

A COOPERATIVE STRATEGY FOR RESOURCE MANAGEMENT & PROTECTION

March 30, 2017

Electronic Submission: losangeles@waterboards.ca.gov

California Regional Water Quality Control Board Los Angeles Region ATTN: Jun Zhu 320 W 4th Street, Suite 200 Los Angeles, CA 90013

Subject: Comment Letter – Revisions to the Los Angeles Region 303(d) List

Dear Dr. Zhu,

The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed (Stakeholders) appreciate the opportunity to provide comments on the proposed revisions to the Clean Water Act Section 303(d) List of impaired waterbodies in the Los Angeles Region [hereinafter referred to as 303(d) List] which was distributed for public review on February 8, 2017.

The development and implementation of TMDLs is a significant investment of resources and it is critical that the 303(d) List be based on sound science and methodologies. The Stakeholders understand that the Los Angeles Regional Water Board (Water Board) is proposing over 200 new waterbody-pollutant segment combination 303(d) listings, of which 95 changes fall within the Calleguas Creek Watershed (CCW). The Stakeholders have developed and implemented six effective TMDLs in the CCW and thus have extensive experience in the area. The Stakeholders have serious concerns with the Region's Proposed 303(d) List and feel that it requires significant review and modification before adoption. The Stakeholders request that the issues identified in this letter be addressed and the proposed 303(d) List be released for another 60-day comment period prior to adoption. Several of the issues identified herein have resulted

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in the inability of the proposed 303(d) List to be fully vetted and reviewed by the Stakeholders.

The requested modifications fall into four general categories:

- 1. New Category 5 listings that should not be listed due to incorrect thresholds being applied for the beneficial use and incorrect interpretation of the data (e.g., mismatched units, incorrectly assigned sample locations)
- 2. Potential delistings that may exist if all watershed data were evaluated (e.g., TMDL monitoring program and all wastewater treatment plant NPDES monitoring).
- 3. New Category 5A listings that should be categorized as Category 5B because TMDLs already exist to address the pollutants.
- 4. Errors in the listing information that make it difficult to fully evaluate the listings. Examples include inconsistencies between the Category 5 list (Appendix B) and the Proposed updates to the 303(d) List (Appendix A), incorrect HUC/Calwater designations, incorrect beneficial uses listed for the applicable water quality objectives, and inconsistent use of thresholds for interpreting narrative objectives.

The remaining sections of this letter provide the detailed list of requested changes to the 303(d) List and the rationale for the requests. In summary, the Stakeholders request that all waterbody-pollutant combinations in **Table 1** not be listed on the 303(d) List, the waterbody-pollutant combinations in **Table 3** be considered for delisting through analysis of all available watershed data, waterbody-pollutant combinations in **Table 4** and **Table 5** be designated as being addressed by a TMDL if they remain on the 303(d) List after the reassessment, and the errors and inconsistencies identified in Comment IV be addressed for all waterbodies.

I. REQUESTED MODIFICATIONS TO THE LISTING STATUS

Based on a review of the proposed Category 5 waterbody-pollutant combinations, the Stakeholders have identified a number of waterbodies that we feel should either be delisted based on available data or proposed listings that should not be listed based on errors in the evaluation. The requested modifications are shown in **Table 1**, below, with a summary of the justifications for the requested change. A detailed discussion of each of the justifications follows the table.

Table 1. Wate	rbody-pollutant cor	nbinations that should not be listed
Waterbody segment	Pollutant	Justification
Calleguas Creek Reach 2 (estuary to Potrero Rd)	DDD	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.

Table 1. Water	oody-pollutant com	binations that should not be listed
Waterbody segment	Pollutant	Justification
Calleguas Creek Reach 2 (estuary to Potrero Rd)	DDE	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 2 (estuary to Potrero Rd)	Dimethoate	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 2 (estuary to Potrero Rd)	Nitrogen, Nitrate	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 2 (estuary to Potrero Rd)	Specific Conductivity	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 2 (estuary to Potrero Rd)	Total Dissolved Solids	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 3 (Potrero Road upstream to Conejo Creek confluence)	Mercury	 Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Ammonia	 Data from agricultural drain rather than waterbody used as basis for listing decision. TMDL data demonstrates delisting possible.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Bifenthrin	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Chloride	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Cyfluthrin	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Cypermethrin	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Malathion	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Mercury	 Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.

		binations that should not be listed
Waterbody segment	Pollutant	Justification
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Nitrogen, Nitrate	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Permethrin	 Data from agricultural drain rather than waterbody used as basis for listing decision. This pollutant is already covered by the Calleguas Toxicity TMDL.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Specific Conductivity	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Sulfates	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Total Dissolved Solids	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)	Chlorpyrifos	 Data does not appear to be from a station in Reach 12.
Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)	Diazinon	 Data does not appear to be from a station in Reach 12.
Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)	Malathion	 Data does not appear to be from a station in Reach 12.
Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)	Temperature, water	 Inappropriately applied beneficial use criteria (see temperature comment below).
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	Sulfate	 Maintained as a brackish waterbody therefore criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. *
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	Specific Conductivity	 Maintained as a brackish waterbody therefore criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.*

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Waterbody segment	Pollutant	Justification	
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	Total Dissolved Solids	 Maintained as a brackish waterbody therefore criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.* 	
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2	Toxaphene	 J-flagged data incorrectly used in assessment 	
Rio De Santa Clara/Oxnard Drain No. 3	Nitrogen, Nitrate	 Maintained as a brackish waterbody therefore criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.* 	
Rio De Santa Clara/Oxnard Drain No. 3	Sulfate	 Maintained as a brackish waterbody therefore criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.* 	
Rio De Santa Clara/Oxnard Drain No. 3	Specific Conductivity	 Maintained as a brackish waterbody theref criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.* 	
Rio De Santa Clara/Oxnard Drain No. 3	Total Dissolved Solids	 Maintained as a brackish waterbody therefore criteria do not apply. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.* 	
Rio De Santa Clara/Oxnard Drain No. 3	Toxicity	Insufficient exceedances to warrant listing.	
La Vista Drain (Ventura County)	Chlordane	 Data from agricultural drain rather than waterbody used as basis for listing decision. J-flagged data incorrectly used in assessment 	
La Vista Drain (Ventura County)	Chlorpyrifos	 Data from agricultural drain rather than waterbody used as basis for listing decision. 	
La Vista Drain (Ventura County)	Copper	 Data from agricultural drain rather than waterbody used as basis for listing decision. 	
La Vista Drain (Ventura County)	DDD	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. 	

Table 1. Waterb	ody-pollutant comb	pinations that should not be listed
Waterbody segment	Pollutant	Justification
La Vista Drain (Ventura County)	DDE	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
La Vista Drain (Ventura County)	DDT	 Data from agricultural drain rather than waterbody used as basis for listing decision.
La Vista Drain (Ventura County)	Indicator Bacteria	 Data from agricultural drain rather than waterbody used as basis for listing decision.
La Vista Drain (Ventura County)	Mercury	 Data from agricultural drain rather than waterbody used as basis for listing decision. Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.
Santa Clara Drain	Chlordane	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Santa Clara Drain	Chlorpyrifos	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Santa Clara Drain	Cypermethrin	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Santa Clara Drain	DDD	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates.
Santa Clara Drain	DDE	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates.
Santa Clara Drain	DDT	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using COMM criteria; public access is prohibited with chain link fencing and locked gates.
Santa Clara Drain	Nitrogen, Nitrate	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Santa Clara Drain	Specific Conductivity	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.

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Table 1. Water	erbody-pollutant com	binations that should not be listed
Waterbody segment	Pollutant	Justification
Santa Clara Drain	Sulfates	 Data from agricultural drain rather than waterbody used as basis for listing decision.
Santa Clara Drain	Total Dissolved Solids	 Data from agricultural drain rather than waterbody used as basis for listing decision. Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.
Santa Clara Drain	Toxaphene	 Data from agricultural drain rather than waterbody used as basis for listing decision.

^{*}Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 and Rio De Santa Clara/Oxnard Drain No. 3 are not listed in the Basin Plan and therefore do not have assigned beneficial uses but they are tributaries to Mugu Lagoon which does not have a MUN beneficial use and are brackish waterbodies that would not support the MUN beneficial use.

Agricultural Drain monitoring data incorrectly used as basis for listing 1. decisions. There are multiple instances where listing decisions are based on data from the Ventura County Agricultural Irrigated Lands Group (VCAILG) which include monitoring data from agricultural drains. In several cases, data from agricultural drains that discharge to waterbody reaches were used to list the waterbody reach. The drains are not listed tributaries or waterbodies in the Basin Plan and are not located within the waterbody that is being listed. As a result, the data should not be used for the listing decisions for these waterbodies. Calleguas Creek Reach 2 and Reach 4 were listed using data from the VCAILG monitoring sites 02D_BROOM (Reach 2) and 04D_ETTG (Reach 4), which are the locations of agricultural drains which drain to Reach 2 and 4. These agricultural monitoring sites were selected to be representative of agricultural discharges to Calleguas Creek Reaches 2 and 4 and are not representative of receiving water conditions. Therefore, any data collected from these sites cannot be used to list the downstream Calleguas Creek Reaches. All listings should be evaluated to ensure that the monitoring locations were in receiving waters rather than agricultural drains.

In addition, La Vista Drain and Santa Clara Drain were listed as new waterbodies never before included in the previous 303(d) List even though data have been collected on both agricultural drains by the MS4 program since the early 1990s. These waterbodies are not designated in the Basin Plan or listed as a tributary in the Basin Plan appendices. The La Vista Drain is an agricultural drain designed to convey excess irrigation water from agricultural lands, and as such, it is predominantly an open ditch that flows alongside W. Los Angeles Avenue and then along Santa Clara Avenue where it becomes the Santa Clara Drain. Additionally, inclusion of the COMM beneficial use for the Santa Clara Drain is inappropriate, as public access is prohibited because of fencing and locked gates maintained by the Ventura County Watershed Protection District. Inclusion of the MAR and EST beneficial uses are also inappropriately applied to the Santa Clara Drain because the drain is located upstream of Highway 101 and is not tidally influenced. The monitoring location on each drain was selected to represent agricultural discharges for the Agricultural Waiver and was not designed to characterize

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receiving waters. Because these are agricultural drains and not tributaries, they should be removed from the Draft Category 5 list.

Requested Action:

- Remove all listings shown in Table 1 that were based on Ag monitoring data from agricultural drains not representative of the listed waterbody and evaluate remaining listings to ensure no other listings are based on agricultural drain monitoring rather than receiving water monitoring.
- Remove the La Vista Drain and the Santa Clara Drain from the List as they
 are agricultural drains and not waterbodies that fall under the jurisdiction
 of the 303(d) List.

2. Remove any pollutant listing based on municipal drinking water objectives where the MUN beneficial use does not apply.

Numerous listings were made using water quality objectives for the protection of the municipal drinking for waterbodies that do not have applicable municipal drinking water beneficial uses. Many of the waterbodies listed are brackish waterbodies for which no beneficial uses are designated or waterbodies designated for the municipal beneficial use with an asterisk (i.e., P*) in the Basin Plan. The asterisked MUN beneficial use should not be used to propose new 303(d) listings. Fact Sheets for previous 303(d) listing cycles have clearly noted that the asterisked MUN beneficial uses should not be used for 303(d) listing purposes.

State Board Resolution No. 88-63 (Sources of Drinking Water) and Regional Board Resolution 89-03 (Incorporation of Sources of Drinking Water Policy into the Water Quality Control Plans (Basin Plans)), state that "All surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic waters supply and should be so designated by Regional Boards... [with certain exceptions which must be adopted by the Regional Board]." The Regional Board adopted a Water Quality Control Plan for the Los Angeles Region (Basin Plan) on June 4, 1994, that included provisions to implement State Water Board Resolution 88-63. On May 26, 2000, the USEPA approved the revised Basin Plan except for the implementation plan for potential MUN-designated water bodies. On August 22, 2000, the City of Los Angeles, City of Burbank, City of Simi Valley, and the County Sanitation Districts of Los Angeles County challenged USEPA's water quality standards action in the U.S. District Court. On December 18, 2001, the court issued an order remanding the matter to USEPA to take further action on the 1994 Basin Plan consistent with the court's decision. On February 15, 2002, USEPA revised its decision and approved the 1994 Basin Plan in whole. In its February 15, 2002 letter, USEPA stated:

"EPA bases its approval on the court's finding that the Regional Board's identification of waters with an asterisk ("*") in conjunction with the implementation language at page 2-4 of the 1994 Basin Plan, was intended "to only conditionally designate and not finally designate as MUN those water bodies identified by an ("*) for the MUN use in Table 2-1 of the Basin Plan, without further action." Court Order

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at p. 4. Thus, the waters identified with an ("*") in Table 2-1 do not have MUN as a designated use until such time as the State undertakes additional study and modifies its Basin Plan. Because this conditional use designation has no legal effect, it does not constitute a new water quality standard subject to EPA review under section 303(c)(3) of the Clean Water Act ("CWA"). 33 U.S.C. § 1313(c)(3)."

In addition to the above decision, the Basin Plan states that until the additional study is undertaken and the Basin Plan is modified "no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations". The Regional Board has also determined that water quality objectives applicable to the MUN beneficial use will not be used to assess impairments under the 303(d) listing programs. For constituents that only have objectives that are applicable to the MUN beneficial use, the decision Fact Sheets for the 303(d) listing process state that there are no applicable water quality objectives in waterbodies designated with an asterisk ("*"). In the 2010 listing cycle, a number of 303(d) listings were actually removed based on this determination. Below is an example of the language from a listing decision for Los Angeles River Reach 1:

"The listing for aluminum in this water body was originally based on data assessed using the MCL for aluminum. Since MUN is a "potential" beneficial use, it is not appropriate to use the MCL to evaluate aluminum data from this reach. Thus, there is no aluminum objective for this reach and the original listing is faulty."

Based on this evidence, it is clear that for waterbodies with a MUN designation that includes an asterisk ("*"), water quality objectives specific to the MUN beneficial use are not applicable. As such, water quality data collected in these receiving waters should not be compared to water quality objectives applicable to the MUN beneficial use.

The listings of total dissolved solids, sulfates, and conductivity are all based on secondary maximum contaminant levels applied to protect the MUN beneficial use. In addition, Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 and Rio De Santa Clara/Oxnard Drain No. 3 are maintained as fresh/brackish water via tide gates on both drains and do not have designated MUN beneficial uses. Therefore, the listing of TDS, sulfate, and specific conductivity is inappropriate as naturally occurring levels of these three constituents in groundwater entering both drains within the footprint of Naval Base Ventura County far exceed the secondary MCLs upon which these listings are based. USEPA validated this reasoning in its "TMDLs for Pesticides, PCBs and Sediment Toxicity for Oxnard Drain 3",2 where the MUN beneficial use was not considered to be "relevant to the impairments" addressed by the TMDL and so was not included in the TMDL. Additionally, Calleguas Creek Reach 2 and Reach 4 are considered brackish waterbodies according to the California Toxics Rule thresholds and

¹ Language adapted from the 2014 National Pollutant Discharge Elimination System permit findings for wastewater treatment plants in the Calleguas Creek Watershed.

² Total Maximum Daily Loads for Pesticides, PCBs, and Sediment Toxicity in Oxnard Drain 3. Approved by USEPA on October 6, 2011.

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are designated with an asterisked MUN beneficial use. Due to the brackish nature of these waterbodies, other Basin Plan objectives for TDS and sulfate are not considered to be applicable to Reach 2 or Reach 4 below Laguna Road. For all of these reasons, these proposed listings summarized in **Table 1** should not be listed.

The proposed Calleguas Creek Reach 2 dimethoate listing was based on three lines of evidence which the Fact Sheet states all show no exceedances (this appears to be a typo). However, it appears that the only line of evidence that shows an exceedance is based on the potential (P*) MUN, which as described above, cannot be used to justify a listing. Furthermore, the Fact Sheet cites a guideline from the California Department of Health Services Notification Levels (1 μ g/L) which has not yet gone through the formal MCL regulatory process and it is not clear that this threshold would meet the Listing Policy requirements.

Requested Action:

- Revise all of the new listings in the Fact Sheets to ensure that none are based on municipal drinking water objectives when the MUN beneficial use does not apply.
- Remove the segment-pollutant combinations for total dissolved solids, specific conductivity, sulfates, nitrogen, nitrate, dimethoate, and other MUN-based pollutants listed in Table 1 above from the 303(d) List.
- 3. Reassess mercury listings using correct objective and correct units

 The data used to assess mercury for Calleguas Creek Reach 3, Reach 4, and La Vista

 Drain are in ng/L and the objective is µg/L. The data have to be converted to the same
 units as the objective before an exceedance can be determined. The Stakeholders
 expect that after this calculation has been performed the waterbodies will no longer
 meet the listing guidelines for mercury. Additionally, although a California Toxics Rule
 objective exists for mercury, an EPA nationally recommended criterion was used for the
 assessment. An explanation for the use of a recommended criterion when an
 established water quality objective exists should be provided.

Requested Action:

Repeat the mercury analysis after correcting the units error.

4. Incorrect location and data were used for listings in Reach 12

The name of the monitoring site presented in the Fact Sheet for the chlorpyrifos, diazinon and malathion listings in Calleguas Creek Reach 12 is unclear. The University site is in Reach 3, not 12 and TO1 is an MS4 discharge characterization site, not a receiving water monitoring location. Therefore, TO1 should not be used for a 303(d) listing decision and University data is not from Reach 12. A review of the datasets provided in the link on the Fact Sheet only show data from University (ME-CC) and the number of samples appears to match up with the sample numbers shown in the Fact Sheet. As a result, it appears that the chlorpyrifos, diazinon and malathion listings do not apply to Reach 12.

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In addition, the Stakeholders request that only data collected *after* the implementation of applicable pesticide use restrictions were in place for these pesticides be considered in the listing decisions. Data from the Calleguas Creek TMDL watershed monitoring program that were not used in the assessment (see Comment II) demonstrates a marked reduction in these pesticides in receiving water since the use restrictions were implemented (approximately 2009 to present), particularly for receiving waters downstream of urban areas (e.g., Reach 12). Given the changed condition resulting from the pesticide use restrictions, monitoring data collected prior to 2009 is not representative of waterbody conditions for these constituents. Therefore, these constituents should not be listed unless data collected after the use restrictions were implemented demonstrates a continued impairment.

Requested Action:

- Remove listings for Reach 12 that are not based on receiving water data from that reach.
- Remove listings for chlorpyrifos, diazinon, and malathion based on historic data that are not representative of conditions after implementation of pesticide use restrictions.
- 5. Correct the proposed temperature listing for Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list) which is based on incorrect criteria.

The temperature listing for Reach 12 uses an evaluation guideline of 13-21°C as the optimum growth range for rainbow trout. However, the beneficial use listed for Reach 12 is WARM. The rainbow trout growth range threshold used for the listing is only applicable to the COLD beneficial use. This guideline should be removed and the number of exceedances recalculated based on the Basin Plan criteria for WARM. ³

The basin plan criteria for WARM beneficial uses states the following: "For waters designated as WARM, water temperature shall not be altered more than 5 degrees F above the natural temperature. At no time shall these WARM designated waters be raised above 80 degrees F as a result of waste discharges." The Fact Sheet states that of 567 samples there were 3 instances of the downstream sample exceeding 80°F and in some cases a 30°F difference between upstream and downstream reaches. The Fact Sheet statement is unclear because Reach 12 is the upstream location and is not downstream of a waste discharge. Reach 12 drains a portion of the City of Thousand

³ Notwithstanding that the evaluation guideline of 13-21°C is inappropriate for Calleguas Creek Reach 12 given the water body's beneficial uses, the manner in which the evaluation guideline is applied is also inappropriate. Line of Evidence (LOE) 85933 references Moyle 1976 as the source of the evaluation guideline. Moyle 1976 was revised and expanded by Moyle 2002[1]. Moyle 2002 states: "Rainbows are found where daytime temperatures range from nearly 0°C in winter to 26-27°C in summer, although extremely low (<4°C) or extremely high (>23°C) temperatures can be lethal if the fish have not previously been gradually acclimated. Even when acclimation temperatures are high, temperatures of 24-27°C are invariably lethal to trout, except for very short exposures (25, 26)." As such, while temperatures above 21°C may not be optimal according to Moyle 1976, Moyle 2002 clearly states that lethal temperatures are those greater than 23°C which indicates that the evaluation guideline of 21°C is more appropriately applied as a chronic guideline (necessitating the establishment of an averaging period) and 23°C is the more appropriate "not-to-exceed" guideline if used for listing.

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Oaks and open space areas and is located upstream of the Thousand Oaks Wastewater Treatment Plant. Therefore, it is unclear if the exceedances discussed in the Fact Sheet actually occur in Reach 12 and if exceedances do occur, whether they are a result of waste discharge or are a natural condition. The data provided for review was not compiled in a way that made it possible to easily review the assessment to determine if the exceedances were observed in Reach 12 (upstream) or Reach 10 (downstream).

Regardless of the location of the samples, if there were 3 instances of temperature above 80°F and if they can be confirmed to be a result of waste discharge and not natural temperature conditions, according to the SWRCB 2015 303(d) Listing Policy⁴ three samples out of 567 would not meet the minimum number of measured exceedances needed to place a water segment on the 303(d) List (see Listing Policy table 3.2). According to the binomial test, with a sample size of 500+ there would need to be well over 20 exceedances in order to be added to the 303(d) List, however, the Fact Sheet mentions only three exceedances of the Basin Plan criteria. According to the SWRCB's own guidance, this proposed listing should be removed.

Requested Action:

- Do not use the 13-21°C rainbow trout evaluation guideline which only applies to COLD beneficial use segments.
- Remove the temperature listing for Reach 12 as it does not meet the
 minimum listing requirements based on the binomial test described above
 and ensure that the analysis is applied to the correct reach.

6. Ensure no J-flagged data were used in the assessment.

The Listing Policy specifically prohibits the use of J-flagged ("estimated") data that fall below the quantitation limit but above the water quality standard. Section 6.1.5.5 of the Listing Policy specifically states:

"When the sample value is less than the quantitation limit and the quantitation limit is greater than the water quality standard, objective, criterion, or evaluation guideline, the result shall not be used in the analysis. The quantitation limit includes the minimum level, practical quantitation level, or reporting limit."

All listings based on the use of J-flagged data should, therefore, be removed from the draft 303(d) List. Specific instances are included in **Table 1** and further explained in **Table 2** below, but this list is by no means inclusive; this significant error will have to be addressed by a thorough review of all listing data to confirm that no J-flagged data were used to justify listings.

⁴ State of California State Water Resources Control Board (SWRCB) Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List. Amended February 3, 2015.

	Table 2. Incorrect use of J-flagged data		
Segment	Pollutant	Comment	
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2	Toxaphene	The Lines of Evidence (LOE) for Toxaphene lists the number of exceedances incorrectly at two. However, only one of six samples exceeded the indicated criterion. The other sample was reported by the laboratory as "estimated" (J-flagged). Because only one of six samples showed an exceedance this listing should be removed as it does not meet the binomial test limits set forth in the Listing Policy.	
Rio de Santa Clara/Oxnard Drain No. 3	Chlordane	The LOE for Chlordane erroneously states that four out of five samples exceed the objectives. A review of the data shows that only 3 out of 5 samples exceed indicated criteria. The remaining 2 results were (1) not detected and (2) "estimated" (J-flagged) by the laboratory because results were below the reporting limit.	
La Vista Drain	Chlordane	The LOE for chlordane shows that one of the samples used to justify the listing is based solely on estimated (J-flagged) data because results were below the reporting limit. Because Chlordane has only one detected value for two sampling events, more monitoring data are needed to justify the listing and the proposed listing should be removed.	

Requested Action:

- Review all Fact Sheets and LOEs for the use of J-flagged data and remove any instances where J-flagged data were used.
- Delist toxaphene for Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2, chlordane for La Vista Drain, and any other pollutants listed in Tables 1 and 2 that lack the minimum number of exceedances required to justify a listing.

7. Remove listings where a waterbody assessment does not meet listing thresholds based on data provided.

Finally, the toxicity listing for Rio De Santa Clara/Oxnard Drain No. 3 does not meet the minimum requirements to be listed according to the Listing Policy (pg. 9). According to the Listing Policy, a waterbody can be listed only when the number of exceedances meets the binomial test; in the case of this waterbody, four samples were collected and only one sample showed an exceedance. However, two exceedances would be required for the waterbody to be added to the 303(d) List. Therefore, toxicity was incorrectly listed for this waterbody and should be removed entirely from the 303(d) List.

Requested Action:

 Remove the toxicity listing for Rio De Santa Clara/Oxnard Drain No. 3 based on meeting listing threshold requirements in the Listing Policy.

II. REQUESTED REASSESSMENTS USING COMPLETE DATA SET

The assessments for the Calleguas Creek watershed do not appear to include any of the submitted Calleguas Creek Watershed TMDL monitoring data, monitoring data from the Camarillo Sanitary District, or monitoring data from the Simi Valley Wastewater Treatment Plant. All of this monitoring data has been provided to the Regional Board in annual monitoring reports and all data were collected using approved QAPPs. As a result, there is no reason why this data should not be included in the 303(d) listing process.

In 2013, the Stakeholders did an assessment of the watershed using all watershed data through 2012 and found that multiple waterbody-pollutant combinations could potentially be delisted as shown in **Table 3**. A summary of the assessment is included as an attachment to this letter and the datasets used in the analysis as well as all of the TMDL annual monitoring reports are available upon request.

Table 3. Waterbody-Pollutant Combinations to Consider for Delisting

Waterbody segment	Pollutant
Calleguas Creek Reach 1	Copper Dieldrin Endosulfan Mercury Nickel Zinc
Calleguas Creek Reach 2	Ammonia Copper
Calleguas Creek Reach 3	Ammonia Chlordane PCBs
Calleguas Creek Reach 4	Diazinon Dieldrin Endosulfan PCBs
Calleguas Creek Reach 6	Ammonia Chlordane Diazinon Dieldrin
Calleguas Creek Reach 7	Ammonia Diazinon
Calleguas Creek Reach 9A	Chlordane DDT Dieldrin Endosulfan Gamma HCH Nitrate as Nitrate Nitrogen, Nitrate PCBs Toxaphene
Calleguas Creek Reach 9B	Ammonia Chlordane Chlorpyrifos

Waterbody segment	Pollutant
	Diazinon Dieldrin Endosulfan PCBs Sulfates
Calleguas Creek Reach 10	Ammonia Chlordane Chlorpyrifos DDT Diazinon Dieldrin Endosulfan Fecal Coliform/Indicator Bacteria Nitrogen, Nitrite PCBs Sulfates Total Dissolved Solids Toxaphene
Calleguas Creek Reach 12	Ammonia DDT Dieldrin PCBs Toxaphene
Calleguas Creek Reach 13	Ammonia Chlordane DDT Dieldrin Endosulfan PCBs Toxaphene

While we recognize that this assessment uses two additional years of data than the current 303(d) listing analysis, a number of these waterbodies had many more samples than were necessary for delisting. As a result, we feel if all the watershed data were used in the assessment, a number of these waterbodies (particularly for metals) would be delisted. We also feel this assessment would demonstrate that several of the proposed listings, particularly for diazinon and chlorpyrifos and a number of organochlorine pesticides, are not warranted. A large number of new proposed listings are being added that are already covered by a TMDL. While the list acknowledges that a TMDL does not need to be developed by categorizing these new listings in Category 5B, in several cases, the watershed now has sufficient data to delist, whereas the listing is an artifact of old data being used to make the listing decision. These listings should not be added to the current list only to be removed during the next listing cycle as an artifact of the timing of the listing assessments.

Requested Action:

• Reassess all Calleguas Creek waterbodies using all available data.

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III. REQUESTED CATEGORY ASSIGNMENT CHANGES

8. Correct pollutants listed as Category 5A which should be 5B based on coverage by an existing TMDL.

There are a number of proposed new listings for pollutants that are already covered by an existing TMDL and are incorrectly categorized as 5A. While the Stakeholders maintain that all of these listings should be removed entirely because of the issues detailed in Comment I, if they are not removed they should, at a minimum, be changed from 5A to 5B, as applicable.

A nutrient TMDL addressing nitrogen has been in effect since 2003, including for Reach 9A where a new 5A listing for nitrite is proposed. In 2006, the Toxicity and OC Pesticide and PCBs TMDLs for the Calleguas Creek watershed were established to address chlordane, chlorpyrifos, DDT, DDE, DDD, dieldrin, PCBs, sediment toxicity, and toxaphene. The La Vista Drain and Santa Clara Drain ultimately flow into Calleguas Creek Reach 4 (was Revolon Slough Main Branch), which is already addressed by an OC Pesticides and PCBs TMDL, the Toxicity TMDL, the Salts TMDL, and the Metals TMDL and therefore all of these proposed listings should be Category 5B. Furthermore, two other segments were listed for Chlorpyrifos – Honda Barranca and Duck Pond Agricultural Drains – but were correctly listed as Category 5B, citing the 2006 Toxicity TMDL. The Stakeholders request that any listings in **Table 4** and **Table 5** that are maintained after addressing the issues in Comment I should also be corrected to be designated as Category 5B.

Segment	Pollutant	Proposed 303(d) Category	Requested 303(d) Category	Existing CCW TMDL ^{5,6,7,8,9,10}
Calleguas Creek Reach 2	Specific Conductivity	5A	5B	Salts TMDL
(estuary to Potrero Rd)	Total Dissolved Solids	5A	5B	Salts TMDL
Calleguas Creek Reach 3 (Potrero Road upstream to Conejo Creek)	Mercury	5A	5B	Metals TMDL
	Mercury	5A	5B	Metals TMDL
	Specific Conductivity	5A	5B	Salts TMDL
Calleguas Creek Reach 4	Total Dissolved solids	5A	5B	Salts TMDL
	Sulfates	5A	5B	Salts TMDL
Calleguas Creek Reach 9A	Nitrogen, Nitrite	5A	5B	Nitrogen TMDL
	Chlorpyrifos	5A	5B	Toxicity TMDL
Calleguas Creek Reach 12	Diazinon	5A	5B	Toxicity TMDL
Honda Barranca	DDT	5A	5B	OC Pesticides and PCB TMDL
Rio De Santa Clara/Oxnard Orain No. 3	Toxicity	5A	5B	Oxnard Drain #3 Pesticides, PCBs, Sediment Toxicity TMD
	Chlorpyrifos	5A	5B	Toxicity TMDL
	Chlordane	5A	5B	OC Pesticides and PCE TMDL
_a Vista Drain (Ventura	DDT	5A	5B	OC Pesticides and PCE TMDL
County)	DDE	5A	5B	OC Pesticides and PCE TMDL
	DDD	5A	5B	OC Pesticides and PCE TMDL
	Copper	5A	5B	Metals TMDL
	Mercury	5A	5B	Metals TMDL
	Chlordane	5A	5B	OC Pesticides and PCE TMDL
	Chlorpyrifos	5A	5B	Toxicity TMDL
	DDD	5A	5B	OC Pesticides and PCB TMDL
Santa Clara Drain	DDE	5A	5B	OC Pesticides and PCB TMDL
	DDT	5A	5B	OC Pesticides and PCE TMDL
	Nitrogen, Nitrate	5A	5B	Nutrients TMDL
	Specific Conductivity	5A	5B	Salts TMDL

⁵ The Calleguas Creek Watershed Metals TMDL. RS 2006-012. Approved by USEPA on March 26, 2007.

In addition, we feel that the Toxicity TMDL should cover all new listings in the watershed for pyrethroids and organophosphate pesticides (e.g., malathion) if they are not removed as requested in the first comment. The Toxicity TMDL includes a trigger for additional investigation if ongoing toxicity is identified in the watershed. The toxicity trigger has resulted in the identification of pyrethroids as a potential cause of toxicity and the Stakeholders have already begun actions to address these pesticides in addition to the organophosphate pesticides included in the TMDL. The structure of the TMDL is designed to proactively prevent toxicity and therefore it is not necessary to develop another TMDL for these constituents. There are already sufficient controls in place through the agricultural waiver and MS4 permit. As a result, if the waterbodies are placed on the 303(d) List as new listings, we request that the waterbodies in **Table 5** be changed from 5A to 5B.

Table 5. Pyrethroid and Organophosphate listings which covered by the existing Toxicity TMDL11

Segment	Pollutant	Proposed 303(d) Listing Category	Requested 303(d) Listing Category
	Bifenthrin	5A	5B
	Cyfluthrin	5A	5B
Calleguas Creek Reach 4 (was Revolon Slough Main Branch)	Cypermethrin	5A	5B
Slough Main Branch)	Malathion	5A	5B
	Permethrin	5A	5B
Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)	Malathion	5A	5B
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	Bifenthrin	5A	5B
Honda Barranca	Bifenthrin	5A	5B
Santa Clara Drain	Cypermethrin	5A	5B

Requested Action:

 Change all pollutant-waterbody segment combinations in Table 4 and Table 5 from 5A to 5B or 4A based on coverage by an existing USEPA approved TMDL.

⁶ The Calleguas Creek, Its Tributaries, and Mugu Lagoon Toxicity, Chlorpyrifos and Diazinon TMDL. RS 2005-009. Approved by USEPA on March 24, 2006.

⁷ The Calleguas Creek Nitrogen TMDL. RS 2002-017. Approved by USEPA on June 20, 2003.

⁸ Total Maximum Daily Load for Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation in Calleguas Creek, its Tributaries and Mugu Lagoon. RS 2005-010. Approved by USEPA on March 24, 2006.

⁹ The Calleguas Creek Watershed Salts TMDL. RS 2007-016. Approved by USEPA on December 2, 2008.

¹⁰ Total Maximum Daily Loads for Pesticides, PCBs, and Sediment Toxicity in Oxnard Drain 3. Approved by USEPA on October 6, 2011.

¹¹ The Calleguas Creek, Its Tributaries, and Mugu Lagoon Toxicity, Chlorpyrifos and Diazinon TMDL. RS 2005-009. Approved by USEPA on March 24, 2006.

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IV. ADDRESS ALL OTHER INCONSISTENCIES AND ERRORS IN LIST

In reviewing the list the Stakeholders identified a large number of inconsistencies and issues in the list that should all be addressed prior to adoption. The summary below provides examples of issues identified and is not a comprehensive list as in many cases the information provided made it challenging to provide comprehensive comments.

- 9. Correct Appendix G Fact Sheets. The Appendix G Fact Sheets often include incorrect information and discussion. While most of the identified issues do not appear to impact the listing decisions, they make the review of information difficult. Examples of errors found include:
- Incorrect beneficial uses assigned to a waterbody. For example, MUN beneficial uses assigned to a tidally-influenced waterbody (e.g., Duck Ponds Agricultural Drain).
- Incorrect beneficial uses assigned to objectives. For example, MUN beneficial uses listed when aquatic life objectives are presented in the Fact Sheet.
- Incorrect TMDLs assigned to a pollutant. For example, for chlordane in Calleguas Creek Reach 2, the applicable TMDL is listed as the Calleguas Creek Metals TMDL. It should be the Organochlorine Pesticides, PCBs, and Siltation TMDL.
- Incorrect QAPPs identified. For example, the VCAILG QAPP is often referenced for the Ventura County MS4 monitoring data set.
- Incorrect number of samples evaluated and incorrect number of criteria exceedances. For example, the number of samples evaluated for toxaphene on the Rio de Santa Clara/Oxnard Drain No. 3 is identified as 2 samples, whereas data files obtained from the Regional Board website contain 5 samples for the date range indicated in Fact Sheets, including 3 samples with results of "ND". Stating that a pollutant actually exceeds criteria in only 40% of samples, versus 100% exceedances as presented in Fact Sheets, provides a more accurate picture of the degree of impairment for that pollutant in a waterbody. The inclusion of J-flagged data when enumerating exceedances (e.g., for chlordane in the same waterbodies) further exacerbates these numbering inaccuracies.

Requested Action:

Correct the Appendix G Fact Sheets for errors such as incorrectly assigned beneficial uses, existing TMDLs, QAPPs, and number of samples/number of exceedances.

10. Correct the Appendices and Fact Sheet Categories. Appendix A, Appendix B, Appendix C, and Appendix G are inconsistent which makes the analysis of new additions very difficult since it is unclear which segment-pollutant combinations actually are new listings. Following are examples of a number of identified issues that need to be corrected to allow the Stakeholders to fully vet and understand the proposed listings.

A number of proposed "name changes" in Appendix A are not shown in Appendix B and there are not associated Fact Sheets describing the name change (e.g., Reach 4 listings for chlorpyrifos and total DDT). This makes it very challenging to assess the

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validity or basis for the name change. In other instances, listed name changes are found in Appendix B or C but not supported by an explanation for the name change in Appendix G. The Fact Sheets for the following name changes should provide justification or explanation for the name change as many appear to be switching tissue or sediment listings to water listings. If this is, in fact, the change being made, the justification for the water listing needs to be provided in the Fact Sheet. It is not appropriate to modify the medium that is the basis for the listing as a name change.

Table 6. Listed as	Name Changes in Appendix A
CCW Segment	Pollutants
Reach 1	Toxicity
Reach 2	Chlordane, Endosulfan, Toxaphene
Reach 4	Chlorpyrifos (tissue), Fecal Coliform, Total DDT
Reach 12	DDT (tissue), Ammonia
Rio De Santa Clara/Oxnard Drain No. 3	Toxicity
Duck Pond	ChemA

There are a number of inconsistencies where Appendix A does not include all of the new 2014 listings found in Appendix B. Below are a few examples of such inconsistencies.

Table 7. I	ncorrectly listed wa	aterbody segment-pollutant combinations
Segment	Pollutant	Issue
La Vista Drain	DDT	Not included as a new change in Appendix A but listed as a new 2014 5A listing in Appendix B.
Honda Barranca	Bifenthrin	Not included as a new change in Appendix A but listed as a new 2014 5A listing in Appendix B.
Rio De Santa Clara/Oxnard	Total Dissolved Solids	Not included as a new change in Appendix A but listed as a new 2014 5A listing in Appendix B.
Drain No. 3	Toxicity	Listed only as a "name change" in Appendix A but listed as a new 2014 5A listing in Appendix B.
	Indicator Bacteria	Not included as a change in Appendix A but listed as a new 5A listing in Appendix B. Clarify if this is a new listing or a "coliform bacteria" name change as described for Calleguas Reaches 6, 9A, 10, and 11.
Calleguas Creek Reach 2 (estuary	PCBs	Not included as a new change in Appendix A but listed as a new 2014 5B listing in Appendix B.
to Potrero Rd)	Toxicity	Not included as a new change in Appendix A but listed as a new 2014 5B listing in Appendix B.
	ChemA	Not included as a new change in Appendix A but listed as a new 2014 5B listing in Appendix B despite cited as a historical use of pesticides and lubricants.
Calleguas Creek Reach 4	Cyfluthrin	Not included as a new change in Appendix A but listed as a new 2014 5A listing in Appendix B.

There are also a number of instances where existing waterbody-pollutant listings from the 2010 303(d) List were not stated as delisted in Appendix A and do not appear in Appendix B, C, or G under the waterbodies to delist. The Stakeholders would like clarification if these listings are in fact being delisted as some align with the assessment shown in **Table 3**.

	ribed as delisted in Appendix A but not found Appendix B or C
CCW Segment	Pollutants
Reach 2	Ammonia
Reach 3	Ammonia
Reach 4	Chlordane (tissue & sediment), DDT (tissue & sediment), PCBs (tissue), Toxaphene (tissue & sediment)
Reach 5	Chlordane (tissue & sediment), Chlorpyrifos (tissue), DDT (tissue & sediment), Dieldrin (tissue), Endosulfan (tissue & sediment), Nitrogen, PCBs (tissue), Toxaphene (tissue & sediment)
Reach 6	DDT (sediment)
Reach 9A	Chlorpyrifos, DDT (tissue), Dieldrin (tissue), Endosulfan (tissue), PCBs (tissue), Toxaphene (tissue & sediment)
Reach 9B	Endosulfan (tissue), Toxaphene (tissue & sediment)
Reach 10	DDT (tissue)
Reach 11	DDT (tissue), Endosulfan (tissue), Toxaphene (tissue & sediment)

Requested Action:

Correct the numerous inconsistencies described above in Table 6, Table 7, and Table 8 and ensure that all of the proposed 303(d) List appendices are internally consistent.

11. Correct the waterbody assigned Hydrologic Unit (HUCs) and Calwater numbers to reflect those listed in the Basin Plan. There are multiple instances of what appear to be incorrectly Hydrologic Unit numbers (HUCs) and Calwater numbers assigned to the various waterways. For instance, a comparison of the 8 digit HUCs listed in Appendix B of the 303(d) List to the 12 digit HUCs listed in Appendix I of the Basin Plan indicate a number of inconsistencies such that waterbodies present in the Santa Clara River Watershed (e.g., Santa Clara River Reach 1, 2, and 3) are listed with a Calleguas watershed HUC (18070103) while the same reaches are listed as 18070102 in the Basin Plan. This makes identifying the location of unknown waterbodies not previously listed or described in the Basin Plan to assess if they are receiving waters that should be assessed especially difficult. A full review of the 303(d) List HUCs should be completed to correct all errors.

Requested Action:

Perform a full review of HUCs and Calwater numbers listed in Appendix B through F and correct any inconsistencies with the Basin Plan.

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12. Correct or clarify inconsistencies in the staff report. There is inconsistent discussion in the staff report about some proposed listings that should be clarified to avoid confusion about the listings. For instance, on page 10 of the Staff Report there is a discussion about existing TMDLs covering newly proposed pollutants "For example, the proposed new listings for DDE and DDD in Calleguas Creek Reach 3 ... are being addressed by the Calleguas Creek Organochlorine Pesticides, PCBs and Siltation TMDL ... and would then be in Category 4A." However, we could find no listings of DDE and DDD for Reach 3 in any Appendix of the report including Appendix C – Category 4A Waterbody Segments. Furthermore, the Fact Sheets in Appendix G state that DDE and DDD should not be listed for Reach 3. We ask the RWQCB to either clarify or remove the above referenced statement and clarify any other inconsistencies between the staff report and the list.

Requested Action:

Correct or remove language cited on page 10 of the staff report regarding DDE and DDD listing of Calleguas Creek Reach 3 and clarify any other identified inconsistencies within the staff report.

13. Ensure that all thresholds being used for assessment are consistent and valid under the Listing Policy. In many cases, the same pollutant is assessed using different thresholds without any explanation for the basis of the threshold. Additionally, in several cases, an LC50 or threshold for individual species were used for the assessment, which is inconsistent with the Listing Policy which states that it must be demonstrated that an evaluation guideline is "applicable to the beneficial use, protective of the beneficial use, scientifically-based and peer reviewed, and well described". Because it has not been demonstrated that the individual species response to these pollutants is applicable and protective of the beneficial use these guidelines should not be used to make a listing. The Stakeholders ask that the Board review all assessments for consistency, especially for the pesticides (bifenthrin, cyfluthrin, cypermethrin, malathion, permethrin) as well as applicability to the beneficial use as described in the Listing Policy.

Table 9. 3	03(d) Pollutants Using Threshold	Is for Interpreting Narrative Objectives
Pollutant	Segment	Objective Used
Bifenthrin	CCW Reach 4	0.0006μg/L (4-day average) from UC Davis ¹
	Honda Barranca	0.0006μg/L (4-day average) from UC Davis ¹
	Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	0.00397µg/L mean acute value for mysid from Cal Dep of Fish and Game²
Cyfluthrin	CCW Reach 4	LC50: 29000µg/L from the USEPA OPP Pesticide Ecotox database
Cypermethrin	CCW Reach 4	0.002μg/L from the Cal Dep of Fish and Game²

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Malathion	CCW Reach 4	0.28µg/L (4-day average) from UC Davis ¹
	CCW Reach 12	0.1µg/L USEPA ³
Permethrin	CCW Reach 4	0.0002µg/L from UC Davis ¹

¹Aquatic life water quality criteria derived via the UC Davis method: II. Pyrethroid insecticides. Reviews of Environmental Contamination and Toxicology 216:51-103.

The 303(d) List includes new listings for bifenthrin, cyfluthrin, cypermethrin, malathion, and permethrin in CCW. Currently, no water quality objectives have been promulgated by USEPA or the State of California for these pollutants and so the criteria listed are from a variety of studies. Some issues with these criteria include the following (this list is by no means inclusive; a thorough review of all listings for these pollutants should be undertaken):

- The criterion used for listing bifenthrin on Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 is 0.00397 µg/L based on the CDFG criteria. The selective use of a saltwater genus mean acute value is inappropriate when the CDFG study clearly states in the "Conclusions and Recommendations" section that "insufficient freshwater and saltwater acute toxicity data were available to calculate CMC values for bifenthrin." The same use of a criterion unsupported by the study author(s) applies to cypermethrin on the Santa Clara Drain.
- Use of LC50 for listing of cyfluthrin for CCW Reach 4 is inappropriate. LC50s do
 not meet the standard set forth in the Listing Policy as stated on page 20 " the
 evaluation guideline... identifies a range above which impacts occur and below
 which no or few impacts are predicted." By definition, an LC50 is simply the
 concentration at which half of the population of the tested species has died. The
 LC50 should not be used as the evaluation guideline.
- The criterion used for listing permethrin for Calleguas Creek Reach 4 is 0.0002μg/L based on the UC Davis¹² criteria. However, upon reviewing the UC Davis source the listed chronic standard for permethrin is 2 ng/L (page 92) which is 0.002μg/L, not 0.0002μg/L as listed in the 303(d) List.
- In many instances the incorrect evaluation guideline and guideline reference are used. For example, the evaluation guideline (i.e., criterion) provided for cyfluthrin (a pyrethroid) in LOEs 84065, 83200, and 88712 is for the chlorinated herbicide 2,4,5-TP. The stated criterion (29 mg/L) was not found in the cited guideline reference. Many additional instances were noted in LOEs for phorate, dimethoate, disulfoton, endosulfan sulfate, and many other LOEs. Because the numeric guidelines (and reference documents from which these are obtained)

² Hazard Assessment of the Synthetic Pyrethroid Insecticides Bifenthrin, Cypermethrin, Esfenvalerate, and Permethrin to Aquatic Organisms in the Sacramento-San Joaquin River System; 2000. Cal Dept. of Fish and Game. Report 00-6.

³ USEPA National Recommended Water Quality Criteria (Red Book). 1976. United States Environmental Protection Agency. Office of Water. Office of Science and Technology.

¹² Aquatic life water quality criteria derived via the UC Davis method: II. Pyrethroid insecticides. Reviews of Environmental Contamination and Toxicology 216:51-103.

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form the basis for any listing, it is critical that these be carefully reviewed and verified prior to issuing the final Fact Sheets and 303(d) List.

Requested Action:

- Review the guidelines used for interpreting narrative objectives and ensure that they are consistently applied and use correct unit conversions.
- Remove all guidelines that do not comply with the stated Listing Policy as described above.

The Stakeholders appreciate the opportunity to comment on the 303(d) List and look forward to continuing to work with the Water Board to address these concerns. Thank you for your time and consideration of these comments. If you have questions, please contact Ashli Desai at (310) 394-1036 / AshliD@lwa.com or me at (805) 388-5334.

Sincerely,

Lucia McGovern

Levin m. mazone

Chair of Stakeholders Implementing TMDLs in Calleguas Creek Watershed

Attachment A: Data Tables from CCW Water Quality Priorities Memorandum

Calleguas Creek Watershed Assessment

1. Data Sources

In order to fully evaluate the progress of TMDL implementation, as well as the general state of the watershed, data was collected from a variety of CCW stakeholders. Data sources include NPDES monitoring data from three Publicly Owned Treatment Works (POTWs) in the watershed along with long-term MS4 monitoring data from the County of Ventura. Ventura County Agricultural Irrigated Lands Group (VCAILG) monitoring data and available Navy data was also provided. Water, sediment, fish tissue, and toxicity data from ongoing TMDL and data was also retrieved from the State Water Quality Control Board's California Environmental Data Exchange Network (CEDEN).

Overall, a data set of over 375,000 data points gathered between 2003 and 2014 was compiled. The data set was then refined by focusing the analysis on receiving water samples and removing POTW effluent, MS4 outfalls, and agricultural discharge data.

The aggregation of data spanning the ten year study period revealed varying levels of completeness in the monitoring data; therefore several conservative assumptions were necessary to carry out the analysis. Where appropriate, constituents sampled under unknown wet/dry conditions were assumed to be sampled during dry weather conditions and were thus subject to dry weather criteria. POTW metals data reported without indication whether they were in the dissolved or total fraction were assumed to be reported in their dissolved fraction for constituents with dissolved targets (copper, nickel, and zinc). Mercury and selenium targets are for the total fraction; undesignated data for these constituents was assumed to be total. These assumptions were intended to provide the most conservative analysis of the data in light of the uncertainty related to the incomplete data.

Table 1. Summary of Receiving Water Data Used in Analysis

Monitoring Program/ Data	Data	D					١	lumbe	r of Sar	nples	by Read	ch					Total
Source	Date	Range	1	2	3	4	5	6	7	8	9A	9B	10	11	12	13	
Camarillo POTW Monitoring	1/22/2003	11/5/2013									7221	237					7458
CCW Characterization Study DBF	1/1/2003	5/3/2005			125				799			238					1162
CCW Salts TMDL	1/31/2011	12/5/2013			296				154		151	135					736
CCW TMDL DBF	2/6/2002	2/3/2014	2593	120	1221	1237	119	596	726		66	525	494		110	414	8221
CCW TMDL Work Plan Monitoring	8/26/2003	10/27/2004	291	292	371	465	208	209	261	158	231	209	231	6	155	207	3294
Navy Monitoring	5/3/2003	1/7/2005	91	59		59											209
RWB4 So. CA Stormwater Monitoring Coalition	5/5/2008	5/13/2008						15		5	15	15			28		78
Simi Valley POTW Monitoring	1/8/2008	6/3/2014							4808								4808
SWAMP Perennial Stream Surveys	5/21/2008	5/21/2008			5												5
Thousand Oaks POTW Monitoring	1/15/2002	10/9/2013											4200		4250		8450
Ventura County MS4 Monitoring	2/12/2003	4/25/2014			4811	541	541							1			5894
Total:				471	6829	2302	868	820	6748	163	7684	1359	4925	7	4543	621	40315

1.1 METALS AND SELENIUM TMDL

The Los Angeles Regional Water Quality Control Board (RWQCB) adopted Resolution No. R4-2006-012 to address water quality issues related to metals and selenium in Calleguas Creek, its tributaries and Mugu Lagoon.

Table 2 summarizes the analysis of available receiving water data for constituents included in the Metals TMDL, as well as the number of exceedances of the final numeric targets. The table illustrates that in most cases a sufficient number of samples is available and the data supports a delisting of the metals. It is important to note that compliance with metals and selenium targets in reach 2 was assessed using data from CCW TMDL monitoring site 01_RR_BR, which is located at the break between reach 1 and 2. Much of the POTW data did not distinguish between the dissolved and total fraction for metals constituents. For metals with dissolved targets (copper, nickel, and zinc) a conservative approach was used by comparing undistinguished metals samples to the dissolved targets. Mercury and selenium have established targets for total metals, in these instances all total and undistinguished samples were compared to these targets. For conservative analysis, available fish tissue mercury data was compared to the lowest fish tissue target for all samples.

Table 2. Analysis of Metals TMDL Constituents in Receiving Water by Reach

Coppe	er (Dry)	303(d) Listed Reac	hes		Uı	n-listed Rea	ches with	TMDL Targ	ets and Ava	ailable Data	1	
Rea	ach	1	2	4	3	5	6	7	9A	9B	10	11	12
Date I	Range	5/3/2003	6/10/2003	6/10/2003	6/5/2003	NS	5/13/2008	2/5/2003	2/19/2003	2/19/2003	2/6/2002	8/13/2013	2/6/2002
	ilable	11/5/2013	11/11/2008	11/5/2013	4/25/2014	NS	5/13/2008	5/6/2014	8/7/2013	5/7/2008	10/9/2013	8/13/2013	10/9/2013
	Targets g/L):	4.7	11.4	3.1	25.9	3.1	29.3	29.3	27.9	27.9	27.9	27.9	27.9
	N	172	102	43	88	NS	1	71	41	2	127	1	129
Previous 10 Years		166	94	41	88	NS	1	61	28	1	126	11 8/13/2013 8/13/2013 27.9 1 1 1 1 1 1 NS	126
10 rears	N Exceed	26	30	13	19	NS	0	5	0	0	0	1	1
	Z	100	29	28	36	NS	NS	44	18	NS	58	1	58
Previous	N Detect	96	29	28	36	NS	NS	44	18	NS	58	1	58
5 Years	N Exceed	0	0	5	0	NS	NS	5	0	NS	0	1	1
Coppe	er (Wet)	303(d	l) Listed Read	hes		Ur	n-listed Rea	ches with	TMDL Targe	ets and Ava	ilable Data		
Rea	ach	1	2	4	3	5	6	7	9A	9B	10	11	12
Date I	Range	10/27/2004	2/26/2004	2/13/2003	2/12/2003	2/13/2003	NS	NS	NS	NS	NS	NS	NS
	ilable	1/25/2013	10/27/2004	1/25/2013	2/28/2014	11/26/2008	NS	NS	NS	NS	NS	NS	NS
	Targets g/L):	7.2	17.2	4.8	26.3	4.8	29.8	29.8	41.6	41.6	41.6	41.6	41.6
Drovious	N	NS	12	18	46	7	NS	NS	NS	NS	NS	NS	NS
Previous 10	N Detect	NS	12	18	46	7	NS	NS	NS	NS	NS	NS	NS
Years	N Exceed	NS	0	3	0	7	NS	NS	NS	NS	NS	NS	NS
	N	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS	NS
Previous	N Detect	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS	NS
5 Years	N Exceed	NS	0	0	0	NS	NS	NS	NS	NS	NS	NS	NS
	Copper (Wet and Dry Data) 303(d) Listed Reaches Un-listed Reaches with TMDL Targets and Available Date					ailable Data	ı						
	ach	1	2	4	3	5	6	7	9A	9B	10		12
	us 5 years)	100 0	37 0	36 5	61 0	NS NS	NS NS	44 5	41 ¹	NS NS	58 0		58
N Exceed 0 0 5 0 NS 5 0 NS 0 1 Potential for Delisting? Achieving Targets per Listing Policy?							1						
		Yes	Yes	No No	Yes	No ¹	NE ¹	No	Yes	NE ¹	Yes	ID¹	Yes

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detected and the potential for listing may exist.

Nickel (Dry) 303(d) Listed Reaches Un-listed Reaches with TMDL Targets and Available Data

Yes

Yes

									•			,		
Re	ach	1	2	4	3	5	6	7	8	9A	9B	10	12	
Date	Range	5/3/2003	6/10/2003	6/10/2003	3 6/5/2003	NS NS	5/13/2008	2/5/2003	NS	2/19/2003	2/19/2003	2/6/2002	2/6/2002	
Ava	ilable	11/5/2013	11/11/2008	11/5/201	3 4/25/201	4 NS	5/13/2008	5/6/2014	NS	8/7/2013	5/7/2008	8/7/2013	8/7/2013	
TMDL Ta	rget (ug/L): 8.2	8.2	8.2	149	8.2	168	168	168	160	160	160	160	
	N	138	61	43	63	NS	1	71	1	41	2	44	46	
Previous 10	N Detec	t 138	59	43	63	NS	1	62	1	25	1	43	43	
Years	N Exceed	0	11	9	0	NS	0	0	1	0	0	0	0	
	N	100	29	28	36	NS	NS	44	NS	18	NS	19	19	
Previous	N Detec	t 100	29	28	36	NS	NS	44	NS	18	NS	19	19	
5 Years	N Exceed	0	1	3	0	NS	NS	0	NS	0	NS	0	0	
Nickel	(Wet)	303(d)	Listed Read	hes		Uı	n-listed Read	hes with T	MDL Targets	s and Availa	ble Data			
Rea	ich	1	2	4	3	5	6	7	8	9A	9B	10	12	
Date F	Range	10/27/2004	2/26/2004	2/13/2003	2/12/2003	2/13/2003	NS	NS	NS	NS	NS	NS	NS	
Avail	-	1/25/2013	1/25/2013	1/25/2013	2/28/2014	11/26/2008	NS	NS	NS	NS	NS	NS	NS	
TMDL T (ug/		74	74	74	856	74	958	958	958	1292	1292	1292	1292	
	N	NS	12	18	46	7	NS	NS	NS	NS	NS	NS	NS	
Previous 10	N Detect	NS	12	18	46	7	NS	NS	NS	NS	NS	NS	NS	
Years	N Exceed	NS	0	0	0	0	NS	NS	NS	NS	NS	NS	NS	
1	N	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS	NS	
Previous 5 Years	N Detect	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS	NS	
	N Exceed	N NS O O O NS NS NS NS NS NS NS		NS	NS									
Nicl (Wet and I		303(d)	Listed Read	hes		Ur	n-listed Read	hes with T	MDL Targets	and Availal	ble Data			
Rea		1	2	4	3	5	6	7	8	9A	9B	10	12	
N (previous		100	37	36	61	NS	NS	44	NS	41 ¹	NS	44 ¹	46 ¹	
N Exceed	l .	0	1	3	0	NS	NS	0	NS	0	NS	0	0	
		Potent	ial for Delist	ing?			Achieving Targets per Listing Policy?							

Yes

Yes

Yes

Yes

I. Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

^{2.} Single exceedance over the number of allowable exceedances for the given sample size. Constituent is likely to have potential for delisting. NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

Seleniur	m (Dry)	303(d) Listed Rea	ches			Un-listed Reaches with TMDL Targets and Available Data 5 6 7 9A 9B 10 1:								
Rea	nch	1	2 ³	4	3	5	6 7 9A 9B 10								
Date R	Range	8/26/2003	8/27/2003	8/28/2003	6/5/2003	3/29/2004	5/13/2008	8/5/2003	5/8/2008	5/7/2008	8/12/2003	5/5/2008			
Availa	able	11/5/2013	11/11/2008	11/5/2013	4/25/2014	9/7/2004	5/13/2008	6/3/2014	5/8/2008	5/7/2008	8/7/2013	5/13/2008			
TMDL T (ug/	•	71	5	5	5	5	5	5	5	5	5	5			
	N	138	64	55	66	7	1	199	1	1	41	43			
Previous 10	N Detect	113	51	51	63	7	1	190	1	1	32	41			
Years	N Exceed	0	14	49	2	6	1	156	0	0	0	2			
	N	100	29	29	36	NS	NS	132	NS	NS	19	19			
Previous 5 Years	N Detect	75	25	29	36	NS	NS	132	NS	NS	18	19			
	N Exceed	0	5	29	0	NS	NS	111	NS	NS	0	0			

Seleniu	Selenium (Wet) 303(d) Listed Reaches Un-listed Reaches with TMDL Targets and TMDL Targets (ug/L): Date Range Available NS 2/26/2004 2/13/2003 2/12/2003 2/13/2003 NS NS							and Availab	e Data			
Rea	nch	1	2 ³	4	3	5	6	7	9A	9B	10	12
Date F	Range	NS	2/26/2004	2/13/2003	2/12/2003	2/13/2003	NS	NS	NS	NS	NS	NS
Avail	able	NS	1/25/2013	1/25/2013	2/28/2014	11/26/2008	NS	NS	NS	NS	NS	NS
		290	290	290		290						
	N	NS	12	18	46	7	NS	NS	NS	NS	NS	NS
Previous 10	N Detect	NS	12	18	46	7	NS	NS	NS	NS	NS	NS
Years	N Exceed	NS	0	3		0	NS	NS	NS	NS	NS	NS
	N	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS
Previous 5 Years	N Detect	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS
	N Exceed	NS	0	3		NS	NS	NS	NS	NS	NS	NS

Selenium (Wet and Dry Data)	303(d) Listed Re	aches	Un-listed Reaches with TMDL Targets and Available Data										
Reach	1	2 ³	4	3	5	6	7	9A	9B	10	12			
N (previous 5 years)	100	37	37	36	NS ¹	NS ¹	132	NS ¹	NS ¹	41	43 ¹			
N Exceed	0	5	32	0	NS	NS	111	NS	NS	0	2			
	Pote	ntial for Deli	sting?	Achieving Targets per Listing Policy?										
	Yes	No	No	Yes ²	NE	ID	No	NE	NE	Yes ²	Yes			

Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.
 In reaches where wet weather targets were not established, only dry weather data were compared to dry weather targets

^{3.} Data may not be representative of conditions in reach 2 due to the consideration of data that includes the influence of reach 4.

NE - Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

Zinc ((Dry)	303(c	d) Listed Re	aches		ι	Jn-listed Re	aches with	TMDL Targe	ets and Avai	ilable Data		
Rea	ıch	1	2	4	3	5	6	7	9A	9B	10	11	12
Date R	Range	5/3/2003	6/10/2003	6/10/2003	6/5/2003	NS	5/13/2008	2/5/2003	2/19/2003	2/19/2003	2/6/2002	8/13/2013	2/6/2002
Availa	able	11/5/2013	11/5/2013	11/5/2013	4/25/2014	NS	5/13/2008	5/6/2014	8/7/2013	5/7/2008	8/7/2013	8/13/2013	8/7/2013
TMDL T (ug/		81	81	81	338	81	382	382	365	365	365	365	365
	N	138	61	43	63	NS	1	77	41	2	44	1	46
Previous 10	N Detect	124	57	35	63	NS	1	70	41	2	44	1	15
Years	N Exceed	1	0	1	0	NS	0	0	0	0	0	1	0
	N	100	29	28	36	NS	NS	48	18	NS	19	1	19
Previous 5 Years	N Detect	89	26	20	36	NS	NS	48	18	NS	19	1	1
	N Exceed	0	0	1	0	NS	NS	0	0	NS	0	1	0
Zinc ((Wet)	303(c	l) Listed Re	aches		ι	Jn-listed Re	aches with	TMDL Targe	ets and Avai	lable Data		
Rea	ıch	1	2	4	3	5	6	7	9A	9B	10	11	12
Date R	Range	NS	2/26/2004	2/13/2003	2/12/2003	2/13/2003	NS	NS	NS	NS	NS	NS	NS
Availa	able	NS	1/25/2013	1/25/2013	2/28/2014	11/26/2008	NS	NS	NS	NS	NS	NS	NS
TMDL T (ug/		90	90	90	214	90	240	240	324	324	324	324	324
	N	NS	12	18	46	7	NS	NS	NS	NS	NS	NS	NS
Previous 10	N Detect	NS	12	18	45	6	NS	NS	NS	NS	NS	NS	NS
Years	N Exceed	NS	0	0	0	0	NS	NS	NS	NS	NS	NS	NS
	N	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS	NS
Previous 5 Years	N Detect	NS	8	8	25	NS	NS	NS	NS	NS	NS	NS	NS
	N Exceed	NS	0	0	0	NS	NS	NS	NS	NS	NS	NS	NS
Zir (Wet and I		` ,	ted Reaches			Reaches with	TMDL Targ						
Rea		1	2	4	3	5	6	7	9A	9B	10	11	12
N (previous		100	37	36	61	NS NS	NS NS	48 0	41 ²	NS NC	442	NS NC	46 ²
N Exceed 0 0 1 0 Potential for Delisting? Achieving							Listing Police		0	NS	0	NS	0
		Yes	Yes	Yes	Yes	NE	NE	Yes	Yes	NE	Yes	ID	Yes

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

NE – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

Merc	ury	303(d) Listed Rea	ches	Un-listed Reaches with TMDL Targets and Available Data									
Rea	Reach		2 4		3	5	7	9A	10	12				
Date F	Date Range		8/27/2003	2/12/2003	2/12/2003	2/12/2003	8/5/2003	8/5/2003	8/15/2003	8/15/2003				
Avail		11/5/2013	11/5/2013	11/5/2013	4/25/2014	11/26/2008	5/6/2014	8/7/2013	10/9/2013	10/9/2013				
TMDL Targets (ug/L):		0.051	0.051	0.051	0.051	0.051	0.051	0.051	0.051	0.051				
	N	136	75	61	114	7	66	39	123	123				
Previous 10	N Detect	102	60	55	103	7	59	5	24	23				
Years	N Exceed	0	6	7	18	6	26	5	3	2				
	N	100	37	37	65	NS	44	18	58	58				
Previous 5 Years	N Detect	68	31	35	55	NS	44	2	12	12				
J Teals	N Exceed	0	2	3	10	NS	24	2	0	0				
		Poten	tial for Delis	ting?	Achieving Targets per Listing Policy?									
		Yes	Yes	Yes	No	No	No	No	Yes	Yes				

Table 3. Analysis of Metals TMDL Constituents in Sediment by Reach

Reach		Data	Danga	TMDL	Prev	ious 10 Y	ears	Pre	Potential		
	Constituent	Date Range Available		target (ppb) ¹	N	N Detect	N Exceed	N	N Detect	N Exceed	for Delisting
	Copper	5/3/2003	8/18/2011	34,000	18	18	1	5	5	0	PD ²
1	Nickel	5/3/2003	8/18/2011	20,900	18	18	6	5	5	0	PD ²
	Zinc	5/3/2003	8/18/2011	150,000	18	18	3	5	5	0	PD ²
2	Copper	2/3/2004	8/22/2013	34,000	11	11	4	3	3	0	PD ²

^{1.} TMDL target only applies if sediment toxicity occurs.

Table 4. Analysis of Metals TMDL Constituents in Fish Tissue by Reach

Mer	cury	1	2	3	4	5	6	7	9A	9B	10	12	13
Date	Date Range		5/6/2004	12/19/2003	12/18/2003	NS	12/16/2003	12/16/2003	12/19/2003	12/19/2003	12/18/2003	12/17/2003	12/17/2003
	ilable	8/21/2008	8/24/2004	8/24/2004	8/27/2013	NS	8/23/2004	8/23/2004	8/26/2004	8/26/2004	8/25/2004	8/25/2004	8/25/2004
	Target MeHg) ¹ :	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03
	N	9	2	10	23	NS	2	7	5	8	6	3	6
Previous 10 Years	N Detect	9	1	8	21	NS	1	7	5	8	6	3	6
	N Exceed	0	0	2	13	NS	0	6	4	5	6	0	6
Duning	N	NS	NS	NS	13	NS	NS	NS	NS	NS	NS	NS	NS
Previous 5 Years	N Detect	NS	NS	NS	13	NS	NS	NS	NS	NS	NS	NS	NS
	N Exceed	NS	NS	NS	13	NS	NS	NS	NS	NS	NS	NS	NS
Potential for Delisting:		NE	NE	No	No		NE	No	No	No	No	NE	NE

^{1.} Mercury was compared against Methyl-Mercury final numeric targets.

NE (No Exceedances) - Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data

^{2.} No exceedances in most recent five years with a significant number of samples. Considering the exceedances that occurred more than five years ago would inappropriately categorize this as a higher priority.

PD (Potential Delisting) - Insufficient data to information listing decision, however a significant number of the most recent 5 years of monitoring are non-detect. The potential for delisting the reach may exist.

1.2 NUTRIENT TMDL

The Calleguas Creek Nitrogen Compounds and Related Effects (Nitrogen TMDL) was incorporated into the Water Quality Control Plan for the Los Angeles Region (Basin Plan) through the RWQCB adoption of Resolution No. R4-2002-017. An update to the Nitrogen TMDL has since been adopted (Resolution No. 2008-009) and went into effect on October 15, 2009. **Table 5** summarizes the comparison of available receiving water data to numeric objectives identified in the Nitrogen TMDL. The data supports the delisting of Ammonia-N and Nitrite-N in many of the river reaches where sufficient data is available.

Table 5. Analysis of Nitrogen TMDL Constituents in Receiving Water by Reach

Ammo	onia-N					303	(d) Listed Ro	eaches					Un-listed Reaches with TMDL Targets and Available Data
Reach		1	2	3	4	5	6	9A	9B	10	12	13	7
Date F	Date Range		8/28/2003	2/12/2003	2/12/2003	2/12/2003	8/28/2003	1/22/2003	1/22/2003	1/15/2002	1/15/2002	8/28/2003	1/8/2003
Avail	able	11/5/2013	11/5/2013	4/25/2014	11/5/2013	11/6/2013	11/5/2013	11/6/2013	11/5/2013	11/6/2013	11/6/2013	11/5/2013	6/3/2014
TMDL Targets (mg/L)		8.1	5.5	8.4	5.7	5.7	8.7	9.5	9.5	8.4	3.2	5.1	4.7
Daniero	N	53	27	108	49	48	40	252	54	178	171	31	289
Previous 10	N Detect	43	25	105	47	41	39	214	49	175	53	24	254
Years	N Exceed	0	0	0	0	0	0	0	0	1	10	0	32
	Ν	28	20	52	28	28	27	114	34	86	78	20	188
Previous	N Detect	28	20	47	27	26	27	72	32	80	74	19	185
5 Years	N Exceed	0	0	0	0	0	0	0	0	0	0	0	0
			Potential for Delisting?										
		Yes	Yes ¹	Yes	Yes	Yes	Yes ¹	Yes	Yes	Yes	Yes	Yes ¹	Yes

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

Nitra	te-N		303(d) Listed Reaches												
Rea	ch	1	2	3	4	5	6	9A	9B	10	12	13	7		
Date R	Date Range		8/7/2008	1/1/2003	2/13/2003	2/13/2003	5/13/2008	1/22/2003	1/1/2003	1/15/2002	1/15/2002	8/7/2008	1/8/2003		
Availa	able	11/5/2013	11/5/2013	4/25/2014	11/5/2013	11/6/2013	11/5/2013	11/6/2013	11/5/2013	11/6/2013	11/6/2013	11/5/2013	6/3/2014		
	TMDL Targets (mg/L):		10	10	10	10	10	10	10	10	10	10	10		
	N	31	22	115	38	38	31	242	93	168	171	22	284		
Previous 10 Years	N Detect	31	22	113	37	38	31	242	93	167	169	22	284		
10 Teals	N Exceed	14	20	36	30	31	14	29	48	1	0	0	13		
	N	28	20	52	28	28	27	114	34	86	78	20	188		
Previous 5 Years	N Detect	27	19	51	27	27	26	72	31	77	62	20	188		
J Teals	N Exceed	13	18	5	23	26	12	3	0	1	0	0	10		
		Potential for Delisting?										Achieving Targets per Listing Policy?			
		No	No	No	No	No	No ¹	Yes	Yes	Yes	Yes	Yes ¹	Yes		

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

Nitrit	Nitrite-N						303(d) List	ed Reaches						Un-listed Reaches with TMDL Targets and Available Data	
		1	2	3	4	5	6	9A	9B	10	11	12	13	7	8
Date R	Date Range		8/7/2008	1/1/2003	2/13/2003	2/13/2003	5/13/2008	1/22/2003	1/1/2003	1/15/2002	NS	1/15/2002	8/7/2008	1/8/2003	NS
Avail	able	11/5/2013	11/5/2013	11/5/2013	11/5/2013	11/6/2013	11/5/2013	11/6/2013	11/5/2013	11/6/2013	NS	11/6/2013	11/5/2013	6/3/2014	NS
	TMDL Targets (mg/L):		1	1	1	1	1	1	1	1	1	1	1	1	1
, ,	N	32	22	96	38	38	31	242	93	168	NS	171	22	284	NS
Previous 10 Years	N Detect	21	22	79	37	36	31	217	70	65	NS	50	22	276	NS
10 Teals	N Exceed	0	0	11	1	2	0	4	19	2	NS	2	0	12	NS
	N	29	20	32	28	28	27	114	34	86	NS	78	20	188	NS
Previous 5 Years	N Detect	28	18	30	28	27	26	55	31	69	NS	69	18	186	NS
J Teals	N Exceed	0	0	0	0	1	0	0	0	0	NS	0	0	0	NS
												Achieving Targets per Listing Policy?			
	Yes NE Yes Yes Yes Yes Yes Yes Yes NE										NE	Yes			

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

	Nitrite-N + Nitrate-N					;	303(d) Liste	d Reaches						Un-listed Reaches with TMDL Targets and Available Data	
		1	2	3	4	5	6	9A	9B	10	11	12	13	7	8
Date R	Date Range		8/7/2008	2/13/2003	2/13/2003	2/13/2003	5/13/2008	1/22/2003	1/1/2003	1/15/2002	NS	1/15/2002	8/7/2008	1/8/2003	5/7/2008
Availa	able	11/5/2013	11/5/2013	11/5/2013	11/6/2013	11/6/2013	11/5/2013	11/6/2013	11/5/2013	11/6/2013	NS	11/6/2013	11/5/2013	6/3/2014	5/7/2008
TMDL T (mg/		10	10	10	10	10	10	10	10	10	10	10	10	10	10
	N	31	22	116	38	38	31	242	93	168	NS	166	22	284	1
Previous	N Detect	31	22	115	37	38	31	242	93	167	NS	164	22	284	1
10 Years	N Exceed	14	21	37	31	31	14	30	48	0	NS	1	0	18	1
	N	28	20	52	28	28	27	114	34	86	NS	78	20	188	NS
Previous 5 Years	N Detect	28	20	52	28	28	27	114	34	85	NS	76	20	188	NS
o rears	N Exceed	13	19	5	23	26	12	3	0	0	NS	0	0	12	NS
	Potential for Delisting?										Achieving Targets per Listing Policy?				
		No	No	No	No	No	No	Yes	Yes	Yes	-	Yes	NE	Yes	ID ¹

^{1.} Historical monitoring data available; however, no samples in previous 5 years. Insufficient number of samples to inform a listing decision.

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

1.3 OC PESTICIDES AND PCBS TMDL

The RWQCB adopted Resolution No. R4-2005-010 to incorporate the OC Pesticides and PCBs TMDL in Calleguas Creek, its Tributaries, and Mugu Lagoon into the Basin Plan. The TMDL became effective on March 24, 2006. Final numeric targets are specified for water, fish tissue, and/or sediment depending on the constituent. The TMDL also specifies load reductions for sediment and habitat preservation in Mugu Lagoon. **Table 6** summarizes the evaluation of receiving water concentrations in the watershed to TMDL targets. However, when TMDL numeric targets were found to be greater than the Human Health Consumption Criteria for Organisms Only, as outlined in Table (b)(1) §131.38 of 40 CFR Part 131, the Human Health Criteria were used in the analysis. Overall, constituents covered by the OC Pesticides and PCBs TMDL have not been detected in the previous ten years in water samples. DDT compounds, chlordane, and toxaphene are the exception, with exceedances within the past 5 years.

Table 6. Analysis of OC Pesticides and PCBs TMDL Constituents in Receiving Water by Reach.

4,4'-	DDD					Un-listed R	Reaches with	n TMDL Targ	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	6/10/2003	6/10/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail	able	5/13/2014	1/7/2005	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	10/9/2013	5/29/2014
WQO	(ng/L):	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84
	N	41	18	108	68	20	45	80	10	164	48	167	137	35
Previous 10	N Detect	19	2	22	35	10	9	10	0	10	2	1	0	1
Years	N Exceed	17	1	22	35	10	9	10	0	10	2	1	0	1
	N	29	NS	54	31	NS	28	53	NS	68	30	80	58	19
Previous 5 Years	N Detect	11	NS	7	19	NS	8	8	NS	2	2	1	0	1
3 . 6416	N Exceed	11	NS	7	19	NS	8	8	NS	2	2	1	0	1
							Achieving Ta	argets per L	isting Polic	у				
		No	ID	No	No	No	No	No	NE	Yes	Yes	Yes	Yes	Yes ¹

Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis
 NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data
 ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

4,4'-	DDE					Un-listed R	eaches with	TMDL Targ	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	6/10/2003	6/10/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail	able	5/13/2014	1/7/2005	5/29/2014	5/29/2014	11/26/2008	2/19/2014	6/3/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	10/9/2013	5/29/2014
WQO	(ng/L):	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59
	N	41	18	108	68	20	45	247	10	164	48	167	137	35
Previous 10	N Detect	30	8	65	57	15	9	178	0	24	11	1	0	4
Years	N Exceed	30	8	65	57	15	9	178	0	24	11	1	0	4
	N	29	NS	54	31	NS	28	162	NS	68	30	80	58	19
Previous 5 Years	N Detect	18	NS	31	30	NS	8	150	NS	6	7	1	0	4
3 . 6416	N Exceed	18	NS	31	30	NS	8	150	NS	6	7	1	0	4
							Achieving Ta	argets per L	isting Polic	у				
	•	No	No	No	No	No	No	No	NE	Yes	No	Yes	Yes	No

4,4'-	DDT	303(d) Listed Reach				Un-lis	sted Reache	s with TMDI	L Targets ar	nd Available I	Data			
Rea	ach	2 ²	1	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	6/10/2003	NS	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail	able	5/13/2014	NS	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/5/2013	5/29/2014
WQO	(ng/L):	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59
	N	59	NS	108	68	20	45	80	10	92	48	62	33	35
Previous 10	N Detect	19	NS	24	29	8	10	7	0	10	1	2	0	1
Years	N Exceed	15	NS	24	29	8	10	7	0	10	1	2	0	1
	N	29	NS	54	31	NS	28	53	NS	34	30	31	9	19
Previous 5 Years	N Detect	6	NS	10	13	NS	8	6	NS	2	1	2	0	1
o rouro	5 Years Detect N Exceed		NS	10	13	NS	8	6	NS	2	1	2	0	1
		Potential for Delisting					Achiev	ing Targets	per Listing	Policy				
		No		No	No	No	No	No	NE	Yes	Yes	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis

^{2.} Station 01_RR_BR is located immediately downstream of the boundary between Reach 1 and Reach 2. The monitoring station was included in analysis of Reach 2 for this constituent due to its 303(d) listing.

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Ald	lrin					Un-listed I	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
WQO	(ng/L):	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	300
	N	32	11	108	61	20	45	80	10	92	48	84	55	35
Previous 10 Years	N Detect	0	0	1	0	0	0	1	0	6	0	0	0	0
TO Teals	N Exceed	0	0	1	0	0	0	1	0	6	0	0	0	0
	N	29	NS	54	31	NS	28	53	NS	34	30	41	19	19
Previous	N Detect	0	NS	0	0	NS	0	1	NS	3	0	0	0	0
5 Years	N Exceed	0	NS	0	0	NS	0	1	NS	3	0	0	0	0
							Achieving T	argets per l	Listing Polic	y				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Endos	ulfan I					Un-listed F	Reaches witl	n TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail	able	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/5/2013	5/29/2014
TMDL 1 (ng/	0	8.7	56	56	56	56	56	56	56	56	56	56	56	56
	N	32	11	108	61	20	45	80	10	92	48	62	33	35
Previous 10	N Detect	0	0	0	0	0	0	0	0	6	0	1	0	0
Years	N Exceed	0	0	0	0	0	0	0	0	0	0	1	0	0
	N	29	NS	54	31	NS	28	53	NS	34	30	31	9	19
Previous 5 Years	N Detect	0	NS	0	0	NS	0	0	NS	0	0	1	0	0
o roars	N Exceed	0	NS	0	0	NS	0	0	NS	0	0	1	0	0
							Achieving T	argets per l	Listing Police	у				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Endos	ulfan II					Un-listed F	Reaches with	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail	able	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/5/2013	5/29/2014
TMDL 7 (ng.		8.7	56	56	56	56	56	56	56	56	56	56	56	56
	Ν	32	11	108	61	20	45	80	10	92	48	62	33	35
Previous 10	N Detect	0	0	0	0	0	0	0	0	0	0	0	0	0
Years	N Exceed	0	0	0	0	0	0	0	0	0	0	0	0	0
	N	29	NS	54	31	NS	28	53	NS	34	30	31	9	19
Previous 5 Years	N Detect	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
	N Exceed	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
							Achieving T	argets per l	Listing Police	;y				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

	rdane tal)					Un-listed	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date I	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/23/2004	5/29/2014
WQO	(ng/L):	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59	0.59
Drovious	N	32	11	108	58	20	45	50	10	92	48	43	14	35
Previous 10	N Detect	9	0	10	11	5	1	3	0	0	3	3	0	1
Years	N Exceed	9	0	10	11	5	1	3	0	0	3	3	0	1
	N	29	NS	54	31	NS	28	30	NS	34	30	22	NS	19
Previous	N Detect	8	NS	3	6	NS	1	3	NS	0	3	3	NS	1
5 Years	N Exceed	5	NS	3	6	NS	1	3	NS	0	3	3	NS	1
							Achieving 1	Targets per	Listing Police	у				
		No	NE	Yes	No	No ¹	Yes	Yes	NE	Yes	Yes	Yes ¹	NE	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Dac	thal					Un-listed	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	12/3/2003	12/3/2003	12/4/2003	12/5/2003	12/5/2003	12/9/2003	12/4/2003	12/19/2003	12/4/2003	12/9/2003	12/5/2003
Avai	lable	8/26/2010	8/24/2004	4/25/2014	8/17/2010	11/26/2008	8/17/2010	8/17/2010	8/23/2004	8/23/2004	8/17/2010	8/17/2010	8/23/2004	8/17/2010
	Targets /L):	1	3500000	3500000	3500000	3500000	3500000	3500000	3500000	3500000	3500000	3500000	3500000	3500000
Dravious	N	12	11	54	31	12	25	28	10	13	25	24	11	21
Previous 10	N Detect	8	10	45	18	9	19	21	0	7	9	3	0	5
Years	N Exceed	1	0	0	0	0	0	0	0	0	0	0	0	0
	N	9	NS	34	10	NS	10	10	NS	NS	10	8	NS	7
Previous	N Detect	6	NS	34	6	NS	8	9	NS	NS	4	3	NS	3
5 Years	N Exceed	1	NS	0	0	NS	0	0	NS	NS	0	0	NS	0
							Achieving 1	Targets per	Listing Police	су				
			NE	Yes	Yes ²	NE	NE	Yes ²	NE	NE	NE	NE	NE	NE

^{1.} TMDL does not establish salt water numeric targets that would apply to this reach.

^{2.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Diel	drin					Un-listed	Reaches wit	th TMDL Tar	rgets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
WQO	(ng/L):	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14
Daniero	N	32	11	108	61	20	45	80	10	92	48	84	55	35
Previous 10	N Detect	0	0	0	0	0	0	0	0	1	0	0	0	0
Years	N Exceed	0	0	0	0	0	0	0	0	1	0	0	0	0
	N	29	NS	54	31	NS	28	53	NS	34	30	41	19	19
Previous	N Detect	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
5 Years	N Exceed	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
							Achieving	Targets per	Listing Police	у				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes1

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

End	drin					Un-listed	Reaches wit	th TMDL Tai	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/5/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
	Targets /L):	2.3	36	36	36	36	36	36	36	36	36	36	36	36s
Drovious	N	32	11	108	61	20	45	116	10	92	48	84	55	35
Previous 10	N Detect	0	0	0	0	0	0	52	0	4	0	0	0	0
Years	N Exceed	0	0	0	0	0	0	1	0	0	0	0	0	0
	N	29	NS	54	31	NS	28	74	NS	34	30	41	19	19
Previous	N Detect	0	NS	0	0	NS	0	44	NS	1	0	0	0	0
5 Years	N Exceed	0	NS	0	0	NS	0	1	NS	0	0	0	0	0
							Achieving 7	Targets per	Listing Police	у				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes1

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

	a-BHC dane)					Un-listed	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date I	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/5/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	6/3/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
WQO	(ng/L):	63	63	63	63	63	63	63	63	63	63	63	63	63
Description	N	32	11	108	61	20	45	247	10	92	48	84	55	35
Previous 10	N Detect	0	0	1	0	1	0	156	0	4	0	2	1	0
Years	N Exceed	0	0	0	0	0	0	0	0	0	0	1	1	0
	N	29	NS	54	31	NS	28	162	NS	34	30	41	19	19
	N Detect	0	NS	0	0	NS	0	132	NS	1	0	1	0	0
5 Years	N Exceed	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
							Achieving 1	argets per	Listing Police	;y				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes1

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Hepta	chlor					Un-listed	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date I	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
WQO	(ng/L):	0.21	0.21	0.21	0.21	0.21	0.21	0.21	0.21	0.21	0.21	0.21	0.21	0.21
Drovious	N	32	11	108	61	20	45	80	10	92	48	84	55	35
Previous 10	N Detect	0	0	0	0	0	0	0	0	1	0	0	0	0
Years	N Exceed	0	0	0	0	0	0	0	0	0	0	0	0	0
	Ν	29	NS	54	31	NS	28	53	NS	34	30	41	19	19
Previous	N Detect	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
5 Years	N Exceed	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
		·					Achieving 1	argets per	Listing Police	y				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes1

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

	ichlor xide					Un-listed	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date I	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
WQO	(ng/L):	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11	0.11
Drovious	N	32	11	108	61	20	45	80	10	92	48	84	55	35
Previous 10	N Detect	0	0	0	0	0	0	0	0	2	0	0	0	0
Years	N Exceed	0	0	0	0	0	0	0	0	1	0	0	0	0
	N	29	NS	54	31	NS	28	53	NS	34	30	41	19	19
Previous	N Detect	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
5 Years	N Exceed	0	NS	0	0	NS	0	0	NS	0	0	0	0	0
							Achieving 1	Targets per	Listing Police	у				
		Yes	NE	Yes	Yes	NE	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Total	PCBs					Un-listed	Reaches wit	h TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	8/28/2003	8/28/2003	8/28/2003	8/28/2003	8/28/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avai	lable	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/5/2013	5/29/2014
WQO	WQO (ng/L):		0.17	0.17	0.17	0.17	0.17	0.17	0.17	0.17	0.17	0.17	0.17	0.17
Drovious	N	32	11	104	58	19	45	80	10	96	49	62	33	35
Previous 10	N Detect	5	0	2	0	1	0	0	0	1	0	1	0	0
Years	N Exceed	5	0	2	0	1	0	0	0	0	0	0	0	0
	N	29	NS	54	32	NS	28	53	NS	37	31	31	9	19
Previous	N Detect	5	NS	1	0	NS	0	0	NS	0	0	0	0	0
5 Years	N Exceed	5	NS	1	0	NS	0	0	NS	0	0	0	0	0
			Achieving Targets per Listing Policy											
		No	NE	Yes	Yes	ID	Yes	Yes	NE	Yes	Yes	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

Toxap	hene					Un-listed F	Reaches witl	n TMDL Tar	gets and Av	ailable Data				
Rea	ach	1	2	3	4	5	6	7	8	9A	9B	10	12	13
Date F	Range	8/21/2008	12/4/2003	2/12/2003	2/13/2003	2/13/2003	8/28/2003	8/5/2003	12/9/2003	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail	able	5/13/2014	8/24/2004	5/29/2014	5/29/2014	11/26/2008	2/19/2014	5/29/2014	8/23/2004	8/7/2013	5/29/2014	5/29/2014	8/7/2013	5/29/2014
WQO	(ng/L):	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75
	N	31	11	108	61	20	45	116	10	92	48	84	55	35
Previous 10 Years	N Detect	15	0	16	23	1	10	59	0	0	4	1	0	1
	N Exceed	15	0	16	23	1	10	59	0	0	4	1	0	1
	Ν	28	NS	54	31	NS	28	74	NS	34	30	41	19	19
Previous 5 Years	N Detect	13	NS	11	19	NS	9	51	NS	0	3	1	0	1
o rouro	N Exceed	13	NS	11	19	NS	9	51	NS	0	3	1	0	1
							Achieving T	argets per l	Listing Police	у				
		No	NE ¹	No	No	ID ¹	No	No	NE ¹	Yes	No	Yes	Yes ¹	Yes ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data. ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

Table 7. Analysis of OC Pesticides and PCBs TMDL Constituents in Sediment by Reach

4,4	'-DDD		303	(d) listed Re	eaches		Un-listed F	Reaches with	n TMDL Tar	gets and Av	ailable Data
Re	each	1	2	4	5	6	3	7	9A	9B	10
Data Pan	go Available	8/19 /200 8	8/27/2003	8/25/2003	NS	8/28/2003	8/25/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Date Range Available		8/18 /201 1	8/22/2013	8/21/2013	NS	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
	TMDLTargets (ng/dry kg):		3500	3500	3500	3500	3500	3500	3500	3500	3500
	N	10	7	7	NS	7	7	7	7	6	1
Previous 10 Years	N Detect	5	2	5	NS	1	0	1	0	0	0
TO TOdis	N Exceed	4	1	4	NS	0	0	0	0	0	0
	N	5	5	5	NS	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	1	4	NS	1	0	0	0	0	NS
J Teals	N Exceed	0	0	3	NS	0	0	0	0	0	NS
	Potential for Delisting							Achieving T	argets per l	isting Polic	у
		No	ID	No		NE	NE	NE	NE	NE	NE

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

4,4'-	DDE		303(d) listed Read	ches		Un-listed	Reaches with	h TMDL Tarç	gets and Ava	ilable Data
Re	ach	1	2	4	5	6	3	7	9A	9B	10
Doto Bono	ro Avoilable	8/19/2008	8/27/2003	8/25/2003	NS	8/28/2003	8/25/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Date Rang	ge Available	8/18/2011	8/22/2013	8/21/2013	NS	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
TMDL Targets (ng/dry kg):		2200	1400	1400	1400	1400	1400	1400	1400	1400	1400
	N	10	7	7	NS	7	7	7	7	6	1
Previous 10 Years	N Detect	10	6	7	NS	4	5	3	7	6	0
10 10010	N Exceed	9	6	7	NS	4	4	3	7	6	0
	N	5	5	5	NS	5	5	5	5	5	NS
Previous 5	N Detect	5	5	5	NS	4	4	2	5	5	NS
o rouro	N Exceed	4	5	5	NS	4	4	2	5	5	NS
			Poten	tial for Delis	sting			Achieving T	argets per L	isting Policy	У
		No	No	No	-	No	No	No	No	No	NE

4,4'-D	DT		303(d) listed Read	hes		Un-listed	Reaches w	ith TMDL T	argets and A	Available
Read	h	1	2	4	5	6	3	7	9A	9B	10
Date Ra	ange	8/19/2008	8/27/2003	8/25/2003	NS	8/28/2003	8/25/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Availa	ble	8/18/2011	8/22/2013	8/21/2013	NS	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
TMDLTa (ng/dry	TMDLTargets (ng/dry kg):		1	1	1	1	1	1	1	1	1
	N	10	7	7	NS	7	7	7	7	6	1
Previous 10 Years	N Detect	4	0	2	NS	0	0	1	0	0	0
10 Touro	N Exceed	4									
	N	5	5	5	NS	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	0	1	NS	0	0	0	0	0	NS
1 24.0	N Exceed	0									
			Poten	itial for Delis	ting		Α	chieving Ta	rgets per L	isting Polic	у
	101	No									

^{1.} The TMDL does not establish numeric targets for freshwater reaches.

BHC-ga	mma	303(d) Read			Un-li	sted Reach	es with TMI	DL Targets a	nd Available	e Data	
Read	h	4	5	1	2	3	6	7	9A	9B	10
Date Ra	ange	8/25/2003	NS	8/19/2008	8/27/2003	8/25/2003	8/28/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Availa	ble	8/21/2013	NS	8/18/2011	8/22/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
TMDLTa (ng/dry		940	940	1	940	940	940	940	940	940	940
	Ν	7	NS	10	7	7	7	7	7	6	1
Previous 10 Years	N Detect	0	NS	0	0	0	0	0	0	0	0
10 10415	N Exceed	0	NS		0	0	0	0	0	0	0
	N	5	NS	5	5	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	NS	0	0	0	0	0	0	0	NS
rodio	N Exceed	0	NS		0	0	0	0	0	0	NS
		Potential for Delisting				Achie	ving Target	s per Listing	Policy		
		NE			NE	NE	NE	NE	NE	NE	NE

The TMDL does not establish numeric targets for saltwater reaches.

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Chlord (Tota		303(d) Read			Un-li	sted Reach	es with TMI	OL Targets a	nd Available	e Data	
Read	h	4	5	1	2	3	6	7	9A	9B	10
Date Ra	ange	8/25/2003	NS	8/19/2008	8/27/2003	8/25/2003	8/28/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Availa	ble	8/21/2013	NS	8/18/2011	8/22/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
TMDLTa (ng/dry		4500	4500	500	4500	4500	4500	4500	4500	4500	4500
	N	7	NS	10	7	7	7	7	7	6	1
Previous 10 Years	N Detect	2	NS	3	0	0	0	0	0	0	0
10 Tears	N Exceed	0	NS	3	0	0	0	0	0	0	0
	N	5	NS	5	5	5	5	5	5	5	NS
Previous 5 Years	N Detect	2	NS	0	0	0	0	0	0	0	NS
Tears	N Exceed	0	NS	0	0	0	0	0	0	0	NS
		Potent Delis				Achie	ving Target	s per Listino	Policy		
NE AL E		NE		No	NE	NE	NE	NE	NE	NE	NE

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Dield	rin			Un-listed	Reaches wi	ith TMDL Ta	rgets and Av	/ailable Data	1	
Read	:h	1	2	3	4	6	7	9A	9B	10
Date Ra	ange	8/19/2008	8/27/2003	8/25/2003	8/25/2003	8/28/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Availa	ble	8/18/2011	8/22/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
	TMDLTargets (ng/dry kg):		2900	2900	2900	2900	2900	2900	2900	2900
	Ν	10	7	7	7	7	7	7	6	1
Previous 10 Years	N Detect	0	0	0	0	0	0	0	0	0
	N Exceed	0	0	0	0	0	0	0	0	0
	Ν	5	5	5	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	0	0	0	0	0	0	0	NS
	N Exceed	0	0	0	0	0	0	0	0	NS
					Achieving	Targets per	Listing Poli	су		
		NE	NE	NE	NE	NE	NE	NE	NE	NE

Endr	in			Un-listed	Reaches w	ith TMDL Ta	rgets and Av	/ailable Data	ı	
Read	h	1	2	3	4	6	7	9A	9B	10
Date Ra	ange	8/19/2008	8/27/2003	8/25/2003	8/25/2003	8/28/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Availa	ble	8/18/2011	8/22/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
TMDLTargets (ng/dry kg):		1	2700	2700	2700	2700	2700	2700	2700	2700
	N	10	7	7	7	7	7	7	6	1
Previous 10 Years	N Detect	0	0	0	0	0	0	0	0	0
	N Exceed		0	0	0	0	0	0	0	0
	N	5	5	5	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	0	0	0	0	0	0	0	NS
. : ::::::	N Exceed		0	0	0	0	0	0	0	NS
					Achieving	Targets per	Listing Poli	су		
			NE	NE	NE	NE	NE	NE	NE	NE

^{1.} The TMDL does not establish numeric targets for saltwater reaches.

NE (No Exceedances) - Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Heptach	nlor Epoxide			Un-liste	d Reaches v	vith TMDL T	argets and A	vailable Data		
F	Reach	1	2	3	4	6	7	9A	9B	10
Doto Do	nga Availahla	8/19/2008	8/27/2003	8/25/2003	8/25/2003	8/28/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Date Ra	Date Range Available		8/22/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
TMDLTarg	TMDLTargets (ng/dry kg):		600	600	600	600	600	600	600	600
	N	10	7	7	7	7	7	7	6	1
Previous 10 Years	N Detect	0	0	0	0	0	0	0	0	0
	N Exceed		0	0	0	0	0	0	0	0
	N	5	5	5	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	0	0	0	0	0	0	0	NS
	N Exceed		0	0	0	0	0	0	0	NS
	Achieving Targets per Listing Po							icy		
			NE	NE	NE	NE	NE	NE	NE	NE

The TMDL does not establish numeric targets for saltwater reaches.
 NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

PCBs (1	otal)			Un-listed	Reaches wi	ith TMDL Ta	rgets and A	vailable Data	a	
Read	:h	1	2	3	4	6	7	9A	9B	10
Date Ra	ange	8/19/2008	8/27/2003	8/25/2003	8/25/2003	8/28/2003	8/28/2003	8/27/2003	8/5/2008	8/27/2003
Availa	ble	8/18/2011	8/22/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/21/2013	8/27/2003
	TMDL Targets (ng/dry kg):		34000	34000	34000	34000	34000	34000	34000	34000
	N	10	7	7	7	7	7	7	6	1
Previous 10 Years	N Detect	3	0	0	0	0	0	0	0	0
	N Exceed	0	0	0	0	0	0	0	0	0
	Ν	5	5	5	5	5	5	5	5	NS
Previous 5 Years	N Detect	0	1	0	1	0	0	0	0	NS
	N Exceed	0	0	0	0	0	0	0	0	NS
					Achieving	Targets per	Listing Poli	су		
		NE	NE	NE	NE	NE	NE	NE	NE	NE

Table 8. Analysis of OC Pesticides and PCBs TMDL Constituents in Fish Tissue by Reach.

4	,4'-DDD				303	(d) listed Rea	aches						Reaches with and Availab	
	Reach	1	2	4	5	9A	9B	10	11	12	13	3	6	7
Doto B	anga Availabla	8/19/2008	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/17/2003	12/19/2003	12/16/2003	12/16/2003
Date K	ange Available	8/27/2008	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/25/2004	8/27/2013	9/3/2009	8/28/2013
TMDL T	Targets (ng/kg):	45000	45000	45000	45000	45000	45000	45000	45000	45000	45000	45000	45000	45000
Previous	N	9	2	23	NS	5	22	6	NS	3	6	28	9	16
10	N Detect	7	2	20	NS	4	17	0	NS	1	0	23	8	10
Years	N Exceed	1	1	15	NS	0	4	0	NS	0	0	9	6	5
Drovious	Ν	NS	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8
Previous 5 Years	N Detect	NS	NS	10	NS	NS	11	NS	NS	NS	NS	14	6	7
Jicais	N Exceed	NS	NS	10	NS	NS	4	NS	NS	NS	NS	8	6	5
					Pote	ential for Del	isting					Achievin	g Targets pe Policy	r Listing
	·	ID	ID	No		NE	No	NE		NE	NE	No	No	No

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

4,	4'-DDE				303	(d) listed Re	aches						Reaches wi	
	Reach	1	2	4	5	9A	9B	10	11	12	13	3	6	7
Doto Bo	ange Available	8/19/2008	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/17/2003	12/19/2003	12/16/2003	12/16/2003
Date Ka	arige Available	8/21/2008	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/25/2004	8/27/2013	9/3/2009	8/28/2013
TMDL T	argets (ng/kg):	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000
Previous	N	9	2	23	NS	5	22	6	NS	3	6	28	9	16
10	N Detect	9	2	23	NS	5	22	4	NS	3	3	28	9	15
Years	N Exceed	9	2	23	NS	5	20	0	NS	3	0	28	9	11
Dunida	N	NS	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8
Previous 5 Years	N Detect	NS	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	7
J Teals	N Exceed	NS	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	7
					Pot	ential for De	listing					Achievin	g Targets pe Policy	er Listing
		No	No	No	<u>-</u> -	No	No	NE		No	NE	No	No	No

4,4'-[DDT					303(d) listed	d Reaches						Reaches wit	
Rea	ch	1	2	4	5	9A	9B	10	11	12	13	3	6	7
Date R	lange	8/19/2008	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/17/2003	12/19/2003	12/16/2003	12/16/2003
Avail		8/21/2008	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/25/2004	8/27/2013	9/3/2009	8/28/2013
TMDL T (ng/l		32000	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000	32000
	N	9	2	23	NS	5	22	6	NS	3	6	28	9	16
Previous 10	N Detect	4	0	19	NS	2	9	0	NS	0	0	17	0	3
Years	N Exceed	2	0	10	NS	0	4	0	NS	0	0	11	0	1
	N	NS	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8
Previous 5 Years	N Detect	NS	NS	11	NS	NS	8	NS	NS	NS	NS	14	0	3
	N Exceed	NS	NS	9	NS	NS	3	NS	NS	NS	NS	9	0	1
	ZAGGGG					Potential fo	r Delisting					Achieving	g Targets pe Policy	r Listing
		No	NE	No		NE	No	NE		NE	NE	No	NE	No ¹

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

Ald	rin				303(d) liste	ed Reaches				Un-listed	Reaches wit	th TMDL Targ	gets and Ava	ilable Data
Rea	ıch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date R	Range	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/18/2011	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T	argets	50	50	50	50	50	50	50	50	50	50	50	50	50
(ng/	kg)													
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10	N Detect	0	0	NS	0	0	0	NS	0	0	0	0	0	0
Years	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
	N Exceed	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
					Potential f	or Delisting					Achieving 7	Targets per L	isting Policy	1
		NE	NE		NE	NE	NE		NE	NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

внс-а	lpha				303	(d) listed Re	aches				Un-liste		vith TMDL Ta able Data	rgets and
Rea	ch	1	2	4	5	9A	9B	10	11	13	3	6	7	12
Date R	Range	NS	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail		NS	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL 7 (ng/l		1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700	1700
	N	NS	2	23	NS	5	22	6	NS	6	28	9	16	3
Previous 10 Years	N Detect	NS	0	0	NS	0	0	0	NS	0	0	0	0	0
10 Tours	N Exceed	NS	0	0	NS	0	0	0	NS	0	0	0	0	0
	N	NS	NS	13	NS	NS	13	NS	NS	NS	17	0	8	NS
Previous 5 Years	N Detect	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
0 10010	N Exceed	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
					Pot	ential for Del	listing				Achi	eving Target	ts per Listing	Policy
NE (A)			NE	NE		NE	NE	NE		NE	NE	NE	NE	NE

NE (No Exceedances) - Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ВНС-	beta				30	3(d) listed Re	aches				Un-listed		th TMDL Tar le Data	rgets and
Rea	ch	1	2	4	5	9A	9B	10	11	13	3	6	7	12
Date R	ange	NS	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Availa	able	NS	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/k		6000	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000	6000
	N	NS	2	23	NS	5	22	6	NS	6	28	9	16	3
Previous 10 Years	N Detect	NS	0	0	NS	0	0	0	NS	0	0	0	0	0
To rouis	N Exceed	NS	0	0	NS	0	0	0	NS	0	0	0	0	0
	N	NS	NS	13	NS	NS	13	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
5 Teals	N Exceed	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
					Po	tential for De	listing				Achie	ving Targets	per Listing	Policy
			NE	NE		NE	NE	NE		NE	NE	NE	NE	NE

BHC-g	amma				303	3(d) listed Re	aches				Un-liste		th TMDL Targ le Data	ets and
Rea	ch	1	2	4	5	9A	9B	10	11	13	3	6	7	12
Date R	Range	NS	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail	able	NS	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/l		8200	8200	8200	8200	8200	8200	8200	8200	8200	8200	8200	8200	8200
	N	NS	2	23	NS	5	22	6	NS	6	28	9	16	3
Previous 10 Years	N Detect	NS	0	0	NS	0	0	0	NS	0	0	0	0	0
10 Teals	N Exceed	NS	0	0	NS	0	0	0	NS	0	0	0	0	0
	N	NS	NS	13	NS	NS	13	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
Jieais	N Exceed	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
					Pot	ential for De	listing				Achie	eving Targets	per Listing P	olicy
	•	1	NE	NE		NE	NE	NE		NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Chlor (To				303(d) liste	ed Reaches	3		Un	-listed Reacl	nes with TMI	DL Targets a	nd Available	Data
Rea	ach	1	2	4	5	9A	12	3	6	7	9B	10	13
Date F	Range	8/19/2008	5/6/2004	12/18/2003	NS	12/19/2003	12/17/2003	12/19/2003	12/16/2003	12/16/2003	12/19/2003	12/18/2003	12/17/2003
Avail	able	8/21/2008	8/24/2004	8/27/2013	NS	8/26/2004	8/25/2004	8/27/2013	9/3/2009	8/28/2013	8/28/2013	8/25/2004	8/25/2004
TMDL 7	Targets kg):	830	830	830	830	830	830	830	830	830	830	830	830
	N	9	2	22	NS	5	3	27	9	16	22	6	6
Previous 10 Years	N Detect	7	1	15	NS	1	0	17	6	5	13	0	0
10 Teals	N Exceed	7	1	15	NS	1	0	17	6	5	13	0	0
	N	NS	NS	12	NS	NS	NS	17	6	8	13	NS	NS
Previous 5 Years	N Detect	NS	NS	10	NS	NS	NS	15	6	5	11	NS	NS
5 Teals	N Exceed	NS	NS	10	NS	NS	NS	15	6	5	11	NS	NS
				Potential for	or Delisting	9			Achi	eving Target	s per Listing	Policy	
Potent Delis		No	ID	No		ID	NE	No	No	No	No	NE	NE

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist

Dielo	drin				303(d) listed	Reaches				Un-listed	d Reaches wi	th TMDL Targ	ets and Avail	able Data
Rea	ch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date R	ange	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Availa	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/k	_	650	650	650	650	650	650	650	650	650	650	650	650	650
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10 Years	N Detect	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	3	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	0	0	0	0	NS
	N Exceed	NS	0	NS	NS	0	NS	NS	NS	0	0	0	0	NS
					Potential for	Delisting					Achieving	Targets per L	isting Policy	
	•	NE	NE - : ":-: to		NE	NE	NE		NE	NE	Yes¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Endos	ulfan I				303(d) list	ed Reaches				Un-listed	Reaches wit	h TMDL Targ	gets and Ava	ailable Data
Rea	ch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date R	lange	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Availa	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
Targets	(ng/kg):	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10	N Detect	0	0	NS	1	0	0	NS	0	0	0	0	0	0
Years	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	3	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	0	0	0	0	NS
	N Exceed	NS	0	NS	NS	0	NS	NS	NS	0	0	0	0	NS
					Potential f	or Delisting					Achieving 1	argets per L	isting Policy	/
	·	NE	NE		NE	NE	NE		NE	NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Endosi	ulfan II				303(d) list	ed Reaches				Un-listed	Reaches w	ith TMDL Ta	rgets and Ava	ilable Data
Rea	ich	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date F	Range	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/l	0	65000000	65000000	65000000	65000000	65000000	65000000	65000000	65000000	6500000	6500000	6500000	6500000	6500000
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10 Years	N Detect	0	0	NS	1	0	0	NS	0	0	0	0	0	0
10 16415	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
Jieais	N Exceed	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
					Potential f	or Delisting					Achieving	Targets per	Listing Policy	/
	•	NE	NE		NE	NE	NE		NE	NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

End	rin				303(d) liste	d Reaches				Un-listed	Reaches wit	h TMDL Tarç	gets and Ava	ilable Data
Rea	ch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date F	ange	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL 7 (ng/l		3200000	3200000	3200000	3200000	3200000	3200000	3200000	3200000	3200000	3200000	3200000	3200000	3200000
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10	N Detect	0	0	NS	1	0	0	NS	0	0	0	0	0	0
Years	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
2 . 0010	N Exceed	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
					Potential fo	or Delisting					Achieving 1	Targets per L	isting Policy	/
	•	NE	NE	NS	NE	NE	NE		NE	NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Hepta	chlor				303(d) listed	Reaches				Un-listed l	Reaches witl	h TMDL Targ	ets and Ava	ilable Data
Rea	ch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date R	Range	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/l	•	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400	2400
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10	N Detect	0	0	NS	0	0	0	NS	0	0	0	0	0	0
Years	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
3 Teals	N Exceed	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
					Potential for	Delisting					Achieving T	argets per L	isting Policy	'
		NE	NE		NE	NE	NE		NE	NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Hepta Epox					303(d) listed	Reaches				Un-listed l	Reaches wit	h TMDL Targ	jets and Ava	ilable Data
Rea	ch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date R	ange	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Availa	able	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/l		1200	1200	1200	1200	1200	1200	1200	1200	1200	1200	1200	1200	1200
	N	2	23	NS	5	22	6	NS	6	9	28	9	16	3
Previous 10	N Detect	0	0	NS	0	0	0	NS	0	0	0	0	0	NS
Years	N Exceed	0	0	NS	0	0	0	NS	0	0	0	0	0	0
	N	NS	13	NS	NS	13	NS	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
3 Teals	N Exceed	NS	0	NS	NS	0	NS	NS	NS	NS	0	0	0	NS
					Potential for	Delisting					Achieving T	argets per L	isting Policy	1
		NE	NE		NE	NE	NE		NE	NE	Yes ¹	NE	NE	NE

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

PCI	Bs				303(d)) listed Reac	hes				Un-listed	Reaches wi Availab		gets and
Rea	ch	1	2	4	5	9A	9B	10	11	13	3	6	7	12
Date R	Range	8/19/2008	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail	able	8/21/2008	8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/l		5300	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300	5300
	N	9	2	22	NS	5	22	6	NS	6	27	9	16	3
Previous 10	N Detect	9	2	10	NS	2	9	0	NS	0	15	6	2	0
Years	N Exceed	9	2	9	NS	2	7	0	NS	0	12	6	1	0
	N	NS	NS	12	NS	NS	13	NS	NS	NS	17	6	8	NS
Previous 5 Years	N Detect	NS	NS	9	NS	NS	9	NS	NS	NS	11	6	2	NS
Jieais	N Exceed	NS	NS	0	NS	NS	0	NS	NS	NS	0	0	0	NS
	•				Poten	tial for Delist	ting				Achie	ving Targets	per Listing	Policy
	-	No	No	PD ¹		No	PD^1	NE		NE	PD^1	PD^1	PD	NE

^{1.} No exceedances in most recent five years with a significant number of samples. Considering the exceedances that occurred more than five years ago would inappropriately categorize this as a higher priority.

ID (insufficient Data) - Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

Toxap	hene				303(d) listed	Reaches				Un-listed	Reaches with	h TMDL Targ	ets and Ava	ilable Data
Rea	ıch	2	4	5	9A	9B	10	11	13	1	3	6	7	12
Date R	Range	5/6/2004	12/18/2003	NS	12/19/2003	12/19/2003	12/18/2003	NS	12/17/2003	8/19/2008	12/19/2003	12/16/2003	12/16/2003	12/17/2003
Avail		8/24/2004	8/27/2013	NS	8/26/2004	8/28/2013	8/25/2004	NS	8/25/2004	8/21/2008	8/27/2013	9/3/2009	8/28/2013	8/25/2004
TMDL T (ng/l		9800	9800	9800	9800	9800	9800	9800	9800	9800	9800	9800	9800	9800
	N	2	22	NS	5	22	6	NS	6	9	27	9	16	3
Previous 10	N Detect	0	18	NS	0	7	0	NS	0	4	10	3	0	0
Years	N Exceed	0	18	NS	0	7	0	NS	0	4	10	3	0	0
	N	NS	12	NS	NS	13	NS	NS	NS	NS	16	6	8	NS
Previous 5 Years	N Detect	NS	12	NS	NS	7	NS	NS	NS	NS	10	3	0	NS
3 Teals	N Exceed	NS	12	NS	NS	7	NS	NS	NS	NS	10	3	0	NS
					Potential for	Delisting					Achieving T	argets per L	isting Policy	1
		NE	No		NE	No	NE		NE	No	No	No	NE	NE

PD (Potential Delisting) – Insufficient data to information listing decision, however a significant number of the most recent 5 years of monitoring are non-detect. The potential for delisting the reach may exist.

NE (No Exceedances) - Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

1.4 TOXICITY TMDL

The RWQCB adopted Resolution No. R4-2005-009 to incorporate the Toxicity, Chlorpyrifos and Diazinon (Toxicity) TMDL in Calleguas Creek, its Tributaries, and Mugu Lagoon into the Basin Plan. The TMDL was effective as of March 25, 2006. Chlorpyrifos and diazinon have been phased out from non-agricultural uses and it was recently announced that additional restrictions on the use of chlorpyrifos on farms may be enacted.

Table 9. Analysis of Toxicity TMDL Constituents in Receiving Water by Reach.

Chlorp (Dr	• .	303(c	d) listed Rea	ches			Un-lis	sted Reache	s with TMD	L Targets ar	nd Available	Data		
Rea	ıch	4	5	7	1	2	3	6	8	9A	9B	10	12	13
Date R	Range	8/28/2003	8/28/2003	8/28/2003	8/21/2008	3/24/2004	6/5/2003	8/28/2003	3/24/2004	8/28/2003	8/28/2003	2/6/2002	2/6/2002	8/28/2003
Availa		11/5/2013	8/23/2004	11/5/2013	11/5/2013	8/24/2004	4/25/2014	11/5/2013	8/23/2004	8/23/2004	11/5/2013	8/21/2013	8/23/2004	11/5/2013
TMDL T (ug/		0.014	0.014	0.014	0.009	0.014	0.014	0.014	0.014	0.014	0.014	0.014	0.014	0.014
	N	34	9	30	21	7	54	29	6	9	30	26	9	21
Previous 10 Years	N Detect	19	6	12	7	0	13	12	0	0	4	0	0	0
10 Tears	N Exceed	14	6	7	4	0	5	6	0	0	0	0	0	0
	N	20	NS	19	19	NS	26	18	NS	NS	19	12	NS	11
Previous 5 Years	N Detect	13	NS	7	6	NS	6	7	NS	NS	2	0	NS	0
Jieais	N Exceed	9	NS	4	3	NS	1	3	NS	NS	0	0	NS	0

Chlorp (We		303(d) listed Rea	ches			Un-lis	ted Reache	s with TMD	L Targets ar	nd Available	e Data		
Rea	ıch	4	5	7	1	2	3	6	8	9A	9B	10	12	13
Date R	Range	2/13/2003	2/13/2003	2/3/2004	12/15/2008	2/3/2004	2/12/2003	2/3/2004	2/3/2004	2/3/2004	2/3/2004	2/3/2004	NS	12/15/2008
Availa		1/25/2013	11/26/2008	1/25/2013	1/25/2013	2/26/2004	2/28/2014	1/25/2013	2/25/2004	2/25/2004	1/25/2013	3/17/2012	NS	3/17/2012
TMDL T (ug/		0.025	0.025	0.025	0.02	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025	0.025
	N	22	9	12	9	3	49	10	3	3	10	11	NS	8
Previous 10 Years	N Detect	19	7	9	9	2	32	8	0	0	4	0	NS	1
10 Tears	N Exceed	18	7	9	9	2	24	7	0	0	3	0	NS	0
	N	8	NS	8	8	NS	25	8	NS	NS	8	7	NS	7
Previous 5 Years	N Detect	8	NS	7	8	NS	19	7	NS	NS	3	0	NS	1
Jieais	N Exceed	7	NS	7	8	NS	13	6	NS	NS	2	0	NS	0

Chlorpyrifos (Wet and Dry Data)	303(d)	Listed Rea	aches			Un-lis	sted Reach	es with TMD	L Targets a	nd Available	Data		
Reach	4	5	7	1	2	3	6	8	9A	9B	10	12	13
N (previous 5 years)	28	18¹	42 ¹	30 ²	10¹	51	39 ¹	NS	NS	40 ¹	37 ¹	NS	29 ²
N Exceed	16	13	14	13	3	14	13	NS	NS	3	0	NS	0
	Potent	ial for Delis	sting?				Achiev	ing Targets	per Listing	Policy?			
	No	No	No	No	No	No	No	NE	NE	Yes	Yes	NE	Yes

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis.

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

Diazino	n (Dry)	303(d) listed Reaches				Un-lis	sted Reaches	with TMDL T	argets and	Available Da	ata			
Rea	ach	7	1	2	3	4	5	6	8	9A	9B	10	12	13
Date F	Range	8/28/2003	8/21/2008	3/24/2004	6/5/2003	8/28/2003	8/28/2003	8/28/2003	3/24/2004	2/19/2003	2/19/2003	2/6/2002	2/6/2002	8/28/2003
Avail		11/5/2013	11/5/2013	8/24/2004	4/25/2014	11/5/2013	8/23/2004	11/5/2013	8/23/2004	8/23/2004	11/5/2013	8/21/2013	8/23/2004	11/5/2013
TMDL 7 (ug/		0.1	0.4	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
	N	30	21	7	55	34	9	29	6	10	31	26	9	21
Previous 10	N Detect	9	3	6	17	10	2	9	0	5	8	5	2	4
Years	N Exceed	1	0	3	4	0	1	1	0	2	2	3	0	0
	N	19	19	NS	27	20	NS	18	NS	NS	19	12	NS	11
Previous 5 Years	N Detect	2	3	NS	5	5	NS	2	NS	NS	2	0	NS	0
	N Exceed	0	0	NS	1	0	NS	0	NS	NS	1	0	NS	0
Diazino	n (Wet)	303(d) listed Reaches				Un-lis	ted Reaches	with TMDL T	argets and	Available Da	ata			
Rea	ach	7	1	2	3	4	5	6	8	9A	9B	10	12	13
	Range	2/3/2004	12/15/2008	2/3/2004	2/12/2003	2/13/2003	2/13/2003	2/3/2004	2/3/2004	2/3/2004	2/3/2004	2/3/2004	NS	12/15/2008
	lable	1/25/2013	1/25/2013	2/26/2004	2/28/2014	1/25/2013	11/26/2008	1/25/2013	2/25/2004	2/25/2004	1/25/2013	3/17/2012	NS	3/17/2012
TMDL (ug	Targets /L):	0.1	0.82	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
	N	12	9	3	51	22	9	10	3	3	10	11	NS	8
Previous 10	N Detect	5	4	1	25	9	1	3	0	1	1	0	NS	0
Years	N Exceed	2	0	0	6	3	0	1	0	1	0	0	NS	0
	N	8	8	NS	27	8	NS	8	NS	NS	8	7	NS	7
Previous 5 Years	Detect	4	4	NS	10	5	NS	3	NS	NS	1	0	NS	0
0 100.0	N Exceed	1	0	NS	3	2	NS	1	NS	NS	0	0	NS	0
	inon Dry Data)	303(d) Listed Reaches				Un-lis	sted Reaches	with TMDL T	argets and	Available D	ata			
	ach	7	1	2	3	4	5	6	8	9A	9B	10	12	13
N (previou		42 ¹	30 ¹	10 ¹	54	28	18 ¹	39 ¹	NS	13 ¹	41	37	NS	28
N Exceed	<u> </u>	Potential for Delisting	0	3	4	2	Achievii	ng Targets pe	NS er Listing Po	3 olicy	2	3	NS	0
,		Yes	Yes	No	Yes	Yes	ID	Yes	NE	No	Yes	Yes	NE	Yes

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

1.5 SALTS TMDL

The Boron, Chloride, Sulfate, TDS (Salts) TMDL was incorporated into the Basin Plan through the RWQCB's adoption of Resolution No. R4-2007-016. **Table 10** summarizes the comparison of available receiving water grab sample data to the final numeric targets established in the Salts TMDL. This evaluation does not include consideration of continuous monitoring for salts at the receiving water compliance points, however, grab samples collected at these locations to calibrate and verify the sensors are a part of the dataset. Additionally, reaches 1 and 2 are tidally influenced and salts targets do not apply, therefore, those reaches are not considered.

Table 10. Analysis of Salts TMDL Constituents in Receiving Water by Reach

Bor	on	303(d) Li	sted Reach	es		Un-	listed Re	aches with T	MDL Targets	and Available	e Data		
Rea	ch	4	7	8	3	5	6	9A	9B	10	11	12	13
Date R	Range	2/25/2004	2/5/2003	NS	2/26/2004	2/25/2004	NS	2/19/2003	2/19/2003	2/15/2002	NS	2/15/2002	NS
Availa	able	11/5/2013	6/3/2014	NS	11/5/2013	2/25/2004	NS	11/6/2013	11/5/2013	10/9/2013	NS	10/9/2013	NS
TMDL T (mg/		1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
	N	65	235	NS	27	1	NS	237	25	124	NS	133	NS
Previous 10 Years	N Detect	65	235	NS	27	1	NS	237	25	124	NS	133	NS
10 Teals	N Exceed	65	85	NS	0	1	NS	1	0	0	NS	0	NS
	N	64	162	NS	26	NS	NS	116	23	58	NS	58	NS
Previous 5 Years	N Detect	64	162	NS	26	NS	NS	116	23	58	NS	58	NS
Jieais	N Exceed	64	55	NS	0	NS	NS	1	0	0	NS	0	NS
		Potentia	l for Delistii	ng			Α	chieving Targ	gets per Listir	ng Policy			
		No	No		NE	ID		Yes	NE	Yes		Yes	

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

Chlori	de		;	303(d) List	ed Reaches			Un-list	ted Reaches	with TMDL Tai	rgets and Av	ailable	e Data
Reac	h	6	7	8	9B	10	13	3	4	5	9A	11	12
Date Ra	inge	NS	1/8/2003	NS	1/1/2003	1/15/2002	NS	1/1/2003	2/13/2003	2/13/2003	1/22/2003	NS	1/15/2002
Availab	ole	NS	6/3/2014	NS	12/5/2013	10/9/2013	NS	4/25/2014	12/5/2013	11/26/2008	12/5/2013	NS	10/9/2013
WQOs (m	ng/L):	150	150	150	150	150	150	150	150	150	150	150	150
	N	NS	281	NS	116	126	NS	206	99	7	282	NS	135
Previous 10 Years	N Detect	NS	278	NS	116	126	NS	206	99	7	282	NS	135
Tears	N Exceed	NS	205	NS	31	40	NS	144	75	0	247	NS	125
	N	NS	194	NS	63	58	NS	144	92	NS	156	NS	58
Previous 5 Years	N Detect	NS	193	NS	63	58	NS	144	92	NS	156	NS	58
	N Exceed	NS	142	NS	16	11	NS	108	73	NS	138	NS	56
	·			Potential f	or Delisting				Achievin	g Targets per	Listing Police	у	
	·		No		No	No		No	No	NE ¹	No		No

Sulfa	ate				;	303(d) Liste	d Reaches						ches with TMDL Available Data
Rea	ch	4	6	7	8	9A	9B	10	11	12	13	3	5
Date R	ange	2/25/2004	5/13/2008	2/5/2003	NS	2/19/2003	1/1/2003	2/15/2002	NS	2/15/2002	NS	1/1/2003	2/25/2004
Availa	able	11/5/2013	5/13/2008	6/3/2014	NS	11/6/2013	11/5/2013	10/9/2013	NS	10/9/2013	NS	11/5/2013	2/25/2004
WQOs (mg/L):	250	250	250	250	250	250	250	250	250	250	250	250
	N	44	1	237	NS	250	86	125	NS	136	NS	103	1
Previous 10 Years	N Detect	44	1	237	NS	250	86	125	NS	136	NS	103	1
10 Teals	N Exceed	42	1	233	NS	51	5	0	NS	116	NS	31	0
	N	43	NS	164	NS	128	36	58	NS	58	NS	74	NS
Previous 5 Years	N Detect	43	NS	164	NS	128	36	58	NS	58	NS	74	NS
Jieais	N Exceed	42	NS	161	NS	22	1	0	NS	54	NS	27	NS
						Potential fo	r Delisting						gets per Listing licy
		No	ID	No		No	Yes	Yes	-	No		No	NE

NE (No Exceedances) – Insufficient data to inform listing decision, however no exceedances were reported in the available monitoring data.

ID (Insufficient Data) – Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

TD	s					303(d)	Listed Reacl	hes					Un-listed Reaches with TMDL Targets and Available Data
Read	ch	3	4	6	7	8	9A	9B	10	11	12	13	5
Date R	ange	1/1/2003	2/13/2003	5/13/2008	2/5/2003	NS	2/19/2003	1/1/2003	2/15/2002	NS	2/15/2002	NS	2/13/2003
Availa	able	4/25/2014	11/5/2013	5/13/2008	11/5/2013	NS	11/6/2013	11/5/2013	10/9/2013	NS	10/9/2013	NS	11/26/2008
WQOs (mg/L):	850	850	850	850	850	850	850	850	850	850	850	850
	N	172	70	1	80	NS	244	89	113	NS	124	NS	8
Previous 10 Years	N Detect	172	70	1	80	NS	244	89	113	NS	112	NS	8
10 Teals	N Exceed	101	61	1	74	NS	133	26	1	NS	97	NS	2
	N	100	44	NS	31	NS	127	37	46	NS	46	NS	NS
Previous 5 Years	N Detect	100	44	NS	31	NS	127	37	46	NS	34	NS	NS
J Teals	N Exceed	61	43	NS	27	NS	77	5	0	NS	33	NS	NS
											Achieving Targets per Listing Policy		
ID (1 (1) :		No	No	ID	No		No	No	Yes		No		No

ID (Insufficient Data) - Insufficient data to inform listing decision, however a single exceedance was detect and the potential for listing may exist.

1.6 INDICATOR BACTERIA/ FECAL COLIFORM

Reaches in the CCW are listed for Indicator Bacteria and Fecal Coliform. The recent revision to bacteria objectives in the Basin Plan replaced limits on Fecal and Total Coliforms in REC1 designated waters with geometric means and instantaneous limits on *E. coli*. This analysis compared available *E. coli* monitoring data to the updated instantaneous objectives of 235 MPN/100mL. Table 11 summarizes the findings of the analysis.

Table 11. Analysis of 303(d) listed Reaches for Bacteria

E. coli		1	2	3	4	5	6	7	8	9A	9B	10	11	12
Currently 303(d) Listed:			Х		Х		Х	Х		Х	Х	Х	Х	
Date Range		5/27/2004	8/28/2003	2/12/2003	2/12/2003	2/12/2003	8/28/2003	8/28/2003	12/2/2003	8/28/2003	8/28/2003	8/15/2003	2/26/2004	8/15/2003
Available		1/7/2005	5/5/2005	4/25/2014	11/26/2008	11/26/2008	3/29/2006	5/5/2005	5/5/2005	5/5/2005	1/7/2005	2/22/2014	8/13/2013	10/27/2013
WQOs (MPN/100mL):		235	235	235	235	235	235	235	235	235	235	235	235	235
Previous 10 Years	N	7	24	88	38	21	32	23	22	23	15	180	4	161
	N Detect	7	24	87	38	21	30	23	22	23	15	150	4	158
	N Exceed	3	15	62	24	12	20	9	12	7	6	6	4	62
Previous 5 Years	N	NS	NS	24	NS	NS	NS	NS	NS	NS	NS	92	1	96
	N Detect	NS	NS	24	NS	NS	NS	NS	NS	NS	NS	69	1	94
	N Exceed	NS	NS	16	NS	NS	NS	NS	NS	NS	NS	0	1	38
Potential for Delisting:		LP ¹	No ¹	LP	No ¹	LP ¹	No ¹	No ¹	LP	No ¹	No ¹	Yes	No ¹	No

^{1.} Previous 5 years of data was insufficient to inform a listing decision, however historical monitoring data was available and used in analysis

LP (Listing Possible) - Considering current and/or earlier data there is potential for this reach to be listed based on the number of observed exceedance