> <td>7-17 Calleguas Creek Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation TMDL</td> <td style="text-align: right;">7-191</td> </tr> <tr> <td>7-19 Calleguas Creek Watershed Metals and Selenium TMDL</td> <td style="text-align: right;">7-219</td> </tr> <tr> <td>7-22 Calleguas Creek Watershed Salts TMDL</td> <td style="text-align: right;">7-253</td> </tr> <tr> <td>7-16 Calleguas Creek Watershed Toxicity TMDL</td> <td style="text-align: right;">7-181</td> </tr> <tr> <td>7-24 Revolon Slough and Beardsley Wash Trash TMDL</td> <td style="text-align: right;">7-285</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • Include page numbers in the “List of Figures, Tables and Inserts” beginning on p.7-4. • Add Figure A (p. 7-15) to the “List of Figures, Tables and 	TMDL Summaries	Page	Calleguas Creek Watershed		7-7 Calleguas Creek Nitrogen Compounds and Related Effects TMDL	7-83	7-17 Calleguas Creek Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation TMDL	7-191	7-19 Calleguas Creek Watershed Metals and Selenium TMDL	7-219	7-22 Calleguas Creek Watershed Salts TMDL	7-253	7-16 Calleguas Creek Watershed Toxicity TMDL	7-181	7-24 Revolon Slough and Beardsley Wash Trash TMDL	7-285	<p>note that the TMDLs may be sorted by watershed on the TMDL webpage of the Regional Board website.</p>
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		<p style="text-align: center;">Inserts.”</p> <p>We feel these changes would significantly increase the usability of the Basin Plan Amendment.</p>	
3	Calleguas Creek Watershed Management Plan	<p>2. Effective Date for Revised TMDLs The Parties request clarification of the effective dates for all TMDLs that have been revised. We suggest that both the original effective date and the revised effective date be included in the applicable TMDL summaries to allow a better understanding of when dates apply and for clarity in understanding the revision history for the TMDLs.</p>	<p>The correct effective date of the TMDL would be the most recent date (September 27, 2004), which reflects the most recent amendment. There can only be one effective date for the TMDL, and listing more than one effective date may cause confusion. For TMDLs that have been revised and have new effective dates, if it was intended that a particular compliance date be tied to the original effective date of a TMDL, staff inserted a hard compliance date into the TMDL based on the original effective date.</p>
4	Calleguas Creek Watershed Management Plan	<p>Comments on Specific TMDLs The Parties have additional comments on certain TMDLs being implemented on the Calleguas Creek Watershed, as follows:</p> <ul style="list-style-type: none"> • 7-7 Calleguas Creek Nitrogen Compounds and Related Effects TMDL <ul style="list-style-type: none"> • On p. 7-83, include both the original effective date (July 16, 2003) and the revised effective date (October 15, 2009). Add the word “revised” to “The [revised] effective date of this TMDL is: October 15, 	<p>See comment 3.</p> <p>As a result of importing the Basin Plan amendments into a different program for the layout of Chapter 7, footnotes were moved to the end of the table. However, these footnotes still reference the correct text within the table.</p> <p>Regional Board appreciates the editing</p>

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		<p>2009.”</p> <ul style="list-style-type: none"> • Move footnotes on p. 7-86 to previous page, since they correspond to the table at the top of p. 7-85 (Waste Load Allocations [for point sources]) • Add border below Item 6 on p. 7-88 • 7-17 Calleguas Creek Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation TMDL <ul style="list-style-type: none"> • Siltation Targets (p. 7-193) – So that it is easier to read, add a line break at the indicated (*) location: <ul style="list-style-type: none"> ▪ “Maintenance of existing habitat in Mugu Lagoon (*) Preservation of the existing 1400 acres of aquatic habitat in Mugu Lagoon.” • 7-19 Calleguas Creek Watershed Metals and Selenium TMDL <ul style="list-style-type: none"> • Table 7-19.2 (p. 7-238) – Add border after Item 20 	<p>suggestions from this commenter, but does not believe that these changes are necessary for the purpose of improving clarity in these TMDLs, or Chapter 7, as a whole.</p>
5	Calleguas Creek Watershed Management Plan	<p>Finally, we request clarification on the version of the Calleguas Creek Toxicity, Diazinon and Chlorpyrifos TMDL (Toxicity TMDL) that is included in the proposed amendment. The version of the TMDL in the proposed Chapter 7 non-regulatory amendments include acute chlorpyrifos wasteload allocations for wastewater and minor point source dischargers and load allocations for non-point sources and other language modifications that are not present in the Final Basin Plan Amendment posted on the Regional Board’s website. We request the Chapter 7 Toxicity TMDL match the Basin Plan Amendment on the Regional Board’s</p>	<p>After Regional Board adoption of the Calleguas Creek Toxicity TMDL, State Board staff determined that minor, non-substantive changes were needed to clarify the language of this TMDL. The Executive Officer made the necessary corrections and the State Board, OAL, and US EPA approved the corrected version of the TMDL. The Regional Board’s website was not updated with the most recent version. The correct version of this TMDL is included in Chapter 7. The website has been</p>

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		website or that documentation be provided that clearly shows the basis for the modifications.	<p>updated to include the most recent version of this TMDL. In addition, the Executive Officer's memorandum transmitting the corrections to State Board has been added to the technical documentation link on the Calleguas Creek Toxicity TMDL webpage on the Regional Board website at:</p> <p>http://www.waterboards.ca.gov/losangeles/board_decisions/basin_plan_amendments/technical_documents/bpa_30_2005-009_td.shtml</p>
6	Calleguas Creek Watershed Management Plan	On behalf of the watershed stakeholders implementing TMDLs, I want to thank you for the opportunity to submit these comments on the proposed Chapter 7 non-regulatory amendments.	Comment noted.