

Calleguas Creek Watershed Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation TMDL

Staff Memorandum

Introduction

This Staff Memorandum presents the elements and implementation plan of the tentative Calleguas Creek Watershed Organochlorine (OC) Pesticides, Polychlorinated biphenyls (PCBs), and Siltation TMDL. The OC Pesticide and PCBs TMDL was developed through a collaborative, stakeholder-led process, which was responsible for the technical analyses leading to the Regional Board staff's recommended TMDL. The Siltation TMDL was developed by staff of the Regional Board. This memorandum provides a brief overview of the TMDL development, and includes the TMDL elements and implementation plan, which the Board will consider adopting as Basin Plan amendments.

This TMDL addresses water quality impairments of Calleguas Creek, including its tributaries, segments and Mugu Lagoon, caused by historic pesticides, PCBs, and siltation. Development of these TMDLs was mandated by the Consent Decree between Heal the Bay, et. al. and US EPA (C 98 4825, 1999). In accordance with this Consent Decree, US EPA must approve or establish these TMDLs by March, 2006.

Calleguas Creek stakeholders have been actively engaged with US EPA and the Regional Board on a variety of watershed planning initiatives through the Calleguas Creek Watershed Management Plan (CCWMP), an established, stakeholder-lead watershed management group, operating since 1996. The CCWMP includes broad participation from Federal, State and County agencies, municipalities, POTWs, water purveyors, groundwater management agencies, and agricultural and environmental groups. As part of its mission to address issues of long-range comprehensive water resources, including land use, economic development, and open space preservation, the CCWMP proposed to the US EPA and Regional Board to take the lead on development of the TMDLs for the Calleguas Creek Watershed.

TMDL Development

The CCWMP worked with US EPA and Regional Board staff to define their respective scope of activities for the OC Pesticides and PCBs TMDL. The CCWMP, with partial funding from US EPA, engaged a contractor, Larry Walker Associates, to develop a workplan under which this TMDL was developed. The workplan was first submitted to the Regional Board in January, 2003. Based on Regional Board staff review and comments, the workplan was revised in June, 2003 and approved in July, 2003. The workplan addressed the methods and schedule for watershed monitoring, source and linkage analysis, development of wasteload and load allocations, and the administrative

structure through which stakeholders and the public were informed on TMDL development. Work commenced in October, 2003 with the submittal of the final TMDL report by Larry Walker Associates in January, 2005.

During the development of the TMDL reports, Regional Board staff worked with US EPA, the CCWMP and staff from Larry Walker Associates on a frequent and regular basis. Outreach and stakeholder comments were solicited through the CCWMP structure, which included monthly steering committee meetings and several subcommittee meetings responsible for various aspects of watershed management. These meetings were open to the public; agendas and meeting minutes were also published on the CCWMP website: www.calleguascreek.org. In addition to the monthly meetings, the CCWMP, Regional Board and US EPA staff, and a representative from the City of Camarillo, Sanitation Department, met on a monthly basis to discuss TMDL issues. These meetings were facilitated and noted by staff of the CCWMP, and several of these meetings were attended by representatives of the Calleguas Creek Watershed POTWs, Heal the Bay, and the Ventura County Coastkeeper. Finally, the CCWMP arranged and hosted a public meeting with invitations mailed to 3,000 persons in the watershed in January, 2005.

In addition to stakeholder and public involvement, the workplan also set forth a Technical Advisory Committee composed of independent reviewers from Universities and National Laboratories for technical review. The Technical Advisory Committee considered issues such as numeric targets, margin of safety, and load allocations. Comments from the Committee were addressed by Larry Walker Associates, and the record of communications, comments and responses were included as an appendix to the TMDL Report.

The development of the TMDL reports followed a process in which the CCWMP and LWA prepared draft documents for discussion. Regional Board and US EPA staff considered these approaches and in some instances provided alternative proposals. These alternative proposals were brought back to the CCWMP for consideration and the CCWMP provided direction to LWA staff on how to address the modifications. During development of the TMDL reports, differences between the US EPA, CCWMP, LWA and the Regional Board staff on technical and policy issues were carefully considered and the TMDL Technical reports include the compilation of input from all of these sources and represent the discussions and compromises of the stakeholder process. The language of the technical report attempts to capture some of the resolutions to the differences and reflects the unique nature of this process.

Key Documents

Regional Board staff's tentative TMDL for OC Pesticides and PCBs, including numeric targets, allocations, and implementation plan, was based on the work by the CCWMP and its contractor, Larry Walker Associates. The load allocations and implementation tasks for siltation were developed by the Regional Board staff, and are included in the memorandum "Mugu Lagoon Siltation TMDL." Tables 1 and 2 contain the elements and implementation plan of the Calleguas Creek Watershed OC Pesticides and PCBs TMDL. The TMDL Report and its appendices are appended to this Staff Report. Records of meetings and communications are contained in the Administrative Record for this TMDL.