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Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region

**Los Angeles Region 2008 Integrated Clean Water Act Section 305(b)  
Report and Section 303(d) List of Impaired Waters**

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**Item 13**

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the 528<sup>th</sup>**

**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**EXECUTIVE SUMMARY**

**Los Angeles Region 2008 Integrated Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters**

**EXECUTIVE SUMMARY**

**California Regional Water Quality Control Board  
Los Angeles Region  
July 16, 2009**

Item Number 13

Proposed Board Action Approval of Clean Water Act Section 303(d) List of Impaired Waters in the Los Angeles Region

Need for Action The Clean Water Act requires each State to assess the status of water quality in the State (Section 305(b)), and provide a list of impaired water bodies (Section 303(d)) to the USEPA every two years. For water quality limited segments included on the 303(d) list, the state is required to develop a Total Maximum Daily Load (TMDL) or take other action to address the impairment.

The report presented at this hearing is an 'Integrated Report' including both the 305(b) information and the 303(d) information.

The list of impaired waters or 303(d) list, requires public review and approval by the Regional Board and then approval by the State Board, prior to submittal to the USEPA.

The last update to the 303(d) list was in 2006. This report proposes additions, deletions, and changes to the 2006 303(d) list. For each proposed change to the list, a "factsheet" with detailed information on the assessment was prepared and made available to the public.

All of the waterbodies assessed, whether in previous listing cycles or this listing cycle, have been sorted into USEPA-defined categories. The category lists of waterbodies are appendices to the Staff Report. Category lists 4 and 5 are the impaired waters categories and make up the 303(d) list.

**Los Angeles Region 2008 Integrated Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters**

**EXECUTIVE SUMMARY**

The other categories of the Integrated Report, which are waters fully or partially supporting beneficial uses and waters with insufficient data for assessment (Category lists 1, 2, and 3), are provided as information and do not require Board action.

**Stakeholder Participation**

A solicitation for water quality data was made throughout the State on December 4, 2006 (and amended on January 30, 2007). The data solicitation period ended February 28, 2007. The Tentative Resolution and Staff Report with appendices including factsheets for this listing cycle, were released for public comment on April 30, 2009. The public comment period ended on June 17, 2009.

**Summary of Comments**

A total of 22 comment letters were received by the due date of June 17, 2009. In response, staff has revised the proposed 303(d) list, as discussed below.

The majority of comments concerned the appropriateness of a specific pollutant or waterbody condition being included or not included on the 303(d) list of impaired waters.

Several commenters (City of Los Angeles, City of Santa Clarita, Los Angeles County Sanitation Districts, Newhall Land and Farming Company, USEPA) stated that the inclusion of a waterbody on the 303(d) list was not appropriate if the waterbody was assessed to protect a conditional, potential MUN use (P\*MUN). Staff agrees and has revised those listings based on protection of other appropriate beneficial uses or has proposed not listing those waterbodies.

Several commenters (Los Angeles County, City of Calabasas) question the utility of including a listing for invasive species principally because no specific standard for invasives exists and due to the difficulty in eliminating or controlling such species. Staff disagrees and has not changed those proposed new listings. Any waterbody demonstrated to be impaired should be included on the 303(d) list. Las Virgenes MWD commented that an additional waterbody, Cold Creek, should be listed for invasive species but staff found that the data do not support listing at this time. Heal the Bay supports the new invasive species listings.

**Los Angeles Region 2008 Integrated Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters**

**EXECUTIVE SUMMARY**

While no listings for biostimulatory substances were proposed for this listing cycle, the Staff Report included a discussion of possible guidelines to use for determining impairments due to biostimulatory substances, which can lead to algae blooms and other negative effects in waterbodies. A number of commenters (City of Los Angeles, CPR, Las Virgenes MWD, Newhall Land and Farming Company) responded with thoughtful discussions of biostimulatory substances and several expressed concerns about the difficulty of making appropriate impairment determinations under this category. Santa Barbara Channelkeeper expressed support for the development of guidelines and Heal the Bay commented that listings for biostimulatory substances should be made in this listing cycle. All these comments will be considered as staff continues to develop approaches to solve the problems associated with excess biostimulatory substances in water bodies in this Region.

A number of commenters requested re-evaluation of data either using recently adopted standards (SSOs), new draft standards (draft sediment quality guidelines), or to re-evaluate listings that existed prior to the State Listing Policy (2004). In these general cases, staff has declined to re-evaluate. The importance of the correctness of the list and the significance of whether or not a waterbody is on the list is acknowledged. We are constrained by limited staff resources. The 303(d) listing in the State of California is cyclic and updating based on new standards or guidelines will happen every cycle.

In addition, several commenters noted the increases in transparency and access to data used in the publication of this year's 303(d) list. Board staff are committed to continued improvements in transparency and documentation with each listing cycle.

Status of Response to Comments    The comment letters received are included in the Board Package. The Response to Comments will be included in a supplemental Board Package.

Los Angeles Region 2008 Integrated Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters

EXECUTIVE SUMMARY

Alternatives

Alternatives for Board consideration include:

1. Approve the proposed 303(d) list.

The approved Los Angeles Region 303(d) list would be forwarded to the State Board for inclusion in the State-wide 303(d) list. The State-wide list will be made available for public comment and will require approval by the State Board, before being forwarded to USEPA.

2. Do not approve the proposed list

Board staff would bring a proposed 303(d) list before the Board at a subsequent hearing.

Recommendation

Staff recommends approval of the proposed 303(d) list.

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**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**TENTATIVE BOARD RESOLUTION**

**State of California**  
**California Regional Water Quality Control Board, Los Angeles Region**

RESOLUTION NO. R4-2009-0XX

July 16, 2009

**Approval of the 2008 Los Angeles Regional Water Quality Control Board Integrated Report of Federal Clean Water Act (CWA) Section 305(b) And Section 303(d) List of Water Quality Limited Segments**

**WHEREAS, the California Regional Water Quality Control Board, Los Angeles Region, finds that:**

1. The Clean Water Act (CWA) requires each State to assess the status of water quality in the State (Section 305(b)), and provide a list of impaired water bodies (Section 303(d)) to the U.S. Environmental Protection Agency (U.S. EPA) every two years.
2. The 2008 Los Angeles Regional Water Quality Control Board Integrated Report includes the requirements of CWA Section 305(b) and Section 303(d).
3. The list of waters identified under the CWA section 303(d) must also include a
  - a. description of the pollutants causing impairment and
  - b. priority ranking of the waters for the purposes of development of Total Maximum Daily Loads (TMDLs).
4. After reviewing all relevant evidence submitted before or during the comment period for the 2008 Los Angeles Regional Water Quality Control Board Integrated Report, Regional Water Quality Control Board staff have:
  - a. For 305(b), made overall beneficial use support ratings for water bodies that have been assessed for this 2008 assessment cycle. Categories 1, 2, 3, 4, and 5 of the Integrated Report reflect the outcome of the overall use support ratings.
  - b. For 303(d), made recommendations to add, remove or change the 2006 CWA Section 303(d) list of water body-pollutant combinations for the 2008 Los Angeles RWQCB Integrated Report. The 303d list is reflected in Categories 4 and 5 of this Integrated Report.
5. The public has had a reasonable opportunity to participate in the development of the Integrated Report. On December 4, 2006, Water Board staff solicited the public to submit any and all water quality data to be considered in preparation of the 2008 303(d) list and 305(b) report. This solicitation established a data submittal deadline of February 28, 2007. On January 30, 2007, staff transmitted a notice clarifying that there were no limits on the type or format of data and information that the public could provide to the Water Boards for their assessment. A draft of the report was released on April 30, 2009; a Notice of Hearing and Notice of Filing

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were published and circulated 45 days preceding Board Action; Regional Board staff responded to oral and written comments received from the public; and the Regional Board held a public hearing on July 16, 2009 to consider approval of this report.

- 6. In developing the 2008 Los Angeles RWQCB Integrated Report, the RWQCB has considered all readily available data and information.
- 7. On July 16, 2009, prior to the Board's action on this resolution, a public hearing was conducted on the Integrated Report. The Notice of the hearing was published in accordance with the requirements of Water Code Section 13244. This notice was published in the Los Angeles Times and the Ventura County Star on April 30, 2009.

**THEREFORE, be it resolved that the Regional Board, in fulfillment of the federal Clean Water Act and the California Water Code, hereby:**

Acknowledges the completion of the 2008 Los Angeles Regional Water Quality Control Board Integrated Report

Approves the list of proposed additions, deletions or modifications to the Region's 303(d) list

Authorizes the Executive Officer to transmit the 2008 Los Angeles RWQCB Integrated Report and other supporting information to the State Water Board for its consideration and approval.

If during State Board's approval process the State Board determines that minor, non-substantive corrections to the language of the report are needed for clarity or consistency, the Executive Officer may make such changes, and shall inform the Board of any such changes.

I, Tracy J. Egoscue, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of a resolution adopted by the California Regional Water Quality Control Board, Los Angeles Region, on July 16, 2009.

\_\_\_\_\_  
Tracy J. Egoscue  
Executive Officer

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Date

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**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**REVISED STAFF REPORT**

**Staff Report**

**Los Angeles Region Integrated Report**

**Clean Water Act Section 305(b) Report  
and Section 303(d) List of Impaired Waters**

**2008 Update**

**Prepared by  
California Regional Water Quality Control Board, Los Angeles Region**



**April 2009**

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Regional Board staff appreciate the assistance given by Peter Kozelka of the United States Environmental Protection Agency and the State Water Resources Control Board Integrated Report Staff.

## 1 Executive Summary

This Integrated Report provides the recommendations of the staff of the California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) for changes to the Clean Water Act (CWA) Section 303(d) list of impaired waterbodies and provides a draft Clean Water Act Section 305(b) report (Integrated Report). The Integrated Report includes both the list of impaired waterbodies and identified waters which are known to be meeting beneficial uses within the Los Angeles Region.

The Introduction to this Integrated Report provides the context and purpose and an overview of the approach and describes the public process that will be used for adoption of the changes to the 303(d) list and finalization of the Integrated Report. The remainder of the report describes data sources used, the objectives and criteria against which data were compared, the methodology for comparing the available data to the criteria to assess attainment of water quality standards and determine potential 303(d) listings and the methodology used to categorize waterbody segments according to beneficial use support for the 305(b) report. Results are briefly summarized and discussed following descriptions of the methodology.

Recommendations are shown in detail in the appendices. Appendix A shows the public solicitation letters requesting that the public submit any and all available data to support the assessment of water quality in the Region. Appendices B through E provide lists of waterbodies in Integrated Report categories of beneficial use support. Appendix F presents a list of all impairments by waterbody including those waterbodies in Integrated Report categories 4 and 5 (appendices D and E) which is the list referred to as the 303(d) list. Appendix G presents "fact sheets" for each waterbody-pollutant combination that was analyzed for the proposed 303(d) listing decisions. These fact sheets include at least one "Line of Evidence" describing the data and information used as a basis for each proposed decision. Appendix H presents fact sheets for other miscellaneous changes to the 303(d) list. Appendix I provides citations for all of the references used in developing the Integrated Report.

There are ~~68~~ 61 proposed new 303(d) listings in ~~41~~ 40 waterbodies and 30 proposed delistings in 19 waterbodies on the Los Angeles Region 303(d) list.

Additions of new impaired waterbodies to the list ('listings') or deletions of no longer impaired waterbodies from the list ('delistings') were constrained by availability of water quality data. Many waterbodies in the Region are not sampled on a regular basis. In addition, identification of waterbodies which are not impaired by pollutants and meet all beneficial uses has also been driven by availability of data.

Regional Board staff reviewed all data available to determine impairment or the absence of impairment but staff focused on developing listing or delisting decisions and factsheets for the update and did not usually develop do-not-list or do-not-delist decisions and factsheets as these decisions would not alter the final 303(d) list.

The Los Angeles Region Integrated Report and updated 303(d) list included in this staff report is being circulated for public comments. Written comments received before June 17, 2009 will be responded to in writing. The reports and the response to comments will then be brought before the Los Angeles Water Board at a public hearing for potential approval. Public testimony will also be heard at the public hearing. After approval by the Los Angeles Water Board, the Integrated Report, including the updated 303(d) list, will be submitted to the State Water Resources Control Board (State Board) for approval along with the other Region's reports. The full State Integrated Report will then be submitted to the USEPA for approval and will then be final.

## **2 Introduction**

The purpose of this report is to identify those surface waters in the Los Angeles Region which are impaired by pollutants or conditions which prevent them from meeting beneficial uses and to identify those waterbodies which data show are meeting beneficial uses.

An important requirement of the Clean Water Act is to identify those waters which are polluted, not meeting established standards and not supporting the uses expected of those waterbodies. With identification is the recognition of the need for action. Appropriate action after identifying a polluted waterbody is generally the development of a Total Maximum Daily Load (TMDL) but, in some cases, may also include permitting actions or prohibiting discharges to the waterbody, taking cleanup actions, or restoration projects.

### **2.1 Regulatory Process**

The Clean Water Act (CWA) requires each State to assess the status of water quality in the State (Section 305(b)), and provide a list of impaired water bodies (Section 303(d)) to the U.S. Environmental Protection Agency (U.S. EPA) every two years. For water quality limited segments included on the 303(d) list, the state is required to develop a Total Maximum Daily Load (TMDL) or take other action to address the impairment.

The last review and update of the State's 303(d) list occurred in 2006. That review was conducted by the State Water Resources Control Board using the State Board's *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy)* (SWRCB 2004) developed in 2004. The 2006 update was the first review and update to use that policy.

For the 2008 update, each Regional Water Board is conducting their own reviews of new and previous water quality data and updating the assessment and list of impaired waterbodies according to the Listing Policy.

This staff report presents this Regional Board's assessment of the current status of water quality in the Los Angeles Region for water bodies with readily available data, and identifies



the methods and data used to evaluate the water quality. This report proposes additions, deletions, and changes to the 2006 303(d) list. The water quality assessments also result in the identification of water bodies where water quality standards are met or where not enough information is available to accurately assess water quality.

Certain sections of the Integrated Report require public review and approval by the Regional Board and then approval by the State Board. These sections, or categories, are the lists of water quality limited segments whether being addressed by a TMDL or action other than a TMDL or not yet being addressed (Category lists 4 and 5, the 303(d) list). The other sections of the Integrated Report, which are waters supporting beneficial uses and waters with insufficient data (Categories lists 1, 2, and 3), are provided as information and do not require Board action.

After approval by the Los Angeles Water Board, the Integrated Report will be submitted to the State Water Resources Control Board for approval along with the other Region's reports. The results of the water quality assessments will be compiled with other Regional Board reports into a statewide integrated report referred to as the 303(d)/305(b) Integrated Report by the State Board. The statewide list of all the water quality limited segments will require final approval by the USEPA. The US EPA then compiles these assessments into their biennial "National Water Quality Inventory Report" to Congress.

### **3 Development of the Integrated Report**

#### **3.1 Data solicitation**

Federal regulation [(40 CFR § 130.7(b)(5)] states that "Each State shall assemble and evaluate all existing and readily available water quality-related data and information" when developing the 303(d) list. On December 4, 2006, Water Board staff solicited the public to submit any and all water quality data to be considered in preparation of the 2008 303(d) list and 305(b) report. This solicitation established a data submittal deadline of February 28, 2007. On January 30, 2007, staff transmitted a notice clarifying that there were no limits on the type or format of data and information that the public could provide to the Water Boards for their assessment. The notices provided to the public can be found in Appendix A of this report.

The Regional Board received 17 submissions in response to the data solicitation. In addition, staff assembled all other available data. Larger databases considered included:

- National Pollutant Discharge Elimination System (NPDES) permitting data from major NPDES discharges. These data included data collected under the Municipal Separate Storm Sewer System (MS4) NPDES permits.
- Surface Water Ambient Monitoring Program (SWAMP) data. SWAMP is a statewide monitoring effort, administered by the State Water Board, designed to assess the conditions of surface waters throughout the state of California. Monitoring is

conducted in SWAMP through the Department of Fish and Game and Regional Boards monitoring contracts.

- Southern California Bight Regional Monitoring (Bight) data. The Southern California Water Research Project (SCCWRP) coordinates the efforts of many participating organization to conduct the Coastal Ecology component of the Bight regional monitoring effort. These surveys seek to determine the spatial extent of contaminant accumulation in marine sediments and assess the effects of this contamination on living marine resources. Coastal Ecology regional monitoring is conducted every five years. More than 60 organizations have participated as partners in the Coastal Ecology portion of SCCWRP's Bight regional monitoring efforts.

### **3.2 Listing Policy and Evaluation Criteria**

The proposed 2008 303(d) list of impaired water bodies in the Los Angeles Region was developed in accordance with the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (State Board Listing Policy) and the Functional Equivalent Document, both adopted by the State Water Resources Control Board in September 2004. The Listing Policy establishes a standardized approach for developing California's section 303(d) list. It outlines an approach that provides the rules for making listing decisions based upon different types of data and establishes a systematic framework for statistical analysis of water quality data.

The Listing Policy also establishes requirements for data quality, data quantity, and administration of the listing process. Decision rules for listing and delisting are provided for: chemical-specific water quality standards; bacterial water quality standards; health advisories; bioaccumulation of chemicals in aquatic life tissues; nuisances such as trash, odor, and foam; nutrients; water and sediment toxicity; adverse biological response; and degradation of aquatic life populations and communities. The listing policy specifies the frequency of exceedance of applicable water quality objectives that is necessary to make a determination that the water is impaired.

Listing and delisting decisions were made in accordance with the listing policy, using all applicable narrative and numeric water quality criteria contained in the Los Angeles Region Basin Plan and in the California and National Toxic Rules.

### **3.3 Standards Used in the Analysis**

#### **Beneficial Uses:**

The beneficial uses for waters in the Los Angeles Region are identified in the Los Angeles Regional Water Quality Control Plan (Basin Plan). For consistency with other Regions in California and other States, six "core" beneficial uses were assessed. The designated beneficial uses in the Basin Plans fit within these six "core" beneficial uses categories, which are:

1. Aquatic Life Support
2. Drinking Water Supply
3. Fish Consumption
4. Secondary Contact
5. Shell fishing, and
6. Swimming.

**Water Quality Objectives, Criteria and Guidelines:**

The water quality objectives and criteria used in the assessments were from existing and available State Policy and Plans and included the following:

- Water Quality Control Plan, Los Angeles Region (Basin Plan)
- Statewide Water Quality Control Plans (e.g., the California Ocean Plan)
- California Toxics Rule (40 CFR 131.38)
- Maximum Contaminant Levels in California Code of Regulations, Title 22.

Narrative water quality objectives were evaluated using evaluation guidelines as allowed by the Listing Policy. When evaluating narrative water quality objectives, staff identified evaluation guidelines that represented standards attainment or beneficial use protection. Depending on the beneficial use and narrative standard, the following were used in the selection of evaluation guidelines:

1. Sediment Quality Guidelines for Marine, Estuarine, and Freshwater Sediments: When applying narrative water or sediment quality criteria, staff used guidelines developed by the U.S. EPA and other government agencies together with findings published in the scientific peer-reviewed literature to interpret data and evaluate the water quality conditions. Sediment quality guidelines published in the peer-reviewed literature or developed by state or federal agencies were used. Acceptable guidelines included selected values (e.g., effects range-median, probable effects level, probable effects concentration), and other sediment quality guidelines. Only those sediment guidelines that were predictive of sediment toxicity were used (i.e., those guidelines that have been shown in published studies to be predictive of sediment toxicity in 50 percent or more of the samples analyzed).
2. Evaluation Guidelines for Protection from the Consumption of Fish and Shellfish: Evaluation guidelines published by USEPA or OEHHA were used.
3. Evaluation Guidelines for Protection of Aquatic Life from Bioaccumulation of Toxic Substances: Evaluation values for the protection of aquatic life published by the National Academy of Science were used.

The State Listing Policy and the use of the same water quality objectives criteria and guidelines ensure that all Regions develop listing or delisting decisions in a consistent manner. Below are three pollutant categories which require some Los Angeles Region-specific elaboration

### 3.3.1 Indicator bacteria

For indicator bacteria listing decisions, the Los Angeles Region followed the State Listing Policy but used a Los Angeles Region-specific exceedance day approach as outlined below.

Previous iterations of the Los Angeles Region's 303(d) list included impairments for "total coliform," "enterococcus," "viruses (enteric)," "coliform," "beach closures," "swimming restrictions," "high coliform count," "bacteria indicators," and "fecal coliform." In this update, Regional Board staff have begun to categorize these impairments all as "indicator bacteria."

"Indicator bacteria" impairments can include impairments due to any sewage or fecal matter bacterial indicator including total coliform, fecal coliform, *E. coli*, and *enterococcus*.

In this update, Regional Board staff have calculated the frequency of exceedances of standards for indicator bacteria using a exceedance day approach.

#### **Basin Plan**

The Los Angeles Region Basin Plan lists bacteria water quality objectives to protect the water contact recreation and non-contact water recreation beneficial uses in marine and fresh water. The marine water objectives for bacteria are also mirrored in the State Water Resources Control Board's Water Quality Control Plan for Ocean Waters of California (Ocean Plan).

Regional Board Resolution **2002-022**, effective on July 15, 2003, to the Basin Plan included Implementation Provisions for Water Contact Recreation Bacteria Objectives which allow a reference system approach. In part, below

*...In the context of a TMDL, the Regional Board may implement the single sample objectives in fresh and marine waters by using a 'reference system/antidegradation approach' or 'natural sources exclusion approach' as discussed below. ...*

*Under the reference system/antidegradation implementation procedure, a certain frequency of exceedance of the single sample objectives above shall be permitted on the basis of the observed exceedance frequency in the selected reference system or the targeted water body, whichever is less. The reference system/anti-degradation approach ensures that bacteriological water quality is at least as good as that of a reference system and that no degradation of existing bacteriological water quality is permitted where existing bacteriological water quality is better than that of the selected reference system.*

#### **Bacterial TMDLs and exceedance days in the Los Angeles Region**

All bacterial TMDLs developed in the Los Angeles Region have used the reference system approach and have calculated the number of exceedance days at the reference system to define the reference condition. These TMDLs include the Santa Monica Bay Beaches Dry Weather Bacteria TMDL (effective 2003), the Santa Monica Bay Beaches Wet Weather

Bacteria TMDL (effective 2003), Marina Del Rey Back Basins Bacteria TMDL (effective 2004), Los Angeles Harbor Inner Cabrillo Beach and Main Ship Channel Bacteria TMDL (effective 2005), the Malibu Creek and Lagoon Bacteria TMDL (effective 2006), the Ballona Creek Bacteria TMDL (effective 2007), and the Harbor Beaches of Ventura County (Channel Islands Harbor Beaches) Bacteria TMDL (effective 2008).

With an exceedance day method, all appropriate bacterial indicators (i.e. marine or fresh water indicators) are evaluated in one analysis to determine if the waterbody is impaired as opposed to evaluating each bacterial indicator separately and then considering those two or three evaluations to determine if the waterbody is impaired.

To calculate the number of exceedance days, the number of days during a defined period during which one or more indicator bacteria exceeds the standard is an exceedance day. For example, at a freshwater, REC-1 site, a day in which *E. coli* exceeds the standard is one exceedance day, a day in which Fecal Coliform exceeds the standard is one exceedance day and a day in which *both E. coli* and Fecal Coliform exceeds the standard is also one exceedance day.

Calculating exceedance days for all applicable indicators may be in some instances a more conservative approach (i.e. more likely to find a waterbody to be impaired) than a straight indicator by indicator approach and therefore is more protective of human health.

The Listing Policy has specific listing factors for bacterial data from coastal beaches. Section 3.3 and of the Listing Policy discuss methodology for listing water bodies. For *listing* coastal beaches, "if water quality monitoring was conducted April 1 through October 31 only, a four percent exceedance percentage shall be used" (SWRCB, 2004). The 4% exceedance percentage applies to the null hypothesis for the binomial distribution formula at the bottom of Table 3.2. Section 4.3 of the Listing Policy discuss methodology for *delisting* water bodies and does not specifically describe the use of more stringent exceedance percentage for coastal beach water quality monitoring conducted April 1 through October 31 only, though one is inferred. A 19% exceedance percentage was used for water quality monitoring conducted April 1 through October 31 only when assessing delisting status. The 19% exceedance percentage applies to the null hypothesis for the binomial distribution formula at the bottom of Table 4.2. Therefore, for coastal beach datasets in which both year-round monitoring was conducted following by subsequent monitoring from April 1 to October 31 (e.g., year-round from 2000 to 2002 and April 1 to October 31 from 2003 to 2005), the datasets were evaluated in two parts due to differing exceedance percentages for assessing listing and delisting status.

Regional Board staff followed the Listing Policy methodology and exceedance percentages and calculated exceedance days by both single sample exceedances and geometric mean exceedances.

a. Single Sample

The Basin Plan lists four single sample limits for marine waters and two for fresh water. If samples tested for indicator bacteria exceed any of the indicator bacteria limits, a “single sample exceedance day” for indicator bacteria was designated.

b. Geometric Means

The Basin Plan lists three geometric mean bacteria limits for marine waters and two for fresh water. Receiving water data was evaluated based on these numeric limits and the exceedance day approach in a similar manner to single samples. As such, a calendar month approach as opposed to a rolling 30 day sample approach was used to assess geometric mean to maintain sample independence. Two or more samples were used per calendar month for calculating geometric means.

**3.3.2 Invasive species**

In this update, Regional Board staff propose new listings for invasive species.

Several other Region’s 303 (d) lists include listings for “exotic species,” which were made in recent listing updates. In the Los Angeles Region there is one listing for “exotic vegetation,” a listing made prior to 1998.

**Table 3-1 Listings for exotic species in the State 2006 303(d)**

	Region	Number of listings	listing	notes
1	North Coast	1	exotic species	european green crab
2	San Francisco Bay	12	exotic species	ballast water
5	Central Valley	10	exotic species	source unknown
4	Los Angeles	1	exotic vegetation	Ballona Creek

For this listing update, Regional Board staff are proposing listings for “invasive species” as opposed to exotic species” Staff prefer not listing for “exotics” or “non-native” because not all exotic or non-native species are invasive or cause loss of beneficial uses and may even support beneficial uses. For example, the Department of Fish and Game has regulations to protect certain non-native species (e.g. striped bass) and mosquito fish are “non-native” but are used as a biological control by most mosquito abatement districts. In fact, in this listing update, The State Board is re-naming the “exotic species” listings as “invasive species” listings to reflect this.

Invasive species is defined as: an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health. This definition is taken from United States Executive Order 13112 of February 3, 1999 on Invasive Species (USA, 1999).

However, there are still several issues inherent in listing for such a non-traditional pollutant.

1) While certain “biological materials” have been considered pollutants, populations of animals have not been traditionally considered “pollutants.” Section 502(6) of the Clean Water Act defines “pollutants” to include “biological materials... *discharged into water*”. The courts have interpreted the term “biological materials” to include “invasive” species that might be found in ballast water which is discharged. It is not clear that these Clean Water Act definitions and court interpretations would apply equally to invasive or non-native species that are already established (i.e. non-native species whose populations are not sustained or increased by ongoing discharges) as they would to invasive species that are continuing to be discharged.

2) Standards have not been written explicitly for invasives.

3) A 303(d) listing would trigger an obligation by the Regional Board to develop a program to address the “invasive” species impairment. It would be a significant challenge to develop the regulatory program to regulate a population of an established invasive species.

In this 2008 update, Regional Board staff have recommended the new listing of Malibu Creek, Medea Creek, Lindero Creek and Las Virgenes Creek in the Malibu Creek watershed and Solstice Canyon Creek in the Santa Monica Bay watershed as impaired for invasive species, specifically the New Zealand mudsnail. Factsheets for these decisions are included in Appendix G.

Cold Creek, and Triunfo Creek also have mudsnails but are not recommended for listing at this time. Factsheets for these decisions are included in Appendix G.

New Zealand mudsnails, *Potamopyrgus antipodarum*, are tiny (3-5 mm), highly invasive aquatic snails. From the Santa Monica Bay Restoration Commission/Santa Monica Baykeeper (2009):

*In large numbers, these small snails can completely cover a stream bed and wreak havoc on local stream ecosystems. Several studies have documented NZMS [New Zealand Mud Snail] densities in streams at more than 500,000 organisms per square meter. These massive colonies simply outcompete native aquatic invertebrates that the watershed's fish and amphibians rely on for food, disrupting the entire food web. NZMS are easily transported from stream-to-stream by hitchhiking, they attach themselves to shoes (especially waders), equipment (fishing gear, bicycle tires), animals (native and non-native), and even boats. Anything that contacts a stream infested by NZMS will likely become contaminated. New Zealand mudsnails were discovered in Idaho in the mid-1980s, and have since spread to every western state except New Mexico. NZMS were first identified in benthic macroinvertebrate (BMI) samples*

*collected in the Malibu Creek watershed in May 2005. Unfortunately, the Malibu Creek watershed samples containing NZMS were not identified until May 2006. NZMS pose a significant danger to streams throughout the Santa Monica Mountains and threaten the many efforts at habitat restoration and protection, particularly those to restore populations of the endangered steelhead trout in this region.*

The data available for mudsnails was evaluated by the State Listing Policy, Section 3.10, Trends in Water Quality, using the narrative toxicity standard in the Basin Plan as the criteria. This approach is similar to the approach taken by State Board for listing “exotic species” during the 2006 listing update and is in accordance with the Listing Policy.

For mudsnails in the Los Angeles Region specifically, a waterbody is proposed to be included on the 303(d) list as impaired for invasive species if a negative trend in water quality has been demonstrated and the Aquatic Life Support core beneficial use was not supported. Staff considered a reach to be demonstrating a negative trend in water quality if at least one site in the waterbody exhibited an increase in density of mudsnails (with at least a three years sampled). Staff considered the core beneficial use of Aquatic Life Support not to be supported if at least one site exhibited a medium or high density of mudsnails.

### **3.3.3 Biostimulatory Substances- possible future impairment determinations**

In this Integrated Report and 303(d) list update, Regional Board staff have continued to determine impairments and list and de-list decisions for nitrogen compounds as in the past based on Basin Plan nitrogen compound objectives. The Basin Plan contains a specific nitrogen (nitrate nitrite) water quality objective, which is established at 10 mg/L nitrogen as nitrate-nitrogen plus nitrite-nitrogen. This objective is specifically set to protect drinking water beneficial uses and is consistent with the California Department Public Health nitrate drinking water standard.

This nitrogen water quality objective does not protect waterbodies from impairments related to biostimulatory substances and eutrophication. However, Basin Plan also contains a narrative standard for biostimulatory substances and the Regional Board recognizes the need for a clear approach for determinations of impairment under the biostimulatory substances standard in the Basin Plan.

Previous iterations of the Los Angeles Region’s 303(d) list have recognized the need to determine impairment based on biostimulatory substances and eutrophication and have included impairments for ‘low DO/org. enrichment,’ ‘algae,’ ‘nutrient/(algae),’ ‘odors, scum,’ ‘Eutroph,’ and ‘unnatural scum/foam.’ In future updates, Regional Board staff is considering categorizing these impairments all as ‘biostimulatory substances’ using a Los Angeles Region specific, nutrient concentration/biological response method as described below. In this 2008 list update, however, no “biostimulatory substances” impairments have been included.



The biostimulatory substances water quality objective in the Basin Plan addresses water quality impairments related to nutrient enrichment (eutrophication). The Basin Plan identifies biostimulatory substances as 'nitrogen, phosphorus and other compounds that stimulate growth'. The water quality objective states:

*Waters shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses.*

Eutrophication and nutrient enrichment problems rank as the most widespread water quality problems nationwide; for example, more lake acres are affected by nutrients than any other pollutant or stressor (EPA 2000). Eutrophication is defined by increased nutrient loading to a waterbody and the resulting increased growth of phytoplankton and other aquatic plants. Additionally, other parameters such as decreased dissolved oxygen and water clarity can also indicate eutrophic conditions. Phosphorus and nitrogen are recognized as key nutrients for the growth of phytoplankton, algae, and aquatic plants and are responsible for the eutrophication of surface waters.

A waterbody's biological response to nutrient loading is often what actually impairs beneficial uses. For example, increased nitrogen and phosphorus loading can lead to harmful algal blooms, which impair the beneficial uses of the waterbody. Therefore, it is useful to evaluate potential biostimulatory substance impairments in terms of both nutrient concentrations and biological response indicators. Key biological response indicators include the following:

- Low Dissolved Oxygen (DO)
- Dramatic Diurnal Variations in DO
- Increased pH
- Decreased Water Clarity
- Increased Chlorophyll a Concentration
- Increase Macro and/or Benthic Algal Biomass
- Unpleasant Odors, Taste and/or Aesthetics

By evaluating both nutrient concentrations and biological response indicators together, a more direct linkage is made between water quality conditions and beneficial use impairments. This approach provides a more robust water quality assessment.

The Los Angeles Regional Water Board is considering including waterbodies on the State's 303(d) list of impaired waterbodies for biostimulatory substances when both nutrient concentrations and one or more biological response indicators are at levels which characterize eutrophic conditions and/or beneficial uses of the waterbody are impaired.

However, there are many nutrient and biological response indicator criteria that may be reviewed and applied for the purposes of placing a waterbody on the State's 303(d) list. Table 3.1 and 3.2 below present various nutrient concentrations and associated biological

response indicator criteria limits. These criteria are being considered by the Regional Board to assess the biostimulatory substances water quality objective. The sources of these criteria include EPA Nutrient Criteria Technical Guidance Manual, EPA Ambient Water Quality Criteria Recommendations Nutrient Ecoregion III, and California Nutrient Numeric Endpoints. The Regional Board intends to solicit stakeholder comments regarding the criteria presented below for development of the guidelines to be used for listing in future updates of the 303(d) list.

**Table 3-2 Rivers and Streams: Nutrient Concentration and Biological Response Indicators Criteria Limits**

Potential Criteria to assess Biostimulatory Substances Water Quality Objective Rivers and Streams							
Total Nitrogen (mg/L)	Total Phosphorus (mg/L)	Benthic Algal Biomass (mg/m <sup>2</sup> )	Percent Cover	pH	Dissolved Oxygen (mg/L)	Source	
0.65	0.09	150	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	EPA National Nutrient Criteria Technical Guidance	
0.37	0.022	43.9	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	EPA Nutrient Criteria Recommendations Ecoregion III	
0.5	0.03	none	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	EPA Nutrient Criteria Recommendations Ecoregion III: Sub-Ecoregion 6 - Southern and Central CA	
0.06	0.002	150	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	Nutrient Numeric Endpoints - Malibu Creek Case Study	
0.23	0.02	WARM 150 COLD 100	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	Nutrient Numeric Endpoints - SWRCB Nutrient Screening tools for 303(d) Listing	
< 0.295 as SIN*	< 0.026 as SRP**	120	Floating 30% Benthic 60%	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	New Zealand Periphyton Guideline. Barry Biggs, June 2000	

\*Soluble Inorganic Nitrogen (SIN). \*\*Soluble Reactive Phosphorus (SRP)  
Basin Plan Water Quality Objectives are applied for pH and dissolved oxygen

**Table 3-3 Lakes: Nutrient Concentration and Biological Response Indicators Criteria Limits**

Potential Criteria to assess Biostimulatory Substances Water Quality Objective						
Lakes						
Total Nitrogen (mg/L)	Total Phosphorus (mg/L)	Chlorophyll a (ug/L)	Secchi Depth (m)	pH	Dissolved Oxygen (mg/L)	Source
1	0.1	14	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	EPA National Nutrient Criteria Technical Guidance
0.4	0.017	3.5	2.8	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	EPA Nutrient Criteria Recommendations Ecoregion III
0.51	0.172	24.6	1.9	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	EPA Nutrient Criteria Recommendations Ecoregion III: Sub - Ecoregion 6 - Southern and Central CA
0.84	0.05	20	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	Nutrient Numeric Endpoints - Malibu Creek Case Study
1.2 (summer mean)	0.1 (summer mean)	WARM 10 COLD 5	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	Nutrient Numeric Endpoints - SWRCB Nutrient Screening tools for 303(d) Listing
Basin Plan Water Quality Objectives are applied for pH and dissolved oxygen						

**Table 3-2 Lakes: Nutrient Concentration and Biological Response Indicators Criteria Limits**

Potential Criteria to assess Biostimulatory Substances Water Quality Objective							
Rivers and Streams							
Total Nitrogen (mg/L)	Total Phosphorus (mg/L)	Benthic-Algal Biomass (mg/m <sup>2</sup> )	Percent Cover	pH	Dissolved Oxygen (mg/L)	Source	
0.65	0.09	150	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	EPA National Nutrient Criteria Technical Guidance	
0.37	0.022	43.9	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	EPA Nutrient Criteria Recommendations Ecoregion III	
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0.23	0.02	WARM 150 COLD 100	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	Nutrient Numeric Endpoints - SWRCB Nutrient Screening tools for 303(d) Listing	
< 0.295 as SIN*	< 0.026 as SRP**	120	Floating 30% Benthic 60%	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥6 COLD & SPWN ≥7	New Zealand Periphyton Guideline. Barry Biggs, June 2000	

\*Soluble Inorganic Nitrogen (SIN). \*\*Soluble Reactive Phosphorus (SRP)  
Basin Plan Water Quality Objectives are applied for pH and dissolved oxygen

**Table 3-3 Rivers and Streams: Nutrient Concentration and Biological Response Indicators Criteria Limits**

Potential Criteria to assess Biostimulatory Substances Water Quality Objective						
Lakes						
Total Nitrogen (mg/L)	Total Phosphorus (mg/L)	Chlorophyll a (ug/L)	Secchi Depth (m)	pH	Dissolved Oxygen (mg/L)	Source
1	0.1	14	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	EPA National Nutrient Criteria Technical Guidance
0.4	0.017	3.5	2.8	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	EPA Nutrient Criteria Recommendations Ecoregion III
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0.84	0.05	20	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	Nutrient Numeric Endpoints - Malibu Creek Case Study
1.2 (summer mean)	0.1 (summer mean)	WARM 10 COLD 5	none	Shall not be < 6.5 or > 8.5 or change 0.5 units from ambient condition due to waste discharge	WARM ≥5 COLD ≥ 6 COLD & SPWN ≥ 7	Nutrient Numeric Endpoints - SWRCB Nutrient Screening tools for 303(d) Listing

Basin Plan Water Quality Objectives are applied for pH and dissolved oxygen

### 3.4 Data Analysis

Water Board staff evaluated the submitted data and additional data in accordance with the Listing Policy, taking into account data quality and spatial and temporal representativeness.

**LOEs.** A determination that a waterbody is impaired by a particular pollutant was dependent on one or more Lines of Evidence (LOE). A Line of Evidence is the specific information for a single pollutant from a single data source in a waterbody. The LOE includes the beneficial use(s) impacted; the pollutant name(s) pertaining to that water segment and data; the water quality objective (WQO), criterion (WQC) or guideline used to assess the data; detailed information specific to that data; how the data was assessed including the type of data, the total number of samples assessed and those samples that exceeded the WQO, WQC or guideline; where and when the data was collected.

**Factsheets.** The factsheet includes all LOEs developed for a certain pollutant waterbody combination and the resulting listing or delisting decision.

All available data was reviewed by staff. Analyses were documented in Lines of Evidence, factsheets and listing or delisting decisions according to established priorities. All high priority factsheets were completed.

#### Los Angeles Region Factsheet Development Priorities

##### 1. High Priority

a. factsheets (decision: *list*) for waterbody/pollutant combinations not on the 2006 303(d) list where an examination of the data indicate standards were not met. This factsheet may refer to more than one core beneficial use.

b. factsheets (decision: *de-list*) for waterbody/pollutant combinations on the 2006 303(d) list where an examination of the data indicate standards were met.

c. factsheets (decision: *a core use is being supported*) for waterbody/core use combination where an examination of the data indicate that all standards (for which there are data) are being met for that core use (305(b)). This factsheet may refer to more than one pollutant.

d. factsheets for waterbody/pollutant combinations on the 303(d) list where a TMDL has been completed and approved by EPA (new approved TMDLs since 2006 303(d) list).

##### 2. Medium Priority

a. factsheets (decision *a core use is being supported*) for waterbody/core use combination where a preliminary examination of the data indicate that standards are being met for that core use (305(b)). This factsheet may refer to more than one pollutant. However, there may be a waterbody/pollutant combinations on the list impairing other core uses.

b. factsheets (decision: *clarification*) for waterbody/pollutant combinations where the name of the pollutant has changed (e.g. PAHs to become individual PAHs (e.g. aldrin, fluoranthene)) or it is advisable to make a change in the extent of the waterbody (e.g. one waterbody is broken into two or a the dividing line between two reaches is modified).

c. factsheets (decision: *do not list or do not de-list*) for waterbody/pollutant combinations where there is significant new data (new line of evidence) but a preliminary examination of the data indicate that the list status (listed or not listed) would not change.

### 3. Low Priority

a. factsheets for waterbody/pollutant combinations where a preliminary examination of the data indicate standards were met (the creation of a “do not list” factsheet where the waterbody is listed for some other waterbody/pollutant combination or a 305(b) supporting factsheet has been completed).

b. factsheets for waterbody/pollutant combinations where the waterbody/pollutant combination is on the 303(d) list for that waterbody/pollutant combination and a preliminary examination of the data indicate standards were not met (the creation of a “do not de-list” factsheet).

c. factsheets for waterbody/pollutant combinations where available data is of insufficient quantity or quality to make assessments.

## 3.5 Integrated Report Categories

In this report, each assessed waterbody segment was assigned to one of five non-overlapping categories.

First, for each core beneficial use associated with each waterbody segment, a rating of fully supporting, not supporting, or insufficient information was assigned based on the readily available data and the analyses and criteria described, above. Then each assessed water segment was placed into one of five non-overlapping categories of water bodies. These Integrated Report categories are based on the USEPA guidance for states’ Integrated Reports, but contain some modifications based on the State Listing Policy. The distribution of waterbodies into these categories may not be representative of the true state of waterbodies in the Los Angeles Region due to the availability of water quality data and Regional Board decision development priorities.

Category 1: A water segment that 1) supports a minimum of one Beneficial Use for each Core Beneficial Use that is applicable to the water; and 2) has no other uses impaired. (No appendix to this report has been included for this category since, at this time, the Los Angeles Region has no waterbodies for which data supports that all beneficial uses are being supported.)

Category 2 (Appendix B): A water segment that 1) supports some, but not all, of its beneficial uses; 2) can have other uses that are not assessed or lack sufficient



information to be assessed; 3) cannot have uses are which not supported; and 4) in agreement with the USEPA, may be included in this category with a minimum of one pollutant assessed for one use.

Category 3: (Appendix C): A water segment with water quality information that could not be used for an assessment, for reasons such as: monitoring data have poor quality assurance, not enough samples in a dataset, no existing numerical objective or evaluation guideline, the information alone cannot support an assessment, etc. Waters completely lacking water quality information are considered "not assessed".

Category 4A (Appendix D): A water segment where ALL its 303(d) listings are being addressed; and 2) at least one of those listings is being addressed by a USEPA approved TMDL.

Category 4B: A water segment where ALL its 303(d) listings are being addressed by action(s) other than TMDL(s). (No appendix to this report has been included for this category since, at this time, the Los Angeles Region does not have waterbodies in this category.)

Category 4C: A water segment that is impacted by non-pollutant related cause(s). (No appendix to this report has been included for this category since, at this time, the Los Angeles Region does not have waterbodies in this category.)

Category 5 (Appendix E): A water segment where standards are not met and a TMDL is required, but not yet completed, for at least one of the pollutants being listed for this segment.

### **3.6 Information Management**

All LOEs, factsheets and listing or delisting decisions were entered into the statewide *California Water Quality Assessment (CalWQA) Database*. The CalWQA database stores all LOEs, listing decisions, and beneficial use support ratings for assessed water bodies in California. This database was developed in 2007 for the purpose of storing detailed water quality assessment information. The database is designed so that this information can be easily reevaluated in future assessment updates and can be exported to the USEPA's Assessment Database at the end of each assessment update.

## **4 Summary of Assessment Results**

A full summary of the Los Angeles Region Integrated Report is included as Table 4-1.

**Table 4-1 Integrated Report Summary**

Integrated Report Category Number	Integrated Report Category definition	Number of waterbodies
1	Waters Supporting All Beneficial Uses	0
2 (Appendix B)	Waters Supporting Some Beneficial Uses	26
3 (Appendix C)	Waters With Insufficient Information	23
4 (Appendix D)	Water Quality Limited Segments Addressed	31
5 (Appendix E)	Water Quality Limited Segments not Fully Addressed	158
<i>Total</i>		<i>238 assessed waterbodies</i>
<i>(4 and 5) (Appendix F) 303(d) list</i>	<i>List of All Waterbody Impairments (the updated 303 (d) list)</i>	<i>189 waterbodies on the 303(d) list</i>

Of the waterbodies included in the Integrated Report, a total of ~~68~~ 61 new listings are proposed and 30 de-listings are proposed. In addition, in this update, 113 previous listings are now included in the list as ‘being addressed by a TMDL’ because a USEPA approved TMDL has been completed. A summary of new additions to the Integrated Report is found in Table 4-2. In this Table, decisions to List are shown in three categories. “List” is the decision to include a waterbody/pollutant combination on the 303(d) list for the first time; “List (being addressed by TMDL)” is the decision to move a waterbody/pollutant combination from the ‘requires a TMDL’ portion of the list to the “being addressed by a TMDL” portion of the list because a USEPA approved TMDL has been completed since the last update to the 303(d) list in 2006; “List (being addressed by action other than TMDL)” is the decision to move a waterbody/pollutant combination from the ‘requires a TMDL’ portion of the list to the “being addressed by action other than TMDL” portion of the list because another regulatory action (such as a permitted restoration action) is sufficient to address the impairment. Factsheets for all these decisions are found in Appendix G.

**Table 4-2 Integrated Report Summary for NEW decisions in 2008 including *delist, do not delist, do not list and list***

New Decision in 2008	Number of waterbodies	Number of waterbody/pollutant combinations
Delist	19	30
Do Not Delist	23	29
Do Not List	50	<del>86</del> <u>92</u>
List	41	<del>68</del> <u>61</u>
List (being addressed by TMDL)	55	113
List (being addressed by action other than TMDL)	2	3
Total		<del>329</del> <u>328</u>

The total number of waterbody/pollutant combinations in the proposed 2008 303(d) list is ~~829~~ 822. ~~448~~ 442 of these waterbody/pollutant combinations, or 54%, require the completion of a TMDL or other regulatory action to address the impairment. 381 of these waterbody/pollutant combinations, or 46%, are currently being addressed by an EPA approved TMDL or other regulatory action.

This was the first time that the Water Boards have prepared an Integrated 303(d)/305(b) Report under the current Listing Policy and USEPA Integrated Report Guidance and the first time that the Regional Boards have used the CalWQA database. Combining the 303(d) list update with the 305(b) report and using the same database as all other Regions added efficiency and ensured consistency, but provided challenges in terms of workload and project management. While individual assessments for potential 303(d) listings or de-listings provided valuable information for the 305(b) report, creating the overall 305(b) report using 303(d) listing decisions as the primary input also had limitations. Preparing assessment fact sheets at the level of detail required for 303(d) list changes under the Listing Policy limited the amount of data which could be developed in the manner necessary for inclusion in the CalWQA database. In addition, the readily available data are also often biased towards areas with more potential discharges, since these areas are where the bulk of the monitoring activity takes place. For these reasons, the number of waterbody segments in each Integrated Report category is not necessarily a representative sampling of all the waterbodies within the Los Angeles Region. Despite these limitations, this Integrated Report provides the most complete 305(b) report for the Los Angeles Region to date.

## 5 TMDL Scheduling

As part of its 1996 and 1998 regional water quality assessments, the Regional Board identified over 700 waterbody-pollutant combinations in the Los Angeles Region where TMDLs would be required (LARWQCB, 1996, 1998). A 13-year schedule for development of TMDLs in the Los Angeles Region was established in a consent decree (Heal the Bay Inc., et al. v. Browner, et al. C 98-4825 SBA) (United States District Court, Northern District of California, 1999) approved on March 22, 1999 (USEPA/Heal the Bay Consent Decree).

For the purpose of scheduling TMDL development, the decree combined the over 700 waterbody-pollutant combinations into 92 TMDL analytical units. Proposed de-listings in this report would discharge or partially discharge 12 TMDL analytical units as specified in the USEPA/Heal the Bay Consent Decree between the U.S. EPA and Heal the Bay, Inc. et al. filed on March 22, 1999.

Staff identified the new listings as a low priority, to be started after the USEPA/Heal the Bay Consent Decree commitments are met. A possible exception to this would be if a new listing could be folded into an existing analytical unit without the need for additional resources to develop the resulting TMDL. The assignment of a low priority to these new TMDL analytical units is not a reflection on their importance, but is given because the Regional Board has first prioritized existing USEPA/Heal the Bay Consent Decree commitments before beginning new TMDLs. The maximum time that can elapse between 303(d) listing and TMDL completion is 13 years. Accordingly, staff have assigned all new listings a TMDL completion date of 2021. This does not suggest that all new listings have the same priority, but rather that the factors determining TMDL priorities have not yet been evaluated as part of this listing process.

**Item 13**

**Table of Contents for Item 13 on the Agenda of  
the 528<sup>th</sup>**

**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**APPENDIX A**

**PUBLIC SOLICITATION LETTERS**

# APPENDIX A

## State Water Resources Control Board



Linda S. Adams  
Secretary for  
Environmental Protection

### Executive Office

Tam M. Doduc, Board Chair  
1001 I Street • Sacramento, California 95814 • (916) 341-5615  
Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100  
Fax (916) 341-5621 • <http://www.waterboards.ca.gov>



Arnold Schwarzenegger  
Governor

December 4, 2006

To: Interested Persons

### NOTICE OF PUBLIC SOLICITATION OF WATER QUALITY DATA AND INFORMATION FOR 2008 INTEGRATED REPORT – LIST OF IMPAIRED WATERS AND SURFACE WATER QUALITY ASSESSMENT [303(d)/305(b)]

This letter initiates the solicitation period to request from interested persons data and information regarding water quality conditions in surface waters of California. Information gathered will be used to provide the basis both for identifying and listing impaired waters and for assessing overall surface water quality conditions in California.

#### Background Information

Every two years, the State of California is required by federal Clean Water Act section 303(d) and Title 40, Code of Federal Regulations section 130.7 to develop and submit to the U.S. Environmental Protection Agency (USEPA) for approval a list of polluted waters or water quality limited segments (distinct portions of rivers, streams, lakes, ocean waters, etc.). This list is commonly referred to as the "Section 303(d) List" or the "List of Impaired Waters." California's 2006 list has been adopted and is available at: [http://www.waterboards.ca.gov/tmdl/303d\\_lists2006.html](http://www.waterboards.ca.gov/tmdl/303d_lists2006.html). The State Water Board's policy regarding listing criteria may be found at: [http://www.waterboards.ca.gov/tmdl/303d\\_listing.html](http://www.waterboards.ca.gov/tmdl/303d_listing.html).

The list includes water bodies not meeting water quality standards (beneficial uses, water quality objectives/criteria and the State's anti-degradation policy) that are not, or are not expected to be, attained with the implementation of technology-based controls. In addition, currently-listed water bodies can be delisted when evidence reveals that such impacts have ceased, impacts never existed, or the water body is meeting water quality standards. As required by federal law, listed water bodies will be scheduled for development of total maximum daily loads (TMDLs) or other appropriate regulatory actions. A TMDL is the total maximum daily load of a pollutant that can be discharged daily into a given water body and still ensure the attainment of applicable water quality standards. In addition, Clean Water Act section 305(b) requires states to submit to USEPA for approval a report assessing statewide surface water quality.

*California Environmental Protection Agency*



## 2008 Integrated Report

For the 2008 update, the List of Impaired Waters and the Surface Water Quality Assessment will be combined into an Integrated Report. This Report is due to USEPA by April 1, 2008. The USEPA integrated reporting guidelines can be viewed at: <http://www.epa.gov/owow/tmdl/2006IRG/report/2006irg-report.pdf>

### Development of Integrated Report

Data and information for the 2006 list were submitted to the State Water Resources Control Board (State Water Board). However, for the 2008 update, data and information are to be submitted to each Regional Water Quality Control Board (Regional Water Board), which will then compile and approve regional lists. Enclosure 1 provides Regional Water Board contact information. Enclosure 2 identifies each of the nine Regional Water Boards and some of the major water bodies within each Region. **To be considered in this review process, data and information must be submitted to the appropriate Regional Water Board no later than February 28, 2007.**

The State Water Board will compile the regional lists into a statewide list and consider it for adoption. Following State Water Board adoption, the list will then be combined with the Regions' surface water quality assessments into an Integrated Report, as described above, and submitted to USEPA for approval by April 1, 2008.


Since the data and information gathered in this solicitation will contribute to the preparation of a statewide assessment of surface water quality, please do not limit your data and information submissions to only those data that show standards are not met. Data that show standards are being met should also be submitted, as these data and information are extremely important to a proper understanding of the health of the waters of the State. More detailed information about the overall process and requirements for submitting water quality data and information can be found in Enclosure 3.

The tentative schedule for conducting the review and approval of portions of the Integrated Report is shown below. The schedule may change depending on the amount of data to be assessed and the resources available to perform the assessment.

Activity	Date
Beginning of solicitation period for data and information	December 2006
End of solicitation period for data and information	February 28, 2007
Regional Water Boards' approvals of the regional lists and water quality assessment	September 2007 through December 2007
Submittal of Regional Water Boards' portions of the List and Report to State Water Board	December 2007
State Water Board approval of statewide Integrated Report and submittal to USEPA	April 2008

Should you have questions regarding data or information you wish to submit or about this notice, please contact the respective Regional Water Board contact (see Enclosures 1 and 2). You may also contact Craig J. Wilson at the State Water Resources Control Board at 916-341-5560 (cjwilson@waterboards.ca.gov).

Sincerely,

  
Thomas Howard  
Acting Executive Director

Enclosures

cc: Ms. Alexis Strauss, Director  
Water Division (WTR-1)  
U.S. Environmental Protection Agency,  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

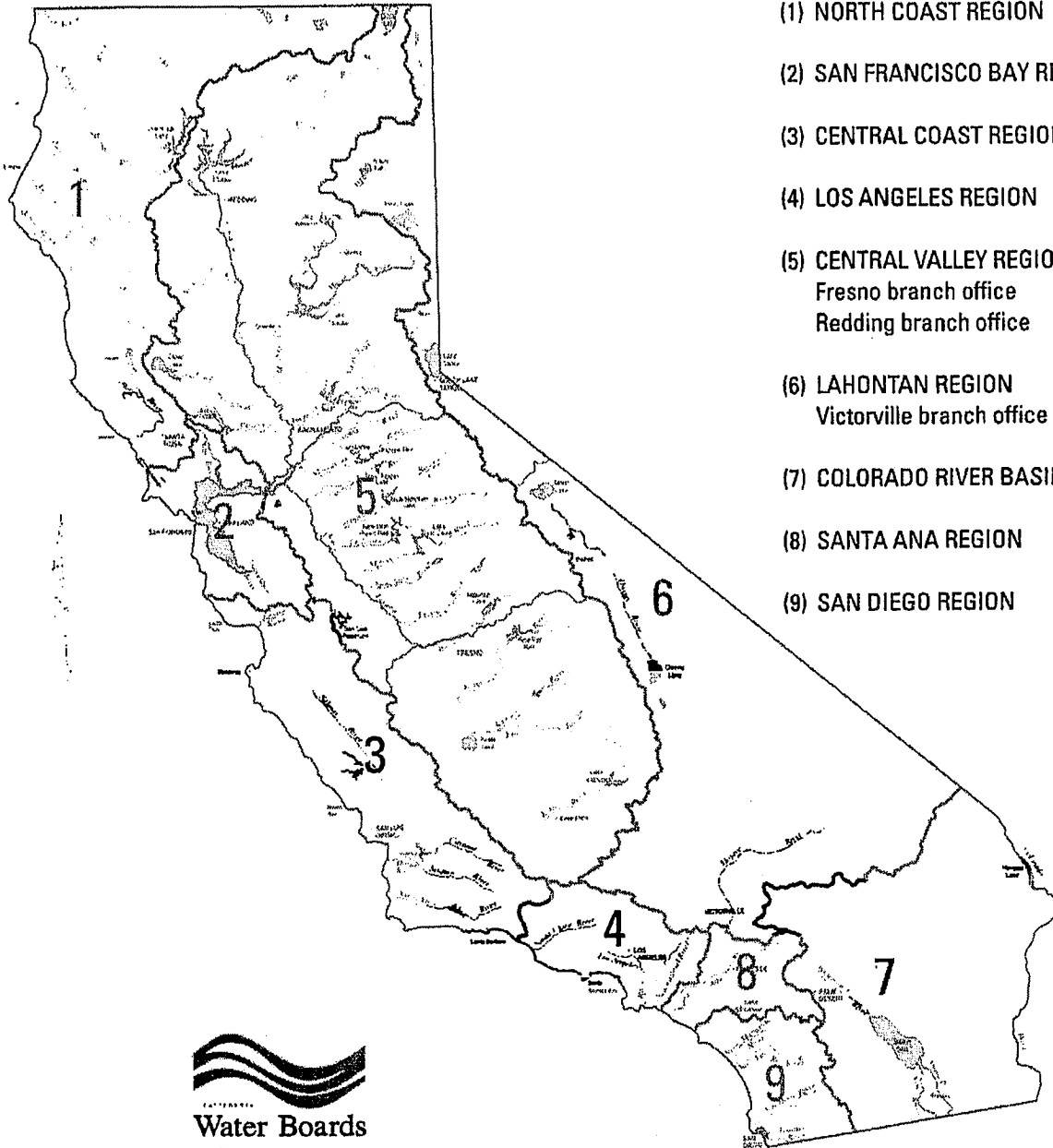
All Regional Water Quality Control Boards



**Regional Water Board Contacts**  
**Integrated Report (List of Impaired Waters and Surface Water Quality Assessment)**

Regional Water Board	Regional Water Board Address	Contact Name Phone Number e-mail address
(1) North Coast	5550 Skylane Blvd., Suite A Santa Rosa, CA 95403	Bruce Gwynne 707-576-2661 <a href="mailto:bgwynne@waterboards.ca.gov">bgwynne@waterboards.ca.gov</a>
(2) San Francisco Bay	1515 Clay St., Suite 1400 Oakland, CA 94612	Naomi Feger 510-622-2328 <a href="mailto:nfeger@waterboards.ca.gov">nfeger@waterboards.ca.gov</a>
(3) Central Coast	895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401	Mary Adams 805-542-4768 <a href="mailto:madams@waterboards.ca.gov">madams@waterboards.ca.gov</a> and Lisa McCann 805-549-3132 <a href="mailto:lmccann@waterboards.ca.gov">lmccann@waterboards.ca.gov</a>
(4) Los Angeles	320 W. Fourth Street, Suite 200 Los Angeles, CA 90013	Deborah Neiter 213-576-6783 <a href="mailto:dneiter@waterboards.ca.gov">dneiter@waterboards.ca.gov</a>
(5) Central Valley	11020 Sun Center Drive #200 Rancho Cordova, CA 95670-6114	Gene Davis 916-464-4687 <a href="mailto:gmdavis@waterboards.ca.gov">gmdavis@waterboards.ca.gov</a> and Joe Karkoski 916-464-4668 <a href="mailto:jkarkoski@waterboards.ca.gov">jkarkoski@waterboards.ca.gov</a>
(6) Lahontan	2501 Lake Tahoe Blvd. So. Lake Tahoe, CA 96150	Judith Unsicker 530-542-5462 <a href="mailto:junsicker@waterboards.ca.gov">junsicker@waterboards.ca.gov</a>
(7) Palm Desert	73-720 Fred Waring Drive, Suite 100 Palm Desert, CA 92260	Logan Raub 760-776-8966 <a href="mailto:lraub@waterboards.ca.gov">lraub@waterboards.ca.gov</a>
(8) Santa Ana	3737 Main Street, Suite 500 Riverside, CA 92501-3348	Pavlova Vitale 951-782-4920 <a href="mailto:pvitale@waterboards.ca.gov">pvitale@waterboards.ca.gov</a>
(9) San Diego	9174 Sky Park Ct., Suite 100 San Diego, CA 92123-4340	Lesley Dobalian 858-637-7139 <a href="mailto:ldobalian@waterboards.ca.gov">ldobalian@waterboards.ca.gov</a> and Julie Chan 858-627-3926 <a href="mailto:jchan@waterboards.ca.gov">jchan@waterboards.ca.gov</a>

# California Regional Water Quality Control Boards



- (1) NORTH COAST REGION
- (2) SAN FRANCISCO BAY REGION
- (3) CENTRAL COAST REGION
- (4) LOS ANGELES REGION
- (5) CENTRAL VALLEY REGION  
Fresno branch office  
Redding branch office
- (6) LAHONTAN REGION  
Victorville branch office
- (7) COLORADO RIVER BASIN REGION
- (8) SANTA ANA REGION
- (9) SAN DIEGO REGION



**Specific information regarding this solicitation and the ensuing section 303(d) Listing/Delisting process:**

1. The Regional Water Boards will utilize the existing statewide policy, "Water Quality Control Policy for Developing California's Clean Water Act section 303(d) List" (Listing Policy) to guide the solicitation, review, and assessment of supporting data and information and to decide which candidate water bodies are to be placed on or removed from the section 303(d) List. All readily available data and information submitted pursuant to this solicitation will be reviewed and assessed using the Listing Policy. Requirements for data and information specified in the Listing Policy — including those for quality control and assurance, temporal and spatial characteristics, and minimum sample sizes — will be followed when reviewing all data and information. The Listing Policy may be viewed at: [http://www.waterboards.ca.gov/tmdl/303d\\_listing.html](http://www.waterboards.ca.gov/tmdl/303d_listing.html).
2. Any person including, but not limited to, private citizens, public agencies, local, State, and federal governmental agencies, non-profit organizations, and businesses possessing information regarding the quality of the State's waters, may contribute data and information pursuant to this solicitation. Data submitted may be in electronic format (see 6. and 7. below), narrative form (see 8. below) or photographic form (see 9. below).
3. All new available data and information will be considered. The following data need not be submitted to the Regional Water Boards for consideration:
  - a. Data submitted as part of the 2006 section 303(d) List update;
  - b. Data that are already in the Regional Water Boards' files (e.g., data submitted as part of a discharger's monitoring and reporting program). Note that data from State and federal agencies (e.g., the United States Geological Survey (USGS), the California Department of Pesticide Regulation, etc.) also need not be submitted, as the Regional Water Boards will be soliciting data from these agencies directly.
4. All new data and information must be received by the respective Regional Water Board (see Enclosures 1 and 2) by the close of business on February 28, 2007. Please note that any information received after February 28, 2007 will not be used for the 2008 section 303(d) List or for compiling the section 305(b) Report, but will be considered in developing the 2010 section 303(d) List and section 305(b) Report.
5. Any interested person may request reassessment of a water body on the existing section 303(d) List. The interested person must:
  - a. Describe the reason(s) the listing is inappropriate and clearly state the reason the interested party would come to a different outcome, and
  - b. Provide the data and information necessary to enable the Regional Water Board to conduct a complete reassessment.
6. Information (see 10. and 12. below) submitted should include the following
  - a. The name of the person or organization providing the information;
  - b. The name of the person certifying the completeness and accuracy of the data and information and a statement describing the standard's exceedances;
  - c. Mailing address, telephone numbers, and email address of a contact responsible for answering questions about the information submitted;
  - d. Identification of any specific software used to format the information and definitions for any codes or abbreviations used, if applicable;
  - e. Bibliographic citations for all published information provided;

- f. If computer model outputs are included in the information, provide bibliographic citations and specify any calibration and quality assurance information available for the model(s) used; and
- g. The name and exact area of the water body the information concerns, including:
  - i. Geographical Information System (GIS) data files (ArcGIS mxd or ArcView shapefiles); or
  - ii. Very clear hard copy maps indicating the area the information concerns; (e.g., mark sample location on a USGS 7.5 minute topographic quad map along with the quad sheet name); or
  - iii. Provide location latitude/longitude; and
  - iv. Metadata for any GIS data must be included. The metadata must detail all the parameters of the projection, including datum.

7. Data (see 11. and 12. below) submitted should contain the following:

- a. To the extent feasible, all data submitted must be submitted in electronic form, i.e., in spreadsheet, database, or ASCII formats;
- b. A hard-copy of all data submitted should also be provided;
- c. References to Web sites will not be accepted *in lieu* of the actual data;
- d. Metadata for the field and lab data, i.e., when measurements were taken (date and time), locations (unique site code, latitude and longitude, and water body name), number of samples, analytes, units of measurement, methods, detection limits, and other relevant factors;
- e. The name and exact area of the water body the information concerns, including:
  - i. GIS data files (ArcGIS mxd or ArcView shapefiles); or
  - ii. Very clear hard copy maps indicating the area the information concerns; (e.g., mark sample locations on a USGS 7.5 minute topographic quad map along with the quad sheet name); or
  - iii. Provide location latitude/longitude; and
  - iv. Metadata for any GIS data must be included. The metadata must detail all the parameters of the projection, including datum.
- f. A copy of the quality assurance procedures including a Quality Assurance Project Plan (QAPP). A QAPP or equivalent document must be available and contain, at a minimum, the following:
  - i. Objectives of the study, project, or monitoring program;
  - ii. Methods used for sample collection and handling;
  - iii. Field and laboratory measurement and analysis;
  - iv. Data management, validation, and recordkeeping (including proper chain of custody) procedures;
  - v. Quality assurance and quality control requirements;
  - vi. A statement certifying the adequacy of the QAPP (plus name of person certifying the document); and
  - vii. A description of personnel training.
- g. A site-specific or project-specific sampling and analysis plan for numeric data should also be available containing the following:

- Data quality objectives or requirements of the project;
  - A statement that data quality objectives or requirements were achieved;

- iii. Rationale for the selection of sampling sites, water quality parameters, sampling frequency and methods that assure the samples are spatially and temporally representative of the surface water and representative of conditions within the targeted sampling timeframe; and
  - iv. Documentation to support the conclusion that results are reproducible.
- h. Data from citizen volunteer water quality monitoring efforts require the name of the group and indication of any training in water quality assessment completed by members of the group. Data submitted by citizen monitoring groups should meet the data quality assurance procedures as detailed in the Listing Policy - section 6.1.4 and as shown above (7.g.).
8. For narrative and qualitative submittals, the submission must:
- a. Describe events or conditions that indicate impacts on water quality;
  - b. Provide linkage between the measurement endpoint (e.g., a study that may have been performed for some other purpose) and the water quality standard of interest;
  - c. Be scientifically defensible;
  - d. Provide analyst's credentials and training;
  - e. Be verifiable by the State Water Board or Regional Water Board; and
  - f. Identify the name and exact area of the water body the narrative or qualitative information concerns, including:
    - i. GIS data files (ArcGIS mxd or ArcView shapefiles); or
    - ii. Very clear hard copy maps indicating the area the information concerns; (e.g., mark sampling locations on a USGS 7.5 minute topographic quad map along with the quad sheet name); or
    - iii. Provide location latitude/longitude; and
    - iv. Metadata for any GIS data must be included. The metadata must detail all the parameters of the projection, including datum.
9. For photographic documentation, the submission must:
- a. Identify the date and time;
  - b. Identify the name and exact area of the water body the narrative or qualitative information concerns, including:
    - i. GIS data files (ArcGIS mxd or ArcView shapefiles); or
    - ii. Very clear hard copy maps indicating the area the information concerns; (e.g., mark photographic locations on a USGS 7.5 minute topographic quad map along with the quad sheet name); or
    - iii. Provide location latitude/longitude; and
    - iv. Metadata for any GIS data must be included. The metadata must detail all the parameters of the projection, including datum.
  - c. Provide a thorough description of photograph(s);
  - d. Describe the spatial and temporal representation of the photographs;
  - e. Provide linkage between photograph-represented condition and condition that indicates impacts on water quality;
  - f. Provide photographer's rationale for area photographed and camera settings used; and
  - g. Be verifiable by the State Water Board or Regional Water Board.
10. For purposes of this solicitation, "information" includes any documentation that a water body is or is not meeting, or is or is not likely to meet, existing water quality standards (i.e., beneficial uses of water, water quality objectives/criteria, and the State's non-degradation policy as listed

in the State's Water Quality Control Plans [Basin Plans], statewide water quality control plans [e.g., the California Ocean Plan], the California Code of Regulations, and pertinent federal laws and regulations).

- 11 "Data" are considered to be numeric information (i.e., measurements of specific physical, chemical, or biological characteristics in aquatic environments).
12. Data and information provided may pertain to individual water body segments, entire water bodies, or whole watersheds.
13. The section 303(d) List and the section 305(b) Report update efforts are not designed, intended, or able to change existing water quality standards. Persons interested in recommending changes to existing water quality standards should contact the respective Regional Water Board.
14. Please send all data and information to the respective Regional Water Board office. **Submittals should be addressed to the attention of the Regional Water Board contact listed in Enclosure 1.**



Linda S. Adams  
Secretary for  
Environmental Protection

# State Water Resources Control Board

## Executive Office

Tam M. Doduc, Board Chair  
1001 I Street • Sacramento, California 95814 • (916) 341-5615  
Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100  
Fax (916) 341-5621 • <http://www.waterboards.ca.gov>



Arnold Schwarzenegger  
Governor

January 30, 2007

To: Interested Persons

### **CLARIFICATION OF NOTICE OF PUBLIC SOLICITATION OF WATER QUALITY DATA AND INFORMATION FOR 2008 INTEGRATED REPORT – LIST OF IMPAIRED WATERS AND SURFACE WATER QUALITY ASSESSMENT [303(d)/305(b)]**

The intent of this letter is to clarify the Notice dated December 4, 2006 regarding the 2008 integrated report described above. There are no limits on the data and information that the public can provide to the Regional Water Quality Control Boards (Regional Water Boards) for their assessment as part of the development of the 2008 integrated report. Federal regulation [(40 CFR § 130.7(b)(5))] states that "Each State shall assemble and evaluate all existing and readily available water quality-related data and information to develop the list required by §§ 130.7(b)(1) and 130.7(b)(2)." The Regional Water Boards will accept any and all data and information.

As stated in the Notice dated December 4, 2006, all data previously submitted to the State Water Resources Control Board (State Water Board) for consideration during the 2006 listing cycle need not be re-submitted, as the State Water Board will make the data available to the Regional Water Boards for consideration for the 2008 integrated report. However, even though it is not necessary, the public may also re-submit such data.

Furthermore, Enclosure 3 of the Notice dated December 4, 2006 contained suggestions and staff preferences for format of data submittals. It was not then, and is not now, the intent of the State Water Board to limit submittals to these format suggestions. The Regional Water Boards will also accept Web addresses that link to actual data. As stated above and in the Notice dated December 4, 2006, all data will be considered.

*California Environmental Protection Agency*

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Interested Persons

-2-

Should you have questions regarding this clarification, please contact the respective Regional Water Board contact (see Enclosure). You may also contact Craig J. Wilson at the State Water Board at 916-341-5560 (cjwilson@waterboards.ca.gov).

Sincerely,

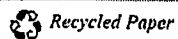
  
Thomas Howard  
Acting Executive Director

Enclosure

cc: Ms. Alexis Strauss, Director  
Water Division (WTR-1)  
U.S. Environmental Protection Agency,  
Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

All Regional Water Quality Control Boards

*California Environmental Protection Agency*





**Regional Water Boards**  
**Section 303(d) List and Section 305(b) Report Contacts**

<b>Regional Water Board</b>	<b>Regional Water Board Address</b>	<b>Contact Name Phone Number e-mail address</b>
<b>(1) North Coast</b>	5550 Skylane Blvd., Suite A Santa Rosa, CA 95403	Bruce Gwynne 707-576-2661 <a href="mailto:bgwynne@waterboards.ca.gov">bgwynne@waterboards.ca.gov</a>
<b>(2) San Francisco Bay</b>	1515 Clay St., Suite 1400 Oakland, CA 94612	Naomi Feger 510-622-2328 <a href="mailto:nfeger@waterboards.ca.gov">nfeger@waterboards.ca.gov</a>
<b>(3) Central Coast</b>	895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401	Mary Adams 805-542-4768 <a href="mailto:madams@waterboards.ca.gov">madams@waterboards.ca.gov</a> and Lisa McCann 805-549-3132 <a href="mailto:lmccann@waterboards.ca.gov">lmccann@waterboards.ca.gov</a>
<b>(4) Los Angeles</b>	320 W. Fourth Street, Suite 200 Los Angeles, CA 90013	Deborah Neiter 213-576-6783 <a href="mailto:dneiter@waterboards.ca.gov">dneiter@waterboards.ca.gov</a>
<b>(5) Central Valley</b>	11020 Sun Center Drive #200 Rancho Cordova, CA 95670-6114	Gene Davis 916-464-4687 <a href="mailto:gmdavis@waterboards.ca.gov">gmdavis@waterboards.ca.gov</a> and Joe Karkoski 916-464-4668 <a href="mailto:jkarkoski@waterboards.ca.gov">jkarkoski@waterboards.ca.gov</a>
<b>(6) Lahontan</b>	2501 Lake Tahoe Blvd. So. Lake Tahoe, CA 96150	Judith Unsicker 530-542-5462 <a href="mailto:junsicker@waterboards.ca.gov">junsicker@waterboards.ca.gov</a>
<b>(7) Palm Desert</b>	73-720 Fred Waring Drive Suite 100 Palm Desert, CA 92260	Logan Raub 760-776-8966 <a href="mailto:lraub@waterboards.ca.gov">lraub@waterboards.ca.gov</a>
<b>(8) Santa Ana</b>	3737 Main Street, Suite 500 Riverside, CA 92501-3348	Paviova Vitale 951-782-4920 <a href="mailto:pvitale@waterboards.ca.gov">pvitale@waterboards.ca.gov</a>
<b>(9) San Diego</b>	9174 Sky Park Ct., Suite 100 San Diego, CA 92123-4340	Lesley Dobalian 858-637-7139 <a href="mailto:ldobalian@waterboards.ca.gov">ldobalian@waterboards.ca.gov</a> and Julie Chan 858-627-3926 <a href="mailto:jchan@waterboards.ca.gov">jchan@waterboards.ca.gov</a>

**Item 13**

**Table of Contents for Item 13 on the Agenda of  
the 528<sup>th</sup>**

**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**APPENDIX B**

**INTEGRATED REPORT CATEGORY 2**

# APPENDIX B

## CATEGORY 2

### 2008 CALIFORNIA WATERS SUPPORTING SOME CALIFORNIA BENEFICIAL USES

Core Beneficial Uses	Applicable California Beneficial Uses
Aquatic Life Support	Cold Freshwater Habitat, Estuarine Habitat, Fish Migration, Fish Spawning, Freshwater Replenishment, Inland Saline Water Habitat, Limited Warmwater, Marine Habitat, Preservation of Areas of Special Biological Significance, Preservation of Rare & Endangered Species, Warm Freshwater Habitat, Wetland Habitat, Wildlife Habitat
Drinking Water Supply	Municipal & Domestic Supply
Fish Consumption	Commercial or recreational collection of fish, shellfish, or organisms, Subsistence Fishing
Secondary Contact	Non-Contact Recreation
Shellfishing	Shellfish Harvesting
Swimming	Water Contact Recreation

Category 2 Criteria: 1) A water that supports some, but not all, of its California beneficial uses; and 2) has other uses that are not assessed or lack sufficient information to be assessed.

\* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = State Water Resources Control Board hydrological subunit area or even smaller planning watershed.

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER / USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Channel Islands Harbor	Bay & Harbor	40311000 / 18070103	Aquatic Life Support <i>Marine Habitat</i> <u>Lead (sediment)</u> <u>Zinc (sediment)</u>	209 Acres
4	Cold Creek	River & Stream	40421000 / 18070104	Aquatic Life Support <i>Cold Freshwater Habitat</i> <u>Invasive Species</u>	0.85 Miles
4	County Line Beach	Coastal & Bay Shoreline	40445000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.7 Miles
4	Deer Creek Beach	Coastal & Bay Shoreline	40446000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.2 Miles

## APPENDIX B

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER/ USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Emma Woods State Beach	Coastal & Bay Shoreline	40100011 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.6 Miles
4	Faria County Park Beach	Coastal & Bay Shoreline	40100011 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.68 Miles
4	Hobson County Park	Coastal & Bay Shoreline	40100010 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.1 Miles
4	Hollywood Beach	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.4 Miles
4	La Conchita Beach	Coastal & Bay Shoreline	40100010 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.3 Miles
4	Mandos Cove Beach	Coastal & Bay Shoreline	40100011 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.69 Miles
4	Marina Park Beach	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.33 Miles

**APPENDIX B**

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER / USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Matilija Creek, North Fork	River & Stream	40220014 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>  Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Total Dissolved Solids</u>	7.7 Miles
4	Mussel Shoals Beach	Coastal & Bay Shoreline	40100010 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.39 Miles
4	Oil Piers Beach	Coastal & Bay Shoreline	40100010 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.2 Miles
4	Oxnard Beach	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1 Miles
4	Oxnard Beach Park	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.65 Miles
4	Point Mugu Beach	Coastal & Bay Shoreline	40311000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.36 Miles

**APPENDIX B**

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER/ USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Port Hueneme Beach Park	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.2 Miles
4	Seaside Wilderness Park Beach	Coastal & Bay Shoreline	40210011 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.74 Miles
4	Silverstrand Beach	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	
4	Solimar Beach	Coastal & Bay Shoreline	40100011 / 18070101	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.6 Miles
4	South Jetty Beach	Coastal & Bay Shoreline	40311000 / 18070103	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.24 Miles
4	Staircase Beach (Leo Carillo Beach, North of County Line)	Coastal & Bay Shoreline	40445000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.51 Miles
4	Sycamore Cove Beach	Coastal & Bay Shoreline	40447000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	0.32 Miles

**APPENDIX B**

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER / USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Thornhill Broome Beach	Coastal & Bay Shoreline	40447000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Indicator Bacteria</u>	1.3 Miles
4	Tuna Canyon Creek	River & Stream	40412000 / 18070104	Aquatic Life Support <i>Warm Freshwater Habitat</i> <u>Nitrate</u>	2.4 Miles

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**APPENDIX C**

**INTEGRATED REPORT CATEGORY 3**



## APPENDIX C

### CATEGORY 3

#### 2008 CALIFORNIA WATERS WITH INSUFFICIENT INFORMATION TO ASSESS BENEFICIAL USES\*

Core Beneficial Uses	Applicable California Beneficial Uses
Aquatic Life Support	Cold Freshwater Habitat, Estuarine Habitat, Fish Migration, Fish Spawning, Freshwater Replenishment, Inland Saline Water Habitat, Limited Warmwater, Marine Habitat, Preservation of Areas of Special Biological Significance, Preservation of Rare & Endangered Species, Warm Freshwater Habitat, Wetland Habitat, Wildlife Habitat
Drinking Water Supply	Municipal & Domestic Supply
Fish Consumption	Commercial or Recreational Collection of Fish, Shellfish, or Organisms, Subsistence Fishing
Secondary Contact	Non-Contact Recreation
Shellfishing	Shellfish Harvesting
Swimming	Water Contact Recreation

**Category 3 Criteria:** A water with water quality information that could not be used for an assessment, for reasons such as: monitoring data have poor quality assurance, not enough samples in a dataset, no existing numerical objective or evaluation guideline, the information alone cannot support an assessment, etc.

\* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = State Water Resources Control Board hydrological subunit area or even smaller planning watershed.

REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Ashland Avenue Drain	River & Stream	40513000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Coliform Bacteria</u>  Aquatic Life Support <i>Warm Freshwater Habitat</i> <u>Organic Enrichment/Low</u> <u>Dissolved Oxygen</u> <u>Toxicity</u>	2.3 Miles
4	Carbon Canyon Creek	River & Stream	40515010 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Chloride</u> <u>Sulfates</u>	8.8 Miles
4	Corral Canyon Creek	River & Stream	40431000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	4.1 Miles

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER / USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> Pollutant	ESTIMATED AREA ASSESSED
4	Encinal Canyon Creek	River & Stream	40441000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	2.7 Miles
4	Escondido Canyon Creek	River & Stream	40434000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	4.6 Miles
4	Lachusa Canyon Creek	River & Stream	40442000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	2.9 Miles
4	Las Flores Canyon Creek	River & Stream	40415000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	3.6 Miles
4	Latigo Canyon Creek	River & Stream	40433000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	2.9 Miles
4	Los Alisos Canyon Creek	River & Stream	40442000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	2.9 Miles
4	Malaga Canyon Creek	River & Stream	40512000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Chloride</u> <u>Sulfates</u>	2.6 Miles

APPENDIX C

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CAL WATER / USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> <u>Pollutant</u>	ESTIMATED AREA ASSESSED
4	Mandeville Canyon Creek	River & Stream	40513000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	1.5 Miles
4	Marie Canyon Creek	River & Stream	40431000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	1.8 Miles
4	Pena Canyon Creek	River & Stream	40413000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	1.6 Miles
4	Puerco Canyon Creek	River & Stream	40431000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	2.4 Miles
4	Ramirez Canyon Creek	River & Stream	40435000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	4.2 Miles
4	Rocky Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	Swimming <i>Water Contact Recreation</i> <u>Beach Closures</u>	0.49 Miles
4	Rustic Canyon Creek	River & Stream	40513000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	7.6 Miles

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER/ USGS HUC	CORE BENEFICIAL USE <i>California Beneficial Use</i> <u>Pollutant</u>	ESTIMATED AREA ASSESSED
4	San Nicolas Canyon Creek	River & Stream	40443000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	2.4 Miles
4	10 (Sespe Creek, from	Stream	18070102	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	9 Miles
4	Santa Ynez Canyon	River & Stream	40513000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	5 Miles
4	Sullivan Canyon Creek	River & Stream	40513000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Sulfates</u>	5.3 Miles
4	Sweetwater Canyon Creek	River & Stream	40421000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Chloride</u> <u>Sulfates</u>	1.6 Miles
4	Trancas Canyon Creek	River & Stream	40437000 / 18070104	Drinking Water Supply <i>Municipal &amp; Domestic Supply</i> <u>Chloride</u> <u>Sulfates</u>	6.4 Miles

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**APPENDIX D**

**INTEGRATED REPORT CATEGORY 4**

CATEGORY 4A

2008 CALIFORNIA LIST OF WATER QUALITY LIMITED SEGMENTS  
BEING ADDRESSED BY USEPA APPROVED TMDLS

Category 4A Criteria: 1) A water segment where ALL its 303(d) listings are being addressed; and 2) at least one of those listings is being addressed by a USEPA approved TMDL.

\* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = State Water Resources Control Board hydrological subunit area or even smaller planning watershed.

\*\* "Addressed By" is defined as: B = Being addressed by USEPA approved TMDL and C = Being addressed by action(s) other than a TMDL

REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT Relevant/Notes	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDR ESSED BY**	USEPA TMDL APPROVAL DATE
4	Brown Barranca/Long Canyon	River & Stream	40321000 / 18070103	<u>Nitrate and Nitrite</u>	2.6 Miles	1998	B	2004
4	Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)	Estuary	40311000 / 18070103	<u>Chlordane (tissue)</u>	344 Acres	1992	B	2005
				<u>Copper</u>	344 Acres	1996	B	2007
				<u>DDT (tissue &amp; sediment)</u>	344 Acres	1992	B	2005
				<u>Dieldrin</u>	344 Acres	2006	B	2006
				<u>Endosulfan (tissue)</u>	344 Acres	2006	B	2006
				<u>Mercury</u>	344 Acres	1996	B	2007
				<u>Nickel</u>	344 Acres	1996	B	2007
				<u>Nitrogen</u>	344 Acres	1996	B	2003
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	344 Acres	1996	B	2005
				<u>Sediment Toxicity</u>	344 Acres	1996	B	2005

APPENDIX D

REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDRESS BY	USEPA TMDL APPROVAL DATE
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Sedimentation/Silt

ation 344 Acres 1992 B 1900

Toxaphene 344 Acres 2006 B 2006

Zinc 344 Acres 1996 B 2007

4	Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)	River & Stream	40364000 / 18070103	<u>Ammonia</u>	5.5 Miles	1996	B	2003
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Chlordane (tissue) 5.5 Miles 1996 B 2005

DDT (tissue) 5.5 Miles 1996 B 2005

Dieldrin 5.5 Miles 2006 B 2006

PCBs  
(Polychlorinated  
biphenyls) 5.5 Miles 1996 B 2006

Sulfates 5.5 Miles 2002 B 2008

Total Dissolved  
Solids 5.5 Miles 2002 B 2008

Toxaphene 5.5 Miles 1988 B 2006

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDR ESSED BY**	USEPA TMDL APPROVAL DATE
4	Calleguas Creek Reach 13 (Conejo Creek South Fork, was Conejo Cr Reach 4 and part of Reach 3 on 1998 303d list)	River & Stream	40368000 / 18070104	<u>Ammonia</u>	17 Miles	1996	B	2003
				<u>ChemA (tissue)</u>	17 Miles	1996	B	2006
				<u>Chlordane</u>	17 Miles	1996	B	2006
				<u>Chloride</u>	17 Miles	2002	B	2008
				<u>DDT (tissue)</u>	17 Miles	1996	B	2005
				<u>Dieldrin</u>	17 Miles	2006	B	2006
				<u>Endosulfan (tissue)</u>	17 Miles	2006	B	2006
				<u>PCBs (Polychlorinated biphenyls)</u>	17 Miles	1996	B	2006
				<u>Sulfates</u>	17 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	17 Miles	2002	B	2008
				<u>Toxaphene (tissue)</u>	17 Miles	1988	B	2005
				<u>Toxicity</u>	17 Miles	1996	B	2005
4	Channel Islands Harbor Beach	Coastal & Bay Shoreline	40311000 / 18070103	<u>Indicator Bacteria</u>	0.03 Miles	2002	B	2008



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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDR ESSED BY	USEPA TMDL APPROVAL DATE
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4	Dan Blocker Memorial (Coral) Beach	Coastal & Bay Shoreline	40431000 / 18070104	<u>Coliform Bacteria</u>	2.1 Miles	1998	B	2002
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*(This listing includes the area of the beach at Latigo Beach and Solstice Canyon.)*

4	Dockweiler Beach	Coastal & Bay Shoreline	40512000 / 18070104	<u>Indicator Bacteria</u>	4.6 Miles	1998	B	2003
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4	Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	River & Stream	40311000 / 18070103	<u>ChemA (tissue)</u>	12 Miles	1996	B	2005
				<u>Chlordane (tissue)</u>	12 Miles	1996	B	2005
				<u>DDT (tissue &amp; sediment)</u>	12 Miles	1996	B	2005
				<u>Nitrogen</u>	12 Miles	1996	B	2003
				<u>Sediment Toxicity</u>	12 Miles	1996	B	2005
				<u>Toxaphene (tissue)</u>	12 Miles	1996	B	2005
				<u>Toxicity</u>	12 Miles	1996	B	2005

4	Fox Barranca (tributary to Calleguas Creek Reach 6)	River & Stream	40362000 / 18070103	<u>Boron</u>	6.7 Miles	1998	B	2008
				<u>Nitrate and Nitrite</u>	6.7 Miles	1998	B	2003

APPENDIX D

REGION	WATER BODY NAME	WATER TYPE	WATERSHED /USGS HUC	CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDR ESSED BY**	USEPA TMDL APPROVAL DATE
					<u>Sulfates</u>	6.7 Miles	1998	B	2008
					<u>Total Dissolved</u>	6.7 Miles	1998	B	2008
4	Hermosa Beach	Coastal & Bay Shoreline	40512000 / 18070104		<u>Indicator Bacteria</u>	2 Miles	1998	B	2003
4	Hobie Beach (Channel Islands Harbor)	Coastal & Bay Shoreline	40311000 / 18070103		<u>Indicator Bacteria</u>	0.1 Miles	2002	B	2008
4	Leo Carillo Beach (South of County Line)	Coastal & Bay Shoreline	40444000 / 18070104		<u>Coliform Bacteria</u>	1.8 Miles	1998	B	2003
4	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	River & Stream	40521000 / 18070104		<u>Ammonia</u>	7.9 Miles	1996	B	2004
					<u>Copper</u>	7.9 Miles	2006	B	2005
					<u>Lead</u>	7.9 Miles	2006	B	2005
					<u>Nutrients (Algae)</u>	7.9 Miles	1996	B	2004
					<u>Trash</u>	7.9 Miles	1996	B	2008

APPENDIX D

REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDRESS BY	USEPA TMDL APPROVAL DATE
4	Lunada Bay Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>Indicator Bacteria</u>	0.63 Miles	1998	B	2002
4	Malibou Lake	Lake &	40424000 /	<u>Algae</u>	40 Acres	1996	B	2003
				<u>Eutrophic</u>	40 Acres	1996	B	2003
				<u>Organic Enrichment/Low Dissolved Oxygen</u>	40 Acres	1998	B	2003
4	Manhattan Beach	Coastal & Bay Shoreline	40512000 / 18070104	<u>Indicator Bacteria</u>	2 Miles	1998	B	2002
4	Marina del Rey Harbor Beach	Coastal & Bay Shoreline	40517000 / 18070104	<u>Indicator Bacteria</u>	0.29 Miles	1998	B	2004
4	McGrath Beach	Coastal & Bay Shoreline	40311000 / 18070103	<u>Coliform Bacteria</u>	1.7 Miles	1996	B	2003
4	Mint Canyon Creek Reach 1 (Confl to Rowler Cyn)	River & Stream	40351000 / 18070102	<u>Nitrate and Nitrite</u>	8.1 Miles	1998	B	2004
4	Monrovia Canyon Creek	River & Stream	40531000 / 18070105	<u>Lead</u>	3.4 Miles	1996	B	2005

APPENDIX D

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDR ESSED BY **	TMDL APPROVAL DATE
4	Palo Comado Creek	River & Stream	40423000 / 18070104	<u>Coliform Bacteria</u>	6.8 Miles	1996	B	2005
4	Point Vicente Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>Indicator Bacteria</u>	0.63 Miles	1994	B	2002
4	Resort Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>Indicator Bacteria</u>	0.15 Miles	1998	B	2002
4	San Gabriel River, East Fork	River & Stream	40543000 / 18070106	<u>Trash</u>	5.9 Miles	1996	B	1999
4	Santa Monica Beach	Coastal & Bay Shoreline	40513000 / 18070104	<u>Indicator Bacteria</u>	3 Miles	1998	B	2002
4	Stokes Creek	River & Stream	40422020 / 18070104	<u>Coliform Bacteria</u>	4.7 Miles	1996	B	2005
4	Torrance Beach	Coastal & Bay Shoreline	40512000 / 18070104	<u>Coliform Bacteria</u>	1.1 Miles	1998	B	2002

APPENDIX D

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDR ESSED BY**	USEPA TMDL APPROVAL DATE
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4	Torrey Canyon Creek	River & Stream	40341000 / 18070103	<u>Nitrate and Nitrite</u>	1.7 Miles	1998	B	2004
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4	Venice Beach	Coastal & Bay Shoreline	40513000 / 18070104	<u>Indicator Bacteria</u>	2.5 Miles	2006	B	2002
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4	Will Rogers Beach	Coastal & Bay Shoreline	40513000 / 18070104	<u>Indicator Bacteria</u>	3 Miles	2006	B	2002
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CATEGORY 4B

2008 CALIFORNIA LIST OF WATER QUALITY LIMITED SEGMENTS  
BEING ADDRESSED BY ACTIONS OTHER THAN TMDLS

Category 4B Criteria: A water segment where ALL its 303(d) listings are being addressed by regulatory action(s) other than TMDL.

\* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = State Water Resources Control Board hydrological subunit area or even smaller planning watershed.

\*\* "Addressed By" is defined as: B = Being addressed by USEPA approved TMDL and C = Being addressed by action(s) other than a TMDL

REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	REGULATORY PROGRAM COMPLETION DATE
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4	Port Hueneme Harbor (Back Basins)	Bay & Harbor	40311000 / 18070103	<u>DDT (tissue)</u>	65 Acres	1994	2019
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				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	65 Acres	1992	2019
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**APPENDIX E**

**INTEGRATED REPORT CATEGORY 5**

CATEGORY 5

2008 CALIFORNIA 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS\*

Category 5 criteria: 1) A water segment where standards are not met and a TMDL is required, but not yet completed, for at least one of the pollutants being listed for this segment.

\* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = State Water Resources Control Board hydrological subunit area or even smaller planning watershed.

\*\* TMDL requirement status definitions for listed pollutants are: A= TMDL still required, B= being addressed by USEPA approved TMDL, C= being addressed by action other than a TMDL

\*\*\* Dates relate to the TMDL requirement status, so a date for A= TMDL scheduled completion date, B= Date USEPA approved TMDL, and C= Completion date for action other than a TMDL

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER //USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Abalone Cove Beach	Coastal & Bay Shoreline	40511000 / 18070104	DDT (sediment)	1.1 Miles	1998	A	2019
				Indicator Bacteria	1.1 Miles	2006	B	2003
				PCBs (Polychlorinated biphenyls)	1.1 Miles	1998	A	2019

*Fish Consumption Advisory for PCBs.*

4	Alamitos Bay	Bay & Harbor	40512000 / 18070104	Indicator Bacteria	328 Acres	2006	A	2019
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*The listing includes the areas 1st St. and Bayshore and 2nd St. Bridge and Bayshore.*

4	Aliso Canyon Wash	River & Stream	40521000 / 18070105	Copper	10 Miles	1996	A	2019
				Fecal Coliform	10 Miles	2006	A	2019
				Selenium	10 Miles	1996	B	2005



APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED *CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Amarillo Beach	Coastal & Bay Shoreline	40431000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	0.64 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>PCBs</u> (Polychlorinated biphenyls)	0.64 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Arroyo Seco Reach 1 (LA River to West Holly Ave.)	River & Stream	40515010 / 18070104	<u>Benthic-Macroinvertebrate Bioassessments</u>	5.2 Miles	2008	A	2021
				<u>Coliform Bacteria</u>	5.2 Miles	2002	A	2009
				<u>Trash</u>	5.2 Miles	2002	B	2008

4	Arroyo Seco Reach 2 (Figueroa St. to Riverside Dr.)	River & Stream	40515010 / 18070104	<u>Coliform Bacteria</u>	4.4 Miles	2002	A	2009
				<u>Trash</u>	4.4 Miles	1996	B	2008

4	Artesia-Norwalk Drain	River & Stream	40515010 / 18070104	<u>Indicator Bacteria</u>	2.5 Miles	2008	A	2021
				<u>Selenium</u>	2.5 Miles	2008	A	2021

APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Avalon Beach	Coastal & Bay Shoreline	40511000 / 18070107	<u>Indicator Bacteria</u>	0.67 Miles	2002	A	2019
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*Area affected is between Pier and BB restaurant (2/3), between Pier and BB restaurant (1/3), between storm drain and Pier (1/3). and between BB restaurant and the Tuna Club.*

4	Ballona Creek	River & Stream	40513000 / 18070104	<u>Cadmium (sediment)</u>	6.5 Miles	1996	A	2005
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*A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.*

				<u>Coliform Bacteria</u>	6.5 Miles	2002	B	2007
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				<u>Copper, Dissolved</u>	6.5 Miles	2006	B	2005
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				<u>Cyanide</u>	6.5 Miles	1996	A	2019
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				<u>Lead</u>	6.5 Miles	2002	B	2005
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				<u>Selenium</u>	6.5 Miles	2006	B	2005
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				<u>Shellfish Harvesting Advisory</u>	6.5 Miles	2006	B	2006
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				<u>Toxicity</u>	6.5 Miles	1996	B	2005
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				<u>Trash</u>	6.5 Miles	1996	B	2001
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				<u>Viruses (enteric)</u>	6.5 Miles	1996	B	2007
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				<u>Zinc</u>	6.5 Miles	1996	B	2005
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4	Ballona Creek Estuary	River & Stream	40513000 / 18070104	<u>Cadmium</u>	2.3 Miles	1992	B	2005
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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				<u>Chlordane (tissue &amp; sediment)</u>	2.3 Miles	1998	B	2005
				<u>Coliform Bacteria</u>	2.3 Miles	1998	B	2007
				<u>Copper</u>	2.3 Miles	1992	B	2005
				<u>DDT (tissue &amp; sediment)</u>	2.3 Miles	2006	B	2005
				<u>Lead (sediment)</u>	2.3 Miles	1992	B	2005
				<u>PAHs (Polycyclic Aromatic Hydrocarbons) (sediment)</u>	2.3 Miles	1998	B	2005
				<u>PCBs (Polychlorinated biphenyls) (tissue &amp; sediment)</u>	2.3 Miles	1998	B	2005
				<u>Sediment Toxicity</u>	2.3 Miles	1998	B	2005
				<u>Shellfish Harvesting Advisory</u>	2.3 Miles	1998	A	2006
				<u>Silver</u>	2.3 Miles	1992	B	2005
				<u>Zinc (sediment)</u>	2.3 Miles	1992	B	2005

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4	Ballona Creek Wetlands	Wetland, Tidal	40517000 / 18070104	<u>Exotic Vegetation</u>	289 Acres	1996	A	2019
				<u>Habitat alterations</u>	289 Acres	1996	A	2019
				<u>Hydromodification</u>	289 Acres	1996	A	2019

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Reduced Tidal

Flushing

289 Acres

1996

A

2019

Trash

289 Acres

1996

B

2019

4	Bell Creek	River & Stream	40521000 / 18070104	<u>Coliform Bacteria</u>	8.9 Miles	1996	A	2009
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4	Big Rock Beach	Coastal & Bay Shoreline	40431000 / 18070104	<u>Coliform Bacteria</u>	0.74 Miles	1998	B	2003
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				<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	0.74 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	0.74 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Bluff Cove Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	0.55 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	0.55 Miles	1998	B	2003
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				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	0.55 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED - CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
4	Bull Creek	River & Stream	40521000 / 18070105	<u>Indicator Bacteria</u>	2.3 Miles	2008	A	2021
4	Burbank Western Channel	River & Stream	40521000 / 18070105	<u>Copper</u>	13 Miles	2006	B	2005
				<u>Cyanide</u>	13 Miles	2006	A	2019
				<u>Indicator Bacteria</u>	13 Miles	2008	A	2021
				<u>Lead</u>	13 Miles	2006	B	2005
				<u>Selenium</u>	13 Miles	2008	A	2021
				<u>Trash</u>	13 Miles	1996	B	2008
4	Cabrillo Beach (Outer)	Coastal & Bay Shoreline	40512000 / 18070104	<u>DDT (Dichlorodiphenyl trichloroethane)</u>	0.58 Miles	1998	A	2019
				<i>Fish Consumption Advisory for DDT.</i>				
				<u>Indicator Bacteria</u>	0.58 Miles	1998	B	2003
				<u>PCBs (Polychlorinated biphenyls)</u>	0.58 Miles	1998	A	2019
				<i>Fish Consumption Advisory for PCBs.</i>				

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Calleguas Creek Reach 2 (estuary to Potrero Rd-was Calleguas Creek Reaches 1 and 2 on 1998 303d list)	River & Stream	40312000 / 18070103	<u>Ammonia</u>	4.3 Miles	1996	B	2003
				<u>ChemA (tissue)</u>	4.3 Miles	1996	B	2006
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Chlordane (tissue)</u>	4.3 Miles	1996	B	2005
				<u>Copper, Dissolved</u>	4.3 Miles	2002	B	2007
				<u>DDT (Dichlorodiphenyl trichloroethane)</u>	4.3 Miles	1996	B	2005
				<u>DDT (tissue &amp; sediment)</u>	4.3 Miles	1996	B	2005
				<u>Dieldrin</u>	4.3 Miles	2006	B	2006
				<u>Endosulfan (tissue)</u>	4.3 Miles	2006	B	2006
				<u>Fecal Coliform</u>	4.3 Miles	2002	A	2006
				<i>Area affected is at the mouth of the creek.</i>				
				<u>Nitrogen</u>	4.3 Miles	2002	B	2003
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	4.3 Miles	1996	B	2005
				<u>Sediment Toxicity</u>	4.3 Miles	1996	B	2005

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				<u>Sedimentation/Siltation</u>	4.3 Miles	2002	A	2005
				<u>Toxaphene (tissue &amp; sediment)</u>	4.3 Miles	1988	B	2005

4	Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)	River & Stream	40312000 / 18070103	<u>Ammonia</u>	3.5 Miles	1996	B	2003
				<u>Chlordane</u>	3.5 Miles	1996	B	2006
				<u>Chloride</u>	3.5 Miles	2002	B	2008
				<u>DDT (Dichlorodiphenyl trichloroethane)</u>	3.5 Miles	1996	B	2019
				<u>Dieldrin</u>	3.5 Miles	2006	B	2019
				<u>Nitrate and Nitrite</u>	3.5 Miles	1996	B	2003
				<u>PCBs (Polychlorinated biphenyls)</u>	3.5 Miles	1996	B	2006
				<u>Sedimentation/Siltation</u>	3.5 Miles	2002	A	2005
				<u>Toxaphene</u>	3.5 Miles	1988	B	2019
				<u>Trash</u>	3.5 Miles	2008	A	2021

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4	Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)	River & Stream	40311000 / 18070103	<u>ChemA (tissue)</u>	7.2 Miles	1996	B	2006
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*Historical use of pesticides and lubricants.*

				<u>Chlordane (tissue &amp; sediment)</u>	7.2 Miles	1996	B	2005
				<u>Chlorpyrifos (tissue)</u>	7.2 Miles	2006	B	2005
				<u>DDT (tissue &amp; sediment)</u>	7.2 Miles	1996	B	2005
				<u>Diazinon</u>	7.2 Miles	2006	B	2006
				<u>Dieldrin (tissue)</u>	7.2 Miles	2006	B	2005
				<u>Endosulfan (tissue &amp; sediment)</u>	7.2 Miles	2006	B	2006
				<u>Fecal Coliform</u>	7.2 Miles	2002	A	2006
				<u>Nitrate as Nitrate (NO3)</u>	7.2 Miles	1996	B	2003
				<u>Nitrogen</u>	7.2 Miles	2002	B	2003
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	7.2 Miles	1996	B	2005
				<u>Sedimentation/Siltation</u>	7.2 Miles	2002	A	2005
				<u>Selenium</u>	7.2 Miles	2002	B	2007



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				<u>Toxaphene (tissue &amp; sediment)</u>	7.2 Miles	1988	B	2005
				<u>Toxicity</u>	7.2 Miles	1996	B	2005
				<u>Trash</u>	7.2 Miles	2002	B	2008

4	Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)	River & Stream	40311000 / 18070103	<u>ChemA (tissue)</u>	4.3 Miles	1996	B	2006
				<u>Chlordane (tissue &amp; sediment)</u>	4.3 Miles	1996	B	2005
				<u>Chlorpyrifos (tissue)</u>	4.3 Miles	2006	B	2005
				<u>DDT (tissue &amp; sediment)</u>	4.3 Miles	1996	B	2005
				<u>Diazinon</u>	4.3 Miles	2006	B	2006
				<u>Dieldrin (tissue)</u>	4.3 Miles	2002	B	2005
				<u>Endosulfan (tissue &amp; sediment)</u>	4.3 Miles	2006	B	2006
				<u>Nitrogen</u>	4.3 Miles	2002	B	2003
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	4.3 Miles	1996	B	2005
				<u>Sedimentation/Siltation</u>	4.3 Miles	2002	A	2005

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				<u>Toxaphene (tissue &amp; sediment)</u>	4.3 Miles	1988	B	2005
				<u>Toxicity</u>	4.3 Miles	1996	B	2005
				<u>Trash</u>	4.3 Miles	2002	B	2008

4	Calleguas Creek Reach 6 ( was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)	River & Stream	40362000 / 18070103	<u>Ammonia</u>	15 Miles	1996	B	2003
				<u>Chlordane</u>	15 Miles	1996	B	2006
				<u>Chloride</u>	15 Miles	2002	B	2008
				<u>Chlorpyrifos</u>	15 Miles	2006	B	2006
				<u>DDT (sediment)</u>	15 Miles	1996	B	2005
				<u>Diazinon</u>	15 Miles	2006	B	2006
				<u>Diieldrin</u>	15 Miles	2006	B	2006
				<u>Fecal Coliform</u>	15 Miles	2002	A	2006
				<u>Nitrate and Nitrite</u>	15 Miles	1996	B	2003
				<u>Nitrate as Nitrate (NO3)</u>	15 Miles	1996	B	2003
				<u>Sedimentation/Siltation</u>	15 Miles	2002	A	2005
				<u>Sulfates</u>	15 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	15 Miles	2002	B	2008

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Toxicity 15 Miles 1996 B 2006

4	Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)	River & Stream	40367000 / 18070103	<u>Ammonia</u>	14 Miles	1996	B	2003
				<u>Boron</u>	14 Miles	2002	B	2008
				<u>Chloride</u>	14 Miles	2002	B	2008
				<u>Chlorpyrifos</u>	14 Miles	2006	B	2006
				<u>Diazinon</u>	14 Miles	2006	B	2006
				<u>Indicator Bacteria</u>	14 Miles		A	2019
				<u>Organophosphorus Pesticides</u>	14 Miles	1996	B	2005
				<u>Sedimentation/Siltation</u>	14 Miles	2002	A	2005
				<u>Sulfates</u>	14 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	14 Miles	2002	B	2008
				<u>Toxicity</u>	14 Miles	1996	B	2006
				<u>Trash</u>	14 Miles	2008	A	2021

4	Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)	River & Stream	40366000 / 18070103	<u>Boron</u>	7.2 Miles	2002	B	2008
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				<u>Chlordane</u>	7.2 Miles	1996	B	2006
				<u>Chloride</u>	7.2 Miles	2002	B	2008
				<u>Chlorpyrifos</u>	7.2 Miles	2006	B	2006
				<u>DDT</u> (Dichlorodiphenyl trichloroethane)	7.2 Miles	1996	B	2006
				<u>Diazinon</u>	7.2 Miles	2002	B	2006
				<u>Dieldrin</u>	7.2 Miles	2006	B	2006
				<u>PCBs</u> (Polychlorinated biphenyls)	7.2 Miles	1996	B	2006
				<u>Sedimentation/Siltation</u>	7.2 Miles	2002	A	2005
				<u>Sulfates</u>	7.2 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	7.2 Miles	2002	B	2008
				<u>Toxaphene</u>	7.2 Miles	1988	B	2006

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4	Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach I on 1998 303d list)	River & Stream	40312000 / 18070103	<u>ChemA (tissue)</u>	1.7 Miles	1996	B	2006
				<u>Chlordane (tissue)</u>	1.7 Miles	1996	B	2005
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Chlorpyrifos</u>	1.7 Miles	2006	B	2006

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				<u>DDT (tissue)</u>	1.7 Miles	1996	B	2005
				<u>Diazinon</u>	1.7 Miles	2006	B	2006
				<u>Dieldrin (tissue)</u>	1.7 Miles	2002	B	2005
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Endosulfan (tissue)</u>	1.7 Miles	2006	B	2006
				<u>Fecal Coliform</u>	1.7 Miles	2002	A	2006
				<u>Lindane/gamma-Hexachlorocyclohexane (gamma-HCH) (tissue)</u>	1.7 Miles	2002	B	2006
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Nitrate as Nitrate (NO3)</u>	1.7 Miles	1996	B	2003
				<u>Nitrogen. Nitrate</u>	1.7 Miles	1996	B	2003
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	1.7 Miles	1996	B	2005
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Sulfates</u>	1.7 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	1.7 Miles	2002	B	2008
				<u>Toxaphene (tissue &amp; sediment)</u>	1.7 Miles	1988	B	2005
				<u>Toxicity</u>	1.7 Miles	1996	B	2006
				<u>Trash</u>	1.7 Miles	2008	A	2021

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	Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)	River & Stream	40363000 / 18070103	<u>Ammonia</u>	6.2 Miles	1996	B	2003
4				<u>ChemA (tissue)</u>	6.2 Miles	1996	B	2006
				<u>Chlordane</u>	6.2 Miles	1996	B	2006
				<u>Chloride</u>	6.2 Miles	2002	B	2008
				<u>Chlorpyrifos</u>	6.2 Miles	2006	B	2006
				<u>DDT (tissue)</u>	6.2 Miles	1996	B	2005
				<u>Diazinon</u>	6.2 Miles	2006	B	2006
				<u>Dieldrin</u>	6.2 Miles	2006	B	2006
				<u>Endosulfan (tissue)</u>	6.2 Miles	2006	B	2006
				<u>Indicator Bacteria</u>	6.2 Miles		A	2019
				<u>PCBs (Polychlorinated biphenyls)</u>	6.2 Miles	1996	B	2006
				<u>Sulfates</u>	6.2 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	6.2 Miles	2002	B	2008
				<u>Toxaphene (tissue &amp; sediment)</u>	6.2 Miles	1988	B	2005
				<u>Toxicity</u>	6.2 Miles	1996	B	2006
				<u>Trash</u>	6.2 Miles	2008	A	2021

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4	Calleguas Creek Reach 10 (Conejo Creek (Hill Canyon)-was part of Conejo Crk Reaches 2 & 3, and lower Conejo Crk/Arroyo Conejo N Fk on 1998 303d list)	River & Stream	40364000 / 18070103	<u>Ammonia</u>	3 Miles	1996	B	2002
				<u>ChemA (tissue)</u>	3 Miles	1996	B	2006
				<u>Chlordane</u>	3 Miles	1996	B	2006
				<u>Chloride</u>	3 Miles	2002	B	2008
				<u>Chlorpyrifos</u>	3 Miles	2006	B	2006
				<u>DDT (tissue)</u>	3 Miles	1996	B	2005
				<u>Diazinon</u>	3 Miles	2006	B	2006
				<u>Dieldrin</u>	3 Miles	2006	B	2006
				<u>Endosulfan (tissue)</u>	3 Miles	2006	B	2006
				<u>Fecal Coliform</u>	3 Miles	2002	A	2006
				<u>Nitrogen, Nitrite</u>	3 Miles	1996	B	2003
				<u>PCBs (Polychlorinated biphenyls)</u>	3 Miles	1996	B	2006
				<u>Sulfates</u>	3 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	3 Miles	2002	B	2008

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				<u>Toxaphene (tissue &amp; sediment)</u>	3 Miles	1988	B	2005
				<u>Toxicity</u>	3 Miles	1996	B	2005
				<u>Trash</u>	3 Miles	2008	A	2021

4	Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)	River & Stream	40365000 / 18070103	<u>Ammonia</u>	8.7 Miles	1996	B	2003
				<u>ChemA (tissue)</u>	8.7 Miles	1996	B	2006
				<u>Chlordane</u>	8.7 Miles	1996	B	2006
				<u>DDT (tissue)</u>	8.7 Miles	1996	B	2005
				<u>Dieldrin</u>	8.7 Miles	2006	B	2006
				<u>Endosulfan (tissue)</u>	8.7 Miles	2006	B	2006
				<u>Fecal Coliform</u>	8.7 Miles	2002	A	2006
				<u>PCBs (Polychlorinated biphenyls)</u>	8.7 Miles	1996	B	2006
				<u>Sedimentation/Siltation</u>	8.7 Miles	2002	A	2005
				<u>Sulfates</u>	8.7 Miles	2002	B	2008
				<u>Total Dissolved Solids</u>	8.7 Miles	2002	B	2008
				<u>Toxaphene (tissue &amp; sediment)</u>	8.7 Miles	1988	B	2005



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Toxicity 8.7 Miles 1996 B 2005

4 Canada Larga (Ventura River Watershed) River & Stream 40210010 / 18070103 Fecal Coliform 8 Miles 2002 A 2019

*Horse stables, land use, cattle, and wildlife may be sources.*

Low Dissolved Oxygen 8 Miles 2002 A 2019

Total Dissolved Solids 8 Miles 2008 A 2021

4 Coastal & Bay Carbon Beach Shoreline 40416000 / 18070104 DDT (Dichlorodiphenyl trichloroethane) 1.5 Miles 1998 A 2019

*Fish Consumption Advisory for DDT.*

Indicator Bacteria 1.5 Miles 1998 B 2003

PCBs (Polychlorinated biphenyls) 1.5 Miles 1998 A 2019

*Fish Consumption Advisory for PCBs.*

4 Castlerock Beach Coastal & Bay Shoreline 40513000 / 18070104 DDT (Dichlorodiphenyl trichloroethane) 0.21 Miles 1998 A 2019

*Fish Consumption Advisory for DDT.*

Indicator Bacteria 0.21 Miles 1998 B 2003

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PCBs  
(Polychlorinated biphenyls)      0.21 Miles      1998      A      2019

*Fish Consumption Advisory for PCBs.*

4	Colorado Lagoon	Wetland, Tidal	40512000 / 18070104	<u>Chlordane (tissue &amp; sediment)</u>	13 Acres	2006	A	2019
				<u>DDT (tissue)</u>	13 Acres	2006	A	2019
				<u>Dieldrin (tissue)</u>	13 Acres	2006	A	2019
				<u>Indicator Bacteria</u>	13 Acres	2006	A	2019

*This listing includes the north, center, and south areas of the lagoon.*

Lead (sediment)      13 Acres      2006      A      2019

PAHs (Polycyclic Aromatic Hydrocarbons) (sediment)      13 Acres      2006      A      2019

PCBs (Polychlorinated biphenyls) (tissue)      13 Acres      2006      A      2019

Sediment Toxicity      13 Acres      2006      A      2019

Zinc (sediment)      13 Acres      2006      A      2019

4	Compton Creek	River & Stream	40515010 / 18070104	<u>Benthic-Macroinvertebrate Bioassessments</u>	8.5 Miles	2008	A	2021
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APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CAL WATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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				<u>Coliform Bacteria</u>	8.5 Miles	1996	A	2009
				<u>Copper</u>	8.5 Miles	1996	B	2005
				<u>Lead</u>	8.5 Miles	1996	B	2005
				<u>Trash</u>	8.5 Miles	2006	B	2008
				<u>pH</u>	8.5 Miles	1996	B	2004

4	Coyote Creek	River & Stream	40515010 / 18070104	<u>Ammonia</u>	13 Miles	1996	C	
				<u>Benthic-Macroinvertebrate Bioassessments</u>	13 Miles	2008	A	2021
				<u>Copper, Dissolved</u>	13 Miles	2002	B	2007
				<u>Diazinon</u>	13 Miles	2006	A	2019
				<u>Indicator Bacteria</u>	13 Miles		A	2009
				<u>Lead</u>	13 Miles	2002	B	2007
				<u>Toxicity</u>	13 Miles	2002	A	2008
				<i>This listing was made by USEPA for 2002.</i>				
				<u>pH</u>	13 Miles	2006	A	2019

4	Coyote Creek, North Fork	River & Stream	40515010 / 18070104	<u>Indicator Bacteria</u>	5 Miles	2008	A	2021
				<u>Selenium</u>	5 Miles	2008	A	2021

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Crystal Lake	Lake & Reservoir	40543000 / 18070106	<u>Organic Enrichment/Low Dissolved Oxygen</u>	3.7 Acres	1998	A	2019
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4	Dominguez Channel (lined portion above Vermont Ave)	River & Stream	40351000 / 18070104	<u>Ammonia</u>	6.7 Miles	1996	A	2019
				<u>Copper</u>	6.7 Miles	1996	A	2019
				<u>Diazinon</u>	6.7 Miles	2008	A	2021
				<u>Indicator Bacteria</u>	6.7 Miles	2006	A	2007
				<u>Lead</u>	6.7 Miles	1800	A	2019
				<u>Toxicity</u>	6.7 Miles	2008	A	2021
				<u>Zinc</u>	6.7 Miles	1800	A	2019

4	Dominguez Channel Estuary (unlined portion below Vermont Ave)	Estuary	40512000 / 18070104	<u>Ammonia</u>	140 Acres	1996	A	2019
				<u>Benthic Community Effects</u>	140 Acres	1996	A	2019
				<u>Benzo(a)pyrene (3,4-Benzopyrene-7-d)</u>	140 Acres	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
				<u>Benzo[a]anthracene</u>	140 Acres	2006	A	2019
				<u>Chlordane (tissue)</u>	140 Acres	1998	A	2019
				<u>Chrysene (C1-C4)</u>	140 Acres	2006	A	2019
				<u>Coliform Bacteria</u>	140 Acres	2002	A	2007
				<u>DDT (tissue &amp; sediment)</u>	140 Acres	1996	A	2019
				<u>Dieldrin (tissue)</u>	140 Acres	1998	A	2019
				<u>Lead (tissue)</u>	140 Acres	1996	A	2019
				<u>PCBs (Polychlorinated biphenyls)</u>	140 Acres	1996	A	2019
				<u>Phenanthrene</u>	140 Acres	2006	A	2019
				<u>Pyrene</u>	140 Acres	2006	A	2019
				<u>Sediment Toxicity</u>	140 Acres	2008	A	2021
				<u>Zinc (sediment)</u>	140 Acres	1996	A	2019
4	Dry Canyon Creek	River & Stream	40521000 / 18070104	<u>Fecal Coliform</u>	3.9 Miles	2002	A	2009
				<u>Selenium, Total</u>	3.9 Miles	2002	B	2005
4	Echo Park Lake	Lake & Reservoir	40515010 / 18070104	<u>Algae</u>	13 Acres	1996	A	2019
				<u>Ammonia</u>	13 Acres	1996	A	2019
				<u>Copper</u>	13 Acres	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
				<u>Eutrophic</u>	13 Acres	1996	A	2019
				<u>Lead</u>	13 Acres	1996	A	2019
				<u>Odor</u>	13 Acres	1996	A	2019
				<u>PCBs</u> <u>(Polychlorinated biphenyls) (tissue)</u>	13 Acres	1996	A	2019
				<u>Trash</u>	13 Acres	1996	A	2007
				<u>pH</u>	13 Acres	1996	A	2019
4	El Dorado Lakes	Lake & Reservoir	40515010 / 18070104	<u>Algae</u>	31 Acres	1996	A	2019
				<u>Ammonia</u>	31 Acres	1996	A	2019
				<u>Copper</u>	31 Acres	1996	A	2019
				<u>Eutrophic</u>	31 Acres	1996	A	2019
				<u>Lead</u>	31 Acres	1996	A	2019
				<u>Mercury (tissue)</u>	31 Acres	1996	A	2019
				<u>pH</u>	31 Acres	1996	A	2019
4	Elizabeth Lake	Lake & Reservoir	40351000 / 18070102	<u>Eutrophic</u>	123 Acres	1996	A	2019
				<u>Organic Enrichment/Low Dissolved Oxygen</u>	123 Acres	1998	A	2019
				<u>Trash</u>	123 Acres	1996	B	2008
				<u>pH</u>	123 Acres	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED - CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Escondido Beach	Coastal & Bay Shoreline	40434000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	1.2 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	1.2 Miles	1998	B	2003
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				<u>PCBs</u> (Polychlorinated biphenyls)	1.2 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Flat Rock Point Beach Area	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	0.11 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	0.11 Miles	1998	B	2003
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				<u>PCBs</u> (Polychlorinated biphenyls)	0.11 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Hopper Creek	River & Stream	40341000 / 18070102	<u>Sulfates</u>	13 Miles	2002	A	2019
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				<u>Total Dissolved Solids</u>	13 Miles	2220	A	2019
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Inspiration Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	0.14 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	0.14 Miles	1998	B	2003
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				<u>PCBs</u> (Polychlorinated biphenyls)	0.14 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	La Costa Beach	Coastal & Bay Shoreline	40416000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	0.74 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	0.74 Miles	1998	B	2003
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				<u>PCBs</u> (Polychlorinated biphenyls)	0.74 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Lake Calabazas	Lake & Reservoir	40521000 / 18070105	<u>Ammonia</u>	18 Acres	1996	A	2006
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				<u>Eutrophic</u>	18 Acres	1996	A	2019
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				<u>Odor</u>	18 Acres	1996	A	2019
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				<u>Organic Enrichment/Low Dissolved Oxygen</u>	18 Acres	1998	A	2019
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS	DATE
				pH	18 Acres	1996	A	2019
4	Lake Hughes	Lake & Reservoir	40351000 / 18070102	<u>Algae</u>	21 Acres	1996	A	2019
				<u>Eutrophic</u>	21 Acres	1996	A	2019
				<u>Fish Kills</u>	21 Acres	1996	A	2019
				<u>Odor</u>	21 Acres	1996	A	2019
				<u>Trash</u>	21 Acres	1996	B	2008
4	Lake Lindero	Lake & Reservoir	40423000 / 18070104	<u>Algae</u>	15 Acres	1996	B	2003
				<u>Chloride</u>	15 Acres	1996	A	2019
				<u>Eutrophic</u>	15 Acres	1996	B	2003
				<u>Odor</u>	15 Acres	1996	B	2003
				<u>Selenium</u>	15 Acres	1996	A	2019
				<u>Specific Conductivity</u>	15 Acres	1996	A	2019
				<u>Trash</u>	15 Acres	1996	A	2019
4	Lake Sherwood	Lake & Reservoir	40426000 / 18070104	<u>Algae</u>	135 Acres	1996	B	2003
				<u>Ammonia</u>	135 Acres	1996	B	2003
				<u>Eutrophic</u>	135 Acres	1996	B	2003
				<u>Mercury (tissue)</u>	135 Acres	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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Organic  
Enrichment/Low  
Dissolved Oxygen    135 Acres    1998    B    2003

4	Las Flores Beach	Coastal & Bay Shoreline	40415000 / 18070104	<u>Coliform Bacteria</u>	1.1 Miles	1998	B	2003
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DDT  
(Dichlorodiphenyl  
trichloroethane)    1.1 Miles    1998    A    2019

*Fish Consumption Advisory for DDT.*

PCBs  
(Polychlorinated  
biphenyls)    1.1 Miles    1998    A    2019

*Fish Consumption Advisory for PCBs.*

4	Las Tunas Beach	Coastal & Bay Shoreline	40412000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl</u> <u>trichloroethane)</u>	1.2 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

Indicator Bacteria    1.2 Miles    1998    B    2003

PCBs  
(Polychlorinated  
biphenyls)    1.2 Miles    1998    A    2019

*Fish Consumption Advisory for PCBs.*

4	Las Virgenes Creek	River & Stream	40422010 / 18070104	<u>Benthic-</u> <u>Macroinvertebrate</u> <u>Bioassessments</u>	12 Miles	2008	A	2021
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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				<u>Coliform Bacteria</u>	12 Miles	1996	B	2005
				<u>Invasive Species</u>	12 Miles	2008	A	2021
				<u>Nutrients (Algae)</u>	12 Miles	1998	B	2003
				<u>Organic Enrichment/Low Dissolved Oxygen</u>	12 Miles	1996	B	2003
				<u>Scum/Foam-unnatural</u>	12 Miles	1996	B	2003
				<u>Sedimentation/Siltation</u>	12 Miles	2002	A	2019
				<u>Selenium</u>	12 Miles	1996	A	2019
				<u>Trash</u>	12 Miles	1996	A	2019

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4	Legg Lake	Lake & Reservoir	40531000 / 18070105	<u>Ammonia</u>	25 Acres	1996	A	2019
				<u>Copper</u>	25 Acres	1996	A	2019
				<u>Lead</u>	25 Acres	1996	A	2019
				<u>Odor</u>	25 Acres	1996	A	2019
				<u>Trash</u>	25 Acres	1996	B	2008
				<u>pH</u>	25 Acres	1996	A	2019

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4	Lincoln Park Lake	Lake & Reservoir	40515010 / 18070104	<u>Ammonia</u>	3.8 Acres	1996	A	2019
				<u>Eutrophic</u>	3.8 Acres	1996	A	2019
				<u>Lead</u>	3.8 Acres	1996	A	2019
				<u>Odor</u>	3.8 Acres	1996	A	2019

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				<u>Organic Enrichment/Low Dissolved Oxygen</u>	3.8 Acres	1998	A	2019
				<u>Trash</u>	3.8 Acres	1996	A	2007

4	Lindero Creek Reach 1	River & Stream	40423000 / 18070104	<u>Algae</u>	3 Miles	1996	B	2003
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				<u>Benthic-Macroinvertebrate Bioassessments</u>	3 Miles	2008	A	2021
				<u>Coliform Bacteria</u>	3 Miles	1996	B	2005
				<u>Invasive Species</u>	3 Miles	2008	A	2021
				<u>Scum/Foam-unnatural</u>	3 Miles	1996	B	2003
				<u>Selenium</u>	3 Miles	1996	A	2019
				<u>Trash</u>	3 Miles	1996	A	2019

4	Lindero Creek Reach 2 (Above Lake)	River & Stream	40425000 / 18070104	<u>Algae</u>	4.5 Miles	1998	B	2003
				<u>Coliform Bacteria</u>	4.5 Miles	1998	B	2005
				<u>Scum/Foam-unnatural</u>	4.5 Miles	1998	B	2003
				<u>Selenium</u>	4.5 Miles	1998	A	2019
				<u>Trash</u>	4.5 Miles	1998	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED - CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Long Beach City Beach	Coastal & Bay Shoreline	40512000 / 18070104	<u>Indicator Bacteria</u>	4.7 Miles	2006	A	2019
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*This listing includes the beach area at 3rd pl., 5th pl., 10th pl., 16th pl., 36th pl., 72nd pl., Coronado ave., Molino ave., and the east side and west side of Belmont Pier.*

4	Long Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>Coliform Bacteria</u>	0.7 Miles	1998	B	2003
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				<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	0.7 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	0.7 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Los Angeles Harbor - Cabrillo Marina	Bay & Harbor	40512000 / 18070104	<u>Benzo(a)pyrene</u> <u>(3,4-Benzopyrene 7-d)</u>	77 Acres	2008	A	2021
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				<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	77 Acres	1998	A	2019
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				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	77 Acres	1998	A	2019
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Los Angeles Harbor - Consolidated Slip	Bay & Harbor	40512000 / 18070104	<u>2-Methylnaphthalene</u>	36 Acres	1998	A	2008
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				<u>Benthic Community Effects</u>	36 Acres	1998	A	2019
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				<u>Benzo(a)pyrene (3,4-Benzopyrene-7-d)</u>	36 Acres	1998	A	2008
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				<u>Benzo[a]anthracene</u>	36 Acres	1998	A	2008
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*This listing was made by USEPA for 2006.*

				<u>Cadmium (sediment)</u>	36 Acres	1998	A	2019
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*Historical use of pesticides and lubricants, stormwater runoff, aerial deposition, and historical discharges for metals.*

				<u>Chlordane (tissue &amp; sediment)</u>	36 Acres	1998	A	2019
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				<u>Chromium (sediment)</u>	36 Acres	1998	A	2019
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				<u>Chrysene (C1-C4)</u>	36 Acres	1998	A	2008
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				<u>Copper (sediment)</u>	36 Acres	1998	A	2019
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				<u>DDT (tissue &amp; sediment)</u>	36 Acres	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Dieldrin</u>	36 Acres	1998	A	2008
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				<u>Lead (sediment)</u>	36 Acres	1998	A	2019
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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Mercury  
(sediment) 36 Acres 2006 A 2019

*Historical use of pesticides and lubricants, stormwater runoff, aerial deposition, and historical discharges for metals.*

PCBs  
(Polychlorinated biphenyls) (tissue & sediment) 36 Acres 1998 A 2019

*Fish Consumption Advisory for PCBs.*

Phenanthrene 36 Acres 1998 A 2008

Pyrene 36 Acres 1998 A 2008

Sediment Toxicity 36 Acres 1998 A 2019

Toxaphene  
(tissue) 36 Acres 1998 A 2019

Zinc (sediment) 36 Acres 1998 A 2019

*Historical use of pesticides and lubricants, stormwater runoff, aerial deposition, and historical discharges for metals.*

4	Los Angeles Harbor - Fish Harbor	Bay & Harbor	40518000 / 18070104	<u>Benzo(a)pyrene</u> <u>(3,4-Benzopyrene - 7-d)</u>	91 Acres	1998	A	2008
				<u>Benzo[a]anthracene</u>	91 Acres	1998	A	2019
				<u>Chlordane</u>	91 Acres	1998	A	2019
				<u>Chrysene (C1-C4)</u>	91 Acres	1998	A	2019
				<u>Copper</u>	91 Acres	1998	A	2019

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				<u>DDT</u> (Dichlorodiphenyl trichloroethane)	91 Acres	1998	A	2019
				<u>Dibenz[a,h]anthracene</u>	91 Acres	1998	A	2019
				<u>Lead</u>	91 Acres	1998	A	2019
				<u>Mercury</u>	91 Acres	1998	A	2019
				<u>PAHs (Polycyclic Aromatic Hydrocarbons)</u>	91 Acres	1998	A	2019
				<u>PCBs (Polychlorinated biphenyls)</u>	91 Acres	1998	A	2019
				<u>Phenanthrene</u>	91 Acres	1998	A	2019
				<u>Pyrene</u>	91 Acres	1998	A	2019
				<u>Sediment Toxicity</u>	91 Acres	1998	A	2019
				<u>Zinc</u>	91 Acres	1998	A	2019

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4	Los Angeles Harbor - Inner Cabrillo Beach Area	Bay & Harbor	40512000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	82 Acres	1998	A	2019
				<i>Fish Consumption Advisory for DDT.</i>				
				<u>Indicator Bacteria</u>	82 Acres	1998	B	2004
				<u>PCBs (Polychlorinated biphenyls)</u>	82 Acres	1998	A	2019
				<i>Fish Consumption Advisory for PCBs.</i>				

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS	DATE
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4	Los Angeles River Estuary (Queensway Bay)	Estuary	40512000 / 18070104	<u>Chlordane (sediment)</u>	207 Acres	2002	A	2019
				<i>Historical use of pesticides and lubricants.</i>				
				<u>DDT (sediment)</u>	207 Acres	2002	A	2019
				<i>Historical use of pesticides and lubricants.</i>				
				<u>PCBs (Polychlorinated biphenyls) (sediment)</u>	207 Acres	2002	A	2019
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Sediment Toxicity</u>	207 Acres	2006	A	2019
				<u>Trash</u>	207 Acres	2006	B	2008

4	Los Angeles River Reach 1 (Estuary to Carson Street)	River & Stream	40512000 / 18070104	<u>Ammonia</u>	3.4 Miles	2002	B	2004
				<u>Cadmium</u>	3.4 Miles	2002	B	2005
				<u>Coliform Bacteria</u>	3.4 Miles	1996	A	2009
				<u>Copper, Dissolved</u>	3.4 Miles	2002	B	2005
				<u>Cyanide</u>	3.4 Miles	2006	A	2019
				<u>Diazinon</u>	3.4 Miles	2006	A	2019
				<u>Lead</u>	3.4 Miles	1996	B	2005
				<u>Nutrients (Algae)</u>	3.4 Miles	1998	B	2004

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
				<u>Trash</u>	3.4 Miles	2006	B	2008
				<u>Zinc, Dissolved</u>	3.4 Miles	2002	B	2005
				<u>pH</u>	3.4 Miles	1996	B	2003
<hr/>								
	Los Angeles River Reach 2 (Carson to Figueroa Street)	River & Stream	40515010 / 18070104	<u>Ammonia</u>	19 Miles	1996	B	2004
4				<u>Coliform Bacteria</u>	19 Miles	1996	A	2009
				<u>Copper</u>	19 Miles	2006	B	2005
				<u>Lead</u>	19 Miles	1996	B	2005
				<u>Nutrients (Algae)</u>	19 Miles	1996	B	2004
				<u>Oil</u>	19 Miles	1996	A	2019
				<u>Trash</u>	19 Miles	1996	B	2008
<hr/>								
	Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)	River & Stream	40521000 / 18070105	<u>Ammonia</u>	11 Miles	1996	B	2004
4				<u>Coliform Bacteria</u>	11 Miles	1996	A	2009
				<u>Copper</u>	11 Miles	2006	B	2005
				<u>Lead</u>	11 Miles	1996	B	2005
				<u>Nutrients (Algae)</u>	11 Miles	1996	B	2004
				<u>Trash</u>	11 Miles	1996	B	2008

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS	DATE
4	Los Angeles River Reach 5 (within Sepulveda Basin)	River & Stream	40521000 / 18070105	<u>Ammonia</u>	1.9 Miles	1996	B	2004
				<u>Copper</u>	1.9 Miles	2006	B	2005
				<u>Lead</u>	1.9 Miles	2006	B	2005
				<u>Nutrients (Algae)</u>	1.9 Miles	1996	B	2004
				<u>Oil</u>	1.9 Miles	1996	A	2019
				<u>Trash</u>	1.9 Miles	1996	B	2008
				4	Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	River & Stream	40521000 / 18070105	<u>Coliform Bacteria</u>
<u>Selenium</u>	7 Miles	1992	B					2005
4	Los Angeles/Long Beach Inner Harbor	Bay & Harbor	40518000 / 18070104					<u>Beach Closures</u>
				<u>Benthic Community Effects</u>	3003 Acres	1998	A	2019
				<u>Benzo(a)pyrene (3,4-Benzopyrene - 7-d)</u>	3003 Acres	2008	A	2021
				<u>Chrysene (C1-C4)</u>	3003 Acres	2008	A	2021

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Copper 3003 Acres 1998 A 2008

DDT  
(Dichlorodiphenyl trichloroethane) 3003 Acres 1998 A 2019

PCBs  
(Polychlorinated biphenyls) 3003 Acres 1998 A 2019

Sediment Toxicity 3003 Acres 1996 A 2009

Zinc 3003 Acres 1988 A 2008

4	Los Angeles/Long Beach Outer Harbor (inside breakwater)	Bay & Harbor	40512000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	4042 Acres	1988	A	2019
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PCBs  
(Polychlorinated biphenyls) 4042 Acres 1988 A 2019

Sediment Toxicity 4042 Acres 1996 A 2008

4	Los Cerritos Channel	Wetland, Tidal	40515010 / 18070104	<u>Ammonia</u>	30 Acres	2002	A	2015
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Bis(2ethylhexyl)phthalate (DEHP) 30 Acres 2006 A 2019

Chlordane (sediment) 30 Acres 2002 A 2019

Coliform Bacteria 30 Acres 2002 A 2019

Copper 30 Acres 2002 A 2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
				<u>Lead</u>	30 Acres	2002	A	2019
				<u>Trash</u>	30 Acres	2006	A	1800
				<u>Zinc</u>	30 Acres	2002	A	2019
4	Machado Lake (Harbor Park Lake)	Lake & Reservoir	40512000 / 18070104	<u>Algae</u>	45 Acres	1996	B	2009
				<u>Ammonia</u>	45 Acres	1996	B	2009
				<u>ChemA (tissue)</u>	45 Acres	1996	A	2019
				<i>Historical use of pesticides and lubricants.</i>				
				<u>Chlordane (tissue)</u>	45 Acres	1996	A	2019
				<i>Fish Consumption Advisory.</i>				
				<u>DDT (tissue)</u>	45 Acres	1996	A	2019
				<i>Fish Consumption Advisory.</i>				
				<u>Dieldrin (tissue)</u>	45 Acres	1996	A	2019
				<u>Eutrophic</u>	45 Acres	1992	B	2009
				<u>Odor</u>	45 Acres	1996	B	2009
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	45 Acres	1992	A	2019
				<u>Trash</u>	45 Acres	1996	B	2008
4	Malaga Cove Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT (Dichlorodiphenyl trichloroethane)</u>	0.39 Miles	1998	A	2019

*Fish Consumption Advisory for DDT.*

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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Indicator Bacteria 0.39 Miles 1998 B 2002

PCBs  
(Polychlorinated biphenyls) 0.39 Miles 1998 A 2019

*Fish Consumption Advisory for PCBs.*

		Coastal & Bay	40421000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	0.77 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

Indicator Bacteria 0.77 Miles 1998 B 2002

4	Malibu Creek	River & Stream	40421000 / 18070104	<u>Benthic-Macroinvertebrate Bioassessments</u>	11 Miles	2008	A	2021
				<u>Coliform Bacteria</u>	11 Miles	1996	B	2002
				<u>Fish Barriers (Fish Passage)</u>	11 Miles	1996	A	2019
				<u>Invasive Species</u>	11 Miles	2008	A	2021
				<u>Nutrients (Algae)</u>	11 Miles	1996	B	2003
				<u>Scum/Foam-unnatural</u>	11 Miles	1996	B	2003
				<u>Sedimentation/Siltation</u>	11 Miles	2002	A	2019
				<u>Selenium</u>	11 Miles	2006	A	2019
				<u>Sulfates</u>	11 Miles	2006	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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Trash 11 Miles 1996 A 2019

4	Malibu Lagoon	Estuary	40421000 / 18070104	<u>Benthic Community Effects</u> Hydromodification	15 Acres	1998	C	
				<u>Coliform Bacteria</u>	15 Acres	1998	B	2005
				<u>Eutrophic</u>	15 Acres	1998	B	2003
				<u>Swimming Restrictions</u>	15 Acres	1998	B	2006
				<u>Viruses (enteric)</u>	15 Acres	1998	B	2006
				<u>pH</u>	15 Acres	2002	A	2006

*Possible sources might be septic systems, storm drains, and birds.*

4	Malibu Lagoon Beach (Surfrider)	Coastal & Bay Shoreline	40421000 / 18070104	<u>Coliform Bacteria</u>	1 Miles	1998	B	2003
				<u>DDT (Dichlorodiphenyl trichloroethane)</u>	1 Miles	1998	A	2019
				<u>PCBs (Polychlorinated biphenyls)</u>	1 Miles	1998	A	2019

*Fish Consumption Advisory for DDT.*

*Fish Consumption Advisory for PCBs.*

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Marina del Rey Harbor - Back Basins	Bay & Harbor	40517000 / 18070104	<u>Chlordane (tissue &amp; sediment)</u>	391 Acres	1998	B	2005
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				<u>Copper (sediment)</u>	391 Acres	1998	B	2005
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				<u>DDT (tissue)</u>	391 Acres	1992	A	2005
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*A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.*

				<u>Dieldrin (tissue)</u>	391 Acres	1992	A	2005
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*A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.*

				<u>Fish Consumption Advisory</u>	391 Acres	1998	B	2005
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				<u>Indicator Bacteria</u>	391 Acres	2006	B	2004
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				<u>Lead (sediment)</u>	391 Acres	1988	B	2005
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				<u>PCBs (Polychlorinated biphenyls) (tissue &amp; sediment)</u>	391 Acres	1994	B	2005
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*Historical use of pesticides, storm water runoff/aerial deposition from urban areas. Shellfish harvesting advisory for PCBs in tissue.*

				<u>Sediment Toxicity</u>	391 Acres	1998	B	2005
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				<u>Zinc (sediment)</u>	391 Acres	1988	B	2005
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Matilija Creek Reach 1 (Jct. With N. Fork to Reservoir)	River & Stream	40220012 / 18070101	<u>Fish Barriers (Fish Passage)</u>	0.63 Miles	1996	A	2019
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4	Matilija Creek Reach 2 (Above Reservoir)	River & Stream	40220010 / 18070101	<u>Fish Barriers (Fish Passage)</u>	15 Miles	1996	A	2019
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4	Matilija Reservoir	Lake & Reservoir	40220012 / 18070101	<u>Fish Barriers (Fish Passage)</u>	121 Acres	1996	A	2019
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4	McCoy Canyon Creek	River & Stream	40521000 / 18070104	<u>Fecal Coliform</u>	4 Miles	2002	A	2009
				<u>Nitrate</u>	4 Miles	2002	A	2019
				<u>Nitrogen, Nitrate</u>	4 Miles	2002	A	2019
				<u>Selenium, Total</u>	4 Miles	2002	B	2005

4	McGrath Lake	Lake & Reservoir	40311000 / 18070103	<u>Chlordane (sediment)</u>	20 Acres	1996	A	2019
				<u>DDT (sediment)</u>	20 Acres	1996	A	2019
				<u>Dieldrin (sediment)</u>	20 Acres	2002	A	2019

*Historical use of pesticides and lubricants, storm water runoff/aerial deposition from agricultural fields.*

				<u>Fecal Coliform</u>	20 Acres	2002	A	2019
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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PCBs  
(Polychlorinated biphenyls)  
(sediment)      20 Acres      2002      A      2019

*Historical use of pesticides and lubricants, storm water runoff/aerial deposition from agricultural fields.*

Sediment Toxicity      20 Acres      1996      A      2019

4	Medea Creek Reach 1 (Lake to Confl. with Lindero)	River & Stream	40424000 / 18070104	<u>Algae</u>	2.6 Miles	1996	B	2003
				<u>Coliform Bacteria</u>	2.6 Miles	1996	B	2005
				<u>Sedimentation/Siltation</u>	2.6 Miles	2002	A	2019
				<u>Selenium</u>	2.6 Miles	1996	A	2019
				<u>Trash</u>	2.6 Miles	1996	A	2019

4	Medea Creek Reach 2 (Abv Confl. with Lindero)	River & Stream	40423000 / 18070104	<u>Algae</u>	5.4 Miles	1996	B	2003
				<u>Benthic-Macroinvertebrate Bioassessments</u>	5.4 Miles	2008	A	2021
				<u>Coliform Bacteria</u>	5.4 Miles	1996	B	2005
				<u>Invasive Species</u>	5.4 Miles	2008	A	2021
				<u>Sedimentation/Siltation</u>	5.4 Miles	2002	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE *****
				<u>Selenium</u>	5.4 Miles	1996	A	2019
				<u>Trash</u>	5.4 Miles	1996	A	2019
4	Munz Lake	Lake & Reservoir	40351000 / 18070102	<u>Eutrophic</u>	6.6 Acres	1996	A	2019
				<u>Trash</u>	6.6 Acres	1996	B	2008
4	Nicholas Canyon Beach	Coastal & Bay Shoreline	40444000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	1.7 Miles	1998	A	2019
				<i>Fish Consumption Advisory for DDT.</i>				
				<u>Indicator Bacteria</u>	1.7 Miles	1998	B	2002
				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	1.7 Miles	1998	A	2019
				<i>Fish Consumption Advisory for PCBs.</i>				
4	Ormond Beach	Coastal & Bay Shoreline	40311000 / 18070103	<u>Indicator Bacteria</u>	3.1 Miles	2002	A	2015
				<i>This listing includes the area of Ormond Beach at Oxnard Drain.</i>				
4	Palo Verde Shoreline Park Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>Pathogens</u>	0.24 Miles	1998	B	2003
				<u>Pesticides</u>	0.24 Miles	1998	A	2019

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4	Paradise Cove Beach	Coastal & Bay Shoreline	40435000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	1.7 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Fecal Coliform</u>	1.7 Miles	1998	B	2003
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				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	1.7 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Peck Road Park Lake	Lake & Reservoir	40531000 / 18070105	<u>Chlordane (tissue)</u>	103 Acres	1996	A	2019
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				<u>DDT (tissue)</u>	103 Acres	1996	A	2019
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				<u>Lead</u>	103 Acres	1996	A	2019
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				<u>Odor</u>	103 Acres	1996	A	2019
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				<u>Organic Enrichment/Low Dissolved Oxygen</u>	103 Acres	1996	A	2019
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				<u>Trash</u>	103 Acres	1996	A	2007
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4	Peninsula Beach	Coastal & Bay Shoreline	40311000 / 18070103	<u>Indicator Bacteria</u>	0.15 Miles	2002	A	2003
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*Area affected is beach area north of South Jetty.*

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	Piru Creek (from gaging station below Santa Felicia Dam to headwaters)	River & Stream	40342000 / 18070102	Chloride	67 Miles	2006	A	2019
				pH	67 Miles	2002	A	2019

4	Point Dume Beach	Coastal & Bay Shoreline	40435000 / 18070104	DDT (Dichlorodiphenyl trichloroethane)	2.5 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				Indicator Bacteria	2.5 Miles	1994	B	2002
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				PCBs (Polychlorinated biphenyls)	2.5 Miles	1996	A	2019
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*Fish consumption advisory for PCBs.*

4	Point Fermin Park Beach	Coastal & Bay Shoreline	40512000 / 18070104	DDT (Dichlorodiphenyl trichloroethane)	1.6 Miles	1996	A	2019
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*Fish Consumption Advisory for DDT.*

				PCBs (Polychlorinated biphenyls)	1.6 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

				Total Coliform	1.6 Miles	1994	B	2002
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REGION	WATER BODY NAME	WATER TYPE	WATERSHED *CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Pole Creek (trib to Santa Clara River Reach 3 )	River & Stream	40331000 / 18070102	<u>Sulfates</u>	9 Miles	2002	A	2019
				<u>Total Dissolved Solids</u>	9 Miles	2002	A	2019

4	Port Hueneme Pier	Coastal & Bay Shoreline	40311000 / 18070103	<u>PCBs (Polychlorinated biphenyls)</u>	0.33 Miles	2006	A	2019
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4	Portuguese Bend Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT (Dichlorodiphenyl trichloroethane)</u>	1.4 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	1.4 Miles	1998	B	2002
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				<u>PCBs (Polychlorinated biphenyls)</u>	1.4 Miles	1998	A	2019
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*Fish Consumption Advisory for PCB.*

4	Promenade Park Beach	Coastal & Bay Shoreline	40210000 / 18070101	<u>Indicator Bacteria</u>	0.58 Miles	2002	A	2015
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*Area affected is at south of drain at Figueroa Street.*

4	Puddingstone Reservoir	Lake & Reservoir	40552000 / 18070106	<u>Chlordane (tissue)</u>	243 Acres	1988	A	2019
				<u>DDT (tissue)</u>	243 Acres	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED - CAL WATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
				<u>Mercury (tissue)</u>	243 Acres	1996	A	2019
				<u>Organic Enrichment/Low Dissolved Oxygen</u>	243 Acres	1996	A	2019
				<u>PCBs (Polychlorinated biphenyls) (tissue)</u>	243 Acres	1996	A	2019
4	Puente Creek	River & Stream	40515010 / 18070104	<u>Indicator Bacteria</u>	5.8 Miles	2008	A	2021
				<u>Selenium</u>	5.8 Miles	2008	A	2021
4	Puerco Beach	Coastal & Bay Shoreline	40431000 / 18070104	<u>DDT (Dichlorodiphenyl trichloroethane)</u>	0.5 Miles	1998	A	2019
				<i>Fish Consumption Advisory for DDT.</i>				
				<u>Indicator Bacteria</u>	0.5 Miles	1998	B	2002
				<u>PCBs (Polychlorinated biphenyls)</u>	0.5 Miles	1998	A	2019
				<i>Fish Consumption Advisory for PCBs.</i>				
4	Redondo Beach	Coastal & Bay Shoreline	40512000 / 18070104	<u>Coliform Bacteria</u>	1.5 Miles	1998	B	2003
				<u>DDT (Dichlorodiphenyl trichloroethane)</u>	1.5 Miles	1998	A	2019
				<i>Fish Consumption Advisory for DDT.</i>				

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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PCBs  
(Polychlorinated biphenyls)      1.5 Miles      1998      A      2019

*Fish Consumption Advisory for PCBs.*

		Coastal & Bay	40100010 /					
4	Rincon Beach	Shoreline	18070101	<u>Indicator Bacteria</u>	0.38 Miles	2002	A	2015

*Area affected is 50 yards south of mouth of Rincon Creek.*

	Rio De Santa Clara/Oxnard Drain No. 3	River & Stream	40311000 / 18070103					
4				<u>ChemA (tissue)</u>	1.9 Miles	1996	A	2019

Chlordane (tissue)      1.9 Miles      1996      A      2019

DDT (tissue)      1.9 Miles      1996      A      2019

Nitrogen      1.9 Miles      1996      B      2003

PCBs  
(Polychlorinated biphenyls) (tissue)      1.9 Miles      1996      A      2019

Sediment Toxicity      1.9 Miles      1996      A      2019

Toxaphene  
(tissue)      1.9 Miles      1996      A      2019

	Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)	River & Stream	40515010 / 18070104					
4				<u>Coliform Bacteria</u>	4.6 Miles	1996	A	2009

Copper      4.6 Miles      1996      B      2005



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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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				<u>Cyanide</u>	4.6 Miles	2008	A	2021
				<u>Lead</u>	4.6 Miles	1996	B	2005
				<u>Toxicity</u>	4.6 Miles	2008	A	2021
				<u>Trash</u>	4.6 Miles	1996	B	2008
				<u>Zinc</u>	4.6 Miles	1996	B	2005
				<u>pH</u>	4.6 Miles	1996	B	2004

4	Rio Hondo Reach 2 (At Spreading Grounds)	River & Stream	40515010 / 18070104	<u>Coliform Bacteria</u>	4.9 Miles	1996	A	2009
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4	Robert H. Meyer Memorial Beach	Coastal & Bay Shoreline	40441000 / 18070104	<u>Beach Closures</u>	1.2 Miles	1998	B	2003
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				<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	1.2 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	1.2 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Royal Palms Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	1.1 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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Indicator Bacteria 1.1 Miles 1998 B 2002

PCBs  
(Polychlorinated biphenyls) 1.1 Miles 1998 A 2019

*Fish Consumption Advisory for PCBs.*

4 San Antonio Creek (Tributary to Ventura River Reach 4) River & Stream 40220023 / 18070101 Indicator Bacteria 9.8 Miles 2008 A 2021

Nitrogen 9.8 Miles 2002 A 2019

Total Dissolved Solids 9.8 Miles 2008 A 2023

4 San Buenaventura Beach Coastal & Bay Shoreline 40210000 / 18070103 Indicator Bacteria 1.8 Miles 1800 A 2015

*This listing includes the area of San Buenaventura Beach at San Jon Rd.*

4 San Gabriel River Estuary River & Stream 40516000 / 18070104 Copper 3.4 Miles 1996 B 2007

Dioxin 3.4 Miles 2008 A 2021

Nickel 3.4 Miles 2008 A 2021

Oxygen, Dissolved 3.4 Miles 2008 A 2021

APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
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4	San Gabriel River Reach 1 (Estuary to Firestone)	River & Stream	40515010 / 18070104	<u>Coliform Bacteria</u>	6.4 Miles	2006	A	2019
				pH	6.4 Miles	1996	A	2009

4	San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)	River & Stream	40515010 / 18070104	<u>Coliform Bacteria</u>	12 Miles	1998	A	2011
				<u>Cyanide</u>	12 Miles	2008	A	2021
				<u>Lead</u>	12 Miles	1996	B	2007

4	San Gabriel River Reach 3 (Whittier Narrows to Ramona)	River & Stream	40531000 / 18070104	<u>Indicator Bacteria</u>	7.2 Miles	2008	A	2021
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4	San Jose Creek Reach 1 (SG Confluence to Temple St.)	River & Stream	40531000 / 18070105	<u>Ammonia</u>	2.7 Miles	1996	C	
				<u>Benthic-Macroinvertebrate Bioassessments</u>	2.7 Miles	2008	A	2021
				<u>Coliform Bacteria</u>	2.7 Miles	1996	A	2009
				<u>Total Dissolved Solids</u>	2.7 Miles	2008	A	2021

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
				<u>Toxicity</u>	2.7 Miles	1996	A	2007
				<u>pH</u>	2.7 Miles	2008	A	2021
4	San Jose Creek Reach 2 (Temple to I-10 at White Ave.)	River & Stream	40531000 / 18070106	<u>Coliform Bacteria</u>	17 Miles	1996	A	2019
4	San Pedro Bay Near/Off Shore Zones	Bay & Harbor	40512000 / 18070104	<u>Chlordane</u>	8173 Acres	2006	A	2019
				<u>DDT (tissue &amp; sediment)</u>	8173 Acres	1996	A	2019
				<i>Fish Consumption Advisory for DDT.</i>				
				<u>PCBs (Polychlorinated biphenyls)</u>	8173 Acres	1996	A	2019
				<i>Fish Consumption Advisory for PCBs.</i>				
				<u>Sediment Toxicity</u>	8173 Acres	1996	A	2009
4	Santa Clara River Estuary	Estuary	40311000 / 18070103	<u>ChemA</u>	49 Acres	1998	A	2019
				<u>Coliform Bacteria</u>	49 Acres	1998	A	2019
				<u>Nitrogen, Nitrate</u>	49 Acres	2008	A	2021
				<u>Toxaphene</u>	49 Acres	1998	A	2019
				<u>Toxicity</u>	49 Acres	2008	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ****
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4	Santa Clara River Estuary Beach-Surfers Knoll	Coastal & Bay Shoreline	40311000 / 18070103	<u>Indicator Bacteria</u>	1 Miles	2008	A	2021
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4	Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)	River & Stream	40311000 / 18070103	<u>Toxicity</u>	10 Miles	2006	A	2019
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4	Santa Clara River Reach 3 (Freeman Diversion to A Street)	River & Stream	40331000 / 18070103	<u>Ammonia</u>	31 Miles	2002	B	2004
				<u>Chloride</u>	31 Miles	2002	B	2002
				<u>Total Dissolved Solids</u>	31 Miles	2002	A	2023
				<u>Toxicity</u>	31 Miles	2008	A	2021

4	Santa Clara River Reach 5 (Blue Cut gaging station to West Pier Hwy 99 Bridge) (was named Santa Clara River Reach 7 on 2002 303(d) list)	River & Stream	40351000 / 18070102	<u>Chloride</u>	9.4 Miles	2006	B	2005
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Chloride was relisted by USEPA in 2002.

APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED *CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
				<u>Chlorodibromomethane</u>	9.4 Miles	2008	A	2021
				<u>Coliform Bacteria</u>	9.4 Miles	2006	A	2019
				<u>Dichlorobromomethane</u>	9.4 Miles	2008	A	2021
				<u>Iron</u>	9.4 Miles	2008	A	2021
				<u>Specific Conductivity</u>	9.4 Miles	2008	A	2021

4	Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)	River & Stream	40351000 / 18070102	<u>Benthic-Macroinvertebrate Bioassessments</u>	5.2 Miles	2008	A	2021
				<u>Chloride</u>	5.2 Miles	1998	B	2005
				<i>Chloride was relisted by USEPA in 2002.</i>				
				<u>Chlorodibromomethane</u>	5.2 Miles	2008	A	2021
				<u>Chlorpyrifos</u>	5.2 Miles	2006	A	2019
				<u>Coliform Bacteria</u>	5.2 Miles	1996	A	2019
				<u>Copper</u>	5.2 Miles	2008	A	2021
				<u>Diazinon</u>	5.2 Miles	2006	A	2019
				<u>Dichlorobromomethane</u>	5.2 Miles	2008	A	2021
				<u>Iron</u>	5.2 Miles	2008	A	2021

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
				<u>Specific- Conductance</u>	5.2 Miles	2008	A	2021
				<u>Toxicity</u>	5.2 Miles	2006	A	2019
4	Santa Clara River Reach 7 ( Bouquet Canyon Rd to above Lang Gaging Station) (was named Santa Clara River Reach 9 on 2002 303(d) list)	River & Stream	40351000 / 18070102	<u>Coliform Bacteria</u>	21 Miles	2002	A	2019
4	Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)	River & Stream	40341000 / 18070102	<u>Boron</u>	6.2 Miles	2006	A	2019
				<u>Specific Conductance</u>	6.2 Miles	2008	A	2021
				<u>Sulfates</u>	6.2 Miles	2006	A	2019
				<u>Total Dissolved Solids</u>	6.2 Miles	2008	A	2021
4	Santa Fe Dam Park Lake	Lake & Reservoir	40531000 / 18070105	<u>Copper</u>	20 Acres	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED *CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
				<u>Lead</u>	20 Acres	1996	A	2019
				<u>pH</u>	20 Acres	1996	A	2019
4	Santa Monica Bay Offshore/Near shore	Bay & Harbor	40513000 / 18070104	<u>DDT (tissue &amp; sediment)</u> <i>Centered on Palos Verdes Shelf.</i>	146645 Acres	1996	A	2019
				<u>Debris</u>	146645 Acres	1998	A	2019
				<u>Fish Consumption Advisory</u> <i>The Fish Consumption Advisory is due to DDT and PCBs.</i>	146645 Acres	1996	A	2019
				<u>PCBs (Polychlorinated biphenyls) (tissue &amp; sediment)</u>	146645 Acres	1996	A	2019
				<u>Sediment Toxicity</u>	146645 Acres	1996	A	2019
4	Santa Monica Canyon	River & Stream	40513000 / 18070104	<u>Indicator Bacteria</u>	2.7 Miles	1996	B	2002
				<u>Lead</u>	2.7 Miles	1996	A	2019
4	Sawpit Creek	River & Stream	40531000 / 18070105	<u>Bis(2ethylhexyl)p hthalate (DEHP)</u>	3.9 Miles	2006	A	2019
				<u>Fecal Coliform</u>	3.9 Miles	2006	A	2019



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REGION	WATER BODY NAME	WATER TYPE	WATERSHED - CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
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4	Sea Level Beach	Coastal & Bay Shoreline	40441000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	0.21 Miles	1998	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	0.21 Miles	2006	B	2002
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				<u>PCBs</u> (Polychlorinated biphenyls)	0.21 Miles	1998	A	2019
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*Fish Consumption Advisory for PCBs.*

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4	Sepulveda Canyon	River & Stream	405.13 / 18070104	<u>Ammonia</u>	0.83 Miles	1996	A	2019
				<u>Copper</u>	0.83 Miles	2006	B	2005
				<u>Indicator Bacteria</u>	0.83 Miles	1996	B	2007
				<u>Lead</u>	0.83 Miles	1996	B	2005
				<u>Selenium</u>	0.83 Miles	2006	B	2005
				<u>Zinc</u>	0.83 Miles	2006	B	2005

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4	Sespe Creek (from 500 ft below confluence with Little Sespe Cr to headwaters)	River & Stream	40332020 / 18070102	<u>Chloride</u>	54 Miles	2006	A	2019
				<u>pH</u>	54 Miles	2006	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
4	Solstice Canyon Creek	River & Stream	40432000 / 18070104	<u>Invasive Species</u>	4.8 Miles	2008	A	2021
4	Surfers Point at Seaside	Coastal & Bay Shoreline	40210000 / 18070101	<u>Indicator Bacteria</u>	0.4 Miles	2002	A	2015
<i>Area affected is the end of the access path via a wooden gate.</i>								
4	Topanga Beach	Coastal & Bay Shoreline	40413000 / 18070104	<u>Coliform Bacteria</u>	2.5 Miles	1998	B	2002
				<u>DDT</u> <u>(Dichlorodiphenyl trichloroethane)</u>	2.5 Miles	1998	A	2019
<i>Fish Consumption Advisory for DDT.</i>								
				<u>PCBs</u> <u>(Polychlorinated biphenyls)</u>	2.5 Miles	1998	A	2019
<i>Fish Consumption Advisory for PCBs.</i>								
4	Topanga Canyon Creek	River & Stream	40411000 / 18070104	<u>Lead</u>	8.6 Miles	1996	A	2019
4	Torrance Carson Channel	River & Stream	40512000 / 18070104	<u>Coliform Bacteria</u>	3.4 Miles	1996	A	2007
				<u>Copper</u>	3.4 Miles	1996	A	2019
				<u>Lead</u>	3.4 Miles	1996	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***			
4	Trancas Beach (Broad Beach)	Coastal & Bay Shoreline	40437000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	1.7 Miles	1998	A	2019			
				<i>Fish Consumption Advisory for DDT.</i>							
				<u>Fecal Coliform</u>	1.7 Miles	2006	B	2002			
4	Triunfo Canyon Creek Reach 1	River & Stream	40424000 / 18070104	<u>PCBs</u> (Polychlorinated biphenyls)	1.7 Miles	1998	A	2019			
				<i>Fish Consumption Advisory for PCBs.</i>							
				<u>Lead</u>	2.5 Miles	1996	A	2019			
4	Triunfo Canyon Creek Reach 1	River & Stream	40424000 / 18070104	<u>Mercury</u>	2.5 Miles	1996	A	2019			
				<u>Sedimentation/Siltation</u>	2.5 Miles	2002	A	2019			
				<u>Benthic-Macroinvertebrate Bioassessments</u>	3.3 Miles	2008	A	2021			
4	Triunfo Canyon Creek Reach 2	River & Stream	40424000 / 18070104	<u>Lead</u>	3.3 Miles	1996	A	2019			
				<u>Mercury</u>	3.3 Miles	1996	A	2019			
				<u>Sedimentation/Siltation</u>	3.3 Miles	2002	A	2019			

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE ***
4	Tujunga Wash (LA River to Hansen Dam)	River & Stream	40521000 / 18070105	<u>Ammonia</u>	9.7 Miles	1996	B	2004
				<u>Coliform Bacteria</u>	9.7 Miles	1996	A	2009
				<u>Copper</u>	9.7 Miles	1996	B	2005
				<u>Trash</u>	9.7 Miles	1996	B	2008
4	Ventura Harbor: Ventura Keys	Bay & Harbor	40311000 / 18070103	<u>Coliform Bacteria</u>	179 Acres	1996	A	2019
4	Ventura Marina Jetties	Coastal & Bay Shoreline	40311000 / 18070103	<u>DDT (Dichlorodiphenyl trichloroethane)</u>	0.69 Miles	2006	A	2019
				<u>PCBs (Polychlorinated biphenyls)</u>	0.69 Miles	2006	A	2019
4	Ventura River Estuary	River & Stream	40210011 / 18070101	<u>Algae</u>	0.2 Miles	1998	A	2019
				<u>Eutrophic</u>	0.2 Miles	1998	A	2019
				<u>Total Coliform</u>	0.2 Miles	2002	A	2019
				<u>Trash</u>	0.2 Miles	1998	B	2008

*Stables and horse property may be the sources.*

REGION	WATER BODY NAME	WATER TYPE	WATERSHED - CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
4	Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)	River & Stream	40210011 / 18070101	<u>Algae</u>	4.5 Miles	1996	A	2019
4	Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)	River & Stream	40210011 / 18070101	<u>Indicator Bacteria</u>	2.8 Miles	2008	A	2021
				<u>Pumping</u>	2.8 Miles	1996	A	2019
				<u>Water Diversion</u>	2.8 Miles	1996	A	2019
4	Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)	River & Stream	40220021 / 18070101	<u>Pumping</u>	19 Miles	1996	A	2019
				<u>Water Diversion</u>	19 Miles	1996	A	2019
4	Verdugo Wash Reach 1 (LA River to Verdugo Rd.)	River & Stream	40521000 / 18070105	<u>Coliform Bacteria</u>	2 Miles	1996	A	2009
				<u>Copper</u>	2 Miles	2008	A	2021
				<u>Trash</u>	2 Miles	1996	B	2008

## APPENDIX E

REGION	WATER BODY NAME	WATER TYPE	WATERSHED * CALWATER /USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE
4	Verdugo Wash Reach 2 (Above Verdugo Road)	River & Stream	40524000 / 18070105	<u>Coliform Bacteria</u>	7.6 Miles	1996	A	2009
				<u>Trash</u>	7.6 Miles	1996	B	2008
4	Walnut Creek Wash (Drains from Puddingstone Res)	River & Stream	40531000 / 18070106	<u>Benthic-Macroinvertebrate Bioassessments</u>	12 Miles	2008	A	2021
				<u>Indicator Bacteria</u>	12 Miles	2008	A	2021
				<u>pH</u>	12 Miles	1996	A	2007
4	Westlake Lake	Lake & Reservoir	40425000 / 18070104	<u>Algae</u>	119 Acres	1996	B	2003
				<u>Ammonia</u>	119 Acres	1996	B	2003
				<u>Eutrophic</u>	119 Acres	1996	B	2003
				<u>Lead</u>	119 Acres	1996	A	2019
				<u>Organic Enrichment/Low Dissolved Oxygen</u>	119 Acres	1996	B	2003
4	Wheeler Canyon/Todd Barranca	River & Stream	40321000 / 18070102	<u>Nitrate and Nitrite</u>	10 Miles	1998	B	2004
				<u>Sulfates</u>	10 Miles	2002	A	2019
				<u>Total Dissolved Solids</u>	10 Miles	2002	A	2019

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REGION	WATER BODY NAME	WATER TYPE	WATERSHED CALWATER / USGS HUC	POLLUTANT <i>Relevant Notes</i>	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	FMDL REQUIREMENT STATUS**	DATE
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4	Whites Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	1.1 Miles	2006	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	1.1 Miles	2006	B	2002
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				<u>PCBs</u> (Polychlorinated biphenyls)	1.1 Miles	2006	A	2019
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*Fish Consumption Advisory for PCBs.*

4	Wilmington Drain	River & Stream	40342000 / 18070104	<u>Coliform Bacteria</u>	0.56 Miles	1996	A	2007
				<u>Copper</u>	0.56 Miles	1996	A	2019
				<u>Lead</u>	0.56 Miles	1996	A	2019

4	Zuma Beach (Westward Beach)	Coastal & Bay Shoreline	40436000 / 18070104	<u>DDT</u> (Dichlorodiphenyl trichloroethane)	1.6 Miles	2006	A	2019
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*Fish Consumption Advisory for DDT.*

				<u>Indicator Bacteria</u>	1.6 Miles	2006	B	2002
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				<u>PCBs</u> (Polychlorinated biphenyls)	1.6 Miles	2006	A	2019
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*Fish Consumption Advisory for PCBs.*

**Item 13**

**Table of Contents for Item 13 on the Agenda of  
the 528<sup>th</sup>**

**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**APPENDIX F**

**THE 303(d) LIST**



APPENDIX F

Revised on July 07, 2009

2008 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SECTIONS

(Those requiring TMDLs (A), being addressed by USEPA approved TMDLs (B), and being addressed by actions other than TMDLs (C))

WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
Abalone Cove Beach	40511000	1.07 Miles	5	DDT (sediment)	A	01/01/2019	
				Indicator Bacteria	B		06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
Alamitos Bay	40512000	328 Acres	5	Indicator Bacteria	A	01/01/2019	
<i>The listing includes the areas 1st St. and Bayshore and 2nd St. Bridge and Bayshore.</i>							
Aliso Canyon Wash	40521000	10.13 Miles	5	Copper	A	01/01/2019	
				Fecal Coliform	A	01/01/2019	
				Selenium	B		12/22/2005
Amarillo Beach	40431000	0.64 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
<i>Fish Consumption Advisory for DDT.</i>							
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
Arroyo Seco Reach 1 (LA River to West Holly Ave.)	40515010	5.15 Miles	5	Benthic-Macroinvertebrate Bioassessments	A	01/01/2021	
Arroyo Seco Reach 2 (Figueroa St. to Riverside Dr.)	40515010	4.42 Miles	5	Coliform Bacteria Trash	A B	01/01/2009	07/24/2008
				Coliform Bacteria	A	01/01/2009	

2008 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SECTIONS

WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Trash							
Artesia-Norwalk Drain	40515010	2.5 Miles	5	Indicator Bacteria	A	01/01/2021	07/24/2008
Avalon Beach	40511000	0.67 Miles	5	Selenium	A	01/01/2021	
				Indicator Bacteria	A	01/01/2019	
<p><i>Area affected is between Pier and BB restaurant (2/3), between Pier and BB restaurant (1/3), between storm drain and Pier (1/3), and between BB restaurant and the Tuna Club.</i></p>							
Ballona Creek	40513000	6.47 Miles	5	Cadmium (sediment)	A	01/01/2005	
<p><i>A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.</i></p>							
				Coliform Bacteria	B	03/26/2007	
				Copper, Dissolved	B	12/22/2005	
				Cyanide	A	01/01/2019	
				Lead	B	12/22/2005	
				Selenium	B	12/22/2005	
				Shellfish Harvesting Advisory	B	01/01/2006	
				Toxicity	B	01/01/2005	
				Trash	B	01/01/2001	
				Viruses (enteric)	B	03/26/2007	
				Zinc	B	12/22/2005	
Ballona Creek Estuary	40513000	2.31 Miles	5	Cadmium	B	12/22/2005	
				Chlordane (tissue & sediment)	B	12/22/2005	
				Coliform Bacteria	B	01/01/2007	
				Copper	B	12/22/2005	
				DDT (tissue & sediment)	B	12/22/2005	
				Lead (sediment)	B	12/22/2005	

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WATER BODY NAME	CALIFORNIA WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
				PAHs (Polycyclic Aromatic Hydrocarbons) (sediment)	B		12/22/2005
				PCBs (Polychlorinated biphenyls) (tissue & sediment)	B		12/22/2005
				Sediment Toxicity	B		01/01/2005
				Shellfish Harvesting Advisory	A	01/01/2006	
				Silver	B		12/22/2005
				Zinc (sediment)	B		12/22/2005
Ballona Creek Wetlands	40517000	289.2 Acres	5	Exotic Vegetation	A	01/01/2019	
Bell Creek	40521000	8.92 Miles	5	Habitat alterations	A	01/01/2019	
Big Rock Beach	40431000	0.74 Miles	5	Hydromodification	A	01/01/2019	
				Reduced Tidal Flushing	A	01/01/2019	
				Trash	B		01/01/2019
				Coliform Bacteria	A	01/01/2009	
				Coliform Bacteria	B		06/19/2003
				DDT	A	01/01/2019	
				(Dichlorodiphenyltrichloroethane)			
				<i>Fish Consumption Advisory for DDT.</i>			
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Bluff Cove Beach	40511000	0.55 Miles	5	DDT	A	01/01/2019	
				(Dichlorodiphenyltrichloroethane)			
				<i>Fish Consumption Advisory for DDT.</i>			

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA TMDL APPROVED
				Indicator Bacteria	B		06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Brown Barranca/Long Canyon	40321000	2.6 Miles	4A	Nitrate and Nitrite	B		03/18/2004
Bull Creek	40521000	2.3 Miles	5	Indicator Bacteria	A	01/01/2021	
Burbank Western Channel	40521000	13.17 Miles	5	Copper	B		12/22/2005
				Cyanide	A	01/01/2019	
				Indicator Bacteria	A	01/01/2021	
				Lead	B		12/22/2005
				Selenium	A	01/01/2021	
				Trash	B		07/24/2008
Cabrillo Beach (Outer)	40512000	0.58 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
				<i>Fish consumption advisory for DDT.</i>			
				Indicator Bacteria	B		06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish consumption advisory for PCBs.</i>			
Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)	40311000	343.79 Acres	4A	Chlordane (tissue)	B		01/01/2005
				Copper	B		03/23/2007

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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)	40312000	4.31 Miles	5	DDT (tissue & sediment)	B		01/01/2005
				Dieldrin	B		03/14/2006
				Endosulfan (tissue)	B		03/24/2006
				Mercury	B		03/26/2007
				Nickel	B		03/23/2007
				Nitrogen	B		06/20/2003
				PCBs (Polychlorinated biphenyls) (tissue)	B		01/01/2005
				Sediment Toxicity	B		01/01/2005
				Sedimentation/Siltation	B		01/01/1900
				Toxaphene	B		03/14/2006
				Zinc	B		03/23/2007
				Ammonia	B		06/20/2003
				ChemA (tissue)	B		03/24/2006
				<i>Historical use of pesticides and lubricants.</i>			
				Chlordane (tissue)	B		01/01/2005
Copper, Dissolved	B		03/23/2007				
DDT (Dichlorodiphenyltrichloroethane)	B		01/01/2005				
DDT (tissue & sediment)	B		01/01/2005				
Dieldrin	B		03/14/2006				

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
				Endosulfan (tissue)	B		03/24/2006
				Fecal Coliform	A	01/01/2006	
				<i>Area affected is at the mouth of the creek.</i>			
				Nitrogen	B		06/20/2003
				PCBs (Polychlorinated biphenyls) (tissue)	B		01/01/2005
				Sediment Toxicity	B		01/01/2005
				Sedimentation/Siltation	A	01/01/2005	
				Toxaphene (tissue & sediment)	B		01/01/2005
Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)	40312000	3.47 Miles	5	Ammonia	B		01/01/2003
				Chlordane	B		03/14/2006
				Chloride	B		12/02/2008
				DDT	B		01/01/2019
				(Dichlorodiphenyltrichloroethane)			
				Dieldrin	B		01/01/2019
				Nitrate and Nitrite	B		06/20/2003
				PCBs (Polychlorinated biphenyls)	B		03/14/2006
				Sedimentation/Siltation	A	01/01/2005	
				Total Dissolved Solids	B		12/02/2008

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WATER BODY NAME	CALIFORNIA WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)	40311000	7.19 Miles	5	Toxaphene	B	01/01/2021	01/01/2019
				Trash	A	01/01/2021	
				ChemA (tissue)	B		03/24/2006
<i>Historical use of pesticides and lubricants.</i>							
				Chlordane (tissue & sediment)	B		01/01/2005
				Chlorpyrifos (tissue)	B		01/01/2005
				<i>Chlorpyrifos also exceeds in water.</i>			
				DDT (tissue & sediment)	B		01/01/2005
				Diazinon	B		03/14/2006
				Dieldrin (tissue)	B		01/01/2005
				Endosulfan (tissue & sediment)	B		03/24/2006
				Fecal Coliform	A	01/01/2006	
				Nitrate as Nitrate (NO3)	B		01/01/2003
				Nitrogen	B		06/20/2003
				PCBs (Polychlorinated biphenyls) (tissue)	B		01/01/2005
				Sedimentation/Siltation	A	01/01/2005	
				Selenium	B		03/23/2007
				Toxaphene (tissue & sediment)	B		01/01/2005

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WATER BODY NAME	CALIFORNIA WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
				Toxicity	B		01/01/2005
				Trash	B		02/27/2008
Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)	40311000	4.34 Miles	5	ChemA (tissue)	B		03/24/2006
				Chlordane (tissue & sediment)	B		01/01/2005
				Chlorpyrifos (tissue)	B		01/01/2005
				<i>Chlorpyrifos also exceeds in water.</i>			
				DDT (tissue & sediment)	B		01/01/2005
				Diazinon	B		03/14/2006
				Dieldrin (tissue)	B		01/01/2005
				Endosulfan (tissue & sediment)	B		03/24/2006
				Nitrogen	B		06/20/2003
				PCBs (Polychlorinated biphenyls) (tissue)	B		01/01/2005
				Sedimentation/Siltation	A	01/01/2005	
				Toxaphene (tissue & sediment)	B		01/01/2005
				Toxicity	B		01/01/2005
				Trash	B		02/27/2008



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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Calleguas Creek Reach 6 ( was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)	40362000	15.3 Miles	5	Ammonia	B		06/20/2003
				Chlordane	B		03/14/2006
				Chloride	B		12/02/2008
				Chlorpyrifos	B		03/14/2006
				DDT (sediment)	B		01/01/2005
				Diazinon	B		03/14/2006
				Dieldrin	B		03/14/2006
				Fecal Coliform	A	01/01/2006	
				Nitrate and Nitrite	B		06/20/2003
				Nitrate as Nitrate (NO3)	B		06/20/2003
				Sedimentation/Siltation	A	01/01/2005	
				Sulfates	B		12/02/2008
				Total Dissolved Solids	B		12/02/2008
				Toxicity	B		03/14/2006
Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)	40367000	13.91 Miles	5	Ammonia	B		06/20/2003
				Boron	B		12/02/2008
				Chloride	B		12/02/2008
				Chlorpyrifos	B		03/14/2006
				Diazinon	B		03/14/2006
				Indicator Bacteria	A	01/01/2019	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)	40366000	7.19 Miles	5	Organophosphorus Pesticides	B		01/01/2005
				Sedimentation/Siltation	A	01/01/2005	
				Sulfates	B		12/02/2008
				Total Dissolved Solids	B		12/02/2008
				Toxicity	B		03/14/2006
				Trash	A	01/01/2021	
				Boron	B		12/02/2008
				Chlordane	B		03/14/2006
				Chloride	B		12/02/2008
				Chlorpyrifos	B		03/14/2006
DDT (Dichlorodiphenyltrichloroethane)	B		03/14/2006				
				Diazinon	B		03/14/2006
				Dieldrin	B		03/14/2006
				PCBs (Polychlorinated biphenyls)	B		03/14/2006
				Sedimentation/Siltation	A	01/01/2005	
				Sulfates	B		12/02/2008
Total Dissolved Solids	B		12/02/2008				
Toxaphene	B		03/14/2006				

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE USEPA APPROVED
						TMDL	COMPLETION DATE	
Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)	40312000	1.68 Miles	5	ChemA (tissue)	B			03/24/2006
				Chlordane (tissue)	B			01/01/2005
				<i>Historical use of pesticides and lubricants.</i>				
				Chlorpyrifos	B			03/14/2006
				DDT (tissue)	B			01/01/2005
				Diazinon	B			03/14/2006
				Dieldrin (tissue)	B			01/01/2005
				<i>Historical use of pesticides and lubricants.</i>				
				Endosulfan (tissue)	B			03/24/2006
				Fecal Coliform	A		01/01/2006	
				Lindane/gamma-Hexachlorocyclohexane (gamma-HCH) (tissue)	B			03/24/2006
				<i>Historical use of pesticides and lubricants.</i>				
				Nitrate as Nitrate (NO3)	B			06/20/2003
				Nitrogen, Nitrate	B			06/20/2003
				PCBs (Polychlorinated biphenyls) (tissue)	B			01/01/2005
				<i>Historical use of pesticides and lubricants.</i>				
				Sulfates	B			12/02/2008
				Total Dissolved Solids	B			12/02/2008
				Toxaphene (tissue & sediment)	B			01/01/2005

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED INTEGRATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Revelant/Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
				Toxicity	B		03/14/2006
				Trash	A	01/01/2021	
Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)	40363000	6.2 Miles	5	Ammonia	B		06/20/2003
				ChemA (tissue)	B		03/24/2006
				Chlordane	B		03/14/2006
				Chloride	B		12/02/2008
				Chlorpyrifos	B		03/14/2006
				DDT (tissue)	B		01/01/2005
				Diazinon	B		03/14/2006
				Dieldrin	B		03/14/2006
				Endosulfan (tissue)	B		03/24/2006
				Indicator Bacteria	A	01/01/2019	
				PCBs (Polychlorinated biphenyls)	B		03/14/2006
				Sulfates	B		12/02/2008
				Total Dissolved Solids	B		12/02/2008
				Toxaphene (tissue & sediment)	B		01/01/2005
				Toxicity	B		03/14/2006
				Trash	A	01/01/2021	

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WATER BODY NAME	CAL WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Calleguas Creek Reach 10 (Conejo Creek (Hill Canyon)-was part of Conejo Crk Reaches 2 & 3, and lower Conejo Crk/Arroyo Conejo N Fk on 1998 303d list)	40364000	2.96 Miles	5	Ammonia	B		01/01/2002
				ChemA (tissue)	B		03/24/2006
				Chlordane	B		03/14/2006
				Chloride	B		12/02/2008
				Chlorpyrifos	B		03/14/2006
				DDT (tissue)	B		01/01/2005
				Diazinon	B		03/14/2006
				Dieldrin	B		03/14/2006
				Endosulfan (tissue)	B		03/24/2006
				Fecal Coliform	A	01/01/2006	
				Nitrogen, Nitrite	B		06/20/2003
				PCBs (Polychlorinated biphenyls)	B		03/14/2006
				Sulfates	B		12/02/2008
				Total Dissolved Solids	B		12/02/2008
				Toxaphene (tissue & sediment)	B		01/01/2005
				Toxicity	B		01/01/2005
				Trash	A	01/01/2021	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE OF AFFECTED WATERSHED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS#	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)	40365000	8.69 Miles	5	Ammonia	B	06/20/2003	06/20/2003
				ChemA (tissue)	B	03/24/2006	03/24/2006
				Chlordane	B	03/14/2006	03/14/2006
				DDT (tissue)	B	01/01/2005	01/01/2005
				Dieldrin	B	03/14/2006	03/14/2006
				Endosulfan (tissue)	B	03/24/2006	03/24/2006
				Fecal Coliform	A	01/01/2006	03/14/2006
				PCBs (Polychlorinated biphenyls)	B		
				Sedimentation/Siltation	A	01/01/2005	
				Sulfates	B		12/02/2008
				Total Dissolved Solids	B		12/02/2008
				Toxaphene (tissue & sediment)	B		01/01/2005
				Toxicity	B		01/01/2005
Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)	40364000	5.49 Miles	4A	Ammonia	B	06/20/2003	06/20/2003
				Chlordane (tissue)	B		01/01/2005
				DDT (tissue)	B		01/01/2005

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED	
						TMDL COMPLETION DATE	DATE USEPA APPROVED
Calleguas Creek Reach 13 (Conejo Creek South Fork, was Conejo Cr Reach 4 and part of Reach 3 on 1998 303d list)	40368000	17.15 Miles	4A	Dieldrin	B	03/14/2006	03/14/2006
				PCBs (Polychlorinated biphenyls)	B	03/14/2006	03/14/2006
				Sulfates	B	12/02/2008	12/02/2008
				Total Dissolved Solids	B	12/02/2008	12/02/2008
				Toxaphene	B	03/14/2006	03/14/2006
				Ammonia	B	06/20/2003	06/20/2003
				ChemA (tissue)	B	03/24/2006	03/24/2006
				Chlordane	B	03/14/2006	03/14/2006
				Chloride	B	12/02/2008	12/02/2008
				DDT (tissue)	B	01/01/2005	01/01/2005
Dieldrin	B	03/14/2006	03/14/2006				
Endosulfan (tissue)	B	03/24/2006	03/24/2006				
PCBs (Polychlorinated biphenyls)	B	03/14/2006	03/14/2006				
Sulfates	B	12/02/2008	12/02/2008				
Total Dissolved Solids	B	12/02/2008	12/02/2008				
Toxaphene (tissue & sediment)	B	01/01/2005	01/01/2005				
Toxicity	B	01/01/2005	01/01/2005				

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS#	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Canada Larga (Ventura River Watershed)	40210010	8.01 Miles	5	Fecal Coliform	A	01/01/2019	
<i>Horse stables, land use, cattle, and wildlife may be sources.</i>							
				Low Dissolved Oxygen	A	01/01/2019	
				Total Dissolved Solids	A	01/01/2021	
Carbon Beach	40416000	1.46 Miles	5	DDT (Dichlorodiphenyltrichloroethane e)	A	01/01/2019	
<i>Fish Consumption Advisory for DDT.</i>							
				Indicator Bacteria	B		06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
Castlerock Beach	40513000	0.21 Miles	5	DDT (Dichlorodiphenyltrichloroethane e)	A	01/01/2019	
<i>Fish Consumption Advisory for DDT.</i>							
				Indicator Bacteria	B		06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
Channel Islands Harbor Beach	40311000	0.03 Miles	4A	Indicator Bacteria	B		12/08/2008
Colorado Lagoon	40512000	13.23 Acres	5	Chlordane (tissue & sediment)	A	01/01/2019	
				DDT (tissue)	A	01/01/2019	



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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE OF AFFECTED WATERSHED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE				
							USEPA APPROVED	TMDL			
Compton Creek	40515010	8.51 Miles	5	Dieldrin (tissue)	A	01/01/2019					
				Indicator Bacteria	A	01/01/2019					
				<i>This listing includes the north, center, and south areas of the lagoon.</i>							
				Lead (sediment)	A	01/01/2019					
				PAHs (Polycyclic Aromatic Hydrocarbons) (sediment)	A	01/01/2019					
				PCBs (Polychlorinated biphenyls) (tissue)	A	01/01/2019					
				Sediment Toxicity	A	01/01/2019					
				Zinc (sediment)	A	01/01/2019					
				Benthic-Macroinvertebrate Bioassessments	A	01/01/2021					
				Coliform Bacteria	A	01/01/2009					
				Copper	B	12/22/2005					
				Lead	B	12/22/2005					
				Trash	B	07/24/2008					
pH	B	03/18/2004									
Coyote Creek	40515010	13.31 Miles	5	Ammonia	C						
				Benthic-Macroinvertebrate Bioassessments	A	01/01/2021					
				Copper, Dissolved	B	03/27/2007					
				Diazinon	A	01/01/2019					
				Indicator Bacteria	A	01/01/2009					
				Lead	B	03/27/2007					
				pH	A	01/01/2019					
				Toxicity	A	01/01/2008					
				<i>This listing was made by USEPA for 2002.</i>							

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Coyote Creek, North Fork	40515010	5 Miles	5	Indicator Bacteria	A	01/01/2021	
Crystal Lake	40543000	3.71 Acres	5	Selenium Organic Enrichment/Low Dissolved Oxygen	A	01/01/2021	
Dan Blocker Memorial (Coral) Beach	40431000	2.1 Miles	4A	Coliform Bacteria	B		01/01/2002
<i>(This listing includes the area of the beach at Latigo Beach and Solstice Canyon.)</i>							
Dockweiler Beach	40512000	4.61 Miles	4A	Indicator Bacteria	B		06/19/2003
Dominguez Channel (lined portion above Vermont Ave)	40351000	6.7 Miles	5	Ammonia  Copper Diazinon Indicator Bacteria Lead Toxicity Zinc	A	01/01/2019	
Dominguez Channel Estuary (unlined portion below Vermont Ave)	40512000	140 Acres	5	Ammonia	A	01/01/2019	
				Benthic Community Effects	A	01/01/2019	
				Benzo(a)pyrene (3,4- Benzopyrene -7-d)	A	01/01/2019	
				Benzo[a]anthracene	A	01/01/2019	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Repetitive Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE USEPA APPROVED TMDL
						TMDL	COMPLETION DATE	
				Chlordane (tissue)	A		01/01/2019	
				Chrysene (C1-C4)	A		01/01/2019	
				Coliform Bacteria	A		01/01/2007	
				DDT (tissue & sediment)	A		01/01/2019	
				Dieldrin (tissue)	A		01/01/2019	
				Lead (tissue)	A		01/01/2019	
				PCBs (Polychlorinated biphenyls)	A		01/01/2019	
				Phenanthrene	A		01/01/2019	
				Pyrene	A		01/01/2019	
				Sediment Toxicity	A		01/01/2021	
				Zinc (sediment)	A		01/01/2019	
Dry Canyon Creek	40521000	3.92 Miles	5	Fecal Coliform	A		01/01/2009	12/22/2005
Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No	40311000	11.86 Miles	4A	Selenium, Total	B			01/01/2005
				ChemA (tissue)	B			
				Chlordane (tissue)	B			01/01/2005
				DDT (tissue & sediment)	B			01/01/2005
				Nitrogen	B			06/20/2003
				Sediment Toxicity	B			01/01/2005
				Toxaphene (tissue)	B			01/01/2005
				Toxicity	B			01/01/2005
Echo Park Lake	40515010	12.95 Acres	5	Algae	A		01/01/2019	
				Ammonia	A		01/01/2019	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
El Dorado Lakes	40515010	31.04 Acres	5	Copper	A	01/01/2019	
				Eutrophic	A	01/01/2019	
				Lead	A	01/01/2019	
				Odor	A	01/01/2019	
				PCBs (Polychlorinated biphenyls) (tissue)	A	01/01/2019	
				Trash	A	01/01/2007	
				pH	A	01/01/2019	
				Algae	A	01/01/2019	
				Ammonia	A	01/01/2019	
				Copper	A	01/01/2019	
Elizabeth Lake	40351000	123.18 Acres	5	Eutrophic	A	01/01/2019	
				Organic Enrichment/Low Dissolved Oxygen	A	01/01/2019	
				Trash	B		02/27/2008
				pH	A	01/01/2019	
				DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
Escondido Beach	40434000	1.21 Miles	5	Fish Consumption Advisory for DDT. Indicator Bacteria	B		06/19/2003

APPENDIX F

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WATER BODY NAME	CAL WATER WATERSHED	ESTIMATED INTEGRATED SIZE AFFECTED	REPORT CATEGORY	POBULANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
PCBs (Polychlorinated biphenyls)							
<i>Fish Consumption Advisory for PCBs.</i>							
Flat Rock Point Beach Area	40511000	0.11 Miles	5	DDT (Dichlorodiphenyltrichloroethane e)	A	01/01/2019	
<i>Fish Consumption Advisory for DDT.</i>							
				Indicator Bacteria	B		06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
Fox Barranca (tributary to Calleguas Creek Reach 6)	40362000	6.72 Miles	4A	Boron	B		12/02/2008
				Nitrate and Nitrite	B		06/20/2003
				Sulfates	B		12/02/2008
				Total Dissolved Solids	B		12/02/2008
Hermosa Beach	40512000	1.98 Miles	4A	Indicator Bacteria	B		06/19/2003
Hobie Beach (Channel Islands Harbor)	40311000	0.1 Miles	4A	Indicator Bacteria	B		12/18/2008
Hopper Creek	40341000	13.38 Miles	5	Sulfates	A	01/01/2019	
				Total Dissolved Solids	A	01/01/2019	
Inspiration Point Beach	40511000	0.14 Miles	5	DDT (Dichlorodiphenyltrichloroethane e)	A	01/01/2019	
<i>Fish Consumption Advisory for DDT.</i>							
				Indicator Bacteria	B		06/19/2003

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
La Costa Beach	40416000	0.74 Miles	5	PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	A	01/01/2019	
				DDT (Dichlorodiphenyltrichloroethane) e) <i>Fish Consumption Advisory for DDT.</i>	A	01/01/2019	
				Indicator Bacteria PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	B A	01/01/2019	06/19/2003
Lake Calabasas	40521000	18.01 Acres	5	Ammonia Eutrophic Odor Organic Enrichment/Low Dissolved Oxygen pH	A A A A A	01/01/2006 01/01/2019 01/01/2019 01/01/2019 01/01/2019	
Lake Hughes	40351000	21.43 Acres	5	Algae Eutrophic Fish Kills Odor Trash	A A A A B	01/01/2019 01/01/2019 01/01/2019 01/01/2019 02/27/2008	
Lake Lindero	40423000	14.64 Acres	5	Algae Chloride Eutrophic Odor Selenium	B A B B A	01/01/2019 01/01/2019 03/21/2003 03/21/2003 01/01/2019	03/21/2003 03/21/2003 03/21/2003

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Regulants Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Specific Conductivity							
Lake Sherwood	40426000	135.07 Acres	5	Trash	A	01/01/2019	03/21/2003
				Algae	B	01/01/2019	
				Ammonia	B	01/01/2019	03/21/2003
				Eutrophic	B	01/01/2019	03/21/2003
				Mercury (tissue)	A	01/01/2019	
				Organic Enrichment/Low Dissolved Oxygen	B	01/01/2019	03/21/2003
Las Flores Beach							
	40415000	1.12 Miles	5	Coliform Bacteria	B	01/01/2019	06/19/2003
				DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
				<i>Fish Consumption Advisory for DDT.</i>			
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Las Tunas Beach							
	40412000	1.15 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
				<i>Fish Consumption Advisory for DDT.</i>			
				Indicator Bacteria	B	01/01/2019	06/19/2003
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Las Virgenes Creek							
	40422010	11.62 Miles	5	Benthic-Macroinvertebrate Bioassessments	A	01/01/2021	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
				Coliform Bacteria	B		01/01/2005
				Invasive Species	A	01/01/2021	
				Nutrients (Algae)	B		03/21/2003
				Organic Enrichment/Low Dissolved Oxygen	B		03/21/2003
				Scum/Foam-unnatural	B		03/21/2003
				Sedimentation/Siltation	A	01/01/2019	
				Selenium	A	01/01/2019	
				Trash	A	01/01/2019	
Legg Lake	40531000	24.76 Acres	5	Ammonia	A	01/01/2019	
				Copper	A	01/01/2019	
				Lead	A	01/01/2019	
				Odor	A	01/01/2019	
				Trash	B		02/27/2008
				pH	A	01/01/2019	
Leo Carillo Beach (South of County Line)	40444000	1.77 Miles	4A	Coliform Bacteria	B		06/19/2003
Lincoln Park Lake	40515010	3.75 Acres	5	Ammonia	A	01/01/2019	
				Eutrophic	A	01/01/2019	
				Lead	A	01/01/2019	
				Odor	A	01/01/2019	
				Organic Enrichment/Low Dissolved Oxygen	A	01/01/2019	
				Trash	A	01/01/2007	
Lindero Creek Reach 1	40423000	2.98 Miles	5	Algae	B		03/21/2003



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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE OF AFFECTED WATERSHED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL		DATE USEPA APPROVED TMDL
						COMPLETION DATE	DATE	
Lindero Creek Reach 2 (Above Lake)	40425000	4.49 Miles	5	Benthic-Macroinvertebrate Bioassessments Coliform Bacteria Invasive Species Scum/Foam-unnatural Selenium Trash Algae	A B A B A A B	01/01/2021 01/01/2021 01/01/2021 01/01/2019 01/01/2019 01/01/2019	01/01/2005 03/21/2003 03/21/2003	
Long Beach City Beach	40512000	4.7 Miles	5	Coliform Bacteria Scum/Foam-unnatural Selenium Trash Indicator Bacteria	B B A A A	01/01/2019 01/01/2019 01/01/2019 01/01/2019 01/01/2019	01/01/2005 03/21/2003	
Long Point Beach	40511000	0.7 Miles	5	Coliform Bacteria DDT (Dichlorodiphenyltrichloroethane) <i>Fish Consumption Advisory for DDT.</i> PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	B A A A	01/01/2019 01/01/2019 01/01/2019 01/01/2019	06/19/2003	

*This listing includes the beach area at 3rd pl., 5th pl., 10th pl., 16th pl., 36th pl., 72nd pl., Coronado ave., Molino ave., and the east side and west side of Belmont Pier.*

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE				
						TMDL	COMPLETION DATE	USEPA APPROVED	TMDL			
Los Angeles Harbor - Cabrillo Marina	40512000	77 Acres	5	Benzo(a)pyrene (3,4- Benzopyrene -7-d)	A		01/01/2021					
				DDT	A		01/01/2019					
				(Dichlorodiphenyltrichloroethane)								
				PCBs (Polychlorinated biphenyls)	A		01/01/2019					
Los Angeles Harbor - Consolidated Slip	40512000	36 Acres	5	2-Methylnaphthalene	A		01/01/2008					
				Benthic Community Effects	A		01/01/2019					
				Benzo(a)pyrene (3,4- Benzopyrene -7-d)	A		01/01/2008					
				Benzo[a]anthracene	A		01/01/2008					
				<i>This listing was made by USEPA for 2006.</i>								
				Cadmium (sediment)	A		01/01/2019					
				<i>Historical use of pesticides and lubricants, stormwater runoff, aerial deposition, and historical discharges for metals.</i>								
				Chlordane (tissue & sediment)	A		01/01/2019					
				Chromium (sediment)	A		01/01/2019					
				Chrysene (C1-C4)	A		01/01/2008					
Copper (sediment)	A		01/01/2019									
DDT (tissue & sediment)	A		01/01/2019									
<i>Fish Consumption Advisory for DDT.</i>												
Dieldrin	A		01/01/2008									
Lead (sediment)	A		01/01/2019									
Mercury (sediment)	A		01/01/2019									

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WATER BODY NAME	CALIFORNIA WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Revolving Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED
<i>Historical use of pesticides and lubricants, stormwater runoff, aerial deposition, and historical discharges for metals.</i>							
				PCBs (Polychlorinated biphenyls) (tissue & sediment)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
				Phenanthrene	A	01/01/2008	
				Pyrene	A	01/01/2008	
				Sediment Toxicity	A	01/01/2019	
				Toxaphene (tissue)	A	01/01/2019	
				Zinc (sediment)	A	01/01/2019	
<i>Historical use of pesticides and lubricants, stormwater runoff, aerial deposition, and historical discharges for metals.</i>							
Los Angeles Harbor - Fish Harbor	40518000	91 Acres	5	Benzo(a)pyrene (3,4-Benzopyrene -7-d)	A	01/01/2008	
				Benzo[a]anthracene	A	01/01/2019	
				Chlordane	A	01/01/2019	
				Chrysene (C1-C4)	A	01/01/2019	
				Copper	A	01/01/2019	
				DDT	A	01/01/2019	
				(Dichlorodiphenyltrichloroethane)			
				Dibenz[a,h]anthracene	A	01/01/2019	
				Lead	A	01/01/2019	
				Mercury	A	01/01/2019	
				PAHs (Polycyclic Aromatic Hydrocarbons)	A	01/01/2019	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Los Angeles Harbor - Inner Cabrillo Beach Area	40512000	82 Acres	5	PCBs (Polychlorinated biphenyls) Phenanthrene Pyrene Sediment Toxicity Zinc	A A A A A	01/01/2019 01/01/2019 01/01/2019 01/01/2019 01/01/2019	
				DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
				<i>Fish Consumption Advisory for DDT.</i>			
				Indicator Bacteria	B		01/01/2004
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Los Angeles River Estuary (Queensway Bay)	40512000	207 Acres	5	Chlordane (sediment)	A	01/01/2019	
				<i>Historical use of pesticides and lubricants.</i>			
				DDT (sediment)	A	01/01/2019	
				<i>Historical use of pesticides and lubricants.</i>			
				PCBs (Polychlorinated biphenyls) (sediment)	A	01/01/2019	
				<i>Historical use of pesticides and lubricants.</i>			
				Sediment Toxicity	A	01/01/2019	
				Trash	B		07/24/2008

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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE OF AFFECTED WATERSHED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE	
						TMDL	COMPLETION	USEPA	TMDL
Los Angeles River Reach 1 (Estuary to Carson Street)	40512000	3.37 Miles	5	Ammonia	B				03/18/2004
				Cadmium	B				12/22/2005
				Coliform Bacteria	A		01/01/2009		
				Copper, Dissolved	B				12/22/2005
				Cyanide	A		01/01/2019		
				Diazinon	A		01/01/2019		
				Lead	B				12/22/2005
				Nutrients (Algae)	B				03/18/2004
				Trash	B				07/24/2008
				Zinc, Dissolved	B				12/22/2005
				pH	B				01/01/2003
Los Angeles River Reach 2 (Carson to Figueroa Street)	40515010	18.8 Miles	5	Ammonia	B				03/18/2004
				Coliform Bacteria	A		01/01/2009		
				Copper	B				12/22/2005
				Lead	B				12/22/2005
				Nutrients (Algae)	B				03/18/2004
				Oil	A		01/01/2019		
				Trash	B				07/24/2008
Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	40521000	7.94 Miles	4A	Ammonia	B				03/18/2004
				Copper	B				12/22/2005
				Lead	B				12/22/2005

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED INTEGRATED REPORT SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
				Nutrients (Algae)	B	01/01/2009	03/18/2004
				Trash	B		07/24/2008
Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)	40521000	11.06 Miles	5	Ammonia	B		03/18/2004
				Coliform Bacteria	A	01/01/2009	
				Copper	B		12/22/2005
				Lead	B		12/22/2005
				Nutrients (Algae)	B		03/18/2004
				Trash	B		07/24/2008
Los Angeles River Reach 5 ( within Sepulveda Basin)	40521000	1.9 Miles	5	Ammonia	B		03/18/2004
				Copper	B		12/22/2005
				Lead	B		12/22/2005
				Nutrients (Algae)	B		03/18/2004
				Oil	A	01/01/2019	
				Trash	B		07/24/2008
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	40521000	6.99 Miles	5	Coliform Bacteria	A	01/01/2009	
				Selenium	B		12/22/2005
Los Angeles/Long Beach Inner Harbor	40518000	3003 Acres	5	Beach Closures	A	01/01/2004	
				Benthic Community Effects	A	01/01/2019	

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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Los Angeles/Long Beach Outer Harbor (inside breakwater)	40512000	4042 Acres	5	Benzo(a)pyrene (3,4-Benzopyrene -7-d)	A	01/01/2021	
				Chrysene (C1-C4)	A	01/01/2021	
				Copper	A	01/01/2008	
				DDT	A	01/01/2019	
				(Dichlorodiphenyltrichloroethane)			
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				Sediment Toxicity	A	01/01/2009	
				Zinc	A	01/01/2008	
				DDT	A	01/01/2019	
				(Dichlorodiphenyltrichloroethane)			
Los Cerritos Channel	40515010	30.5 Acres	5	PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				Sediment Toxicity	A	01/01/2008	
				Ammonia	A	01/01/2019	
				Bis(2ethylhexyl)phthalate (DEHP)	A	01/01/2019	
				Chlordane (sediment)	A	01/01/2019	
				Coliform Bacteria	A	01/01/2019	
				Copper	A	01/01/2019	
				Lead	A	01/01/2019	
				Trash	A	01/01/2019	
				Zinc	A	01/01/2019	
Lunada Bay Beach	40511000	0.63 Miles	4A	Indicator Bacteria	B	01/01/2002	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Machado Lake (Harbor Park Lake)	40512000	44.98 Acres	5	Algae	B		03/11/2009
				Ammonia	B		03/11/2009
				ChemA (tissue)	A	01/01/2019	
				<i>Historical use of pesticides and lubricants.</i>			
				Chlordane (tissue)	A	01/01/2019	
				<i>Fish Consumption Advisory.</i>			
				DDT (tissue)	A	01/01/2019	
				<i>Fish Consumption Advisory.</i>			
				Dieldrin (tissue)	A	01/01/2019	
				Eutrophic	B		03/11/2009
				Odor	B		03/11/2009
				PCBs (Polychlorinated biphenyls) (tissue)	A	01/01/2019	
				Trash	B		03/06/2008
Malaga Cove Beach	40511000	0.39 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
				<i>Fish Consumption Advisory for DDT.</i>			
				Indicator Bacteria	B		01/01/2002
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Malibou Lake	40424000	39.51 Acres	4A	Algae	B		03/21/2003
				Eutrophic	B		03/21/2003
				Organic Enrichment/Low Dissolved Oxygen	B		03/21/2003



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Revised on July 07, 2009

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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE		
						TMDL	COMPLETION DATE	USEPA APPROVED	TMDL	
Malibu Beach	40421000	0.77 Miles	5	DDT (Dichlorodiphenyltrichloroethane e)	A		01/01/2019			
Malibu Creek	40421000	10.85 Miles	5	<i>Fish Consumption Advisory for DDT.</i> Indicator Bacteria	B				01/01/2002	
Malibu Lagoon	40421000	14.72 Acres	5	Benthic-Macroinvertebrate Bioassessments Coliform Bacteria Fish Barriers (Fish Passage) Invasive Species Nutrients (Algae) Scum/Foam-unnatural Sedimentation/Siltation Selenium Sulfates Trash Benthic Community Effects Coliform Bacteria Eutrophic Swimming Restrictions Viruses (enteric) pH	A A B A B A A A A A A C B B B B A		01/01/2021  01/01/2019 01/01/2021  01/01/2019 01/01/2019 01/01/2019 01/01/2019		01/01/2002  03/21/2003 03/21/2003	
Malibu Lagoon Beach (Surfrider)	40421000	1.01 Miles	5	<i>Possible sources might be septic systems, storm drains, and birds.</i> Coliform Bacteria	B					06/19/2003

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Revelant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Manhattan Beach	40512000	2 Miles	4A	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
Marina del Rey Harbor - Back Basins	40517000	390.91 Acres	5	<i>Fish Consumption Advisory for DDT.</i> PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	A	01/01/2019	
				Indicator Bacteria	B		01/01/2002
				Chlordane (tissue & sediment)	B		01/01/2005
				Copper (sediment)	B		01/01/2005
				DDT (tissue)	A	01/01/2005	
				<i>A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.</i>			
				Dieldrin (tissue)	A	01/01/2005	
				<i>A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.</i>			
				Fish Consumption Advisory	B		01/01/2005
				Indicator Bacteria	B		03/18/2004
				Lead (sediment)	B		01/01/2005
				PCBs (Polychlorinated biphenyls) (tissue & sediment)	B		01/01/2005
				<i>Historical use of pesticides, storm water runoff/aerial deposition from urban areas. Shellfish harvesting advisory for PCBs in tissue.</i>			
				Sediment Toxicity	B		01/01/2005
				Zinc (sediment)	B		01/01/2005

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Marina del Rey Harbor Beach	40517000	0.29 Miles	4A	Indicator Bacteria	B		03/18/2004
Matilija Creek Reach 1 (Jct. With N. Fork to Reservoir)	40220012	0.63 Miles	5	Fish Barriers (Fish Passage)	A	01/01/2019	
Matilija Creek Reach 2 (Above Reservoir)	40220010	14.52 Miles	5	Fish Barriers (Fish Passage)	A	01/01/2019	
Matilija Reservoir	40220012	120.89 Acres	5	Fish Barriers (Fish Passage)	A	01/01/2019	
McCoy Canyon Creek	40521000	4.02 Miles	5	Fecal Coliform Nitrate	A	01/01/2009	
				Nitrogen, Nitrate Selenium, Total	A	01/01/2019	12/22/2005
McGrath Beach	40311000	1.7 Miles	4A	Coliform Bacteria	B		11/20/2003
McGrath Lake	40311000	20.14 Acres	5	Chlordane (sediment) DDT (sediment) Dieldrin (sediment) <i>Historical use of pesticides and lubricants, storm water runoff/aerial deposition from agricultural fields.</i>	A	01/01/2019	
				Fecal Coliform PCBs (Polychlorinated biphenyls) (sediment) <i>Historical use of pesticides and lubricants, storm water runoff/aerial deposition from agricultural fields.</i>	A	01/01/2019	
				Sediment Toxicity	A	01/01/2019	

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WATER BODY NAME	CAL WATER WATERSHED	ESTIMATED INTEGRATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE
						TMDL	COMPLETION DATE	
							USEPA APPROVED	TMDL
Medea Creek Reach 1 (Lake to Confl. with Lindero)	40424000	2.57 Miles	5	Algae	B			03/21/2003
				Coliform Bacteria	B			01/01/2005
				Sedimentation/Siltation	A		01/01/2019	
				Selenium	A		01/01/2019	
				Trash	A		01/01/2019	
Medea Creek Reach 2 (Abv Confl. with Lindero)	40423000	5.41 Miles	5	Algae	B			03/21/2003
				Benthic-Macroinvertebrate Bioassessments	A		01/01/2021	
				Coliform Bacteria	B			01/01/2005
				Invasive Species	A		01/01/2021	
				Sedimentation/Siltation	A		01/01/2019	
				Selenium	A		01/01/2019	
				Trash	A		01/01/2019	
Mint Canyon Creek Reach 1 (Confl to Rowler Cyn)	40351000	8.11 Miles	4A	Nitrate and Nitrite	B			03/18/2004
Monrovia Canyon Creek	40531000	3.36 Miles	4A	Lead	B			12/22/2005
Munz Lake	40351000	6.57 Acres	5	Eutrophic	A		01/01/2019	
				Trash	B			02/27/2008
Nicholas Canyon Beach	40444000	1.65 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A		01/01/2019	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
<i>Fish Consumption Advisory for DDT.</i>							
Ormond Beach	40311000	3.1 Miles	5	Indicator Bacteria	B	01/01/2019	01/01/2002
Palo Comado Creek	40423000	6.76 Miles	4A	PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							
Palo Verde Shoreline Park Beach	40511000	0.24 Miles	5	Indicator Bacteria	A	01/01/2015	01/01/2005
<i>This listing includes the area of Ormond Beach at Oxnard Drain.</i>							
Paradise Cove Beach	40435000	1.66 Miles	5	Coliform Bacteria	B		06/19/2003
<i>Pesticides</i>							
<i>DDT (Dichlorodiphenyltrichloroethane)</i>							
<i>Fish consumption advisory for DDT.</i>							
Peck Road Park Lake	40531000	103.22 Acres	5	Fecal Coliform	B	01/01/2019	06/19/2003
<i>Fish consumption advisory for PCBs.</i>							
<i>Chlordane (tissue)</i>							
<i>DDT (tissue)</i>							
<i>Lead</i>							
<i>Odor</i>							
<i>Organic Enrichment/Low Dissolved Oxygen</i>							
<i>Trash</i>							

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Peninsula Beach	40311000	0.15 Miles	5	Indicator Bacteria <i>Area affected is beach area north of South Jetty.</i>	A	01/01/2003	
Piru Creek (from gaging station below Santa Felicia Dam to headwaters)	40342000	67 Miles	5	Chloride	A	01/01/2019	
Point Dume Beach	40435000	2.5 Miles	5	pH DDT (Dichlorodiphenyltrichloroethane) <i>Fish consumption advisory for DDT.</i>	A	01/01/2019	01/01/2002
Point Fermin Park Beach	40512000	1.6 Miles	5	Indicator Bacteria PCBs (Polychlorinated biphenyls) <i>Fish consumption advisory for PCBs.</i>	A	01/01/2019	
Point Vicente Beach	40511000	0.63 Miles	4A	DDT (Dichlorodiphenyltrichloroethane) <i>Fish consumption advisory for DDT.</i>	A	01/01/2019	
Pole Creek (trib to Santa Clara River Reach 3)	40331000	9.02 Miles	5	PCBs (Polychlorinated biphenyls) <i>Fish consumption advisory for PCBs.</i> Total Coliform Indicator Bacteria Sulfates	B		01/01/2002

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Port Hueneme Harbor (Back Basins)	40311000	64.8 Acres	4B	Total Dissolved Solids DDT (tissue)	A C	01/01/2019	
Port Hueneme Pier	40311000	0.33 Miles	5	PCBs (Polychlorinated biphenyls) (tissue)	C		
Portuguese Bend Beach	40511000	1.4 Miles	5	PCBs (Polychlorinated biphenyls) DDT (Dichlorodiphenyltrichloroethane)	A A	01/01/2019 01/01/2019	
Promenade Park Beach	40210000	0.58 Miles	5	Indicator Bacteria PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	B A A	01/01/2019	01/01/2002
Puddingstone Reservoir	40552000	243.08 Acres	5	Indicator Bacteria <i>Area affected is at south of drain at Figueroa Street.</i> Chlordane (tissue)	A A	01/01/2015 01/01/2019	
Puente Creek	40515010	5.8 Miles	5	DDT (tissue) Mercury (tissue) Organic Enrichment/Low Dissolved Oxygen PCBs (Polychlorinated biphenyls) (tissue) Indicator Bacteria	A A A A A	01/01/2019 01/01/2019 01/01/2019 01/01/2019 01/01/2021	

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Puerto Beach	40431000	0.5 Miles	5	Selenium DDT (Dichlorodiphenyltrichloroethan e) <i>Fish Consumption Advisory for DDT.</i>	A	01/01/2021	
Redondo Beach	40512000	1.49 Miles	5	Indicator Bacteria PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	B A	01/01/2019	01/01/2002
Resort Point Beach	40511000	0.15 Miles	4A	Coliform Bacteria	B		06/19/2003
Rincon Beach	40100010	0.38 Miles	5	DDT (Dichlorodiphenyltrichloroethan e) <i>Fish Consumption Advisory for DDT.</i>	A	01/01/2019	
Rio De Santa Clara/Oxnard Drain No. 3	40311000	1.92 Miles	5	PCBs (Polychlorinated biphenyls) <i>Fish Consumption Advisory for PCBs.</i>	A	01/01/2019	
				Indicator Bacteria	B		01/01/2002
				Indicator Bacteria	A	01/01/2015	
				<i>Area affected is 50 yards south of mouth of Rincon Creek.</i>			
				ChemA (tissue)	A	01/01/2019	
				Chlordane (tissue)	A	01/01/2019	
				DDT (tissue)	A	01/01/2019	
				Nitrogen	B		06/20/2003



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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE OF AFFECTED WATERSHED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE	
							USEPA	TMDL APPROVED
Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)	40515010	4.55 Miles	5	PCBs (Polychlorinated biphenyls) (tissue) Sediment Toxicity Toxaphene (tissue) Coliform Bacteria	A	01/01/2019		
				Copper	B			12/22/2005
				Cyanide	A	01/01/2021		
				Lead	B			12/22/2005
				Toxicity	A	01/01/2021		
				Trash	B			07/24/2008
				Zinc	B			12/22/2005
				pH	B			03/18/2004
Rio Hondo Reach 2 (At Spreading Grounds)	40515010	4.92 Miles	5	Coliform Bacteria	A	01/01/2009		
Robert H. Meyer Memorial Beach	40441000	1.17 Miles	5	Beach Closures	B			06/19/2003
				DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019		
				<i>Fish Consumption Advisory for DDT.</i>				
				PCBs (Polychlorinated biphenyls)	A	01/01/2019		
				<i>Fish Consumption Advisory for PCBs.</i>				

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Royal Palms Beach	40511000	1.14 Miles	5	DDT (Dichlorodiphenyltrichloroethane) e) <i>Fish consumption advisory for DDT.</i>	A	01/01/2019	01/01/2002
				Indicator Bacteria	B		
				PCBs (Polychlorinated biphenyls) <i>Fish consumption advisory for PCBs.</i>	A	01/01/2019	
San Antonio Creek (Tributary to Ventura River Reach 4)	40220023	9.79 Miles	5	Indicator Bacteria	A	01/01/2021	
				Nitrogen	A	01/01/2019	
				Total Dissolved Solids	A	01/01/2023	
San Buenaventura Beach	40210000	1.8 Miles	5	Indicator Bacteria	A	01/01/2015	
San Gabriel River Estuary	40516000	3.36 Miles	5	Copper	B		03/27/2007
				Dioxin	A	01/01/2021	
				Nickel	A	01/01/2021	
				Oxygen, Dissolved	A	01/01/2021	
San Gabriel River Reach 1 (Estuary to Firestone)	40515010	6.37 Miles	5	Coliform Bacteria	A	01/01/2019	
				pH	A	01/01/2009	

*This listing includes the area of San Buenaventura Beach at San Jon Rd.*

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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE	
						TMDL	COMPLETION	USEPA APPROVED	TMDL
San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)	40515010	12.28 Miles	5	Coliform Bacteria	A		01/01/2011		
San Gabriel River Reach 3 (Whittier Narrows to Ramona)	40531000	7.16 Miles	5	Indicator Bacteria	A		01/01/2021		
					B				03/27/2007
San Gabriel River, East Fork	40543000	5.87 Miles	4A	Trash	B				01/01/1999
San Jose Creek Reach 1 (SG Confluence to Temple St.)	40531000	2.67 Miles	5	Ammonia	C				
San Jose Creek Reach 2 (Temple to I-10 at White Ave.)	40531000	17.27 Miles	5	Benthic-Macroinvertebrate Bioassessments	A		01/01/2021		
				Coliform Bacteria	A		01/01/2009		
				Total Dissolved Solids	A		01/01/2021		
				Toxicity	A		01/01/2007		
				pH	A		01/01/2021		
San Pedro Bay Near/Off Shore Zones	40512000	8173 Acres	5	Chlordane	A		01/01/2019		
				DDT (tissue & sediment)	A		01/01/2019		

*Fish Consumption Advisory for DDT.*

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish consumption advisory for PCBs.</i>			
Santa Clara River Estuary	40311000	49.06 Acres	5	Sediment Toxicity	A	01/01/2009	
				ChemA	A	01/01/2019	
				Coliform Bacteria	A	01/01/2019	
				Nitrogen, Nitrate	A	01/01/2021	
				Toxaphene	A	01/01/2019	
				Toxicity	A	01/01/2019	
Santa Clara River Estuary Beach-Surfers Knoll	40311000	1 Miles	5	Indicator Bacteria	A	01/01/2021	
Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)	40311000	10 Miles	5	Toxicity	A	01/01/2019	
Santa Clara River Reach 3 (Freeman Diversion to A Street)	40331000	31 Miles	5	Ammonia	B		03/18/2004
				Chloride	B		01/01/2002
				Total Dissolved Solids	A	01/01/2023	
				Toxicity	A	01/01/2021	

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WATER BODY NAME	CALIFORNIA WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Santa Clara River Reach 5 (Blue Cut gaging station to West Pier Hwy 99 Bridge) (was named Santa Clara River Reach 7 on 2002 303(d) list)	40351000	9.4 Miles	5	Chloride	B		01/01/2005
<p><i>Chloride was relisted by USEPA in 2002.</i></p>							
				Chlorodibromomethane	A	01/01/2021	
				Coliform Bacteria	A	01/01/2019	
				Dichlorobromomethane	A	01/01/2021	
				Iron	A	01/01/2021	
				Specific-Conductivity	A	01/01/2021	
Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)	40351000	5.2 Miles	5	Benthic-Macroinvertebrate Bioassessments	A	01/01/2021	
<p><i>Chloride was relisted by USEPA in 2002.</i></p>							
				Chloride	B		01/01/2005
				Chlorodibromomethane	A	01/01/2021	
				Chlorpyrifos	A	01/01/2019	
				Coliform Bacteria	A	01/01/2019	
				Copper	A	01/01/2021	
				Diazinon	A	01/01/2019	
				Dichlorobromomethane	A	01/01/2021	

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WATER BODY NAME	CAL WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Santa Clara River Reach 7 ( Bouquet Canyon Rd to above Lang Gaging Station) ( was named Santa Clara River Reach 9 on 2002 303(d) list)	40351000	21 Miles	5	Iron Specific Conductance Toxicity Coliform Bacteria	A A A A	01/01/2021 01/01/2021 01/01/2019 01/01/2019	
Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)	40341000	6.2 Miles	5	Boron	A	01/01/2019	
Santa Fe Dam Park Lake	40531000	19.76 Acres	5	Specific Conductance Sulfates Total Dissolved Solids Copper	A A A A	01/01/2021 01/01/2019 01/01/2021 01/01/2019	
Santa Monica Bay Offshore/Nearshore	40513000	146645 Acres	5	Lead pH DDT (tissue & sediment)	A A A A	01/01/2019 01/01/2019 01/01/2019 01/01/2019	

Centered on Palos Verdes Shelf.

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WATER BODY NAME	CALIFORNIA WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant/Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE	
							USEPA APPROVED	TMDL
				Debris	A	01/01/2019		
				Fish Consumption Advisory	A	01/01/2019		
				PCBs (Polychlorinated biphenyls) (tissue & sediment)	A	01/01/2019		
				Sediment Toxicity	A	01/01/2019		
Santa Monica Beach	40513000	3.04 Miles	4A	Indicator Bacteria	B			01/01/2002
Santa Monica Canyon	40513000	2.7 Miles	5	Indicator Bacteria Lead	B A			01/01/2002 01/01/2019
Sawpit Creek	40531000	3.9 Miles	5	Bis(2ethylhexyl)phthalate (DEHP)	A	01/01/2019		
Sea Level Beach	40441000	0.21 Miles	5	Fecal Coliform DDT (Dichlorodiphenyltrichloroethane)	A A	01/01/2019 01/01/2019		
				<i>Fish Consumption Advisory for DDT.</i>				
				Indicator Bacteria	B			01/01/2002
				PCBs (Polychlorinated biphenyls)	A	01/01/2019		
				<i>Fish Consumption Advisory for PCBs.</i>				
Sepulveda Canyon	405.13	0.83 Miles	5	Ammonia Copper Indicator Bacteria Lead Selenium Zinc	A B B B B B	01/01/2019		12/22/2005 02/20/2007 12/22/2005 12/22/2005 12/22/2005 12/22/2005

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WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA TMDL APPROVED
Sespe Creek (from 500 ft below confluence with Little Sespe Cr to headwaters)	40332020	54 Miles	5	Chloride	A	01/01/2019	
Solstice Canyon Creek	40432000	4.8 Miles	5	pH	A	01/01/2019	
Stokes Creek	40422020	4.72 Miles	4A	Invasive Species	A	01/01/2021	01/01/2005
Surfers Point at Seaside	40210000	0.4 Miles	5	Coliform Bacteria	B		
				Indicator Bacteria	A	01/01/2015	
<i>Area affected is the end of the access path via a wooden gate.</i>							
Topanga Beach	40413000	2.5 Miles	5	Coliform Bacteria	B		06/19/2002
				DDT	A	01/01/2019	
				(Dichlorodiphenyltrichloroethane)			
				<i>Fish Consumption Advisory for DDT.</i>			
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
				<i>Fish Consumption Advisory for PCBs.</i>			
Topanga Canyon Creek	40411000	8.55 Miles	5	Lead	A	01/01/2019	
Torrance Beach	40512000	1.08 Miles	4A	Coliform Bacteria	B		01/01/2002
Torrance Carson Channel	40512000	3.39 Miles	5	Coliform Bacteria	A	01/01/2007	
Torrey Canyon Creek	40341000	1.74 Miles	4A	Copper	A	01/01/2019	
				Lead	A	01/01/2019	
				Nitrate and Nitrite	B		03/18/2004



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WATER BODY NAME	CAL WATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED		DATE	
						TMDL	COMPLETION DATE	USEPA APPROVED	TMDL
Trancas Beach (Broad Beach)	40437000	1.74 Miles	5	DDT (Dichlorodiphenyltrichloroethane) e)	A		01/01/2019		
				<i>Fish Consumption Advisory for DDT.</i>					
				Fecal Coliform	B				01/01/2002
				PCBs (Polychlorinated biphenyls)	A	01/01/2019			
				<i>Fish Consumption Advisory for PCBs.</i>					
Triunfo Canyon Creek Reach 1	40424000	2.51 Miles	5	Lead	A	01/01/2019			
				Mercury	A	01/01/2019			
				Sedimentation/Siltation	A	01/01/2019			
Triunfo Canyon Creek Reach 2	40424000	3.32 Miles	5	Benthic-Macroinvertebrate Bioassessments	A	01/01/2021			
				Lead	A	01/01/2019			
				Mercury	A	01/01/2019			
				Sedimentation/Siltation	A	01/01/2019			
Tujunga Wash (LA River to Hansen Dam)	40521000	9.68 Miles	5	Ammonia	B				03/18/2004
				Coliform Bacteria	A	01/01/2009			
				Copper	B				12/22/2005
				Trash	B				07/24/2008
Venice Beach	40513000	2.54 Miles	4A	Indicator Bacteria	B				01/01/2002
Ventura Harbor: Ventura Keys	40311000	178.78 Acres	5	Coliform Bacteria	A	01/01/2019			

2008 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SECTIONS

WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Ventura Marina Jetties	40311000	0.69 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
Ventura River Estuary	40210011	0.2 Miles	5	PCBs (Polychlorinated biphenyls)	A	01/01/2019	
Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)	40210011	4.49 Miles	5	Algae Eutrophic Total Coliform <i>Stables and horse property may be the sources.</i> Trash	A A A B	01/01/2019	02/27/2008
Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)	40210011	2.82 Miles	5	Indicator Bacteria	A	01/01/2021	
Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)	40220021	19.22 Miles	5	Pumping Water Diversion Pumping	A A A	01/01/2019	
Verdugo Wash Reach 1 (LA River to Verdugo Rd.)	40521000	2.02 Miles	5	Water Diversion Coliform Bacteria	A A	01/01/2019	
				Copper Trash	A B	01/01/2021	07/24/2008

2008 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SECTIONS

WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
Verdugo Wash Reach 2 (Above Verdugo Road)	40524000	7.55 Miles	5	Coliform Bacteria	A	01/01/2009	
Walnut Creek Wash (Drains from Puddingstone Res)	40531000	11.7 Miles	5	Trash Benthic-Macroinvertebrate Bioassessments	B A	01/01/2021	07/24/2008
Westlake Lake	40425000	118.98 Acres	5	Indicator Bacteria pH Algae	A A B	01/01/2021 01/01/2007	03/21/2003
Wheeler Canyon/Todd Barranca	40321000	10.09 Miles	5	Nitrate and Nitrite	B		03/18/2004
Whites Point Beach	40511000	1.11 Miles	5	Sulfates Total Dissolved Solids DDT (Dichlorodiphenyltrichloroethane) e) <i>Fish Consumption Advisory for DDT.</i> Indicator Bacteria PCBs (Polychlorinated biphenyls)	A A A B B A A	01/01/2019 01/01/2019 01/01/2019	03/21/2003 03/21/2003 03/21/2003 01/01/2002

2008 CWA SECTION 303(d) LIST OF WATER QUALITY LIMITED SECTIONS

WATER BODY NAME	CALWATER WATERSHED	ESTIMATED SIZE AFFECTED	INTEGRATED REPORT CATEGORY	POLLUTANT <i>Relevant Notes</i>	TMDL REQUIREMENT STATUS*	EXPECTED TMDL COMPLETION DATE	DATE USEPA APPROVED TMDL
<i>Fish Consumption Advisory for PCBs.</i>							
Will Rogers Beach	40513000	3.01 Miles	4A	Indicator Bacteria	B	01/01/2002	
Wilmington Drain	40342000	0.56 Miles	5	Coliform Bacteria	A	01/01/2007	
				Copper	A	01/01/2019	
				Lead	A	01/01/2019	
Zuma Beach (Westward Beach)	40436000	1.59 Miles	5	DDT (Dichlorodiphenyltrichloroethane)	A	01/01/2019	
<i>Fish Consumption Advisory for DDT.</i>							
				Indicator Bacteria	B		01/01/2002
				PCBs (Polychlorinated biphenyls)	A	01/01/2019	
<i>Fish Consumption Advisory for PCBs.</i>							

**Item 13**

**Table of Contents for Item 13 on the Agenda of  
the 528<sup>th</sup>  
Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

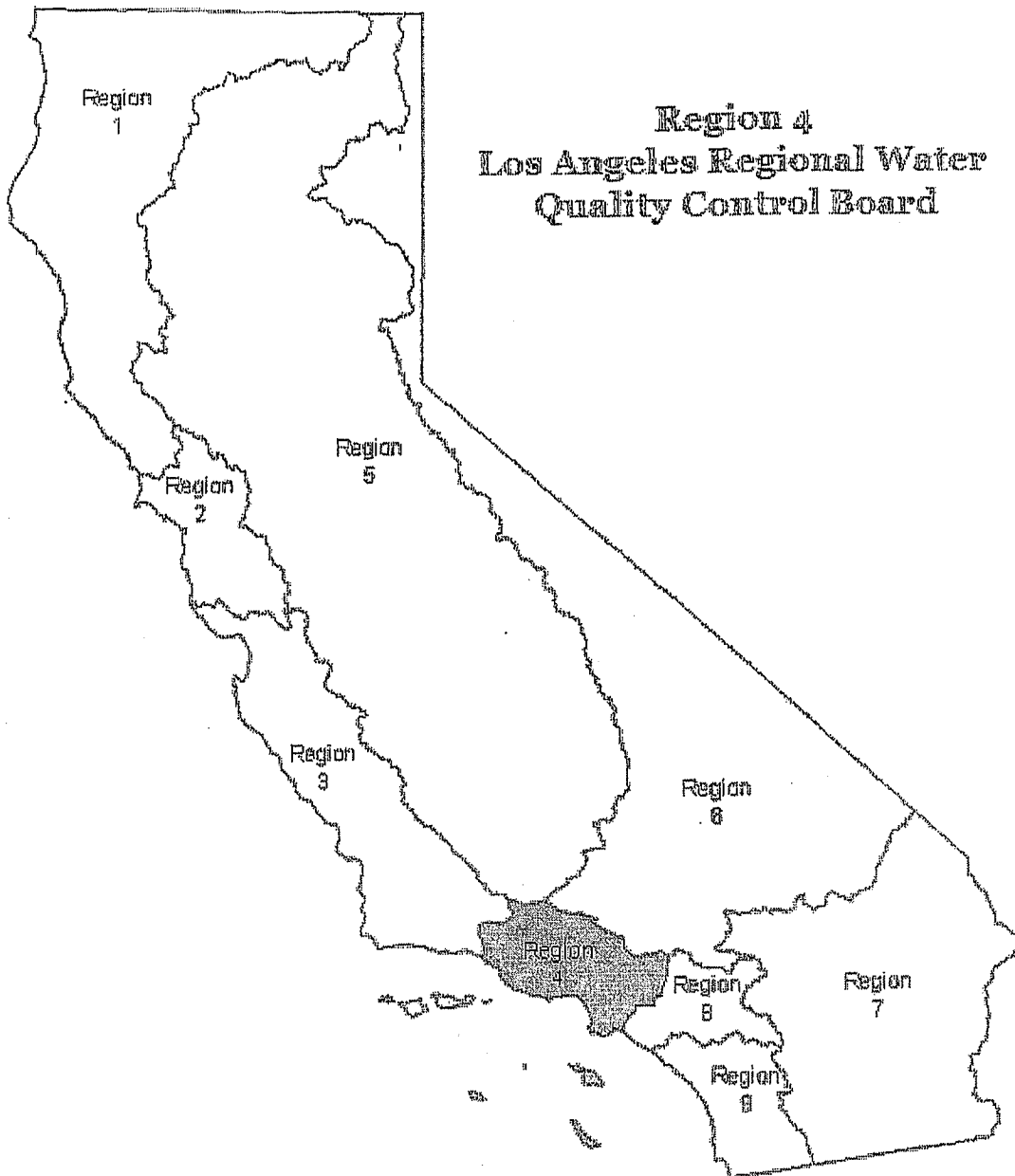
**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**APPENDIX G**

**TABLE OF CONTENTS:  
FACT SHEETS FOR REVISED DECISIONS**

# APPENDIX G

## Draft 2008 California 303(d)/305(b) Integrated Report Supporting Information



Draft

# Draft 2008 California 303(d)/305(b) Integrated Report

## Supporting Information

### REGIONAL BOARD 4 - LOS ANGELES REGION

- **New or Revised Fact Sheets**

These lines of evidence and/or decisions, which were developed during the last listing cycle, are new or have been revised.

- **Original Fact Sheets**

These lines of evidence and/or decisions were developed during the last listing cycle.

## New or Revised Fact Sheets

### Delist from 303(d) list (TMDL required list)

- Ballona Creek
  - Silver (sediment) (4341)
- Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)
  - Boron (7544)
  - Sulfates (7546)
  - Total Dissolved Solids (7548)
- Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)
  - Dacthal (sediment) (7053)
- Channel Islands Harbor
  - Lead (sediment) (7048)
  - Zinc (sediment) (7049)
- Coyote Creek
  - Zinc (4967)
- Dominguez Channel (lined portion above Vermont Ave)
  - Dieldrin (tissue) (7180)
  - Sediment Toxicity (6851)
- Lake Calabasas
  - DDT (tissue) (7032)

- Los Angeles Harbor - Inner Cabrillo Beach Area
  - Copper (5382)
- Los Angeles River Estuary (Queensway Bay)
  - Lead (sediment) (5387)
  - Zinc (sediment) (7363)
- Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)
  - 1,1-Dichloroethylene (DCE)/Vinylidene Chloride (7397)
  - Tetrachloroethylene/PCE (7400)
  - Trichloroethylene/TCE (7401)
- Malibu Lagoon
  - Shellfish Harvesting Advisory (7253)
- San Jose Creek Reach 1 (SG Confluence to Temple St.)
  - Selenium (6063)
- San Pedro Bay Near/Off Shore Zones
  - Chromium (sediment) (7290)
  - Copper (sediment) (7291)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (sediment) (7292)
  - Zinc (sediment) (7293)
- Walnut Creek Wash (Drains from Puddingstone Res)
  - Toxicity (7325)
- Wilmington Drain
  - Ammonia (7114)

Delist from 303(d) list (being addressed by USEPA approved TMDL)

- Burbank Western Channel
  - Ammonia (4240)
- Rio Hondo Reach 2 (At Spreading Grounds)
  - Ammonia (4154)
- Santa Clara River Reach 5 (Blue Cut gaging station to West Pier Hwy 99 Bridge) (was named Santa Clara River Reach 7 on 2002 303(d) list)
  - Ammonia (7166)
  - Nitrate and Nitrite (4102)
- Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)
  - Ammonia (4205)



Do Not Delist from 303(d) list (TMDL required list)

- Alamos Bay
  - Indicator Bacteria (5897)
  
- Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)
  - Indicator Bacteria (4535)
  
- Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)
  - Indicator Bacteria (4542)
  
- Colorado Lagoon
  - Indicator Bacteria (6247)
  
- Coyote Creek
  - Diazinon (5096)
  - Indicator Bacteria (7120)
  - pH (4548)
  
- Dominguez Channel (lined portion above Vermont Ave)
  - Copper (5194)
  - Lead (5186)
  - Zinc (5217)
  
- Long Beach City Beach
  - Indicator Bacteria (5898)
  
- Los Angeles River Estuary (Queensway Bay)
  - Sediment Toxicity (6683)
  
- Los Angeles/Long Beach Inner Harbor
  - Sediment Toxicity (6809)
  
- Los Cerritos Channel
  - Ammonia (7450)
  
- Marina del Rey Harbor - Back Basins
  - DDT (tissue) (7328)
  - Dieldrin (tissue) (6816)
  
- Ormond Beach
  - Indicator Bacteria (4850)
  
- Rincon Beach
  - Indicator Bacteria (4148)
  
- San Buenaventura Beach
  - Indicator Bacteria (4864)
  
- San Gabriel River Reach 1 (Estuary to Firestone)

- Coliform Bacteria (7046)
  - pH (4806)
- San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)
  - Coliform Bacteria (4626)
- San Jose Creek Reach 1 (SG Confluence to Temple St.)
  - Coliform Bacteria (7050)
- San Pedro Bay Near/Off Shore Zones
  - Sediment Toxicity (6684)
- Santa Clara River Reach 3 (Freeman Diversion to A Street)
  - Total Dissolved Solids (5708)

Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)

- Ballona Creek Estuary
  - Sediment Toxicity (6027)
- Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)
  - DDT (tissue & sediment) (5509)
- Marina del Rey Harbor - Back Basins
  - Sediment Toxicity (4465)

Do Not Delist from 303(d) list (being addressed with action other than TMDL)

- Coyote Creek
  - Ammonia (7354)

Do Not List on 303(d) list (TMDL required list)

- Artesia-Norwalk Drain
  - Copper (9946)
- Ballona Creek Estuary
  - Antimony | Arsenic | Benzo(a)pyrene (3,4-Benzopyrene -7-d) | Benzof[a]anthracene | Chromium (total) | Chrysene (C1-C4) | Dibenz[a,h]anthracene | Mercury | Phenanthrene | Pyrene (7584)
  - Toxicity (7641)
- Bull Creek
  - Toxicity (16475)

- Burbank Western Channel
  - Toxicity (16482)
- Cold Creek
  - Invasive Species (16623)
- Compton Creek
  - Toxicity (16468)
- County Line Beach
  - Indicator Bacteria (16238)
- Coyote Creek
  - Chloride (11170)
  - Cyanide (4407)
  - Fluoride (11285)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (11298)
  - Nitrogen, Nitrite (4408)
  - Oxygen, Dissolved (11281)
  - Pentachlorophenol (PCP) (11383)
  - Selenium (4339)
- Coyote Creek, North Fork
  - Copper (13552)
  - Zinc (13352)
- Deer Creek Beach
  - Indicator Bacteria (16239)
- Emma Woods State Beach
  - Indicator Bacteria (16252)
- Faria County Park Beach
  - Indicator Bacteria (16253)
- Hobson County Park
  - Indicator Bacteria (16254)
- Hollywood Beach
  - Indicator Bacteria (16255)
- La Conchita Beach
  - Indicator Bacteria (16256)
- Los Angeles Harbor - Cabrillo Marina
  - Sediment Toxicity (6007)
- Los Angeles Harbor - Inner Cabrillo Beach Area
  - Sediment Toxicity (16651)
- Malibu Creek
  - Copper, Dissolved (13730)

- Ammonia (11607)
- Malibu Lagoon
  - Antimony | Arsenic | Benzo[a]pyrene (B[a]aP) | Benzo[a]anthracene | Chrysene (C1-5) | Copper | Dibenz[a,h]anthracene | Lead | Phenanthrene | Pyrene | Zinc (16282)
  - Sediment Toxicity (16286)
- Mandos Cove Beach
  - Indicator Bacteria (16267)
- Marina Park Beach
  - Indicator Bacteria (16268)
- Matilija Creek Reach 1 (Jct. With N. Fork to Reservoir)
  - Indicator Bacteria (16423)
- Matilija Creek Reach 2 (Above Reservoir)
  - Indicator Bacteria (16288)
- Matilija Creek, North Fork
  - Indicator Bacteria (16440)
  - Total Dissolved Solids (16466)
- Mussel Shoals Beach
  - Indicator Bacteria (16266)
- Oil Piers Beach
  - Indicator Bacteria (16269)
- Oxnard Beach
  - Indicator Bacteria (16270)
- Oxnard Beach Park
  - Indicator Bacteria (16271)
- Point Mugu Beach
  - Indicator Bacteria (16272)
- Port Hueneme Beach Park
  - Indicator Bacteria (16273)
- San Gabriel River Reach 1 (Estuary to Firestone)
  - Ammonia (4168)
- San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)
  - Chloride (4614)
  - Nitrogen, Nitrite (12071)
- San Gabriel River Reach 3 (Whittier Narrows to Ramona)
  - Lead (12206)

- Santa Clara River Estuary
  - Arsenic (8830)
- Santa Clara River Reach 5 (Blue Cut gaging station to West Pier Hwy 99 Bridge) (was named Santa Clara River Reach 7 on 2002 303(d) list)
  - DDT (Dichlorodiphenyltrichloroethane) (9056)
  - PCBs (Polychlorinated biphenyls) (5092)
- Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)
  - Bis(2ethylhexyl)phthalate (DEHP) (9451)
- Seaside Wilderness Park Beach
  - Indicator Bacteria (16274)
- Silverstrand Beach
  - Indicator Bacteria (16276)
- Solimar Beach
  - Indicator Bacteria (16277)
- South Jetty Beach
  - Indicator Bacteria (16278)
- Staircase Beach (Leo Carillo Beach, North of County Line)
  - Indicator Bacteria (16279)
- Sycamore Cove Beach
  - Indicator Bacteria (16280)
- Thornhill Broome Beach
  - Indicator Bacteria (16281)
- Triunfo Canyon Creek Reach 1
  - Invasive Species (16626)
- Tujunga Wash (LA River to Hansen Dam)
  - Toxicity (16473)
- Tuna Canyon Creek
  - Nitrate (16393)
- Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)
  - Indicator Bacteria (13179)
  - Total Dissolved Solids (13395)
- Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)
  - Total Dissolved Solids (13398)
- Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)
  - Indicator Bacteria (13182)

Insert Under Santa Clara River Reach 5 and Santa Clara River Reach 6;  
Chlorodibromomethane,  
Dichlorobromomethane,  
Specific Conductance

- Total Dissolved Solids (13256)
- Walnut Creek Wash (Drains from Puddingstone Res)
  - Copper, Dissolved (9496)
  - Lead (9491)

List on 303(d) list (TMDL required list)

- Arroyo Seco Reach 1 (LA River to West Holly Ave.)
  - Benthic-Macroinvertebrate Bioassessments (17212)
- Artesia-Norwalk Drain
  - Indicator Bacteria (10026)
  - Selenium (9947)
- Bull Creek
  - Indicator Bacteria (16412)
- Burbank Western Channel
  - Indicator Bacteria (4356)
  - Selenium (16395)
- Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)
  - Trash (17169)
- Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)
  - Trash (10423)
- Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)
  - Trash (17171)
- Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)
  - Trash (17172)
- Calleguas Creek Reach 10 (Conejo Creek (Hill Canyon)-was part of Conejo Crk Reaches 2 & 3, and lower Conejo Crk/Arroyo Conejo N Fk on 1998 303d list)
  - Trash (17170)
- Canada Larga (Ventura River Watershed)
  - Total Dissolved Solids (13212)
- Compton Creek
  - Benthic-Macroinvertebrate Bioassessments (17213)
- Coyote Creek
  - ~~Benthic-Macroinvertebrate Bioassessments (17214)~~
- Coyote Creek, North Fork
  - Indicator Bacteria (13921)

- Selenium (14116)
- Dominguez Channel (lined portion above Vermont Ave)
  - Dioxin (11842)
  - Toxicity (16354)
- Dominguez Channel Estuary (unlined portion below Vermont Ave)
  - Sediment Toxicity (16600)
- Las Virgenes Creek
  - Benthic-Macroinvertebrate Bioassessments (17207)
  - Invasive Species (16621)
- Lindero Creek Reach 1
  - Benthic-Macroinvertebrate Bioassessments (17208)
  - Invasive Species (16624)
- Los Angeles Harbor - Cabrillo Marina
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (16616)
- Los Angeles/Long Beach Inner Harbor
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (16662)
  - Chrysene (C1-CA) (16663)
- Malibu Creek
  - Benthic-Macroinvertebrate Bioassessments (17209)
  - Invasive Species (16618)
- Medea Creek Reach 2 (Abv Confl. with Lindero)
  - Benthic-Macroinvertebrate Bioassessments (17210)
  - Invasive Species (16626)
- Promenade Park Beach
  - Indicator Bacteria (4254)
- Puente Creek
  - Indicator Bacteria (14109)
  - Selenium (14116)
- Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)
  - Cyanide (16391)
  - Toxicity (16469)
- San Antonio Creek (Tributary to Ventura River Reach 4)
  - Indicator Bacteria (13186)
  - Total Dissolved Solids (13184)
- San Gabriel River Estuary
  - Dioxin (11842)
  - Nickel (11984)
  - Oxygen, Dissolved (11995)

- San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)
  - Cyanide (12167)
- San Gabriel River Reach 3 (Whittier Narrows to Ramona)
  - Indicator Bacteria (12248)
- San Jose Creek Reach 1 (SG Confluence to Temple St.)
  - Benthic-Macroinvertebrate Bioassessments (17215)
  - Total Dissolved Solids (9944)
  - pH (9945)
- Santa Clara River Estuary
  - Nitrogen Nitrate (8831)
  - Toxicity (8672)
- Santa Clara River Estuary Beach-Surfers Knoll
  - Indicator Bacteria (16327)
- Santa Clara River Reach 3 (Freeman Diversion to A Street)
  - Toxicity (10524)
- Santa Clara River Reach 5 (Blue Cut gaging station to West Pier Hwy 99 Bridge) (was named Santa Clara River Reach 7 on 2002 303(d) list)
  - ~~Chlorodibromomethane (9808)~~
  - ~~Dichlorobromomethane (9858)~~
  - Iron (9302)
  - ~~Specific Conductivity (9316)~~
- Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)
  - Benthic-Macroinvertebrate Bioassessments (17217)
  - ~~Chlorodibromomethane (9455)~~
  - Copper (9431)
  - ~~Dichlorobromomethane (9456)~~
  - Iron (9449)
  - ~~Specific Conductance (9490)~~
- Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)
  - Specific Conductance (9318)
  - Total Dissolved Solids (9317)
- Solstice Canyon Creek
  - Invasive Species (16622)
- Surfes Point at Seaside
  - Indicator Bacteria (4149)
- Triunfo Canyon Creek Reach 2
  - Benthic-Macroinvertebrate Bioassessments (17211)
- Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)
  - Indicator Bacteria (13171)



- Verdugo Wash Reach 1 (LA River to Verdugo Rd.)
  - Chloride (6978)
- Walnut Creek Wash (Drains from Puddingstone Res)
  - Benthic Macroinvertebrate Bioassessments (17216)
  - Indicator Bacteria (6192)

List on 303(d) list (being addressed by USEPA approved TMDL)

- Arroyo Seco Reach 1 (LA River to West Holly Ave.)
  - Trash (7181)
- Arroyo Seco Reach 2 (Figueroa St. to Riverside Dr.)
  - Trash (7188)
- Brown Barranca/Long Canyon
  - Nitrate and Nitrite (4211)
- Burbank Western Channel
  - Trash (7528)
- Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)
  - Endosulfan (tissue) (6196)
- Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)
  - ChemA (tissue) (7355)
  - Endosulfan (tissue) (6712)
- Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)
  - Chloride (7538)
  - Total Dissolved Solids (7841)
- Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)
  - ChemA (tissue) (7140)
  - Endosulfan (tissue & sediment) (6721)
  - Trash (6977)
- Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)
  - ChemA (tissue) (6753)
  - Endosulfan (tissue & sediment) (7101)
  - Trash (6973)
- Calleguas Creek Reach 6 ( was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)
  - Chloride (6979)
  - Sulfates (6980)
  - Total Dissolved Solids (6981)

- Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)
  - Boron (6982)
  - Chloride (6983)
  - Sulfates (6984)
  - Total Dissolved Solids (6985)
  
- Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)
  - Boron (6986)
  - Chloride (6987)
  - Sulfates (6988)
  - Total Dissolved Solids (6989)
  
- Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)
  - ChemA (tissue) (7103)
  - Endosulfan (tissue) (7138)
  - Lindane/gamma-Hexachlorocyclohexane (gamma-HCH) (tissue) (7139)
  - Sulfates (6990)
  - Total Dissolved Solids (6991)
  
- Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)
  - ChemA (tissue) (6812)
  - Chloride (6993)
  - Endosulfan (tissue) (6920)
  - Sulfates (6994)
  - Total Dissolved Solids (6995)
  
- Calleguas Creek Reach 10 (Conejo Creek (Hill Canyon)-was part of Conejo Crk Reaches 2 & 3, and lower Conejo Crk/Arroyo Conejo N Fk on 1998 303d list)
  - ChemA (tissue) (7204)
  - Chloride (6996)
  - Endosulfan (tissue) (6905)
  - Sulfates (6998)
  - Total Dissolved Solids (6999)
  
- Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)
  - ChemA (tissue) (6887)
  - Endosulfan (tissue) (6889)
  - Sulfates (7000)
  - Total Dissolved Solids (7028)
  
- Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)
  - Sulfates (7029)
  - Total Dissolved Solids (7030)
  
- Calleguas Creek Reach 13 (Conejo Creek South Fork, was Conejo Cr Reach 4 and part of Reach 3 on 1998 303d list)
  - ChemA (tissue) (6914)
  - Chloride (4557)
  - Endosulfan (tissue) (6931)
  - Sulfates (7031)
  - Total Dissolved Solids (7036)
  
- Channel Islands Harbor Beach
  - Indicator Bacteria (7078)

- Compton Creek
  - Trash (6830)
- Coyote Creek
  - Copper, Dissolved (4549)
  - Lead (4518)
- Elizabeth Lake
  - Trash (7530)
- Fox Barranca (tributary to Calleguas Creek Reach 6)
  - Boron (7539)
  - Sulfates (7540)
  - Total Dissolved Solids (7542)
- Hobie Beach (Channel Islands Harbor)
  - Indicator Bacteria (5258)
- Lake Hughes
  - Trash (7314)
- Lake Lindero
  - Algae (7316)
  - Eutrophic (7319)
  - Odor (7320)
- Lake Sherwood
  - Algae (7329)
  - Ammonia (7330)
  - Eutrophic (7332)
  - Organic Enrichment/Low Dissolved Oxygen (7024)
- Las Virgenes Creek
  - Nutrients (Algae) (7059)
  - Organic Enrichment/Low Dissolved Oxygen (7108)
  - Scum/Foam-unnatural (7109)
- Legg Lake
  - Trash (7231)
- Lindero Creek Reach 1
  - Algae (7287)
  - Scum/Foam-unnatural (7333)
- Lindero Creek Reach 2 (Above Lake)
  - Algae (7340)
  - Scum/Foam-unnatural (7343)
- Los Angeles River Estuary (Queensway Bay)
  - Trash (6815)
- Los Angeles River Reach 1 (Estuary to Carson Street)

- Trash (4121)
- Los Angeles River Reach 2 (Carson to Figueroa Street)
  - Trash (4109)
- Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)
  - Trash (4120)
- Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)
  - Trash (4122)
- Los Angeles River Reach 5 ( within Sepulveda Basin)
  - Trash (5418)
- Machado Lake (Harbor Park Lake)
  - Algae (7121)
  - Ammonia (7122)
  - Eutrophic (7124)
  - Odor (7125)
  - Trash (7239)
- Malibou Lake
  - Algae (7242)
  - Eutrophic (7243)
  - Organic Enrichment/Low Dissolved Oxygen (7244)
- Malibu Creek
  - Nutrients (Algae) (7247)
  - Scum/Foam-unnatural (7248)
- Malibu Lagoon
  - Eutrophic (7252)
  - Swimming Restrictions (7278)
  - Viruses (enteric) (7281)
- Medea Creek Reach 1 (Lake to Confl. with Lindero)
  - Algae (7338)
- Medea Creek Reach 2 (Abv Confl. with Lindero)
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- Mint Canyon Creek Reach 1 (Confl to Rowler Cyn)
  - Nitrate and Nitrite (4209)
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- Robert H. Meyer Memorial Beach
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- Verdugo Wash Reach 1 (LA River to Verdugo Rd.)
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- Verdugo Wash Reach 2 (Above Verdugo Road)
  - Trash (7321)
- Westlake Lake
  - Algae (7331)
  - Ammonia (7023)
  - Eutrophic (7025)
  - Organic Enrichment/Low Dissolved Oxygen (7057)

List on 303(d) list (being addressed by action other than TMDL)

- Malibu Lagoon
  - Benthic Community Effects (7251)
- Port Hueneme Harbor (Back Basins)
  - DDT (tissue) (7407)
  - PCBs (Polychlorinated biphenyls) (tissue) (7408)

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**APPENDIX H**

**FACT SHEETS FOR MISCELLANEOUS CHANGES**

## APPENDIX H

### MISCELLANEOUS CHANGES REPORT

**Water Body:** El Dorado Lakes  
**Water Body ID:** CAL4051501020000228153407  
**Water Body Type:** Lake & Reservoir  
**Change Type:** Water body areal extent modification  
**Change Information:** The mapped representation of El Dorado Lakes has been revised to remove a golf course lake that was erroneously included in the El Dorado Lakes coverage. The golf course lake does not belong because it: 1. Is not hydraulically connected with the El Dorado Park lakes. 2. Is in another drainage area. 3. To our knowledge has not been sampled.

**Change Date:** 2/2/2009

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**APPENDIX I**

**REFERENCES**



## REFERENCE REPORT

Author	Publishing Date	Reference Body
Abramson, M., Topel, J., Burdick, H.	03/2009	New Zealand Mudsail Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains. Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.
AES Alamos L.L.C. and the City of Los Angeles Department of Water and Power	01/2006	Reasonable Potential Analysis for Haynes Generating Station (NPDES No. CA0000353).
Ambrose, F. and Antony, R. Orme	05/2000	Lower Malibu Creek and Lagoon Resource Enhancement and Management Final Report to the California State Coastal Conservancy. Ambrose, Richard F. and Antony, R. Orme. University of California, Los Angeles. May 2000. Chapter 3.
Anchor Environmental CA, L.P.	06/2008	Draft Final (90 Percent) Design Report Sediment Dredging, Beach Renourishment, Confined Aquatic Disposal (CAD), and Capping Port Hueneme, California. Prepared for Oxnard Harbor District.
Ayers, R. S. and D. W. Westcot	02/1985	Water Quality for Agriculture, Food and Agriculture Organization of the United Nations - Irrigation and Drainage Paper No. 29, Rev 1, Rome (1985)
Bailey, Howard, Villalobos, Alex, Gottl, Erika, Brattin, Lisa, Hanes, David, and Hinton, David	01/1997	Toxicity Study of the Santa Clara River, San Gabriel River, and Calleguas Creek. Final Report. Prepared by Aquatic Toxicology Laboratory, Department of Medicine, School of Veterinary Medicine, University of California Davis.
Bay, S.M., D. Lapota, J. Anderson, J. Armstrong, T. Mikel, Jirik, A.W., and S. Asato.	12/2000	Southern California Bight 1998 Regional Monitoring Program. Volume IV.
Bight 03 Coastal Ecology Committee	06/2003	Southern California Bight 2003 Regional Marine Monitoring Survey (Bight 03) Quality Assurance Manual
Bight 98 Steering Committee	07/1998	Southern California Bight 1998 Regional Marine Monitoring Survey (Bight 98) Quality Assurance Manual
Brodberg, R.K., and G.A. Pollock	06/1999	Prevalence of Selected Target Chemical Contaminants in Sport Fish From Two California Lakes: Public health designed screening study. Sacramento, CA: Office of Environmental Health Hazard Assessment
Burbank Water Reclamation Plant	09/2007	NPDES receiving water monitoring reports for Burbank Water Reclamation Plant (NPDES No. CA0055531) (2003-2007).

Author	Publishing Date	Reference Body
California Code of Regulations	04/2009	California Code of Regulations Title 17, sections 7958-7960.
California Department of Fish and Game	12/2003	California Stream Bioassessment Procedure (Protocol Brief for Biological and Physical/Habitat Assessment in Wadeable Streams) California Department of Fish and Game Water Pollution Control Laboratory Aquatic Bioassessment Laboratory Revision Date - December, 2003
California Department of Public Health	03/2008	California Code of Regulations, Title 22, Division 4, Chapter 15. Domestic Water Quality and Monitoring. <a href="http://www.cdph.ca.gov/certlic/drinkingwater/Pages/Lawbook.aspx">http://www.cdph.ca.gov/certlic/drinkingwater/Pages/Lawbook.aspx</a>
City of Long Beach Health Department	07/2007	The City of Long Beach Health Department Bacteria Monitoring Data for Alamitos Bay.
City of Long Beach Health Department	07/2007	The City of Long Beach Health Department Bacteria Monitoring Data for Long Beach.
City of Long Beach Health Department	07/2007	The City of Long Beach Health Department Bacteria Monitoring Data for Colorado Lagoon.
City of Long Beach	04/2009	(MS4 Data) for Los Cerritos Channel - CI 8052 for order no. 99-060 NPDES No. CAS004003 Municipal Storm Water and Urban Runoff Discharges within the City of Long Beach
City of Los Angeles Department of Public Works	01/2008	City of Los Angeles, Department of Public Works, Bureau of Sanitation Status and Trends Monitoring Program QAPP for VOC Collection and Laboratory Analysis
City of Los Angeles Department of Public Works	01/2008	City of Los Angeles, Department of Public Works, Bureau of Sanitation Status and Trends Monitoring Program VOC Data
City of Los Angeles Watershed Protection Division	06/2008	Water quality monitoring for Wilmington Drain at Lomita Blvd.
City of Los Angeles	12/2008	Quality Assurance Manual prepared for the analysts, supervisors, and managers of the Environmental Monitoring Division, Bureau of Sanitation, Department of Public Works, City of Los Angeles
City of San Buenaventura	07/2007	NPDES receiving water monitoring reports for the City of San Buenaventura Ventura Water Reclamation Facility (NPDES No. CA0053651).
County of Los Angeles & the Incorporated Cities therein, except the City of Long Beach	01/2007	Summary tables for monitoring station S28, County of Los Angeles, Department of Public Works, Stormwater Monitoring Reports for 2001-2002, 2002-2003, 2003-2004, 2004-2005, 2005-2006, and 2006-2007 (MS4 Data)

Author	Publishing Date	Reference Body
County of Los Angeles & the Incorporated Cities therein, except the City of Long Beach	05/2007	Monitoring Report (MS4 Data) - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach
County of Los Angeles & the Incorporated Cities therein, except the City of Long Beach	03/2008	Monitoring Data (MS4 Data) for Tributaries of the San Gabriel River Watershed- CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach
County of Los Angeles & the Incorporated Cities therein, except the City of Long Beach	04/2009	Lead Monitoring Data (MS4 Data) for Coyote Creek. Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach.
County of Los Angeles & the Incorporated Cities therein, except the City of Long Beach	04/2009	Lead Monitoring Data (MS4 Data) for San Gabriel River Reach 2. Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach.
County of Los Angeles Department of Public Works	08/2008	Summary of MS4 toxicity results for the years 2001-2002, 2003-2004, 2005-2006, and 2006-2007.
County of Ventura Environmental Health Division	07/2007	County of Ventura coastal beach bacteria monitoring data for AB411.
Department of the Navy	03/2008	Port Hueneme Harbor Master Dredging Permit application and attached documents to the Los Angeles Contaminated Sediments Task Force.
DHS	04/2006	Draft Guidance for Salt Water Beaches. Last Update: April 10, 2006. Initial Draft: November 1997. Division of Drinking Water and Environmental Management, California Department of Health Services
Fairey, R., E.R. Long, C.A. Roberts, B.S. Anderson, B.M. Phillips, J.W. Hunt, H.R. Puckett and C.J. Wilson	01/2001	An evaluation of methods for calculating mean sediment quality guideline quotients as indicators of contamination and acute toxicity to amphipods by chemical mixtures. Environmental Toxicology and Chemistry. 20(10): 2276-2286
Finlayson, B	01/2004	Water quality for diazinon. Memorandum to J. Karkoski, Central Valley RWQCB. Rancho Cordova, CA: Pesticide Investigation Unit, CA Department of Fish and Game
Harrington, J. M.	05/2006	California Stream Bioassessment Procedure Biological and Physical Habitat Field Audit

Author	Publishing Date	Reference Body
Heal the Bay	12/2005	Malibu Bioassessment Winter 2005
Hinton, D., Hanes, D., Smith, D.J., and Tan, H.	08/1992	Toxicity Study of the Santa Clara River, San Gabriel River, and Calleguas Creek Toxicity Work/QA Project Plan
Kozelka, P.	01/2007	Letter to National Resources Defense Council, Heal the Bay, and Santa Monica Baykeeper determining no impairment for toxicity in Walnut Creek. USEPA.
LACSD	01/2003	County Sanitation Districts of Los Angeles County QA/QC Memo for 2003 Toxicity testing in Walnut Creek.
LACSD	11/2003	Monitoring and Reporting Program No. CI-2960 for County Sanitation Districts of Los Angeles County (Saugus Water Reclamation Plant) (NPDES NO. CA0054313)
LACSD	01/2006	NPDES receiving water metals data for Long Beach Water Reclamation Plant (NPDES No. CA0054119), Los Coyotes Water Reclamation Plant (NPDES No. CA0053716), Pomona Water Reclamation Plant (NPDES No. CA0053911), San Jose Creek Water Reclamation Plant (NPDES No. CA0053619), and Whittier Narrows Creek Water Reclamation Plant (NPDES No. CA0054011).
LACSD	04/2007	NPDES receiving water monitoring reports for Long Beach Water Reclamation Plant (NPDES No. CA0054119), Los Coyotes Water Reclamation Plant (NPDES No. CA0053716), Pomona Water Reclamation Plant (NPDES No. CA0053911), San Jose Creek Water Reclamation Plant (NPDES No. CA0053619), and Whittier Narrows Creek Water Reclamation Plant (NPDES No. CA0054011).
LACSD	04/2007	NPDES receiving water monitoring reports for Saugus Water Reclamation Plant (NPDES No. CA0054313) and Valencia Water Reclamation Plant (NPDES No. CA0054216).
LACSD	04/2007	Valencia Water Reclamation Plant Monitoring and reporting program for NPDES No. CA0054216 (County Sanitation Districts of Los Angeles County)
LACSD	06/2007	NPDES receiving water monitoring reports for Santa Paula Water Reclamation Facility (NPDES No. CA0054224).
LACSD	01/2008	Whittier Narrows Water Reclamation Plant (WNRP) -Monitoring Reports 2003-2007
LACSD	12/2008	County Sanitation Districts of Los Angeles County 2003-2006 Toxicity Testing in Walnut Creek data.

Author	Publishing Date	Reference Body
Larry Walk Associates	06/2005	FINAL Calleguas Creek Watershed Toxicity, Chlorpyrifos and Diazinon TMDL Technical Report.-2005. Submitted to Los Angeles Regional Water Quality Control Board. Prepared by Larry Walker Associates on behalf of the Calleguas Creek Watershed Management Plan. June 21, 2005.
Larry Walk Associates	04/2007	Calleguas Creek Watershed Boron, Chloride, TDS, and Sulfate TMDL Public Review Technical Report
Long, E.R., D.D. MacDonald, S.L. Smith, and F.D. Calder	01/1995	Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuary sediments. Environmental Management. 19, (1): 81-97
Los Angeles County Department of Beaches and Harbors	08/2002	Pesticide tissue samples for Marina del Rey Harbor Back Basins. Sampled by Aquatic Bioassay & Consulting and tested by CRG Marine Laboratories for Aquatic for Los Angeles County Department of Beaches and Harbors.
Los Angeles County	08/2005	Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report. Section 3, Methods, pp3.1 - 3.28
Los Angeles County	08/2005	Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report. Section 4, San Gabriel River Watershed Management Area, pp4.1 - 4.36.
Los Angeles County	08/2005	Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report. Section 5, Los Angeles River Watershed Management Area, pp5.1 - 5.40
Los Angeles County	08/2005	Los Angeles County 1994-2005 Integrated Receiving Water Impacts Report. Section 9, Santa Clara River Watershed Management Area, pp 9.1 - 9.19.
Los Angeles RWQCB and CA Coastal Commission	04/2009	Contaminated Sediments Task Force Sediment Chemistry data for San Pedro Bay. 1992-1997.
Los Angeles RWQCB and CA Coastal Commission	04/2009	Contaminated Sediments Task Force Sediment Chemistry data for Los Angeles/Long Beach Inner Harbor. 1999-2003.
Los Angeles RWQCB and CA Coastal Commission	04/2009	Contaminated Sediments Task Force Sediment Chemistry data for San Pedro Bay. 1999-2003.
Los Angeles RWQCB and CA Coastal Commission	04/2009	Contaminated Sediments Task Force Sediment Toxicity data for Los Angeles/Long Beach Inner Harbor, Outer Harbor, Fish Harbor, Inner Cabrillo Beach area, the San Pedro Bay, and the Los Angeles River Estuary. 1999-2003.

Author	Publishing Date	Reference Body
Los Angeles RWQCB and CA Coastal Commission	04/2009	Contaminated Sediments Task Force Sediment Chemistry and Toxicity data for Los Angeles Harbor - Cabrillo Marina. 1999-2003.
Los Angeles RWQCB and CA Coastal Commission	04/2009	Contaminated Sediments Task Force Sediment Metals data for the Los Angeles River Estuary. 1999-2003.
Los Angeles RWQCB and USEPA	07/2005	Ballona Creek Estuary Toxic Pollutants TMDL Final Staff Report. Prepared by California Regional Water Quality Control Board Los Angeles Region and U.S. Environmental Protection Agency Region 9.
Los Angeles RWQCB	04/1997	Santa Paul Wastewater Reclamation Facility Monitoring and Reporting Program for NDPES No. CA0054224
Los Angeles RWQCB	06/1999	MS4 Permit - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach
Los Angeles RWQCB	06/2000	Waste Discharge Requirements for AES Alamitos, L.L.C.(Alamitos Generating Station) NPDES No. CA0001139
Los Angeles RWQCB	06/2000	Waste Discharge Requirements for City of Los Angeles Department of Water and Power (Haynes Generating Station) NPDES No. CA0000353.
Los Angeles RWQCB	07/2000	Monitoring and reporting program No. CI 7388 for Storm Water Management/Urban Runoff Discharges for Ventura County Flood Control District, County of Ventura, and the cities of Ventura County NPDES Permit No. CAS004002
Los Angeles RWQCB	12/2001	Monitoring and Reporting Program - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach
Los Angeles RWQCB	07/2002	Long Beach Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0054119 (County Sanitation Districts of Los Angeles County)
Los Angeles RWQCB	10/2002	Callleguas Creek Nitrogen Compounds and Related Effects TMDL.
Los Angeles RWQCB	12/2003	Santa Paul Wastewater Reclamation Facility Time Schedule Order for NDPES No. CA0054224

Author	Publishing Date	Reference Body
Los Angeles RWQCB	06/2004	Pomona Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0053619 (County Sanitation Districts of Los Angeles County)
Los Angeles RWQCB	06/2004	San Jose Creek Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0053911 (County Sanitation Districts of Los Angeles County)
Los Angeles RWQCB	12/2006	Monitoring and Reporting Program No. CI-4424 for City of Burbank (Burbank Water Reclamation Plant) (NPDES NO. CA0055531)
Los Angeles RWQCB	07/2007	Trash Total Maximum Daily Loads for the Los Angeles River Watershed Staff Report. California Regional Water Quality Control Board, Los Angeles Region. July 27, 2007.
Los Angeles RWQCB	10/2008	Ventura Water Reclamation Facility Monitoring and reporting program for NPDES No. CA0053651
Los Angeles RWQCB	02/2009	Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009
MacDonald, D.L. R.S. Carr, F.D. Calder, E.R. Long, and C.G. Ingersoll	01/1996	Development and evaluation of sediment quality guidelines for Florida coastal waters. Ecotoxicology 5: 253-278
Malibu Creek Watershed Monitoring Program	06/2006	Malibu Watershed 2005 Bioassessment Monitoring Report. (2005) The Malibu Creek Watershed Monitoring Program City of Calabasas, Environmental Services Division. Submitted by: Aquatic Bioassay and Consulting Laboratories.
Moffatt & Nichol and Heal the Bay	03/2005	Malibu Lagoon Restoration Feasibility Study Final Alternatives Analysis. 2005. Prepared by: Moffatt & Nichol In Association With Heal the Bay. Prepared for California State Coastal Conservancy & California State Parks. March 2005.
Ode, P. R., A. C. Rehn and J. T. May	05/2005	A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams. Environmental Management Vol. 35, No. 4, pp. 493-504.
Port of Los Angeles and Port of Long Beach	09/2006	Port of Los Angeles and Port of Long Beach sediment and overlaying and pore water data.
Port of Los Angeles	03/2009	Port of Los Angeles Enhanced Water Quality Monitoring Data 2005-2006.
Port of Los Angeles	04/2009	Los Angeles Harbor Inner Cabrillo Beach are shallow water habitat map.
PTI Environmental Services	01/1999	Pollutants of concern in Puget Sound. EPA 910/9-91-003. Seattle, WA: U.S. Environmental Protection Agency

Author	Publishing Date	Reference Body
Puckett, M	12/2002	Quality Assurance Management Plan for the State of California's Surface Water Ambient Monitoring Program. Sacramento, CA. State Water Resources Control Board. SWAMP. December 2002 (1st version)
Rasmussen, D.	01/2003	Toxic Substances Monitoring Program 1991 Data Report. 93-1WQ. State Water Resources Control Board, Division of Water Quality. Sacramento, CA.
Richards, D.C.	02/2002	The New Zealand Mudsail Invades the Western United States. Aquatic Nuisance Species Digest Volume 4 No. 4.
San Gabriel River Regional Monitoring Program	04/2009	Toxicity Monitoring in Walnut Creek 2005 to 2007.
Santa Barbara Channelkeeper	10/2004	Ventura River Watershed Monitoring Program Quality Assurance Project Plan (Santa Barbara Channelkeeper, October 2004)
Santa Barbara Channelkeeper	02/2007	Santa Barbara Channelkeeper Water Quality Data Submittal and 303(d) List Recommendations
SCCWRP	01/1998	Southern CA Bight 1998 Regional Marine Monitoring Survey Chemistry Data
SCCWRP	01/1998	Southern CA Bight 1998 Regional Marine Monitoring Survey Data
SCCWRP	01/2003	Southern California Bight 2003 Regional Marine Monitoring Survey Data
Schiff, K., Bax, B., Markle, P., Fleming, T., and Newman, J.	10/2006	Technical Report 493: Wet and Dry Weather Toxicity in the San Gabriel River.
Scott Johnson Aquatic Bioassay & Consulting Laboratories	02/2007	San Gabriel River Regional Monitoring Program Quality Assurance Project Plan. San Gabriel River Regional Monitoring Program.
Siepmann, S., and B. Finlayson	01/2000	Water quality criteria for diazinon and chlorpyrifos. Administrative Report 00-3. Rancho Cordova, CA: Pesticide Investigations Unit, Office of Spills and Response. CA Department of Fish and Game
Smith, D.J., W. Phillips, A. Corado, H. Trim, M. Ven Katanarayana, G. Hubner, T. Moore and P. Hicks	01/1994	Water Quality Control Plan Los Angeles Region R4 Basin Plan



Author	Publishing Date	Reference Body
Southern California Coastal Water Research Project and Nautilus Environmental	06/2005	Evaluation of Toxicity in the San Gabriel River Watershed Quality Assurance Project Plan
Strauss, A.	02/2009	Letter to SWRCB and Los Angeles RWQCB conferring approval of the Calleguas Creek Nitrogen TMDL for addressing Nitrogen in Oxnard Drain No. 3. USEPA.
SWAMP	07/2007	Surface Water Ambient Monitoring Program data for all watersheds in the Los Angeles Region 2001-2005.
SWRCB	01/1994	Bay Protection and Toxic Cleanup Program QAPP. (BPTCP). Sacramento, CA: State Water Resources Control Board
SWRCB	06/2008	Zinc and Lead sediment data for Channel Islands Harbor. Bay Protection Toxics Clean Program
Toxic Substance Monitoring Program	01/2002	CD includes NON-SWAMP data: including TSMP database for years 1992-2002 and Coastal Fish Contamination Program (CFCP) for years 1 and 2. State Water Resources Control Board. Sacramento, CA
USEPA	09/1991	Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition
USEPA	01/2000	Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency
USEPA	01/2002	National recommended water quality criteria: 2002. EPA-822-R-02-047 Washington, D.C. USEPA
USEPA	10/2002	Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms. Fourth Edition. Office of Water, U.S. Environmental Protection Agency. Washington, D.C. EPA-821-R-02-013
USEPA	03/2003	Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Nutrients in the Malibu Creek Watershed.
USEPA	03/2007	Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Metals in the San Gabriel River Watershed.
USEPA	01/2002	National recommended water quality criteria: 2002. EPA-822-R-02-047 Washington, D.C. USEPA
Ventura Coastkeeper	02/2007	Calleguas Creek volunteer water quality monitoring data for 2006 conducted by Ventura Coastkeeper.

**APPENDIX I**

Author	Publishing Date	Reference Body
Ventura County Flood Control District, County of Ventura, and the cities of Ventura County	06/2007	Monitoring Reports for the Storm Water Management/Urban Runoff Discharges for Ventura County Flood Control District, County of Ventura, and the cities of Ventura County NPDES Permit No. CAS004002
Weston Solutions	09/2006	Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation. Prepared for the Port of Los Angeles and Port of Long Beach.
Weston Solutions	03/2009	Los Angeles Harbor Inner Cabrillo Beach Area sediment data.
Wishtoyo Foundation	12/2006	Calleguas Creek Watershed Monitoring Report prepared by Wishtoyo Foundation, Ventura Coastkeeper, 2006

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**COMMENTS RECEIVED**

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*Sent via electronic and certified mail*

June 13, 2009

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RECEIVED  
2009 JUN 17 PM 1 43  
CALIFORNIA REGIONAL WATER  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

Ré: 2008 Integrated Report

This comment letter responds to the Los Angeles Regional Water Quality Control Board's request for public input and comments on the draft Clean Water Act §§ 305(b) and 303(d) Integrated Report for the Los Angeles Region. The Center for Biological Diversity requests that Los Angeles region's ocean water segments be added to the Clean Water Act § 303(d) list of impaired water bodies due to impairment resulting from ocean acidification.

On February 27, 2007, the Center for Biological Diversity submitted scientific information supporting the inclusion of ocean waters on California's 303(d) List to each of the coastal regional water boards. Since then, it has only become more apparent that ocean acidification poses a serious threat to seawater quality with adverse effects on marine life. On February 4, 2009, the Center for Biological Diversity submitted additional scientific information concerning the latest findings on ocean acidification to the Regional Board and State Water Resources Control Board. Nonetheless, the Los Angeles draft Integrated Report failed to list ocean waters as impaired from ocean acidification or even discuss how this serious water quality problem will be addressed by the Board.

Section 303(d) of the Clean Water Act requires states to establish a list of impaired water bodies within their boundaries for which existing pollution controls "are not stringent enough to implement any water quality standard applicable to such waters." 33 U.S.C. § 1313(d). EPA regulations mandate that a state's list shall be approved only if it meets the requirements that existing pollution control requirements are stringent enough to ensure waters meet all water quality standards. 40 C.F.R. § 130.7(b)(1) & (d)(2).

Recent actions of EPA underscore the authority that states have to address ocean acidification pursuant to the Clean Water Act. EPA announced that it will review the aquatic life criterion for marine pH under the Clean Water Act to determine if a revision is necessary to protect designated uses from the threat of ocean acidification (EPA 2009). On April 15, 2009, EPA issued a notice of data availability in the Federal Register that calls for information and data

on ocean acidification that the agency will use to evaluate water-quality criteria under the Clean Water Act. In the notice, EPA acknowledged the threat that ocean acidification poses to marine ecosystems:

Preliminary projections indicate that oceans will become more acidic over time and overall, the net effect is likely to disrupt the normal functioning of many marine and coastal ecosystems.

(EPA 2009: 17485). Thus, EPA is soliciting information and data on ocean acidification pursuant to the Clean Water Act section 304. Despite what approach EPA ultimately decides to take on ocean acidification, California has an independent obligation under the Clean Water Act to list its ocean waters as impaired and establish a total maximum daily load.

Although early predictions about ocean acidification painted it as something of the future, the future is here with the impacts already appearing in our ocean waters. The concentration of calcium carbonate in seawater decreases with depth. The aragonite concentration horizon (defined as the depth at which seawater becomes undersaturated with respect to aragonite,  $\Omega = 1$ ) has decreased by as much as 200m as a direct consequence of the uptake of anthropogenic carbon dioxide (Feely et al. 2008). This indicates that the effects of ocean acidification are becoming more widespread throughout the water column. The northeastern Pacific Ocean has a particularly shallow aragonite concentration horizon. This fact, combined with the strong seasonal upwelling, means that the Pacific coast is extremely sensitive to the documented changes in the aragonite concentration horizon. A recent study along several transects off of the Oregon-California border showed that the entire water column became undersaturated with respect to aragonite during periods of upwelling (Feely et al. 2008). As a result, marine organisms in surface waters, in the water column, and on the sea floor along the Pacific Coast are already being exposed to corrosive water during the upwelling season. This situation was not predicted to occur in open-ocean surface waters until 2050.

Similarly, a high-resolution multi-year dataset collected off the coast of Washington state showed a rate of pH decline almost an order of magnitude higher than that previously predicted by models (Wootton et al. 2008). California Current System is particularly sensitive to ocean acidification with the pH of surface waters comparatively low and change in pH for a given uptake of anthropogenic CO<sub>2</sub> is particularly high (Hauri et al. 2009). Already the aragonite saturation horizon has shoaled by ~100 m and now reaches the euphotic zone in a few eddies and in near-shore environments during upwelling along the Pacific Coast (Hauri et al. 2009). Additionally, modeling specific to the California Current System predicts rapid changes in pH and aragonite saturation (Hauri et al. 2009).

Moreover, it has also recently come to my attention that there have been detectable measurements of declining pH due to ocean acidification in the Monterey Bay area. According to a presentation by Dr. Francisco Chavez, who presented at the International Marine Conservation Congress in May 2009, declining pH has been documented in the Monterey Bay and that pH is changing at a faster rate than atmospheric carbon dioxide is increasing. As this

information is highly relevant to the impact of ocean acidification on California's coastal waters, I would encourage the Los Angeles Regional Water Quality Control Board and the State Water Resources Control Board to consider this closely. These studies underscore the urgency of the situation and demonstrate that rapid changes in seawater chemistry that are already underway (Feely et al. 2008).

The effect of ocean acidification on Pacific coast ecosystems has also been the subject of recent studies. Changes in saturation state may cause substantial changes in overall calcification rates for many species of marine calcifiers, which includes those that are major food source for local juvenile salmon (Feely et al. 2008). Additionally, many species of juvenile fish and shellfish of economic importance (including but not limited to mussels, clams, and oysters) are highly sensitive to increases in the concentration of carbon dioxide (Feely et al. 2008) and may be affected by even intermittent exposure to the corrosive waters noted throughout the water column in recent field measurements. Shell-forming marine life off the coast of Washington is adversely affected by even seasonal exposure to corrosive water. Such species exhibited increased probabilities of replacement by other species and decreasing probabilities of displacing other species as pH decreased (Wootton et al. 2008). Noncalciferous animals showed an opposite response, indicating a shift in the delicate ocean ecosystem (Wootton et al. 2008). California mussel beds are a dominant coastal habitat in the northeastern Pacific and provide an important food resource for humans. The California mussel is among the species adversely impacted by seasonal exposures to undersaturated water (Wootton et al. 2008). As mussel beds tend to be robust ecosystems, the sensitivity of these animals to decreasing saturation values may indicate much broader-scale impacts to less hardy ecosystems (Wootton 2008).

Pacific Coast hatcheries are already experiencing difficulties associated with increasing ocean acidification. Two of the largest hatcheries report production rates down by as much as 80% (Miller et al. 2009). In July of 2008, upwelling of waters affected by acidification was the likely cause of a huge mortality event at the Whiskey Creek Shellfish Hatchery in Tillamook, Oregon (Barton et al. 2009). The die-off affected larvae of Pacific and Kumamoto oysters, Manila clams, and Mediterranean mussels, foreshadowing the widespread effects that increased upwelling events of corrosive waters will have on the fishing industry. Problems with oyster hatcheries are not isolated in Oregon, but have been reported along the West Coast. Assuming business as usual projections for carbon emissions and a corresponding decline in ocean pH and mollusk harvests, the Pacific coast fishing industry could experience economic losses of up to \$600 million by 2060 (Cooley et al. 2009).

The Los Angeles Regional Board is urged to add ocean waters to its impaired waters list. The Board is encouraged to consider the new information on ocean acidification enclosed here as well as the other supporting information previously submitted by the Center for Biological Diversity in support of listing.

The peer-reviewed scientific literature submitted to the Water Quality Control Board concerning ocean acidification meets data quality standards. The peer-reviewed scientific information previously submitted and enclosed herein supporting this request meets all data

assurances and data quality objectives. The data and information is of high quality and credibility using methods and parameters to control for errors. The regulations governing implementation of the Clean Water Act's section 303(d) *require* that California "evaluate all existing and readily available water quality-related data and information to develop the list." 40 C.F.R. § 130.7(b)(5); *see also Sierra Club v. Leavitt*, 488 F.3d 904 (11<sup>th</sup> Cir. 2007)

Moreover, EPA's guidance states that the "[l]ack of a State-approved QAPP should not, however, be used as the basis for summarily rejecting data and information submitted by such organizations, or assuming it is of low quality, regardless of the actual QA/QC protocols employed during the gathering, storage, and analysis of these data" (EPA 2006: 33).

EPA's guidance for listing of impaired waters emphasizes that states should evaluate all data, and that listings may be based on small data sets, data other than site specific monitoring, and data from the public (EPA, Guidance for 2006 Assessment, Listing and Reporting Requirements Pursuant to Sections 303(d), 305(b) and 314 of the Clean Water Act at 33-35; 38 (2005) ("EPA 2006")(EPA advised states to use the 2006 Guidance for their 2008 303(d) listings. See Memo from Diane Regas: Information Concerning 2008 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions (Oct. 12, 2006))). Here, the absence of site specific monitoring should not obviate the need to list California's ocean waters as impaired, rather it demonstrates a need for additional coastal monitoring. Recognizing the limited monitoring data available, EPA encourages states to consider a more expansive versus cautious approach to monitoring data (EPA 2006). Site-specific monitoring data is not required for impaired water listing. EPA regulations require that "reports from dilution calculations and predictive modeling" be included in the data and information that a state considers in its assessment process for section 303(d) listing purposes. 40 CFR 130.7(b)(5)(ii)). EPA guides states to consider even very small sample sets to ascertain the attainment status of waters. Moreover, states should use information about observed effects, predictive modeling, and knowledge about pollutant sources and loadings when making its listing determinations (EPA 2006).

Furthermore, EPA regulations and guidance require states to seek public participation in the impaired waters listing process. EPA regulations require that states actively solicit data and information from organizations and individuals, including conservation organizations. 40 C.F.R. 130.7(b)(5)(iii); EPA 2006. Here, the Center for Biological Diversity presents well-documented and highly credible scientific evidence that California's ocean waters are impaired from ocean acidification.

Sincerely,

/s/ Miyoko Sakashita  
Miyoko Sakashita



cc:

Shakoora Azimi-Gaylon  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100  
[sagaylon@waterboards.ca.gov](mailto:sagaylon@waterboards.ca.gov)

enclosed

Barton, Alan, Cudd, S., and M. Weigardt. 2009. Update on Hatchery Research and Use of State Funds to improve Larval Performance at Whiskey Creek Shellfish Hatchery.

Cooley, Sarah R., and S.C. Doney. 2009. Anticipating ocean acidification's economic consequences for commercial fisheries. *Environmental Research Letters* 4: 024007.

Cudd, Sue letter to Dr. Timothy Wootton. Nov. 26, 2008. Ocean Acidification and affect on larval oysters. (Included with permission.)

Current Journal of Marine Education. 2009. Special Issue: Ocean Acidification—From ecological impacts to policy opportunities 25:1.

Environmental Protection Agency. 2009. Ocean Acidification and Marine pH Water Quality Criteria. *Federal Register* 74: 17484.

Feely, R.A., Sabine, C.L., Hernandez-Ayon, J.M., Ianson, D., Hales, B. 2008. Evidence for Upwelling of Corrosive "Acidified" Water onto the Continental Shelf. *Science* 320:1490-92.

Hauri, Claudine, Gruber, N, Lachkar, Z., Plattner, G. 2009 Abstract. Accelerated acidification in eastern boundary current systems. *Goldschmidt Conference Abstracts*.

Moy, A.D., Howard, W.R., Bray, S.G., Trull, T.W. 2009. Reduced calcification in modern Southern Ocean planktonic foraminifera. *Nature Geoscience*.

Silverman, J., Lazar, B., Cao, L., Caldeira, K., Erez, J. 2009. Coral reefs may start dissolving when atmospheric CO<sub>2</sub> doubles. *Geophysical Research Letters* 36: L05606.

Steinacher, M., F. Joos, T. L. Frölicher, G.-K. Plattner, and S. C. Doney. 2009. Imminent ocean acidification in the Arctic projected with the NCAR global coupled carbon cycle-climate model. *Biogeosciences* 6: 515–533.

Wootton, T.J., Catherine A. Pfister, and James D. Forester. 2008. Dynamic patterns and ecological impacts of declining ocean pH in a high-resolution multi-year dataset. *Proceedings of the National Academy of Sciences*. 105:48 18848-18853.



CITY of CALABASAS

June 16, 2009

Samuel Unger  
Section Chief, Regional Programs  
Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

RE: COMMENT ON THE LOS ANGELES REGION INTEGRATED REPORT  
CLEAN WATER ACT SECTION 303(D) LIST OF IMPAIRED WATERS.

Dear Mr. Unger,

This letter serves as written notice that the City of Calabasas opposes the inclusion of the New Zealand Mudsnail, *Potamopyrgus antipodarum* on the proposed 303(d) listing for Las Virgenes Creek, as stated in the Decision ID 16621.

Since the discovery of the New Zealand Mudsnail in the Malibu Creek Watershed, the City of Calabasas has engaged in rigorous Best Management Practices to limit the spread of this non-native snail. These "BMPs" included suspending water quality monitoring programs while locating and researching the New Zealand Mudsnail in each tributary of Malibu Creek.

To prevent the unintentional spread of mudsnails during the subsequent water quality monitoring, separate waders were used at each survey location. Additionally, waders were placed in a freezer for a minimum of 48 hours after each use and all equipment was washed and inspected. City of Calabasas participated in the mudsnail "summit" meeting hosted by the Santa Monica Bay Restoration Commission in June of 2006. To promote awareness of this issue the City also posted information signage at various locations along Las Virgenes Creek.

In recent survey conducted by Heal the Bay and the Santa Monica Bay Restoration Commission, it was stated that numbers of mudsnails found in Las Virgenes Creek stations was substantially lower than those of surrounding areas of Malibu Creek. This study also observed native snails within the watershed; Lymnaeidae, *Fossaria* sp. that are nearly identical in size and color to the New Zealand snail, the only difference was fewer number of shell whorls. Additionally, the survey describes that the New Zealand Mudsnail has been established in three streams within the Malibu Creek Watershed and shows no evidence of spreading into other streams.

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Calabasas, CA 91302  
(818) 224-1600  
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Pg. 2  
Unger

The New Zealand Mudsnaill is a non native species found in many watersheds throughout the United States. Currently there is no form or procedure known for eradication of this species. In its native range populations are controlled by a parasitic trematode. There is not any known biological control. Some have suggested introducing the trematode into infested waters. There is still not enough known about the effects of the trematode on native snail species to be confident enough to introduce it.

While the City understands that the snail is non-native and present in Las Virgenes Creek, there is currently no no form or procedure known for eradication of this species. Calabasas has taken all necessary steps to prevent the spread of this non-native snail. The HTB/SMBRC study referenced above observed small numbers of snails in Las Virgenes Creek and no evidence of spreading within the watershed. In addition given the existing science and technology, establishing and complying with a new TMDL for the New Zealand Mudsnaill would sidetrack efforts and financing better spent on other obtainable TMDLs. We, therefore recommend that the Board remove the New Zealand Mudsnaill from the proposed 303(d) list for Las Virgenes Creek.

If you need additional information, please contact Alex Farassati, Environmental Services Manager, at (818) 878-4225 ext. 307.

Sincerely,



Anthony Coroaalles  
City Manager

# CITY OF LOS ANGELES

CALIFORNIA



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June 17, 2009

Ms. Tracy Egoscue, Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street  
Los Angeles, CA 90013

Attn: Man Voong

## **COMMENTS ON THE PROPOSED 2008 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS AND STAFF REPORT**

Dear Ms. Egoscue:

The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the Los Angeles Regional Water Quality Control Board's (RWQCB) proposed 2008 Federal Clean Water Act (CWA) §303(d) List of Water Quality Limited Segments and staff report.

We believe in general that RWQCB staff has improved the transparency of the listing process. Where sufficient information has been provided in fact sheets, this transparency has helped stakeholders to assess the proposed listing in a more informed manner. In particular, the Bureau commends the effort that RWQCB staff has undertaken to make available more fact sheets for proposed listings, as well as to collect and review readily available data and information in conformance with the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Developing California's Clean Water Act § 303(d) List (Listing Policy).

The Bureau generally supports the Region's 2008 CWA §303(d) List. However, after reviewing the proposed changes to the 2008 List, the Bureau remains concerned about a number of specific issues with the RWQCB staff's proposal. It is our intention that the attached comments and the supporting data will assist the RWQCB in assessing our local waterbodies and further refine the CWA §303(d) List to the benefit of all of the Region's inhabitants.

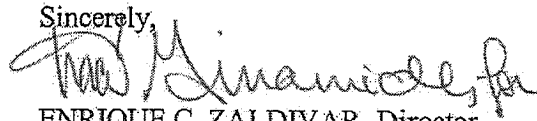


Ms. Tracy Egoscue, Executive Officer  
CRWQCB - Los Angeles Region  
June 17, 2009  
Page 2 of 2

The Bureau provides world-class environmental services and continues to support the Regional Board and its mission by funding on-going regional water quality research via the Southern California Coastal Water Research Project, the Stakeholder process for TMDL development, and focused receiving water studies in order to better understand existing conditions and provide solutions to address water quality in the Los Angeles region. This investment in the future is done in partnership with your agency to achieve maximum return in local environmental programs and infrastructure.

Thank you for your consideration of these comments. If there are any questions, please feel free to call Mr. H.R. (Omar) Moghaddam, Regulatory Affairs Division Manager at (310) 648-5423 or Mr. Jim Marchese, Environmental Supervisor at (310) 648-5421.

Sincerely,



ENRIQUE C. ZALDIVAR, Director  
Bureau of Sanitation

Enclosures

Bureau of Sanitation City of Los Angeles - Appendix Technical Comments proposed 2008 CWA § 303(d) list  
Bureau's October 18, 2006 CWA § 303(d) correspondence

c: Man Voong, California Water Quality Control Board Los Angeles Region  
Michael Mullin, Mayor's Office  
Chris Westhoff, City Attorney  
Rafael Prieto, Chief Legislative Analyst Office  
Cynthia Ruiz, President Board of Public Works  
Traci Minamide, Bureau of Sanitation/EXEC  
Varouj Abkian, Bureau of Sanitation/EXEC  
Adel Hagekhalil, Bureau of Sanitation/EXEC  
Alex Helou, Bureau of Sanitation/EXEC  
Mas Dojiri, Bureau of Sanitation/EMD  
Shahram Kharaghani, Bureau of Sanitation/WPD  
H.R. (Omar) Mogaddam, Bureau of Sanitation/RAD  
RAD Central File/Water Quality Section

The Bureau requests the following:

1. REVIEW OF UNEXAMINED WATER QUALITY LIMITED SEGMENTS: The Bureau requests that the RWQCB re-evaluate the “legacy” listings shown in Table 1 (attached) utilizing the procedures in the 2004 State Listing Policy. This request reiterates Comment No. 5 on the Bureau’s October 18, 2006 letter, which was submitted during the comment period for the 2006 303(d) list proposed by the State Water Resources Control Board (SWRCB) and is enclosed for reference. While we are re-submitting that comment, the following additional thoughts are added regarding these listings. The “legacy” listings were placed on the 303(d) List prior to 2002 and appear on the previous 1998 303(d) List available on the RWQCB’s website. While we recognize that the SWRCB declined to re-evaluate many of these listings as indicated in its Responses to Comments staff report for the 2006 303(d) listing, we do not agree with the rationale and logic for not re-evaluating the listings utilizing the Listing Policy. We note the objective of the Listing Policy is to “establish a standardized approach for developing California’s section 303(d) list” and the “methodology to be used to develop the section 303(d) list [40 CFR 130.7(b)(6)(i)] is established by this Policy.”

Our principle concern with the RWQCB staff’s decision not to retroactively apply the Listing Policy to the legacy listings is the potential substantial resources that the State will incur for developing TMDLs and the resources the Bureau and other stakeholders will expend to comply with a TMDL approved based on each and every one of the listings. The most effective way to ensure such resources are not wasted due to a flawed listing rationale is to ensure that the same procedures, criteria, and transparency are applied uniformly to all pollutant/waterbodies combinations. This can be achieved by providing the data used to justify these listings and evaluating the data based on the applicable listing factors in the Listing Policy. We note that this concern would be partly addressed if the Bureau could examine the data and information that formed the basis of the original listings for these waterbody/pollutant combinations in the first place. After due diligence, however, we cannot locate this data or any information to substantiate the basis for the listings. We note that the 1996 List available on the RWQCB’s website link does not provide any data or data reference for the list as no fact sheets were prepared for the listings to our knowledge (with the exception of two listings), and no information is contained in the “comment” column for the 1998 List.

*The Bureau requests that all listed waterbody/pollutant combinations be examined under the listing criteria of 2004 State Listing Policy. The waterbody/pollutant segments identified by the Bureau as requiring examination are listed in Table 1. The Bureau requests that at a minimum, the waterbody/pollutant segments identified in Table 1 be reviewed under the listing requirements in the 2004 Listing Policy.*

2. **PREPARE AND UPDATE FACT SHEETS FOR ALL IMPAIRED WATERS LISTINGS:**  
The Bureau requests that fact sheets be prepared for all Impaired Waters on the 303(d) List and included in the staff report. The Bureau appreciates the development of fact sheets for listings that change the 303(d) list and agrees with the purpose of fact sheets in relation to the role they serve in providing tangible evidentiary support for each listing decision. Fact sheets meeting the Listing Policy's implementation requirements for all water bodies, in particular the legacy listings in Table 1, would facilitate review and validation of the listings. If the fact sheets are not present for a listing the State cannot: 1) validate the previous impairment decision, 2) adjust for changes in the development of new water quality criteria, 3) adjust to changes in environmental and receiving water conditions, and 4) adjust to the application of the use attainability analysis or site specific objective. The data presented in fact sheets are typically utilized as part of the TMDL development and implementation process and a component of scientific studies conducted to determine impairment.

*The Bureau requests that these fact sheets be prepared and included in the 2008 report. Fact sheets should be developed for all listings not just for changes on the list. These fact sheets should be updated biennially, so that stakeholders can be better informed on the reasons for a listing decision and review water quality trends.*

3. **CONDITION LISTINGS WITH NO ASSOCIATED WATER QUALITY CRITERIA:**  
During the 2006 listing cycle, the SWRCB deleted a number of waterbody listings for "conditions" from the 303(d) list. Waters listed for conditions such as algae, odor, debris, enteric virus, scum/foam, or beach closures are inappropriate because these are waterbody conditions and not pollutants as required by 40 CFR §130.7(b)(4) or the 2004 Listing Policy. The Bureau also requests that the RWQCB move away from listings based on a Category of Pollutants. Pollutants should be identified as stated in 40CFR §130.7(b)(4): "The list required under §§ 130.7(b)(1) and 130.7(b)(2) of this section...shall identify the pollutants causing or expected to cause violations of the applicable water quality standards..." For the 2008 List, the Bureau requests that listings shown in Table 2 for conditions without water quality criteria be evaluated for removal from the 2008 303(d) list.

Additionally, although the Bureau agrees with the desire of RWQCB staff to identify "a clear approach for determinations of impairment under the biostimulatory substances standard in the Basin Plan" as described in Section 3.3.3 (pp. 10-12) of the Staff Report, the Bureau is concerned with the proposed use of numeric guidelines for listing for biostimulatory substances that are not based on established water quality criteria. Should the RWQCB staff decide to pursue the development of numeric values for biostimulatory substances for listing decisions, the RWQCB should develop numeric criteria through a Water Quality Standards setting process in which all required factors under the State Water Code are considered and the required public process is followed. It is not appropriate to set de facto biostimulatory substances objectives that will be used for the development of listing decisions and TMDLs through the 303(d) development process. Objectives for biostimulatory substances are generally site-specific and dependent on local conditions as demonstrated from the range of values presented in the tables (Tables 3.2, 3.3). To effectively determine impairments, site-

specific criteria need to be developed through a standard setting process and utilized for listing decisions. It should also be noted that to date, no Region 4 TMDL to address biostimulatory substances has used targets as low as the numbers proposed in Table 3-2 of the Staff Report for listing considerations. As a result, the potential criteria would result in listings for waterbodies that are meeting TMDL targets.

*The Bureau requests that waterbodies listed for a condition (Table 2) be evaluated and if appropriate removed from the list until further data indicates impairment due to pollution or toxicity. The Bureau also requests that listings for enteric virus be evaluated under the Listing Policy, as there are no criteria to evaluate impairment. Additionally, the Bureau requests that the development of numeric values for biostimulatory pollutants be established through the Water Quality Standards setting process*

4. TYPOGRAPHICAL ERRORS AND CONTRADICTION LANGUAGE:

*Due to confusing language, the Bureau requests that the current wording in Section 3.3.1 (pg. 7) of the Integrated Report regarding the exceedance days for indicator bacteria, be revised as shown below.*

~~“To calculate the The number of exceedance days, the number of days during a defined period equals the sum of individual days during which one or more indicator bacteria exceeds the standard is an exceedance day.”~~

5. DETAILED COMMENTS ON SPECIFIC LISTINGS: In addition to the previous comments on listings provided in Tables 1 and 2 the Bureau has identified incomplete, incongruent or inaccurate listings and delistings based on the report and data provided by the RWQCB and the 2004 State Listing Policy. More detailed comments on these listings are provided in the Table 3. Specific issues are highlighted below:

- a. *The Bureau requests that the listings for dieldrin and DDT for Marina Del Rey Harbor Back Basins be delisted. During development of the Toxic Pollutants TMDL for this water body, the RWQCB reviewed the available data and determined that dieldrin and DDT no longer cause impairment of the marina's back basins. (See Table 7-18.1 to Attachment A to LARWQCB Resolution No. 2005-012 amending Section 7 of the Basin Plan).*
- b. *The Bureau requests that the listing for trash for Compton Creek be re-categorized from requiring a TMDL to “being addressed by USEPA approved TMDL (B).” A Trash TMDL for the Los Angeles River and its tributaries has been incorporated in the Los Angeles Region Basin Plan by LARWQCB Resolution No. 2007-012. Compton Creek is identified as a tributary of the Los Angeles River in the TMDL Staff Report. Thus, the trash impairment in Compton Creek is already being addressed by a TMDL.*



- c. *The Bureau requests that the decision to "Do Not Delist" sediment toxicity for the San Pedro Bay be placed on hold until the data used to justify the listing is made readily available in a more transparent fashion for review by stakeholders. The language used in the reference section of the fact sheet for this listing provides insufficient information to locate the data used to justify that listing. Specifically, "Eleven of 33 samples were toxic (BPTCP). Two of 14 samples were toxic (Bight, 1998). None of three samples were toxic (W-EMAP) (LARWQCB & CCC, 2004).". These references do not provide a data year for the BPTCP data and nor describe which specific stations were monitored by each study. The weblinks provided by RWQCB staff (Jeffrey Shu) were not useful in discovering the specific data described in the fact sheet. This may have occurred because the location description was vague ("Los Angeles and Long Beach harbors," never specifying San Pedro Bay) or because the data retrieved by the web link did not contain sediment toxicity data.*
  - d. *The Bureau requests listings based on sediment toxicity including those for specific pollutants in sediment should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that this plan "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments" (SWRCB Resolution 2008-0070). The SWRCB recognizes the need to ensure that the listing policy and the SQO Plan are consistent. Therefore, SWRCB staff has been directed to revise the Listing Policy to achieve consistency with the sediment quality objectives in said plan. The Bureau has listed in Table 3 those waterbodies that should be evaluated based on the SQOs.*
  - e. *The Bureau requests that the PAH listing for Ballona Creek Estuary, be removed based on the Fact Sheets Decision ID 7584 which state "Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against placing this water segment/pollutant combination on the section 303(d) list in the Water Quality Limited Segments category."*
  - f. *The Bureau requests that RWQCB staff should ensure the available data and fact sheets are consistent. Although the data available for review for the proposed new listings generally support the listings, the fact sheets are not always consistent with the data available for review.*
6. USE A PRIMARY LINE OF EVIDENCE IN CONJUNCTION WITH THE TMDL: A primary line of evidence used in conjunction with a TMDL will satisfy Section 2.2 or Section 3.11 of the Listing Policy. Referencing a TMDL does not provide information to evaluate the original listing or subsequent listing decision. Without including the supporting data in the Staff Report, stakeholders can not verify if the conditions for placement in the water quality

limited segments category have been met or if water quality standards have been attained. This includes listings placed in the 'Being Addressed' category.

*The Bureau requests that the data used to make the initial impairment determination be included in the Staff report and used in conjunction with a TMDL.*

**Table 1. "Legacy Listings" Pre-Dating 2002 CWA 303(d) List in Region 4 that Have Not Been Reviewed Utilizing the SWRCB 2004 Listing Policy**

Water Body Name	Pollutant
Echo Park Lake	Algae
Echo Park Lake	Eutrophic
Echo Park Lake	Odor
Echo Park Lake	PCBs (tissue)
Echo Park Lake	Trash
Echo Park Lake	pH
Ballona Creek Estuary	Shellfish Harvesting Advisory
Ballona Creek Wetlands	Exotic Vegetation
Ballona Creek Wetlands	Habitat Alterations
Ballona Creek Wetlands	Hydromodification
Ballona Creek Wetlands	Reduced Tidal Flushing
Dominguez Channel Estuary	Benthic Community Effects
Lincoln Park Lake	Eutrophic
Lincoln Park Lake	Odor
Lincoln Park Lake	Organic Enrichment/ Low Dissolved Oxygen
Lincoln Park Lake	Trash
Lincoln Park Lake	Lead
Los Angeles Harbor-Consolidated Slip	Benthic Community Effects
Los Angeles Harbor-Consolidated Slip	Sediment Toxicity
Los Angeles/ Long Beach Inner Harbor	Beach Closures
Machado Lake (Harbor Park Lake)	ChemA (tissue)
Santa Monica Bay Offshore/Nearshore	Debris
Echo Park Lake	Ammonia
Echo Park Lake	Copper

**Table 1. "Legacy Listings" Pre-Dating 2002 CWA 303(d) List in Region 4 that Have Not Been Reviewed Utilizing the SWRCB 2004 Listing Policy**

Water Body Name	Pollutant
Echo Park Lake	Lead
Arroyo Seco Reach 1	Coliform Bacteria
Compton Creek	Coliform Bacteria
Dominguez Channel	Ammonia
Dominguez Channel Estuary	Ammonia
Dominguez Channel Estuary	Coliform Bacteria
Lincoln Park Lake	Ammonia
Los Angeles River Reach 1	Coliform Bacteria
Los Angeles River Reach 2	Coliform Bacteria
Los Angeles River Reach 4	Coliform Bacteria
Los Angeles River Reach 6 (above Sepulveda flood control basin)	Coliform Bacteria
Los Angeles River Reach 6 (above Sepulveda flood control basin)	Tetrachloroethylene/PCE
Los Angeles River Reach 6 (above Sepulveda flood control basin)	Trichloroethylene/TCE
Santa Monica Canyon	Lead
Torrance Carson Channel	Coliform Bacteria
Torrance Carson Channel	Copper
Torrance Carson Channel	Lead
Tujunga Wash	Coliform Bacteria
Wilmington Drain	Coliform Bacteria
Wilmington Drain	Copper
Wilmington Drain	Lead

**Table 2. Water Bodies Listed for "Conditions" for Which no Water Quality Objective or Standard Exists**

<b>New Water Body Name</b>	<b>Pollutant/ Stressor</b>
Echo Park Lake	Algae
Echo Park Lake	Odors
Lincoln Park Lake	Odors
Ballona Creek	Enteric Virus
Los Angeles/ Long Beach Inner Harbor	Beach Closures
Santa Monica Bay Offshore/Nearshore	Debris
Echo Park Lake	Eutrophic
Lincoln Park Lake	Eutrophic
Lincoln Park Lake	Organic Enrichment/ Low Dissolved Oxygen

**Table 3. Detailed Comments on Specific Listings**

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Marina del Rey Harbor - Back Basins	DDT (tissue)		This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that DDT is no longer a cause of impairment.
Marina del Rey Harbor - Back Basins	Dieldrin (tissue)		This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that Dieldrin is no longer a cause of impairment.
Compton Creek	Trash		This listing should be categorized as "being addressed by USEPA approved TMDL (B)." Compton Creek was identified as a tributary in the Los Angeles River Trash TMDL.
Cabrillo Beach (Outer)	DDT	NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL/	The RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. The original fish consumption advisory, which was based on fish tissue and formed the basis for the listing, appears to have conducted in the mid-1990's. There are no Fact Sheets available indicating the reason the listing appears as based on water column instead of fish tissue pollutant levels. The basis for the advisory should be investigated and upheld prior to maintaining the pollutant-waterbody on the list.
Cabrillo Beach (Outer)	PCBs	NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	The RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. The original fish consumption advisory, which was based on fish tissue and formed the basis for the listing, appears to have conducted in the mid-1990's. There are no Fact Sheets available indicating the reason the listing appears as based on water column instead of fish tissue pollutant levels. The basis for the advisory should be investigated and upheld prior to maintaining the pollutant-waterbody on the list.

**Table 3. Detailed Comments on Specific Listings**

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	Dichloroethylene / 1,1-DCE	GRW, REC1, REC2, WARM, WILD, WET/ MUN, IND	There is no line of evidence to support the original listing. Using the 2004 State Listing Policy listing criteria, the existing data provided by the State do not support a listing for this constituent. There are 0 exceedances out of 16 samples. There are 16 non-detects that are above the CTR objective for human health and organisms of 0.057 ppb. We believe any monitoring required due to groundwater contamination should be addressed under an alternative enforcement program. Additional data needs to be collected in order to support a listing or delisting of this constituent in this waterbody. The Los Angeles River and most of its tributaries have a conditional beneficial use designation for MUN. Conditional designations are not subject to federal law and therefore are not subject to TMDLs.
Los Angeles Harbor - Cabrillo Marina	DDT (tissue)	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	The OEHHA fish consumption advisory should be re-evaluated as most of the original advisories were conducted in the mid-1990's. In addition, the RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. According to Section 3.4 of the Listing Policy a OEHHA health advisory must be posted, a beneficial use for consumption identified, and the supporting data must be available indicating the evaluation guideline for tissue has been exceeded.
Los Angeles Harbor Consolidated Slip	DDT (tissue & sediment)	REC1, REC2, COMM, MAR, RARE, EST, MIGR, SPWN, WILD, NAV	<p>This pollutant-water body listing for sediment should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that this plan "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments." (SWRCB Resolution 2008-0070). The SWRCB recognizes the need to ensure that the listing policy and the SQO Plan are consistent. Therefore, SWRCB staff has been directed to revise the Listing Policy to achieve consistency with the sediment quality objectives in said plan. (Ibid.).</p> <p>For the tissue based listing, there is no fact sheet available or tissue data available for review. Therefore the listing could not be validated using the Listing Policy.</p>

**Table 3. Detailed Comments on Specific Listings**

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Los Angeles Fish Harbor	DDT	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no 2006 and 2008 Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory that formed the basis for the listing appears to have been conducted in the mid-1990's. The basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.
Los Angeles River Reach 2 (Carson to Figueroa Street)	Oil	GWR, REC1, REC2, WARM/ MUN, IND, WILD	This Listing does not meet the requirements of Section 2 or 3.7 of the Listing Policy. There are no data in the record to evaluate as no fact sheets were found substantiating the listing decision. The Basin Plan describes the objective as "Waters shall not contain oils...in concentrations that result in a visible film or coating on the surface of the water or on objects in the water that cause nuisance or that otherwise adversely affect beneficial uses. No observational data is available that substantiates any of the conditions necessary to violate this standard.
Point Fermin Park Beach	PCBs		The current listing is based on water column exceedances. This original listing appeared to have been based on Section 3.4 of the Listing Policy, which allows for a listing where a OEHHA health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. OEHHA's fish advisories are based on fish tissue concentrations. Thus, listing should reflect this. This and similarly-based listings were conducted in the mid-1990's and were apparently founded on fish tissue pollutant concentrations. Therefore, (1) the RWQCB has not substantiated the water based pollutant listing and (2) the basis for the current fish advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.



**Table 3. Detailed Comments on Specific Listings**

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Point Fermin Park Beach	DDT		<p>This waterbody/pollutant combination should be listed according to Section 3.4 of the Listing Policy which states that a health advisory must be posted, a beneficial use for consumption identified, and the supporting data must be available indicating the evaluation guideline for tissue has been exceeded.</p> <p>A fact sheet is not available for this listing; therefore, it is assumed that this listing was based on OEHHA's fish consumption advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.</p>
Royal Palms Beach	DDT	NAV, REC1, REC2, COMM, MAR, WILD, SHELL/ SPWN	<p>This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no 2006 and 2008 Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory that formed the basis for the listing appears to have been conducted in the mid-1990's. Therefore, the basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.</p>
Royal Palms Beach	PCBs	NAV, REC1, REC2, COMM, MAR, WILD, SHELL/ SPWN	<p>This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory, which should be based on fish tissue and form the basis for the listing, appears to have been conducted in the mid-1990's. The basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.</p>
Santa Monica Bay Offshore/ Nearshore	Fish Consumption Advisory	REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	<p>Please correct the "pollutant" basis for the listing. The existence of a fish consumption advisory is a listing factor, but is neither a "pollutant" nor a water quality objective delineated in any applicable plan or regulation. The fact that supporting data based on organism tissue must be available to support the listing under Section 3.4 of the Listing Policy which indicates specific pollutant concentrations in the organisms must be the reason OEHHA has issued the advisory. Currently there are OEHHA fish advisories for PCBs and DDT.</p>

**Table 3. Detailed Comments on Specific Listings**

Water Body	Pollutant/ Stressor	Existing/ Potential BU	2008 Revised Comment
Santa Monica Bay Offshore/ Nearshore	Sediment Toxicity	REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	During the SWRCB's 2006 listing process, the State provided no toxicity data in their line of evidence to support the listing decision. The RWQCB has provided no fact sheet for this listing. Therefore, stakeholders cannot validate the listing. Nonetheless, this pollutant-water body listing should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that Part 1 "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments." (SWRCB Resolution 2008-0070).
Los Angeles / Long Beach Inner Harbor	DDT	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	This listing has been updated from DDT (sediment & tissues) to DDT, i.e., a water column listing on the 2006 303 (d) list. However, a fact sheet is not available for this pollutant/waterbody combination. A fact sheet would allow the Bureau to review the data and appropriately comment on this pollutant/waterbody listing. The only information available for this listing is the SWRCB's 2006 comments stating that this listing was based on OEHHA fish advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.
Los Angeles / Long Beach Inner Harbor	PCBs	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	This listing has been updated from PCB(sediment & tissues) to PCB, i.e., a water column listing in the 2006 303 (d) list. However, a fact sheet is not available for this pollutant/waterbody combination. A fact sheet would allow the Bureau to review the data and appropriately comment on this pollutant/waterbody listing. The only information available for this listing is the State Board's 2006 comments stating that this listing was based on OEHHA fish advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.

# CITY OF LOS ANGELES

CALIFORNIA



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October 18, 2006

Ms. Tam Doduc, Board Chair  
State Water Resources Control Board  
1001 I Street, Sacramento, CA 95814

Attention Song Her, Clerk to the Board

## **COMMENTS ON THE PROPOSED 2006 FEDERAL CLEAN WATER ACT SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS AND STAFF REPORT**

Dear Ms. Doduc:

The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the State Water Resources Control Board's (SWRCB) proposed 2006 Federal Clean Water Act (CWA) §303(d) List of Water Quality Limited Segments and staff report. The Bureau has previously submitted comments at a SWRCB workshop and hearing on the proposed CWA §303(d) 2006 List and appreciates SWRCB staff response to our past requests and the changes made.

The Bureau commends the effort that SWRCB staff has undertaken to collect and review all readily available environmental data and information and evaluate a portion of these data utilizing the SWRCB Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy).

The Bureau generally supports the State's 2006 CWA §303(d) List. However, after reviewing the proposed changes for the 2006 List, the Bureau is requesting the following revisions:

1. That the SWRCB re-evaluate the 2006 Water Quality Limited Segments utilizing established water quality criteria. Some of the proposed listings do not have any associated water quality criteria to determine impairment. (See Table 1); and
2. That the SWRCB make the revisions as indicated in the SWRCB's Staff Report - Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments and clarify a response. (See Table 2).

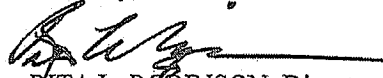


In our January 2006 correspondence, we presented a number of issues that may assist in producing more accurate impaired waters listings and also may help all stakeholders in understanding the SWRCB Listing decisions. These issues are still valid and we have included them in the attached Appendix for this proposed List and the next review.

The Bureau believes these changes will result in more accurate listings that will focus scarce public resources on impaired waters to improve water quality and our environment. The Bureau appreciates and thanks the SWRCB and its staff for the effort they have put forth in preparing both the 303(d) List and implementing the new Listing Policy. It is our intention that the attached comments and supporting data will assist the SWRCB to further refine the CWA §303(d) List to the benefit of all of the State's inhabitants.

If you should have any additional questions or comments, please contact Mr. H.R. (Omar) Moghaddam of my staff at (310) 648-5423.

Sincerely,



RITA L. ROBINSON, Director  
Bureau of Sanitation

RLR:HRM:GD:JM

Enclosures

cc: Celeste Cantu, State Water Resources Control Board, Executive Officer  
Jonathan Bishop, Los Angeles Regional Water Quality Control Board  
Michael Mullin, Mayor's Office  
Chris Westhoff, City Attorney  
Rafael Prieto, Chief Legislative Analyst Office  
Cynthia Ruiz, President Board of Public Works  
Enrique Zaldivar, Bureau of Sanitation/EXEC  
Varouj Abkian, Bureau of Sanitation/EXEC  
Traci Minamide, Bureau of Sanitation/EXEC  
Mas Dojiri, Bureau of Sanitation/EMD  
Shahram Kharaghani, Bureau of Sanitation/WPD  
H.R. (Omar) Mogaddam, Bureau of Sanitation/RAD  
RAD Central File/Water Quality Section

The Bureau requests:

1. ONE LIST. The preparation of one list would make it clear which listings were evaluated under the State listing policy. The format of the 2006 staff report is confusing as to the overall changes to the 2002 List and the proposed 2006 List. A simple table that identifies by region the 2002 CWA 303(d) listings and includes all the proposed change designators would provide clarity.

*The Bureau requests that one list be prepared for the future Impaired Waters Lists. This Impaired Waters List to be organized by Region and Waterbody would include a column that would identify all the change status designators such a 'List', 'Delist', 'Do Not List', 'Do Not Delist', 'No Change' and 'Being Addressed'.*

2. PREPARE AND UPDATE FACT SHEETS FOR ALL IMPAIRED WATERS LISTINGS. Fact sheets are critical because they provide the rationale for placing waterbodies on or off the 303(d) list. If the Fact Sheets are not present for a Waterbody/pollutant combination the State can not: 1) validate the previous impairment decision, 2) confirm the new listing decision 3) adjust for changes in the development of new water quality criteria, 4) adjust to changes in environmental and receiving water conditions, 5) adjust to the application of the use attainability analysis or site specific objective.

*The Bureau requests that these fact sheets be prepared for the next Impaired Waters List and included in the staff report. Fact sheets should be developed for all listings not just for changes on the list. These fact sheets should be updated biennially, so that stakeholders can be better informed on the reasons for a listing decision and review of water quality trends.*

3. DATA MANAGEMENT: The current process for a data records review is problematic. In anticipation of the 303(d) Listing process, the Bureau requested copies of all data submitted to the SWRCB for Region 4 that was to be considered as part of the process. Much of the data and information received by the Bureau was in the form of printed spreadsheets that had been reduced in size to fit on a letter sized page making it illegible. From the recordkeeping perspective, the RWQCBs and the SWRCB should consider posting all information that was used in previous listings and the 2006 Listing on the SWRCB's website. By providing public access to this information, the public can view all lines of evidence used in the decision-making process which provides transparency to the 303(d) listing process. In particular, some of the old listings carried over from the 1996, 1998 and 2002 lists do not identify the reports and information used to make the original listing decision. We appreciate the SWRCB's efforts to correct some of these early faulty listings in the 2006 Listing process. However, we believe that a more thorough review of earlier listings is warranted. By providing the reports and information used to make these early listing decisions on the SWRCB's website, members of the public can review the listings that are of concern to them.

*The Bureau requests that an updated records repository system be prepared to retain legible and accurate records of data required to make the listing decisions and that this system be made available to public.*

4. MAPPING: Map the data used for the future Impaired Waters List analysis by sample location and geocode.
5. REVIEW OF UNEXAMINED WATER QUALITY LIMITED SEGMENTS: To ensure an accurate Impaired Waters List that is completely consistent with the 2004 State Listing Policy and clearly identifies impaired waterbodies in California, the SWRCB should review and revise the remaining unexamined Water Quality Limited Segments under the new Listing Policy. Until adoption of the 2004 State Listing Policy, there had been no standardized procedure for listing waterbodies on the CWA 303(d) List (federal or state). Due to the absence of a standardized procedure, the Bureau agrees with SWRCB staff that many of the waterbody/pollutant combinations were improperly listed on the 1998 and 2002 Lists which are now being carried forward onto the new CWA 303(d) Lists. Faulty listings may be caused by judgment errors, such as choosing an insufficiently small data set or absence of data, accepting data whose origin was from samples collected and analyzed using improper analytical methods or without approved quality assurance/quality control procedures, data collected outside of a waterbody segment, use of unapproved criteria or guidelines, or evidence that natural sources have caused or contributed to the impairment. In order to avoid similar problems in the future, we believe that the SWRCB should take this opportunity to completely evaluate all previous listings by the application of listing criteria in the State's 2004 Listing Policy.

*The Bureau requests that all listed waterbody/pollutants combinations be examined under the listing criteria of 2004 State Listing Policy. As an alternative the Bureau requests that the waterbody/pollutant segments identified in the Appendix be reviewed under the listing requirements in the 2004 Listing Policy (see Appendix Table 3).*

6. USE A PRIMARY LINE OF EVIDENCE IN CONJUNCTION WITH THE TMDL: A primary line of evidence used in conjunction with a TMDL will satisfy Section 2.2 or Section 3.11 of the Listing Policy. Referencing a TMDL does not provide information to evaluate the original listing or subsequent listing decision. Without the supporting data included in the Staff Report, stakeholders can not verify if the conditions for placement in the water quality limited segments category have been met in the first place or if water quality standards have been attained. This includes listings placed in the 'Being Addressed' category.

*The Bureau requests that the data used to make the initial impairment determination be included in the Staff report and used in conjunction with a TMDL. (see Appendix Table 4).*

7. CONDITION LISTINGS WITH NO ASSOCIATED WATER QUALITY CRITERIA: The Bureau supports the SWRCB in recommending that a number of waterbody listings for conditions be deleted from the 303(d) list as they are not consistent with the Listing

Policy. Waters listed for algae, odor, debris, enteric virus, scum/foam or beach closure are inappropriate because these are waterbody conditions and not pollutants as required by 40 CFR §130.7(b)(4) or the 2004 Listing Policy. For the 2006 List, the SWRCB may have missed some of these listings.

*The Bureau requests that waterbodies listed for a condition be evaluated using established water quality criteria (see Appendix Table 1).*

8. LISTINGS FOR TROPHIC STATUS: Criteria are not available to determine impairment for trophic conditions (eutrophic, mesotrophic and oligotrophic waterbodies). Currently the term Eutrophic is used to mean many different things; some may use it to indicate the relative level of nutrient concentrations, others use them (particularly the “eutrophic” adjective) as shorthand for the effects of severe nutrient enrichment (e.g., low DO, high organic detritus levels, fish kills, pH exceedances, etc.). These terms are used without explanation. Often a water body gets a “eutrophic” listing simply because it receives anthropogenic sources of nitrogen and phosphorus with no demonstration of actual impairment of beneficial uses.

*The Bureau requests that the eutrophic listing be evaluated as it does not meet the requirements of the Listing Policy Section 2 and Section 6.1.3 (see Appendix Table 5).*

9. SEASONAL VARIATION: As a note of caution - many of the listings in Region 4 rely mainly on data collected during storm events. In general, storm events in Region 4 are brief and the data collected represents pollutant issues associated with dry weather deposition. Storm water data in the Los Angeles area does not identify detrimental conditions to aquatic life or human health in these channels during these brief episodes. Thus, the data is not representative of daily conditions in Southern California waterbodies.

The Listing Policy contains clear guidance regarding the temporal representation of data and how it should be used to evaluate listing decisions. Data samples during episodic storm events do not represent critical timing for impacts to Southern California waterbodies. The Bureau has reviewed the SWRCB’s proposed listings and have identified several proposed listings that are based on the SWRCB’s reliance on stormwater event data. (see Appendix Table 6).

Table 1

Pollutant Identification and Conditions Listings

Comments on the proposed 2006 303d List  
 City of Los Angeles  
 Bureau of Sanitation

New Water Body Name	Pollutant/ Stressor	State decision	BOS Proposed Status
Echo Park Lake	Algae	Silent	Evaluate under Listing Policy
Machado Lake (Harbor Park Lake)	Algae	Silent	Evaluate under Listing Policy
Los Angeles River Reach 1 (Estuary to Carson Street)	Nutrients (Algae)	List	Evaluate under Listing Policy
Los Angeles River Reach 2 (Carson to Figueroa Street)	Nutrients (Algae)	List	Evaluate under Listing Policy
Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Nutrients (Algae)	Silent	Evaluate under Listing Policy
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Nutrients (Algae)	Silent	Evaluate under Listing Policy
Los Angeles River Reach 5 ( within Sepulveda Basin)	Nutrients (Algae)	Silent	Evaluate under Listing Policy
Echo Park Lake	Odors	Silent	Evaluate under Listing Policy
Lincoln Park Lake	Odors	Silent	Evaluate under Listing Policy
Machado Lake (Harbor Park Lake)	Odors	Silent	Evaluate under Listing Policy
Los Angeles River Reach 5 ( within Sepulveda Basin)	Oil	Silent	Evaluate under Listing Policy
Ballona Creek	Enteric Virus	Silent	Evaluate under Listing Policy
Los Angeles/ Long Beach Inner Harbor	Beach Closures	Silent	Evaluate under Listing Policy
Sanita Monica Bay Offshore/Nearshore	Debris	Silent	Evaluate under Listing Policy



Table 2

Revision not completed  
as indicated in SWRCB response

Comments on the Proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

Comment No.	Summary of Comment	Response	BOS Evaluation October 2006
73,119	<p>Los Angeles River Reach 1 (Estuary to Carson Street)-Zinc, Dissolved: 'It cannot be determined if the data the State used in its analysis Total Metals data or Dissolved Metals data or if the Hardness values were present and utilized. The most conservative applicable water quality criterion for dissolved zinc is 170 µg/L for the CTR Aquatic Life Freshwater Acute (CMC) objective. In Los Angeles River Reach 1 (Estuary to Carson Street), the criterion was exceeded in 0 of 54 samples, which is 0% of the sample events. Under the State's Listing Policy, a water body is eligible for delisting for dissolved zinc if there are 4 or fewer exceedances out of the 54 samples. Newer data indicate that an evaluation under the Listing Policy is warranted.' The State Board recommendation for this pollutant water body combination is 'do not delist'.</p>	<p>When combining this new data with existing data, there are 7 out of 72 samples which exceed the CTR CCC for dissolved copper. This is still too many to delist.</p>	<p>The comment was for zinc listing. The response does not address the comment but addresses copper listing. The review of the fact sheet for zinc shows that there were 18 samples collected by LACDPW in 2003 and 2004 exceeding 7 samples for both acute and chronic criteria making it eligible for listing. The fact sheet needs to be updated to incorporate newer data and listing decision.</p>
73,142	<p>Los Angeles River Reach 5 ( within Sepulveda Basin)-Oil: 'This Listing does not meet the requirements of Section 2 or 3.7 of the Listing Policy. There are no data in the record to evaluate. Based on the readily available information, the weight of evidence indicates that there is sufficient justification in favor of removing these listing from the 303(d) Water Quality Limited Segment list because the segment pollutant combinations is not a pollutant. The state has not identified a beneficial use for protection or impairment.' The State Board did not prepare a fact sheet for this pollutant water body combination. This listing has been modified as it should be for 'Scum/Foam-Unnatural' and it is being recommended for delisting from the 303(d) list.</p>	<p>This listing has been modified as it should be for 'Scum/Foam-Unnatural' and it is being recommended for delisting from the 303(d) list. The original line of evidence supporting the listing does not identify a pollutant but rather, a condition caused by a pollutant(s).</p>	<p>The 303 (d) list has not been modified to reflect the Los Angeles River Reach 5 ( within Sepulveda Basin)-Oil as 'Delist' as indicated in the response to the comment.</p>

Table 3

Review Unexamined  
Water Quality Limited Segments

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

New Water Body Name	Pollutant/Stressor	State specified Beneficial Use	RB Potential BU	RB Existing BU	State Comment	State decision
Aliso Canyon Wash	Selenium	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD	No Comment	Silent
Arroyo Seco Reach 1 (LA River to West Holly Ave.)	Trash	None identified by the State	MUN, WARM, WILD	REC1, REC2	No Comment	Silent
Arroyo Seco Reach 1 (LA River to West Holly Ave.)	High Coliform Count	None identified by the State	MUN, WARM, WILD	REC1, REC2	No Comment	Silent
Ballona Creek	Toxicity	None identified by the State	MUN, REC1, WARM	REC2, WILD	No Comment	Silent
Ballona Creek	High Coliform Count	None identified by the State	MUN, REC1, WARM	REC2, WILD	No Comment	Silent
Ballona Creek	Enteric Viruses	None identified by the State	MUN, REC1, WARM	REC2, WILD	No Comment	Silent
Ballona Creek Estuary	Shellfish Harvesting Advisory	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Estuary	Sediment Toxicity	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Estuary	High Coliform Count	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Estuary	PAHs (sediment)	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN, SHELL	No Comment	Silent
Ballona Creek Wetlands	Hydromodification	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Trash	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Reduced Tidal Flushing	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Habitat alterations	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Ballona Creek Wetlands	Exotic Vegetation	None identified by the State		REC1, REC2, EST, WILD, RARE, MIGR, SPWN, WET	No Comment	Silent
Burbank Western Channel	Trash	None identified by the State	MUN, REC1, WARM, WILD	REC2	No Comment	Silent
Casterock Beach	Bacteria Indicators	None identified by the State			No Comment	Silent
Compton Creek	Copper	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Compton Creek	Lead	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Compton Creek	High Coliform Count	None identified by the State	MUN	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Dominguez Channel (above Vermont)	Ammonia	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	Chromium (sediment)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	Lead (tissue)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	PAHs (sediment)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	PCBs (tissue)	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (above Vermont)	Ammonia	None identified by the State	MUN, REC1, WARM, WILD	REC2, RARE	No Comment	Silent
Dominguez Channel (Estuary to Vermont)	Benthic Community Effects	None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, SPWN	No Comment	Silent
Dominguez Channel (Estuary to Vermont)		None identified by the State		NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent

Table 3

Review Unexamined  
Water Quality Limited Segments

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

Dominguez Channel (Estuary to Vermont)	High Colliform Count	None identified by the State	NAV, REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Echo Park Lake	Copper	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Lead	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Ammonia	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	pH	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Eutrophic	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Odors	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	Algae	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Echo Park Lake	PCBs (tissue)	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Lead	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Ammonia	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Organic Enrichment/Low Dissolved Oxygen	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Eutrophic	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Lincoln Park Lake	Odors	None identified by the State	MUN, REC1, REC2, WARM, WILD	No Comment	Silent
Los Angeles / Long Beach Inner Harbor	Sediment Toxicity	None identified by the State	IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
Los Angeles / Long Beach Outer Harbor (inside breakwater)	PCBs	None identified by the State	NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
Los Angeles Harbor - Inner Cabrillo Beach Area	Beach Closures (Colliform)	None identified by the State	NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	No Comment	Silent
Los Angeles Harbor Consolidated Slip	Sediment Toxicity	None identified by the State	REC1, REC2, COMM, MAR, RARE, EST, MIGR, SPWN, WILD, NAV	No Comment	Silent
Los Angeles Harbor Consolidated Slip	Benthic Community Effects	None identified by the State	REC1, REC2, COMM, MAR, RARE, EST, MIGR, SPWN, WILD, NAV	No Comment	Silent
Los Angeles River Reach 1 (Estuary to Carson Street)	Aluminum, Total	None identified by the State	MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	No Comment	Silent
Los Angeles River Reach 1 (Estuary to Carson Street)	High Colliform Count	None identified by the State	MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	No Comment	Silent
Los Angeles River Reach 2 (Carson to Figueroa Street)	High Colliform Count	None identified by the State	GWR, REC1, REC2, WARM	No Comment	Silent
Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Nutrients (Algae)	None identified by the State	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Nutrients (Algae)	None identified by the State	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	High Colliform Count	None identified by the State	GWR, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 5 ( within Sepulveda Basin)	Nutrients (Algae)	None identified by the State	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 5 ( within Sepulveda Basin)	Oil	None identified by the State	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent

Table 3

Review Unexamined  
Water Quality Limited Segments

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

Location	Parameter	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	High Coliform Count	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	Dichloroethylene / 1,1-DCE	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	Trichloroethylene / TCE	None identified by the State	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Ammonia	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Eutrophic	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Odors	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Trash	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	Algae	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Machado Lake (Harbor Park Lake)	ChemA (tissue)	None identified by the State	MUN	REC1, REC2, WARM, WILD, RARE, WET	No Comment	Silent
Marina del Rey Harbor - Back Basins	Fish Consumption Advisory	None identified by the State	REC1	NAV, REC2, COMM, MAR, WILD, RARE, SHELL	No Comment	Silent
Marina del Rey Harbor - Back Basins	Sediment Toxicity	None identified by the State	REC1	NAV, REC2, COMM, MAR, WILD, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Chromium (sediment)	None identified by the State		IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Copper (sediment)			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	PAHs (sediment)			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Sediment Toxicity			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
San Pedro Bay Near/Offshore Zones	Zinc (sediment)			IND, NAV, REC1, REC2, COMM, MAR, RARE, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	Debris	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	Fish Consumption Advisory	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	Sediment Toxicity	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Bay Offshore/Nearshore	DDT (tissue & sediment)	None identified by the State		REC1, REC2, COMM, MAR, WILD, MIGR, RARE, SPWN, SHELL	No Comment	Silent
Santa Monica Canyon	Lead	None identified by the State	MUN, REC1, WARM, WILD	REC2	No Comment	Silent
Sepulveda Canyon	Lead	None identified by the State		WARM, WILD	No Comment	Silent
Sepulveda Canyon	Ammonia	None identified by the State			No Comment	Silent
Torrance Carson Channel	Copper	None identified by the State	NAV	REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Torrance Carson Channel	Lead	None identified by the State	NAV	REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Torrance Carson Channel	High Coliform Count	None identified by the State	NAV	REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	Copper	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	Ammonia	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	Trash	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent

Table 3

Review Unexamined  
Water Quality Limited Segments

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

Location	High Coliform Count	None identified by the State	MUN, REC1, WARM, COLD, WILD	REC2, GWR	No Comment	Silent
Tujunga Wash (LA River to Hansen Dam)	High Coliform Count	None identified by the State		NAV, REC1, REC2, COMM, MAR, WILD, RARE, MIGR, SPWN, SHELL	No Comment	Silent
Venice Beach	High Coliform Count	None identified by the State		NAV, REC1, REC2, COMM, MAR, WILD, SHELL	No Comment	Silent
Will Rogers Beach	High Coliform Count	None identified by the State	SPWN		No Comment	Silent
Wilmington Drain	Copper	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent
Wilmington Drain	Lead	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent
Wilmington Drain	Ammonia	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent
Wilmington Drain	High Coliform Count	None identified by the State	MUN	REC1, REC2, WARM, RARE, WET, WILD	No Comment	Silent

Table 4

Use Primary LOE in conjunction with TMDL

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

Ref. No.	New Water Body Name	Pollutant/ Stressor	State specified Beneficial Use	RB Potential BU	RB Existing BU	State Comment	TMDL as single LOE
2	Ballona Creek	Trash	REC2	MUN, REC1, WARM	REC2, WILD	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. The weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
3	Cabrillo Beach (Outer)	Indicator Bacteria	REC1		NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	A TMDL is in place. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
4	Compton Creek	pH	REC2	MUN	GWR, REC1, REC2, WARM, WILD, WET	A TMDL is in place. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
5	Dockweiler Beach	High Coliform Count	REC1		IND, NAV, REC1, REC2, COMM, MAR, WILD, SPWN	One line of evidence is available in the administrative record to assess this pollutant. Based on the applicable factor, a TMDL has been developed and approved by USEPA and an approved implementation is expected to result in attainment of this standard.	x
6	Echo Park Lake	Trash	REC2		MUN, REC1, REC2, WARM, WILD	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
7	Lincoln Park Lake	Trash	REC2		MUN, REC1, REC2, WARM, WILD	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
8	Los Angeles River Reach 1 (Estuary to Carson Street)	Trash	REC2		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
9	Los Angeles River Reach 1 (Estuary to Carson Street)	pH	WARM		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	One line of evidence is available in the administrative record. Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard.	x
10	Los Angeles River Reach 1 (Estuary to Carson Street)	Nutrients (Algae)	WARM		MUN, IND, PROC, GWR, REC1, REC2, WARM, MAR, WILD, RARE, MIGR, SPWN, SHELL	Sufficient justification in favor of placing this water segment-pollutant combination on the 303(d) list. Other related lines of evidence are available in the administrative record to assess this pollutant. A TMDL and implementation plan has been approved for this water segment-pollutant combination. The Los Angeles River Nitrogen TMDL was approved by RWQCB on August 19, 2003 and subsequently approved by USEPA on March 18, 2004.	x

Table 4

Use Primary LOE in conjunction with TMDL

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

11	Los Angeles River Reach 2 (Carson to Figueroa Street)	Trash	REC2, WARM, WILD, WET	MUN, IND, WILD	GWR, REC1, REC2, WARM	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
12	Los Angeles River Reach 2 (Carson to Figueroa Street)	Ammonia	WARM	MUN, IND, WILD	GWR, REC1, REC2, WARM	This pollutant is being considered for listing under section 2.2 of the Listing Policy. Under this section of the Policy, a minimum of one line of evidence is needed to assess listing status. The weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
13	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Ammonia	REC2	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
14	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Trash	REC2, RARE, WARM, WET	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
15	Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Ammonia	REC2	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. The nutrient(algae), foam, and odor listings are backed by ammonia data. Nutrient(algae), foam, and odor information should not be placed on the section 303(d) list because they are not pollutants or toxicity (section 2 of the Listing Policy). sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
16	Los Angeles River Reach 4 (Riverside Dr. to Sepulveda Dam)	Trash	REC2, WARM, WILD, WET	MUN, IND	GWR, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
17	Los Angeles River Reach 5 ( within Sepulveda Basin)	Ammonia	WARM	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. The nutrient(algae), foam, and odor listings are backed by ammonia data. Nutrient(algae), foam, and odor information should not be placed on the section 303(d) list because they are not pollutants or toxicity (section 2 of the Listing Policy). sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
18	Los Angeles River Reach 5 ( within Sepulveda Basin)	Trash	COLD, EST, MAR, MIG, REC2, RARE, SAL, SPWN, WARM, WET, WILD	MUN, IND	GRW, REC1, REC2, WARM, WILD, WET	One line of evidence is available in the administrative record. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. This water segment-pollutant combination was moved off the section 303(d) list during the 2002 listing cycle only because a TMDL had been completed. No substantial evidence in the record shows that standards are met. sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x

Table 4

Use Primary LOE in conjunction with TMDL

Comments on the proposed 2006 303d List  
 City of Los Angeles  
 Bureau of Sanitation

19	Marina del Rey Harbor - Back Basins	High Coliform Count	REC1	REC1	NAV, REC2, COMM, MAR, WILD, RARE, SHELL	One line of evidence is available in the administrative record. After review of the available data and information for this recommendation, SWRCB staff conclude that the water body should be placed in the Water Quality Limited Segments Being Addressed category of the section 303(d) list because a TMDL has been approved by USEPA and an implementation plan has been approved.	x
21	Marina del Rey Harbor Beach	Indicator Bacteria	REC1	REC1	NAV, REC1, REC2, COMM, MAR, WILD, RARE	Two lines of evidence are available in the administrative record to assess this pollutant. Based on the applicable factor, a TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
22	Santa Monica Beach	High Coliform Count	REC1	REC1	NAV, REC1, REC2, COMM, MAR, WILD, MIGR, SPWN, SHELL	Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
23	Santa Monica Canyon	High Coliform Count	MUN, REC1, REC2, WARM, WILD	REC2	REC2	Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x
24	Sepulveda Canyon	High Coliform Count	REC1	REC1	REC1, REC2	Sufficient justification in favor of placing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.	x



Table 5

Listings for Trophic Status

Comments on the proposed 2006 303(d) List  
 City of Los Angeles  
 Bureau of Sanitation

New Water Body Name	Pollutant/ Stressor	State decision	BOS Proposed Status
Echo Park Lake	Eutrophic	Silent	Evaluate under Listing Policy
Lincoln Park Lake	Eutrophic	Silent	Evaluate under Listing Policy
Machado Lake (Harbor Park Lake)	Eutrophic	Silent	Evaluate under Listing Policy

**Table 6**

**Stormwater Data Only**

Comments on the proposed 2006 303d List  
City of Los Angeles  
Bureau of Sanitation

New Water Body Name	Pollutant/ Stressor	State decision	BOS Proposed Status
Los Angeles River Reach 1 (Estuary to Carson Street)	Copper	List	Stormwater data only
Los Angeles River Reach 1 (Estuary to Carson Street)	Zinc	List	Stormwater data only



MARK NORRIS  
Assistant Public Works Director

Public Works Department - Utilities Services Branch  
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June 10, 2009

Tracy Egoscue, Executive Officer  
Regional Water Quality Control Board - Los Angeles Region  
320 West 4th Street  
Los Angeles California, 90013

RECEIVED  
2009 JUN 15 PM 4 0  
CALIFORNIA REGIONAL BOARD  
QUALITY CONTROL BOARD  
LOS ANGELES REGION

**Subject: LOS ANGELES REGION INTEGRATED REPORT CLEAN WATER ACT SECTION 305(b) REPORT AND SECTION 303(d) LIST OF IMPAIRED WATERS**

Dear Ms. Egoscue:

We have received the *Notice of Availability* of the referenced documents and the solicitation of public comments. We have reviewed the documents, and concur with Regional Board staff's recommendation to de-list Channel Islands Harbor, listed for lead and zinc in sediment from non-point sources. We understand that this listing was based on a single Bay Protection and Toxic Cleanup Program (BPTCP) sample 13 years ago. At that time, the BPTCP document said that since Channel Islands Harbor "had relatively undegraded benthos and few chemicals at elevated concentration it might also serve as a potential reference site". We'd go even further than that, and state that Channel Islands Harbor is probably one of the cleanest harbors in the nation.

According to the *Surface Water Ambient Monitoring Program Annual Workplan for FY 2004/05* (September 30, 2004), the "Available Information for Channel Islands Harbor/Mandalay Bay" was:

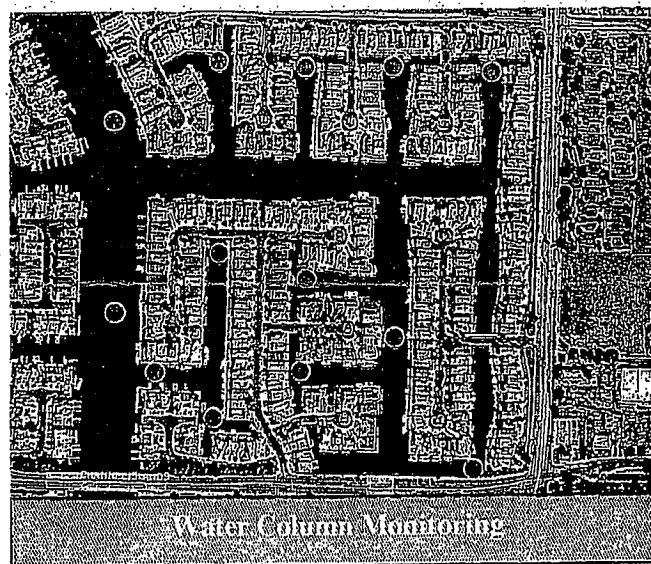
"During the early to mid-1980s, the State Mussel Watch Program found low to intermediate levels of metals and organics in mussels collected from Channel Islands Harbor, with the exception of one sample with very high DDT concentrations. Sediment sampling for metals conducted by Regional Board staff in the harbor in 1988 revealed slightly to moderately elevated concentrations. The harbor is 303(d) listed for lead and zinc in sediments. Sediment samples were collected from the harbor in 1993, 1994 and 1997 as part of the Bay Protection and Toxic Cleanup Program. Channel Islands Harbor was listed as a site of concern due to DDT and silver sediment concentrations and sediment toxicity. The benthic infaunal community sampled at a single station in the harbor in 1997 appeared to be relatively healthy.

The City of Oxnard conducted sediment characterizations of east and west Mandalay Bay to support an application for waste discharge requirements for dredging. Two composite sediment samples collected and analyzed in 2001 from the eastern bay showed low levels of trace metals and trace organics. A single composite sediment sample collected and analyzed in 2004 from the western bay showed low levels of trace metals and trace organics...”

This information suggests that most of the available historic information shows very limited impairment of Channel Islands Harbor.

Harbor conditions are currently being monitored for water column chemistry and bacteria, sediment chemistry and toxicity, and bioassessment (Triad Approach); however, water quality and bioassessment monitoring in the harbor was first performed in a comprehensive study by Moffatt & Nicol Engineers for Ventura County Department of Public Works in 1970. The Summary of the Ecological Study in this report stated that the “floral-faunal assemblages recorded in Channel Islands Harbor indicate that the present water quality is good. Stagnant, warm water areas are anticipated in the easterly channel cul-de-sacs of the proposed residential marina expansion.” These areas became the focus of more recent studies by the City of Oxnard to verify that the harbor continued to meet water quality standards.

The monitoring sites for this focused study in the Mandalay Bay area of Channel Islands Harbor were:



Under conditions of development, the Seabridge Development Project was required to demonstrate effectiveness of best management practices (BMPs) employed at their site, and verify that their project did not negatively impact harbor water quality or benthic habitat. This was done with a monitoring program developed with the assistance of Regional Board staff, and designed to be Surface Water Assessment and Monitoring (SWAMP) compatible and in line with State Water Resources Control Board monitoring programs for the development of sediment quality objectives.

The eight sample locations in this monitoring program are:

Five sample locations are in the newly constructed channels within Seabridge ("SB"):

1. Shallow Bay (SB1)
2. Marina Channel North (SB2)
3. North Channel (SB3)
4. Marina East Channel (SB4)
5. Main Channel/Edison Canal (SB5)

Three sample locations are in the existing channels of the Channel Islands ("CI") Harbor:

1. Main Channel, north of Channel Islands Boulevard Bridge (CI6)
2. Main Channel, south of Channel Islands Boulevard Bridge (CI7)
3. Eastern arm, south of Channel Islands Boulevard Bridge (CI8)

This program addresses metals in sediments by considering the following sediment quality objective (SQO) for aquatic life pertaining to benthic community protection:

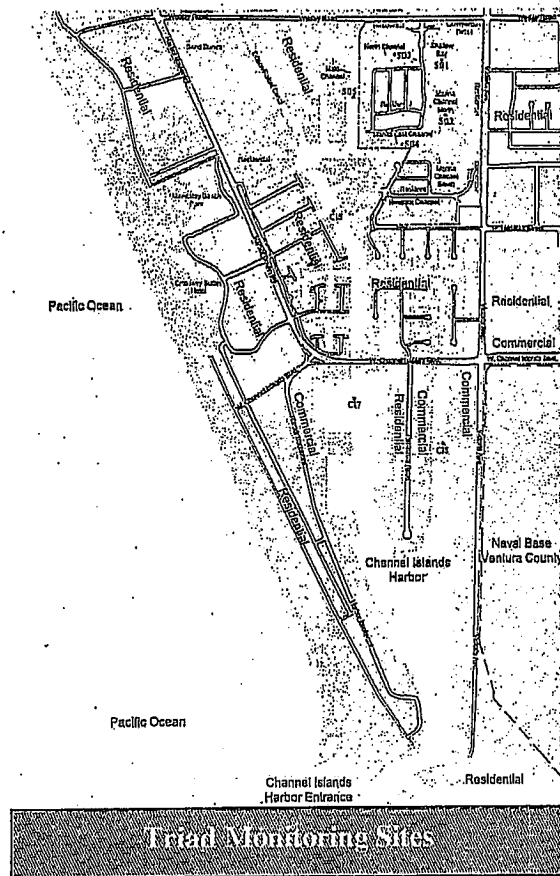
*"Pollutants in sediments shall not be present in quantities that, alone or in combination, are toxic to benthic communities in bays and estuaries of California."*

To assess if this objective is being met, a multiple lines of evidence (MLOE) approach was used. The three lines of evidence (LOE) used included:

- ❖ Sediment toxicity tests using the amphipod (*Eohaustorius estuaries*) 10-day laboratory survival test which measures the response of test organisms to surficial sediments and assesses both pollutant related biological effects and exposure.
- ❖ Assessment of the biological community composition which is the primary receptor of both natural and anthropogenic disturbances. For this report the benthic response index (BRI) was calculated.

- ❖ Sediment chemistry measuring a suite of contaminants to assess the potential risk to benthic organisms from toxic chemicals. The NOAA Status and Trends, ER-L (Effects Range- Low) and ER-M (Effects Range-Median) threshold limits for exposure were used (NOAA 1991, Long and Morgan 1990, Long and MacDonald 1995). The ER-L represents concentrations of a constituent below which adverse effects rarely occur. The ER-M values are representative of concentrations above which effects frequently occur.

For this portion of the program two sites were located in the recently created channels adjacent the Seabridge housing development (SB3 and SB4) and two were located in the outer channels of CIH (CI7 and CI8).



The Annual Report for the Monitoring Program found:

- ❖ Sediment Chemistry - None of the metals exceeded the ER-M
- ❖ Sediment Toxicity - Of the 24 amphipod survival tests conducted during the six quarterly surveys, 22 were non-toxic, and two were characterized as having "low toxicity" based on criteria in the SQO guidelines
- ❖ Benthic Community - Benthic community conditions using the BRI showed that the two outer harbor sites were comparable to conditions found at reference sites in other southern California bays and estuaries. Each of the sites located in the channels adjacent to the Seabridge development were categorized as being moderately disturbed.... These differences in community structure appear to be the result of the dredging that occurred to create the Seabridge channels

The full Annual Report has been provided to Regional Board staff.

The water quality is expected to further improve, because the new development areas are using filters for the urban runoff. These filters were evaluated recently, and showed the following effluent concentrations:

Parameter	Effluent Concentration (mg/L)		
	Arithmetic EMC Average (for 3 sampled events)	Volume-Weighted EMC Average (for 3 sampled events)	Expected (as per Project Plan)
TSS (SM)	37	32	35
Total Copper	<0.01	<0.01	0.014
Total Lead	<0.01	<0.01	0.007
Total Zinc	0.037	0.036	0.108
Total Kjeldahl-N	1.6	1.6	2.17
Total Phosphorus	0.3	0.3	0.21

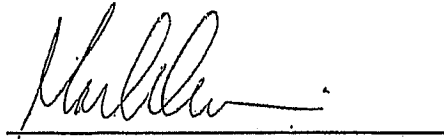
The potential impacts from existing harbor areas have already been mitigated. Although the 303(d) list states that the source of the elevated zinc and lead was non-point, City staff believe that the elevated levels found were due to an NPDES permitted discharge from a boat repair facility that has since been allowed to connect to the City's WWTP collection system, following extensive pretreatment. City staff continue to inspect and monitor these types of facilities for compliance.

Ms. Tracy Egoscue  
Executive Officer

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Thank you for the opportunity to review the draft 305(b) report and provide comments. Please feel free to call me at (805) 385 - 8308 if any clarification is required, or ask your staff to contact Mark Pumford, Technical Services Manager, at (805) 271 - 2220.

Sincerely,



Mark S. Norris  
Assistant Public Works Director

c: Man Voong, Regional Water Quality Control Board - Los Angeles Region





City of  
**SANTA CLARITA**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

June 17, 2009

Mr. Man Voong  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Voong:

Subject: Revision to the 2008 Section 303(d) List, Santa Clara River

Thank you for the opportunity to submit comments on the revisions to the Federal Clean Water Act Section 303(d) List. The City of Santa Clarita (City) is fortunate to have the Santa Clara River running through its boundaries. This watershed is home to one of the last natural rivers in Southern California.

The City takes the protection of the Santa Clara River very seriously and has an active stormwater program. Considering the cost and time it takes to create and implement a Total Maximum Daily Load (TMDL) and the large effort to address multiple stormwater requirements, the City has concerns about several listings on the proposed 2008 Section 303(d) List.

**Listings Based on the P\*MUN Beneficial Use Should be Removed**

Newly proposed listings for the Santa Clara River are erroneously based on application of the conditional Municipal and Domestic Supply (MUN) Beneficial Use. A Federal Court, the State Water Resources Control Board (State Board), and the Federal Environmental Protection Agency (EPA) have all determined that the P\*MUN use is not a properly designated use available for any regulatory purpose, such as the proposed 2008 Section 303(d) List. The application of the conditional P\*MUN Beneficial Use resulted in the incorrect application of maximum contaminant levels (MCL) and California Toxics Rule (CTR) human health criteria using "water plus organisms" standards.

In 1994, the California Regional Water Quality Control Board, Los Angeles (Regional Board) sought to designate a Municipal and Domestic Supply (P\*MUN) Beneficial Use to all water bodies identified in the Basin Plan. This was a response to the State Board's issuance of Resolution No. 88-63 (the "Sources of Drinking Water Policy") and the Regional Board's companion resolution, Resolution No. 89-03. However, the Regional Board only conditionally designated the Beneficial Use by forming the P\*MUN and cannot establish effluent limitations based on conditional designations.



Mr. Man Voong  
June 17, 2009  
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In addition, during the previous Section 303(d) List update in 2006, the Regional Board included water body segments based on the P\*MUN Beneficial Use. After receiving comments objecting to this action, the State Board removed all of the proposed 303(d) listings based on this beneficial use. The State Board indicated the P\*MUN Beneficial Use should not be used for listing purposes, and is not a designated beneficial use for the identified water bodies. No change to the status of the P\*MUN Beneficial Use has occurred since. Therefore, the City of Santa Clara requests that the Regional Board act in accordance with the State Board's previous determination on this issue and asks for the following waterbody/pollutant listings to be removed from the Regional Board's proposed 2008 Section 303(d) List:

- **Santa Clara River, Reach 5 - Iron, Specific Conductivity** (based on secondary MCLs); **Chlorodibromomethane, and Dichlorobromomethane** (based on application of CTR human health criteria using water plus organisms)
- **Santa Clara River, Reach 6 - Iron, Specific Conductivity** (based on secondary MCLs); **Chlorodibromomethane, Dichlorobromomethane, Bis (2-ethylhexyl) phthalate** (based on application of CTR human health criteria using water plus organisms)

#### **Diazinon, Santa Clara River, Reach 6**

The Regional Board included Diazinon for Reach 6 of the Santa Clara River during the 2008 listing cycle. This was based on the evaluation of available data indicating that the California Department of Fish and Game (CADFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L Diazinon was exceeded in samples collected from Bouquet Canyon Creek. All of the utilized monitoring data was collected as part of the Surface Water Ambient Monitoring Program (SWAMP).

On December 31, 2004, the EPA banned sales of all nonagricultural products containing Diazinon. The EPA's action should be considered implementation of a significant management practice in Reach 6 of the Santa Clara River. Therefore, the City believes only data collected since January 1, 2005, should be used for listing reevaluation.

As stated in previous comments submitted by the City regarding this listing, upon receipt of notification of a 13267 letter from the Regional Water Quality Control Board in September 2002, the City and County of Los Angeles embarked on a very aggressive Public Outreach and Abatement program. Inspections, enforcement, and cooperation from local retailers and the public led to a drastic reduction of Diazinon levels recorded in the original samples. Though this information was provided to the Regional Board, no response to the final report has been given to date.

Mr. Man Voong  
June 17, 2009  
Page 3

It is the City's understanding that data taken by the Los Angeles County Sanitation Districts shows no exceedances were found in nine samples collected between April 2007 and July 2008. This listing should be moved to the "Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL" category since the EPA Residential Use phaseout of Diazinon is a regulatory action other than a TMDL. Therefore, Diazinon in Reach 6 of the Santa Clara River should be removed from the 303(d) list.

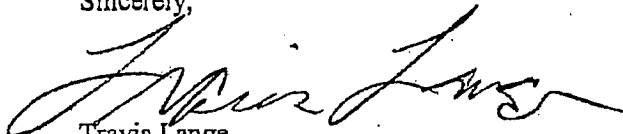
#### **Chlorpyrifos, Santa Clara River, Reach 6**

The Regional Board included Chlorpyrifos for Reach 6 of the Santa Clara River during the 2008 Section 303(d) listing cycle. Similar to Diazinon, the EPA has been phasing out all nonagricultural uses of Chlorpyrifos with the cessation of sales of all residential use products by December 31, 2004.

It is the City's opinion that data collected from January 1, 2005, forward should only be considered for the 2008 Section 303(d) listing. The City understands that monitoring by the Los Angeles County Sanitation Districts resulted in 18 four-day average Chlorpyrifos monitoring results with no exceedances of the 0.05 µg/L threshold. Therefore, this listing should be moved to the "Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL" category since the Residential Use phaseout of Chlorpyrifos is a regulatory action other than a TMDL and appears to be resulting in attainment of standards.

The City of Santa Clarita strives to protect the water quality in the Santa Clara River watershed. Thank you for your time and consideration of our comments and requests. If you have any questions or need any additional information, please contact Oliver Cramer, Environmental Analyst, at (661) 255-4904 or [ocramer@santa-clarita.com](mailto:ocramer@santa-clarita.com).

Sincerely,



Travis Lange  
Environmental Services Manager

TL:OC:kms

S:\ENVS\RVCS\INPDES\2\TMDL\303(d) listing\Revision to 303(d), June 2009.doc

cc: Robert G. Newman, Director of Public Works



# CITY OF SIMI VALLEY

*Home of The Ronald Reagan Presidential Library*

June 17, 2009

*Transmitted via e-mail to [mvoong@waterboards.ca.gov](mailto:mvoong@waterboards.ca.gov)*

Mr. Man Voong  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street  
Los Angeles, CA 90013

**SUBJECT: COMMENTS ON DRAFT 2008 303(d) LIST**

Dear Mr. Voong:

The City of Simi Valley appreciates the opportunity to comment on the Draft 2008 303(d) List and respectfully opposes the listing of trash in the Arroyo Simi (Reach 7) on the Draft List. The City understands the fiscal challenges facing the State agencies, as the City is facing very similar fiscal challenges. The response for us must be to collectively and jointly find cost-effective, efficient solutions to issues we encounter.

First, on a technical level, there may be inadequate data to support the listing. Members of the *Parties Implementing TMDLs on the Calleguas Creek Watershed* identified a discrepancy in the data available on the fact sheet (Decision ID 10423). The Ventura Coastkeepers staff revised the data sheet to correct the inaccuracy. The State's Listing Policy indicates the need to use both numeric and non-numeric data for determining a trash listing. The City requests that the 303 (d) listing follow the policy for submittal of non-numeric data. Such data could be photographic evidence allowing locations to be determined and/or detailed data on trash, including location, to facilitate an effective TMDL development. Data used to justify listings for impairments like trash require supporting documentation to ensure that the observations are verifiable.

A 303(d) listing of trash in the Arroyo Simi is not a cost effective means to address this issue. Importantly, the Waste Discharge Requirements for Ventura County Municipal Separate Storm Sewer System includes significant new requirements to reduce trash in the storm sewer system, and should provide more tangible progress towards reducing such pollution. This is a more effective means to remove the impact than subjecting the issue to further study under a TMDL. Actions planned already by the City include:

California Regional Water Quality Control Board  
Los Angeles Region  
Page Two

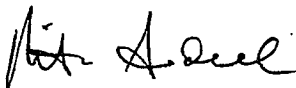
- Prioritizing, inspecting, and cleaning catch basins based trash at the location;
- Managing trash at public events;
- Installing and maintaining trash cans in high trash generation areas; and
- Installing excluders on catch basins or conducting alternative BMPs to reduce trash discharges to receiving waters in the next two years.

Should your agency decide that a 303 (d) listing meets the Listing Policy requirements, the City requests a Category C, "addressed by action(s) other than a TMDL," listing. This would follow the City's understanding of the State's Listing Policy to allow existing programs to address water-related trash. A significant effort by your agency and all of the Ventura County Cities and the County of Ventura recently resulted in the adopted Waste Discharge Requirements for Ventura County Municipal Separate Storm Sewer System. The State's Listing Policy specifically acknowledges that storm water permits and associated Storm Water Management Plans (SWMP) are existing programs that justify Category C categorization. The Waste Discharge Requirements for Ventura County Municipal Separate Storm Sewer System is an adopted regulatory program that is enforceable by the RWQCB, contains a monitoring program and reporting programs that demonstrate progress, and provisions to address discharges of trash to the Arroyo Simi within a reasonable amount of time. This meets all the State's Listing Policy for the Category C categorization.

For the reasons set forth above, the City requests your consideration on the proposed 303 (d) listing for trash in the Arroyo Simi - either defer action, or use the Category C designation. The City is strongly committed to addressing trash in the Arroyo Simi, and your agency has already acted to permit and enforce such programs to address trash. There is insufficient data to support the 303 (d) listing, and there is no regulatory need to add another plan to actions already underway.

Thank you for considering the City's offered alternatives. If you have any questions or comments, please contact Mr. Joe Deakin, Assistant Director of Public Works, at (805) 583-6401 or [jdeakin@simivalley.org](mailto:jdeakin@simivalley.org).

Sincerely,



Mike Sedell  
City Manager

cc: Director of Public Works  
Assistant Director of Public Works  
Executive Officer, RWQCB

June 17, 2009

California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street  
Los Angeles, CA 90013

ATTN: Man Voong,

**SUBJECT: COMMENTS ON THE PROPOSED 2008 303(D) LIST OF WATER QUALITY LIMITED SEGMENTS AND STAFF REPORT**

The City of San Buenaventura appreciates the opportunity to comment on the proposed 2008 303(d) list. The focus of the City's comments is bacteriological based listings for beaches on the Ventura County Coast, which fall inside the City limits, and arsenic and toxicity listings in the Santa Clara River Estuary.

**Bacteriological Water Quality Listings**

The 2008 303(d) list proposes that Promenade Park Beach be listed for bacterial indicators and San Buenaventura Beach not be delisted for bacterial indicators. The City has the following two comments on these listings.

1. For the Promenade Park Beach bacterial indicators listing, the fact sheet shows comparison of exceedances at individual stations to the Listing Policy. Therefore, individual stations, rather than the whole beach, should be listed on the 2008 303(d) list. Only one (1) of the four (4) stations monitored at Promenade Park Beach has bacterial exceedances that meet the Listing Policy criteria for addition to the 2008 303(d) list. There may be specific activities occurring in this part of the beach or attributes of these sampling locations that are resulting in the bacterial exceedances. The City requests that only the station where the exceedances meet the Listing Policy be listed. This would allow us to focus City resources on addressing problematic areas rather than the entire beach. A summary of available data from the RWQCB for each station for the beach is presented in

**Table 1. Summary of Exceedances at Promenade Park Beach**

	VC14000	VC15000	VC16000	VC17000
# of Single Samples	307	191	195	245
# of Single Samples Exceedances	31	21	24	29
Exceeds Listing Policy?	No	No	No	No
# of Geomeans	49	22	22	32
# of Geomeans Exceedances	9	1	2	3
Exceeds Listing Policy?	Yes	No	No	No

- For the San Buenaventura Beach bacterial indicators listing, the fact sheet associated with this listing shows comparison of exceedances at individual stations to the Listing Policy. Therefore, individual stations, rather than the whole beach, should not be delisted from the 303(d) list. Only one (1) of the three (3) stations monitored has bacterial exceedances that do not meet the Listing Policy requirements for delisting. There may be specific activities occurring in this part of the beach or attributes of these sampling locations that are resulting in the bacterial exceedances. The City requests that all stations, except the station where the exceedances do not meet the Listing Policy for delisting, be delisted to allow City resources to be focused on addressing problematic areas rather than the entire beach. A summary of available data from the RWQCB for each station for the beach is presented in **Table 2**.

**Table 2. Summary of Exceedances at San Buenaventura Beach**

	VC18000	VC19000	VC20000
# of Single Samples	288	354	286
# of Single Samples Exceedances	28	67 <sup>[1]</sup>	16
Meets Listing Policy for delisting?	Yes	No	Yes
# of Geomeans	64	76	64
# of Geomeans Exceedances	7	21 <sup>[2]</sup>	5
Meets Listing Policy for delisting?	Yes	No	Yes

<sup>1</sup> The factsheet for this listing shows 61 single sample exceedances; however, our data analysis using an exceedance day approach leads to 67 exceedances. This still does not meet the Listing Policy criteria for delisting.

<sup>2</sup> The fact sheet for this listing shows 24 geomean exceedances; however, our data analysis using an exceedance day and calendar month geomean exceedance approach leads to 21 exceedances. This still does not meet the Listing Policy criteria for delisting.

### Santa Clara River Estuary Arsenic

The 2008 303(d) list proposes listing arsenic in the Santa Clara River Estuary based on nine (9) exceedances out of 63 samples, which meets the Listing Policy criteria for addition to the 303(d) list of impaired waters. However, upon review of the provided data used to assess water quality, the City found only two (2) exceedances of the CTR saltwater criterion maximum concentration of 69 ug/L (0.069 mg/L) out of 63 samples. This does not meet the Listing Policy criteria for addition to the 303(d) list of impaired waters, therefore, the City requests that the Santa Clara River Estuary arsenic listing be removed from the 2008 303(d) list. The data review is presented in Table 3.

Table 3. Santa Clara River Estuary Arsenic Data Provided for 2008 303(d) Listing Process

Station R1		Station R3		Station L5	
Date	As (mg/L)	Date	As (mg/L)	Date	As (mg/L)
12-Feb-02	<0.0020	12-Feb-02	<0.0020	12-Feb-02	<0.0020
07-May-02	<0.0002	07-May-02	<0.0002	07-May-02	<0.0020
06-Aug-02	<0.0020	06-Aug-02	<0.0020	06-Aug-02	<0.0020
05-Nov-02	<0.0020	05-Nov-02	<0.0020	05-Nov-02	<0.0020
11-Feb-03	<0.0020	11-Feb-03	<0.0020	11-Feb-03	<0.0020
06-May-03	<0.0002	03-May-03	<b>0.0814</b>	03-May-03	<0.0020
05-Aug-03	<0.0020	05-Aug-03	<0.0020	05-Aug-03	<0.0020
04-Nov-03	<0.0020	04-Nov-03	<0.0020	04-Nov-03	<0.0020
03-Feb-04	<0.0020	03-Feb-04	<0.0020	03-Feb-04	<0.0020
04-May-04	0.0095	04-May-04	<b>0.0814</b>	04-May-04	0.00814
24-Aug-04	0.0091	03-Aug-04	0.0025	03-Aug-04	0.00536
10-Nov-04	<0.0020	02-Nov-04	0.0067	02-Nov-04	<0.0020
01-Feb-05	<0.0020	01-Feb-05	0.0023	01-Feb-05	<0.0020
03-May-05	<0.0020	03-May-05	<0.0020	03-May-05	<0.0020
10-Aug-05	<0.0020	02-Aug-05	0.0055	09-Aug-05	<0.0020
10-Nov-05	<0.0020	01-Nov-05	<0.0020	10-Nov-05	<0.0020
28-Feb-06	<0.0020	07-Feb-06	0.0123	28-Feb-06	<0.0020
09-May-06	<0.0020	09-May-06	<0.0020	09-May-06	<0.0020
02-Aug-06	<0.0020	02-Aug-06	<0.0020	02-Aug-06	<0.0020
01-Nov-06	<0.0020	01-Nov-06	<0.0020	01-Nov-06	<0.0020
07-Feb-07	<0.0020	06-Feb-07	0.0160	07-Feb-07	<0.0020
<b>Total Data Points</b>		<b>63</b>			
<b>Total Exceedances</b>		<b>2</b>			

### Santa Clara River Estuary Toxicity

The proposed 2008 303(d) list includes a listing for toxicity in the Santa Clara River Estuary. The City requests an examination of the appropriateness of the dataset, as well as clarification and procedural changes regarding this listing.

Firstly the City would like to comment that all available toxicity data for the estuary was conducted using freshwater species. An examination of available salinity and hardness data indicate that even in samples with relatively low salinity, significant seawater mixing was occurring resulting in hardness values typically exceeding 1000 mg/L CaCO<sub>3</sub>. Therefore, it is most likely that any "toxicity" observed was due to ion imbalance associated with elevated sea water concentrations and not due to toxic compounds. Only toxicity test results conducted using species tolerant of euryhaline conditions or tests conducted with marine species with salinity levels appropriately adjusted would be suitable for evaluating this listing. In the absence of such data, there is not enough suitable data to make a determination whether toxicity is present and should be listed.

Secondly, the fact sheet for this listing describes the toxicity evaluation guideline as follows:



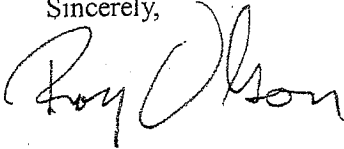
*Toxicity was defined as a reduction of the NOEC below 100% and was considered significant if the effect on the sample exposure was greater than 25%. Chronic toxicity is further expressed as toxic units (TUC), where  $TUC = 100/NOEC$ . The No Observable Effect Concentration (NOEC) is expressed as the maximum percent of receiving water that causes no observable effect on a test organism, as determined by the result of a critical life stage toxicity test. The NOEC is defined, in (USEPA, 2002) as the lowest concentration of toxicant to which organisms are exposed in a life-cycle or partial life-cycle (short-term) test, which causes adverse effects on the test organisms (i.e., where the values for the observed responses are statistically significantly different from the controls).*

This definition of the listing criteria is not sufficiently straightforward and clear given that the data provided is in the form of TUCs, and the numeric TUC value to which the data were compared was not provided. A more clear presentation of the above criteria would be that significant toxicity is considered a 75% effect or greater on the test organisms as a percentage of the control.

Additionally, the toxicity listing is based on toxicity tests to multiple test species. The purpose of testing toxicity to multiple species of test organisms is that these different organisms are indicators of different types of toxicity problems. Therefore, it would be more appropriate and useful to list toxicity to each individual species independently, rather than one general toxicity listing that does not differentiate the different toxicity tests. Additionally, if there is significant toxicity to a test species by a survival endpoint, then toxicity by a reproduction or growth endpoint should not additionally be counted. Toxicity measured by a survival endpoint is greater than toxicity measured by a reproduction or growth endpoint, and is therefore already accounted for and need not be tested separately.

Thank you for your consideration of these comments. If you have any questions, please feel free to contact me at 805-652-4593.

Sincerely,



Ray Olson  
Environmental Services Manager  
City of San Buenaventura

cc: Vicki Musgrove, City of Ventura Assistant PW Director



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

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P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE: WM-9

June 17, 2009

Ms Tracy Egoscue, Executive Officer  
California Regional Water Quality  
Control Board – Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Attention Mr. Man Voong

Dear Ms Egoscue.

### **COMMENTS ON THE 2008 LOS ANGELES REGION IMPAIRED WATER BODIES LIST, SECTION 303(d) OF THE CLEAN WATER ACT**

Thank you for the opportunity to comment on the proposed impaired water bodies list for the Los Angeles Region, Section 303(d) of the Clean Water Act (303(d)). On behalf of the County of Los Angeles and the Los Angeles County Flood Control District (LACFCD), we have the following comments.

#### **1. Evaluation of Sediment Impairment**

In evaluating the sediment impairment in Bays and Estuaries for 303(d) listing purposes, the Regional Water Quality Control Board (Regional Board) – Los Angeles Region (Los Angeles Regional Board) utilized sediment quality guidelines and numeric objectives established by the National Oceanic and Atmospheric Administration (NOAA). These NOAA guidelines and objectives were established based on the single-line-of-evidence approach and were never intended to be used for 303(d) listing purposes.

As you are aware, the State Water Resources Control Board (State Water Board) has developed Sediment Quality Objectives (SQO) for Enclosed Bays and Estuaries, adopted on September 16, 2008, in the State of California. For the purposes of assessing sediment impairment, the State SQO utilizes the

multiple-line-of-evidence approach. Further, the State SQO was established based on the most recent scientific information available to date and is hence more robust and scientifically sound.

The State SQO plan recommends that Regional Boards utilize the plan to evaluate sediment impairments in Bays and Estuaries to develop a new or revise the existing 303(d) list. Given that the State SQO supersedes the NOAA criteria, the State SQO must be used for appropriate evaluation of 303(d) listings of sediment impairments in Bays and Estuaries in the Los Angeles Region.

## **2. Evaluation of Impairment for Bacteria**

The use of calendar-month approach for calculating the geometric mean for bacteria indicators is more reasonable than the 30-day rolling approach that has been used in the past. Bacteria standards established by the Los Angeles Regional Board (e.g., Basin Plan), the State Water Board (e.g., Ocean Plan), and the United States Environmental Protection Agency (EPA) all require a minimum of five data points for the calculation of geometric mean to satisfy the needed statistical significance. The use of data points less than five for the calculation of geometric mean for 303(d) listing purposes does not follow the Federal and State standard guidelines. Given that the Los Angeles Regional Board indicated in its report that two or more samples were used in the calculation of the geometric mean, this does not meet the established guidelines for the calculation of geometric mean.

It is clear that sufficient data points ( $\geq 5$ ) may not be available in each month. To avoid the insufficiency of data points, it is more appropriate to calculate the geometric mean based on calendar seasons (instead of calendar months), consistent with the EPA's recommendation. In this approach, a year can be divided into two to four seasons based on recreational uses and one geometric mean would be calculated for each season.

Moreover, it is not appropriate to use geometric mean for 303(d) listing purposes. Geometric mean can be used to assess the condition of a water body over a longer time period for impaired water bodies, but not as a parameter for developing a new or revising the current 303(d) list. Thus, listing a water body for bacterial impairment shall be made exclusively based on the evaluation of the single-sample exceedances only.

Further, the Basin Plan lists four bacteria indicators (total coliform, fecal coliform, Enterococcus, and fecal-to-total coliform ratio) for marine waters and two bacteria indicators (*E. coli* and fecal coliform) for fresh water. With the exceedance-day approach used by the Los Angeles Regional Board to assess bacteria impairment, an exceedance day is defined as a day during which any of the bacteria indicators exceeds the standard. In the case of marine waters having four bacteria indicators, a day with exceedance in only one bacteria indicator can still be considered as an exceedance day, even if the other three remaining indicators do not show an exceedance. This approach is not logical and could potentially result in an unimpaired water body being listed as impaired. Instead, the appropriate approach should be to list a water body when two or more of the bacteria indicators have exceeded the standard.

### **3. Evaluation of Impairment for Invasive Species**

We agree that actions need to be taken to curtail the impact of invasive species on the aquatic environment and human health. However, we have reservations on listing invasive species as pollutants requiring Total Maximum Daily Loads (TMDL). Invasive species should not be interpreted as pollutants. Invasive species are alien species of which the sources are mostly unknown, and even when known, they cannot be attributed to local discharges. Further, there is no water quality standards set for invasive species in the Basin Plan. Additionally, the State listing policy, which the current listing is based on, does not include guidelines for listing invasive species. Thus, the invasive species listing should be removed from the TMDL-required list.

Invasive species should be treated as a cause of harm to the aquatic environment, but not as pollutants that require development of TMDL allocations. The impact of invasive species on the aquatic ecosystem should then be addressed through programs other than TMDLs.

### **4. Evaluation of Impairment for Metals**

In the current evaluations for metals listing, it is unclear whether total or dissolved metals criteria are applied and appropriate hardness values are used. However, in reviewing some of the exceedances observed in the applicable datasets in comparison with the exceedances listed in the Los Angeles Regional Board's fact sheet for the proposed listings, it appears that most of the listings are made based on observed total metals fraction. The California Toxics Rule

mandates that the dissolved, and not the total, metals fraction be used, as dissolved metals concentrations more closely approximate the bioavailable fraction of a metal than total recoverable concentrations do.

Although the California Toxics Rule includes conversion factors for total metals, only dissolved metals were intended to be used as criteria for assessing water body impairment for 303(d) listing purposes. In the absence of dissolved metals data, listing a water body for metals impairment lacks the necessary scientific and regulatory basis. Therefore, all currently proposed metals listings that are generated based on observed total recoverable metals data must be removed. The assessment of water body impairment for metals must be made only based on observed dissolved metals data.

#### **5. Evaluation of Impairment for Ammonia**

For several water bodies in the Los Angeles Region, site-specific objectives (SSOs) for ammonia were developed, amended into the Basin Plan, and became effective on April 23, 2009. As indicated in the associated Basin Plan Amendment, the SSO adopted for ammonia applies to water bodies in the Los Angeles River, San Gabriel River, and Santa Clara River Watersheds.

With the Los Angeles Regional Board having adopted the ammonia SSO, the criteria proposed in the SSO must be utilized for evaluating the current listing. Therefore, the assessments for ammonia impairment in all of the applicable watersheds need to be re-evaluated to reflect the appropriate ammonia water quality standards in the Basin Plan.

#### **6. Evaluation of Listings Based on Conditional Beneficial Uses**

Several of the new proposed 303(d) listings are generated based on the conditional beneficial use designations, which are denoted with an asterisk (\*) in the Basin Plan. In the past, both the State Water Board and the EPA have taken the position that conditional beneficial uses are not final designations and should not be used for 303(d) listing purposes. As such, the State Water Board removed all of the proposed 303(d) listings generated for the conditional beneficial use designations during the 2006 303(d) listing update.

Since the 2006 action, we are not aware of any status change on conditional beneficial use designations. Thus, the Regional Board must abide to the Federal and State policies and remove all water bodies that are proposed for the 2008 303(d) listings where a listing was done based on an evaluation of criteria for beneficial uses designated as conditional (i.e., asterisked) in the Basin Plan

**7. Evaluation of Impairment for Sulfates in Puente Creek**

Based on the water quality data available for Puente Creek, the Los Angeles Regional Board concluded that Puente Creek should be placed on the 303(d) listing for sulfate impairment. As you know, the Puente Creek station was sampled during the 2006-07 monitoring year by the LACFCD as part of the Los Angeles County Municipal Storm Water Permit's San Gabriel River Tributary Monitoring Program.

In its evaluation, the Los Angeles Regional Board used recommended maximum contaminant level criteria of 250 micrograms per liter as specified in the California Code of Regulations' Table 64449-B and concluded that five out of seven data points were exceeded. However, an exceedance for sulfate was observed for only one of the seven data points per the data collected by the LACFCD and reported to the Los Angeles Regional Board. Given the State's 303(d) listing policy requires a minimum of two exceedances for a water body to be listed as impaired, Puente Creek is erroneously listed for sulfate and must be removed from the proposed listing.

**8. Evaluation of Impairment for Bis(2-ethylhexyl)phthalate**

Bis(2-ethylhexyl)phthalates (DEHPs) are commonly found in plastic materials used for sampling and laboratory analysis, including gloves, tubings, and buckets that are made of plastics. A review of the LACFCD's sampling data from 2001 to 2007 indicates that a significant exceedance of DEHP was observed during the 2003-04 sampling season, but not detected in any of the remaining sampling years. In 2004 our records indicate that a change was made in the equipment used to analyze the samples. During the same period, it was noted that analytical laboratories across the State were making changes to address DEHP sample contamination. Given that the major sources of DEHP are plasticizers, the DEHP detections observed during the 2003-04 sampling season could

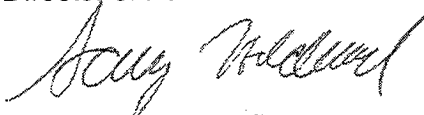
Ms. Tracy Egoscue  
June 17, 2009  
Page 6

potentially be a result of sample handling and laboratory analysis. Therefore, until further evidence is found that links the DEHP to sources other than the field and laboratory equipments used, this pollutant must not be included in the 303(d) list.

We look forward to your consideration of our comments. If you have any questions, please call me or your staff may contact Mr. Frank Wu at (626) 458-4358 or [fwu@dpw.lacounty.gov](mailto:fwu@dpw.lacounty.gov)

Very truly yours,

GAIL FARBER  
Director of Public Works



GARY HILDEBRAND  
Assistant Deputy Director  
Watershed Management Division

GA:jtz

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## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN  
*Chief Engineer and General Manager*

June 17, 2009  
File No. 31-370.40.4A

Mr. Man Voong  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Dear Mr. Voong:

### **Comments on the April 2009 Proposed 2008 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters**

The Sanitation Districts of Los Angeles County ("Sanitation Districts") appreciate the opportunity to comment on the April 2009 proposed 2008 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters ("303(d) List") prepared by the California Regional Water Quality Control Board, Los Angeles Region ("Regional Board"). The Sanitation Districts are a consortium of 24 independent special districts serving the wastewater and solid waste management needs of over five million people and 3,300 industries in Los Angeles County, California. The Sanitation Districts currently operate and maintain over 1,400 miles of trunk sewers and 11 wastewater treatment plants that collectively treat over 450 million gallons per day of wastewater. Of the 11 wastewater treatment plants, nine are located in the Los Angeles Region. Seven of these treatment plants discharge to inland surface waters in the San Gabriel River, Santa Clara River, and Rio Hondo watersheds; one discharges to the Pacific Ocean; and one does not discharge to surface waters but instead solely supplies recycled water for irrigation.

First, the Sanitation Districts would like to take this opportunity to commend Regional Board staff for their diligent implementation of the State Water Resources Control Board's ("State Board's") Quality Control Policy for Developing California's Clean Water Act Section 303(d) List ("Listing Policy") to produce, for the most part, a well-documented and scientifically valid 303(d) List. In addition, the Sanitation Districts greatly appreciate the efforts of the Regional Board to make the listing process more transparent, particularly through making the data used to assess listings available on the Regional Board's website and through production of clear fact sheets on each water body/pollutant combination.

Although the Sanitation Districts support the overall methodology used by the Regional Board to produce the 303(d) List, the Sanitation Districts do have concerns on some aspects of it, particularly where the methodology used was not consistent with direction provided by the State Board in their Listing Policy. General comments relating to these concerns are provided below and detailed specific comments are provided in Attachment 1 and appendices to this letter.



### *1. Nutrient Criteria Should Not be Promulgated as Part of the 303(d) Listing Process*

Section 3.3.3 of the 2008 Update of the Los Angeles Region Integrated Report Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters ("303(d) List Staff Report") states that in the current 303(d) List update, nitrogen impairment decisions continue to be based on the current Basin Plan objectives for nitrogen compounds. However, in the 303(d) List Staff Report the Regional Board proposes to use a new methodology for assessing nutrient-related impairments in the future. This methodology would rely on an assessment of both nutrient concentrations and one or more biological response indicators such as pH and dissolved oxygen.

While we commend the Regional Board for recognizing the significant issues associated with eutrophication and nutrient-related impairments, the 303(d) List Staff Report is an inappropriate vehicle to introduce proposed nutrient criteria and objectives. Promulgation of new nutrient criteria and/or implementation policies related thereto constitutes an amendment to the Basin Plan, and should therefore be handled exclusively through appropriate Basin Plan amendment procedures. Adoption of Basin Plan amendments requires fulfilling the requirements of California Environmental Quality Act ("CEQA") as well as conducting an analysis in accordance with California Water Code 13241/13000 factors. The appropriate time to consider whether numeric nutrient criteria should be pursued is during the triennial review of the Basin Plan. During this and subsequent basin plan amendment review, the costs and benefits of adopting such criteria can be assessed and the priority for pursuing the criteria can be weighed against other basin planning priorities.

Notwithstanding our previous objection that proposed Basin Plan objectives and/or implementation policies related thereto should only be addressed through an appropriate Basin Plan amendment process, the Sanitation Districts have a number of concerns with the nutrient and biological response criteria approach proposed by the Regional Board. The Sanitation Districts do not believe that it is appropriate for the Regional Board to pursue development of numeric nutrient criteria at this time. The State Board, in conjunction with the United States Environmental Protection Agency ("USEPA") Region 9, has been actively working for a number of years on the development of numeric nutrient endpoint ("NNE") tools for California to address nutrient objectives. Statewide tools to assess nutrient impairments in freshwater streams and lakes are currently being peer reviewed, with ongoing validation studies being conducted for estuaries. These tools utilize biological indicators to assess nutrient impairments (excess algal biomass and extremes in photosynthesis-caused dissolved oxygen and pH). The State Board and USEPA have put extensive resources toward development of scientifically sound NNE tools. To avoid duplication of effort, the Regional Board should wait until the State Board releases its NNE tools before considering whether it should develop its own independent nutrient objectives. The approach to nutrient criteria developed by the State Board and USEPA Region 9 is described in the report, "Technical Approach to Develop Nutrient Numeric Endpoints for California" ("CA NNE"), released in 2006. The CA NNE report calls for using multiple lines of biological responses to make an assessment of impairment. Based on this assessment, if an impairment exists, then nutrient concentrations can be examined to determine if they are causing or contributing to the impairment, and nutrient standards can then be developed as appropriate. In preparing this report, the State Board and other experts correctly recognized that ambient nutrient concentrations typically do not correlate with algal/nutrient related impairments, and thus nutrient concentrations should not be used to assess whether an impairment exists. In conflict with the Statewide approach, the Regional Board approach includes nutrient concentrations (i.e., total nitrogen and phosphorous) as a line of evidence to use when assessing whether an impairment exists. Beneficial use impairment only occurs when, independent of nutrient loading, the biological response is of sufficient magnitude to adversely impact the use.

Examples of the proposed Regional Board approach to nutrient criteria are presented in Tables 3-2 and 3-3 of the 303(d) List Staff Report. In this table, the Regional Board lists criteria from a number of different sources, including the 2000 USEPA National Nutrient Criteria Technical Guidance ("National Guidance") and the subsequent 2001 USEPA Ecoregion III Nutrient Criteria Recommendations for Rivers and Streams ("Ecoregion III Guidance"). The purpose of the National Guidance was not to recommend specific nutrient criteria, but rather to describe an approach to be used by the states to develop such criteria. The numbers cited by the Regional Board in Tables 3-2 and 3-3 of the 303(d) List Staff Report from the National Guidance were taken from a table listing a number of examples of numeric thresholds drawn from various studies. No justification was provided by the Regional Board as to why these particular values were chosen, or why these particular values would be applicable to waterbodies in the Los Angeles Region. Furthermore, the approach described in the National Guidance and in the Ecoregion III Guidance, which covers the Xeric West ecoregion that includes most of the Los Angeles Basin, has been widely criticized for its technical shortcomings. Under this approach, criteria for nutrients are set at the 25<sup>th</sup> percentile of nutrient concentrations for all waterbodies within an ecoregion. This arbitrarily delineates 75% of the waterbodies in a region as impaired. Additionally, no attempt was made in the guidance documents to show a relationship between the nutrient criteria and eutrophic conditions that would affect beneficial uses. In response to these and other flaws, the guidance was never adopted in California, and the State Board and USEPA Region 9 continued to pursue efforts to develop guidance specific to California, as described above.

Another criteria source listed by the Regional Board was a New Zealand guidance document. The Sanitation Districts believe that criteria for another continent should not be used without a high degree of scrutiny to ensure that it is appropriate for the Los Angeles Region. A site-specific study for Malibu Creek was also referenced; however, criteria for one specific water body should not be applied region-wide unless a technical review indicates that it is appropriate region-wide. The last source mentioned is the State Board NNE screening tools for 303(d) listing. While the Sanitation Districts concur that the State Board's NNE guidance, as presented in the CA NNE report, is the most appropriate guidance currently available, the Regional Board's tables do not accurately portray the guidance in the report. In particular, the pH, dissolved oxygen, total nitrogen, and total phosphorus criteria listed in Table 3-2 for the State Board NNE screening tools for 303(d) listing are not consistent with the CA NNE report. Additionally, the criteria listed for benthic algal biomass are misrepresented; the criteria listed are not meant to be used to determine impairments, but rather, to distinguish between waterbodies that are definitely not impaired versus those that are potentially impaired, but for which further study is needed to assess an impairment.

Overall, regarding assessment of nutrient impairments, the Sanitation Districts recommend that the Regional Board not develop its own policy at this time, or in this forum. Where assessment of nutrient impairments is necessary prior to release of statewide nutrient criteria, the Regional Board should refer to the CA NNE for guidance. Should the Regional Board elect to develop regional nutrient criteria, this should be accomplished through the Basin Plan amendment process.

**2. All Listings Based on the P\* MUN Beneficial Use should be Removed**

The Sanitation Districts believe that the following water body/pollutant combinations should not be added to the 303(d) List:

**Coyote Creek** - sulfate and TDS (based on application of secondary MCLs)

**San Gabriel River Reach 1** - TDS (based on application of secondary MCLs)

**San Jose Creek Reach 1** - sulfate (based on application of secondary MCLs)

**Santa Clara River Reach 5** - iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane (based on application of California Toxics Rule (CTR) human health criteria using water plus organisms)

**Santa Clara River Reach 6** - iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane, bis(2-ethylhexyl)phthalate (based on application of CTR human health criteria using water plus organisms)

These new proposed listings are erroneously based on application of the conditional Municipal and Domestic Supply (P\* MUN) beneficial use. A federal court, the State Board, and the USEPA have all determined that the P\*MUN beneficial use is not a properly designated use available for any regulatory purpose, including assessment of water bodies for inclusion on the Regional Board's proposed 2008 303(d) List. The application of the conditional P\* MUN beneficial use resulted in the incorrect application of maximum contaminant levels (MCLs) and CTR human health criteria using "water plus organisms" standards.

As background, in 1994, the Regional Board chose to designate a Municipal and Domestic Supply (MUN) beneficial use to all water bodies identified in the Basin Plan as a response to the State Board's issuance of Resolution No. 88-63 (the "Sources of Drinking Water Policy") and the Regional Board's companion resolution, Resolution No. 89-03. However, the Regional Board also recognized that additional technical work was needed before such designations could validly occur, and included the following language in the Basin Plan, at pages 2-3 and 2-4:

"These policies [Res. 88-63 and 89-03] allow for Regional Boards to consider the allowance of certain exceptions according to criteria set forth in SB Resolution 88-63. While supporting the protection of all waters that may be used as a municipal water supply in the future, the Regional Board realizes that there may be exceptions to this policy.

In recognition of this fact, the Regional Board will soon implement a detailed review of criteria in the State Sources of Drinking Water policy and identify those waters in the Region that should be excepted from the MUN designation. Such exceptions will be proposed under a special Basin Plan Amendment and will apply exclusively to those waters designated as MUN under SB Res. No. 88-63 and RB Res. No. 89-03.

In the interim, no new effluent limitations will be placed in Waste Discharge Requirements as a results [sic] of these designations until the Regional Board adopts this amendment."

In accordance with this Basin Plan implementation provision, Table 2-1 of the Basin Plan (which sets forth the beneficial uses of inland surface waters) contains a distinct designation, in form of the P\* MUN use, for the MUN use that was purportedly conditionally designated pursuant to Res. Nos. 88-63

and 89-03. At the bottom of each page of Table 2-1, a footnote exists to explain the asterisk, as follows: “\* Asterixed MUN designations are designated under SB 88-63 and RB 89-03. Some designations may be considered for exemptions at a later date. (See pages 2-3,4 for more details).”

Following a judicial challenge to the USEPA’s partial approval/partial disapproval of these Basin Plan provisions, in December 2001 the U.S. District Court for the Central District of California found that the beneficial use designation of P\* MUN was only a “conditional” designation, and that implementation of the beneficial use could not occur until or unless the Regional Board undertook the study referenced in the Basin Plan provision and revised the Basin Plan accordingly. *See Order Granting Plaintiffs’ Motion for Summary Judgment and Remanding Action to EPA in Cities of Los Angeles, Burbank, and Simi Valley, and County Sanitation Districts of Los Angeles County v. U.S. EPA, et al.*, U.S. District Court, Central District, Case No. 00-08919 R(RZx) (December 18, 2001) (included as Attachment 2). The District Court directed USEPA to approve the Basin Plan provisions in accordance with the decision, and on February 15, 2002, the USEPA approved the provisions as follows:

“I. Municipal and Domestic Supply Designation (“MUN”)

In today’s action, EPA approves in whole the 1994 Basin Plan. 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 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 ...” [emphasis added]

See February 15, 2002 letter from Alexis Strauss, Director, Water Division, USEPA to Celeste Cantu, Executive Director, State Water Board (included as Attachment 3).

During the previous 303(d) List update in 2006, the Regional Board included water body segments on that proposed 303(d) List based on the P\* MUN beneficial use. After receiving comments objecting to this action, similar to the Sanitation Districts comments herein, the State Board removed all of the proposed 303(d) listings based on the P\* MUN beneficial use, stating that the P\* MUN beneficial use should not be used for listing purposes, and is not a designated beneficial use for the identified water bodies.<sup>1</sup> No change to the status of the P\* MUN beneficial use has occurred since the above described actions; therefore, the Sanitation Districts recommend that the Regional Board act in accordance with the State Board’s previous determination on this issue.

In summary, the P\* MUN beneficial use as currently set forth in the Basin Plan does not yet designate the water bodies at issue with any MUN-related beneficial use. Thus, no 303(d) listing decisions can be based on the P\* MUN beneficial use and resulting application of MCLs and CTR human health criteria using “water plus organisms” standards. The Sanitation Districts therefore request that these water body/pollutant listings noted above be removed from the Regional Board’s proposed 2008 303(d) List.

<sup>1</sup> Staff Report, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments, Response to Comments, State Board, September 2006, at pages 69, 82, 91-92 (pertaining to listings for Coyote Creek, San Gabriel River Reach 2, Santa Clara River Reaches 5 & 6), 94, 101, 105, and 106.

### ***3. Listing Analyses Should be Consistent with State Board Direction***

In addition to addressing application of the P\*MUN use when it evaluated the 2006 303(d) List, the State Board provided direction on several additional issues, to ensure statewide consistency in assessment of water body impairments.<sup>2</sup> These issues include the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values for hardness-dependent metals. The Regional Board failed to adhere to this direction when making several listing decisions. The Sanitation Districts believe that consistent application of the guidance provided by the State Board will result in a cohesive, well-documented, and scientifically valid 303(d) List, and urge the Regional Board to follow this guidance.

### ***4. Additional Data Should be Included Where Appropriate***

In several instances the Sanitation Districts' analyses of listing decisions reached different conclusions than the Regional Board analyses because the Sanitation Districts were able to identify additional data that, when considered together with the data considered by the Regional Board, demonstrate attainment. In all instances, the Sanitation Districts believe that these data meet the definition of "existing and readily available data," and therefore must be considered by the Regional Board.<sup>3</sup> In most cases, these data were collected as part of NPDES permit monitoring requirements and were submitted to the Regional Board in discharge monitoring reports. The data were, therefore, in the possession of the Regional Board. In some cases, the data were collected after the initial data solicitation for the 2008 303(d) List, and a large enough dataset is now available to meet the minimum number of samples required for listing/delisting. In all of these instances, re-examination of the proposed decisions with respect to listing is warranted to ensure that sound listings decisions are made in accordance with the Listing Policy.

### ***5. Specific Comments on Listing Decisions***

In addition to these general comments, the Sanitation Districts have specific comments on the listing decisions for a number of water body/pollutant combinations. Detailed specific comments are provided in the appendices to this letter, and Attachment 1 includes a tabular summary of the specific comments. Based on review of the data and fact sheets released for public comment, the Sanitation Districts have identified a number of water body/pollutant combinations proposed for inclusion on the 2008 303(d) List that are attaining water quality standards and therefore qualify for delisting (or, alternatively, when they are not already on the 303(d) List do not qualify for listing). The Sanitation Districts believe it is very important for the Regional Board to follow-up on this information and make changes to the proposed 2008 303(d) List where appropriate, since the implications of erroneous listings are substantial.

### ***6. Support Proposed Delistings for Certain Water body/Pollutant Combinations***

The Sanitation Districts have reviewed the Regional Board's 303(d) listing analyses for the water body/pollutant combinations listed below. The Sanitation Districts believe the analyses are technically sound, and support the Regional Board's decisions to remove these water body/pollutant combinations from the 303(d) list:

- Ballona Creek - silver

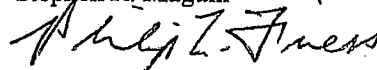
<sup>2</sup> Staff Report, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments, Response to Comments, State Board, September 2006.

<sup>3</sup> Listing Policy, Section 6.1.1, p. 17, stating, "at a minimum, readily available data and information includes... receiving water monitoring data from discharger monitoring reports."

- Coyote Creek – zinc
- Los Angeles River Estuary - lead (sediment) and zinc (sediment)
- Rio Hondo Reach 2 - ammonia
- San Jose Creek - selenium
- Wilmington Drain - ammonia
- Walnut Creek Wash - toxicity

In conclusion, the Sanitation Districts would like to thank the Regional Board for its efforts in revising the proposed 2008 303(d) List. We urge the Regional Board to take the final step in revising this list and to consider the information and analysis we are submitting to complete the development of a scientifically and legally defensible list with a sound and consistent basis. If you have any questions regarding our comments or the information and data we are providing to you, please contact Ken Hoffman at (562) 908-4288, extension 2445, [khoffman@lacsds.org](mailto:khoffman@lacsds.org)

Very truly yours,  
Stephen R. Maguin



Phillip L. Friess  
Departmental Engineer  
Technical Services Department

PLF:KMH:lmb  
Attachments

cc: LB Nye, Regional Board, Los Angeles Region

ATTACHMENT 1

**Table 1: Summary of Comments on Specific 303(d) Listings**

Fact Sheet	Water Body	Constituent	Regional Board Proposed Decision	Sanitation Districts Recommendation	Reason
A	San Gabriel River Estuary	Copper	Do Not Delist	Delist	Water quality objective being achieved
B	Coyote Creek	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
C	Santa Clara River Reach 6	Copper	List	Do not list	Water quality objective being achieved
D	San Gabriel River Reach 2	Cyanide	List	Do not list	Water quality objective being achieved
E	Santa Clara River Reach 6	Chlorpyrifos	Do Not Delist	Delist	Water quality objective being achieved
F	San Gabriel River Estuary	Nickel	List	Do not list	Insufficient Basis to List
G	Santa Clara River Reach 6	Diazinon	Do Not Delist	Delist	Water quality objective being achieved
H	San Gabriel River Reach 1	Total Dissolved Solids	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply
	Coyote Creek	Total Dissolved Solids & Sulfate			
	Santa Clara River Reaches 5 and 6	Iron & Conductivity			
I	Coyote Creek	Diazinon	List	Do not list	Water quality objective being achieved
J	Coyote Creek	Copper	Do Not Delist	Delist	Water quality objective being achieved
K	Coyote Creek	Lead	Do Not Delist	Delist	Water quality objective being achieved
L	San Gabriel River Reach 2	Lead	List	Delist	Water quality objective being achieved
M	Santa Clara River Reaches 5 and 6	Chlorodibromomethane	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply
N	Santa Clara River Reaches 5 and 6	Dichlorobromomethane	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply
O	San Jose Creek Reach 1	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
P	Santa Clara River Reach 5	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
Q	Santa Clara River Reach 5	Nitrate and Nitrite	Do Not Delist	Delist	Water quality objective being achieved
R	Santa Clara River Reach 6	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
S	Santa Clara River Reach 5	Polychlorinated biphenyls (PCBs)	List	Do not list	Insufficient Basis to List
T	Santa Clara River Reach 5	DDT	List	Do not list	Insufficient Basis to List
U	Santa Clara River Reach 6	Bis(2ethylhexyl)phthalate (DEHP)	List	Do not list	Water quality objective being achieved
V	Walnut Creek	Copper	List	Do not list	Water quality objective being achieved
W	Santa Clara River Estuary	Arsenic	List	Do not list	Water quality objective being achieved
X	Walnut Creek	Lead	List	Do not list	Water quality objective being achieved

ATTACHMENT 1

FACT SHEET A

**Water Body:** San Gabriel River Estuary  
**Pollutant:** Copper

**Listing:** Listed on the 303(d) List (Being Addressed by EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objective Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that this listing be moved to the list of constituents “being addressed by an EPA-approved TMDL.” In 2006 the Environmental Protection Agency (EPA) added copper impairment to the 303(d) List for the San Gabriel River Estuary (SGRE) based on total copper monitoring data, and a TMDL for copper was completed by EPA in March 2007.

*State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the State Board addressed the issue of using total metals data to assess impairments, stating:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>1</sup>

*Existing Listing Reevaluation*

As stated by the State Board, only the dissolved fraction of metals should be used for comparison with the CTR criteria. Therefore, in accordance with State Board direction, the copper listing should be reevaluated using only dissolved copper data. After the 2006 listing cycle, the Sanitation Districts of Los Angeles County (Sanitation Districts) and Los Angeles Department of Water and Power (LADWP) began conducting dissolved copper analyses on SGRE samples. Table A1 of Appendix A contains the results of this dissolved copper monitoring. From the 120 total usable samples, ninety four-day chronic criteria averages were calculated, none of which exceeded the Criterion Continuous Concentration (CCC) for dissolved copper of 3.1 µg/L for marine waters. The Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List requires a minimum of twenty-eight samples with no more than two exceeding the water quality standard to remove a previously listed water segment from the 303(d) list. For a sample size from 95 to 106, Table 4.1 of the State’s listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than eight. Since ninety four-day average dissolved copper results through February 2009 show no exceedances of the CCC, copper should be delisted from the SGRE.

<sup>1</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.



## ATTACHMENT 1

### *EPA Method 200.8 compared with EPA Method 1640*

Additionally, dissolved copper data presented in Table A1 were generated using EPA Method 200.8 and EPA Method 1640. It is well documented that EPA Method 200.8 is susceptible to salt interferences, resulting in an over-estimation of the total copper concentration when used to analyze samples with elevated salinity. This is caused by sodium in the sample combining with argon used in the instrumentation to form a complex that has the same molecular weight as copper. Although this interference can be partially minimized with varying success by using collision cell techniques and sample dilution, the potential for a significant over-estimation of the actual copper concentrations remains. Additionally, increased sample dilution leads to unacceptably high detection limits. Sample dilution when using EPA Method 200.8 often results in reporting levels (RL) in excess of the 3.1 µg/L water quality objective.

In 1997, to address the shortcomings of EPA Method 200.8 the EPA developed and subsequently approved EPA Method 1640 for the quantification of trace metals. EPA Method 1640, in addition to requiring the use of "clean" sampling procedures, addresses the sodium/argon interference by incorporating a chelation preparation step that removes the metal from the matrix before ICPMS analysis. Using dissolved copper measurements obtained by EPA Method 1640 for 303(d) listing determination eliminates multiple confounding factors such as the ambiguity regarding the use of an appropriate dissolution translator and allows for direct evaluation of the impairment condition.

Results in Table A1 demonstrate the superiority of EPA Method 1640 as opposed to EPA Method 200.8. Analyses obtained from EPA Method 200.8 yielded only four usable samples while analysis using EPA Method 1640 yielded 116 usable samples. EPA Method 1640 clearly generates more accurate results and, for the purposes of assessing the validity of the 303(d) listing, should be the only method considered. Of the 86 samples analyzed using EPA Method 1640, no samples exceed the CCC of 3.1 µg/L for marine waters.

ATTACHMENT 1

FACT SHEET B

**Water Body:** Coyote Creek  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by Actions Other than a TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Site-specific objectives (SSOs) for ammonia were developed for Coyote Creek and became effective and adopted into the Basin Plan on April 23, 2009. However, these objectives were approved by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) in 2007 and subsequently approved by the State Water Resources Control Board in January 2008. Considering that the Regional Board has been aware of these impending changes to the Basin Plan since 2007, the chronic ammonia water quality standards reflected in the SSO should have been used to evaluate ammonia listings for this 303(d) listing cycle.

*Existing Listing Reevaluation*

An examination of the Coyote Creek ammonia, pH, and temperature data provided to the Regional Board as part of their 303(d) listing review (March 2004 through February 2007) reveals that the four-day chronic SSO-adjusted Criterion Continuous Concentration (CCC) threshold for ammonia was only exceeded in Coyote Creek on 17 occasions out of a total 374 measurements, as presented in Appendix B Table B.1. For a sample size of 363 to 374 the State's 303(d) listing policy, using the binomial distribution formula associated with Table 4.1, recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 31. Since 374 four-day average ammonia results show 17 exceedances of the CCC, ammonia should be delisted from Coyote Creek.

ATTACHMENT 1

FACT SHEET C

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Copper  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do not list – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that a new listing for copper be made to the 303(d) list in Santa Clara River Reach 6. The fact sheet for copper in Santa Clara River Reach 6 states six of 21 samples exceeded the "CTR [California Toxics Rule] water quality standard for copper (acute) that is 13.44 ppb. The standard is hardness dependent based on a hardness value of 100." The fact sheet also states the standard was compared against data collected at Los Angeles County MS4 Mass Emission Santa Clara River Monitoring Station (S29 - San Francisquito Creek) for data collected from October 31, 2003 to April 2, 2007. It is unclear if the Regional Board's assessment was made using total or dissolved copper data for this recommended listing, but it should be noted that the CTR copper values are expressed as a dissolved fraction.

*State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. The State Board directed that dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

"The CTR mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions."<sup>2</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

"Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant."<sup>3</sup>

<sup>2</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>3</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

Finally, the State Board provided the following guidance on the appropriate hardness to use for listing assessment:

“Revisions were made to fact sheets in order to clarify how the hardness based criteria was calculated. In almost all cases, the criteria was calculated for each individual sample using the hardness value for that sample. However, there were a few instances where only the average hardness data was available and used. In cases where the average value was used, recommendations were to not list so using this average value did not result in any new listings.”<sup>4</sup>

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available only for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

Using the concurrently measured hardness to evaluate the hardness-dependent CTR copper objectives, the chronic water quality objectives ranged from 8.2 to 36.6 µg/L for dissolved copper. For the purposes of calculating the hardness dependent CTR copper objectives, concurrently measured hardness was also used when available and the average of all location hardness measurements collected were used when concurrent hardness was not measured. To reevaluate the proposed listing, total copper measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the Santa Clara River Reach 6 during approximately the same time period (2004 through April 2007) should be considered. Although dissolved copper was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total copper was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts' data with the MS4 data, a total of three copper exceedances of the Criterion Continuous Concentration (CCC) were observed out of sample size of 69 and two copper exceedances of the Criterion Maximum Concentration (CMC) were observed out of sample size of 71. For a sample size from 60 to 71, Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than six. Therefore, the proposed copper listing in Santa Clara River Reach 6 should be rejected. A complete summary of the copper and hardness data along with the CTR hardness dependant objective calculations can be found in Appendix C - Table C1.

<sup>4</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 171 (Comments:81.3), September 2006.

## ATTACHMENT 1

### FACT SHEET D

**Water Body:** San Gabriel River Reach 2  
**Pollutant:** Cyanide

**Listing:** List on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Do not list – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing a new listing for cyanide on the 303(d) list in San Gabriel River Reach 2. The fact sheet prepared by the Regional Board for cyanide in San Gabriel River Reach 2 states "Eight of 20 samples exceeded the California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for Cyanide and one of 20 samples exceeded the Criterion Maximum Concentration (CMC)." The data included with the fact sheet was collected from October 2003 to April 2007 at Los Angeles County Department of Public Works (LACDPW) MS4 mass emission monitoring station S14, which located downstream of San Gabriel River Parkway.

#### *State Water Resource Control Board Guidance*

In September 2006, the State Water Resources Control Board (State Board) was clear in response to comments during the 303(d) listing cycle that both wet and dry weather data must be used for assessment unless the Basin Plan includes provision for separating wet and dry weather data:

"Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant."<sup>5</sup>

#### *Proposed Listing Reevaluation*

As confirmed by the State Board, wet and dry weather data are necessary to examine possible listing on the 303(d) list. The Regional Board, however, neglected to include other available data in San Gabriel River Reach 2 for the cyanide listing assessment. Although it is unclear whether the omission of data by the Regional Board was accidental, the dry weather data must be included in accordance with the State Board's guidance. Thus, an additional 108 San Gabriel River Reach 2 cyanide samples collected during the same time period by the Sanitation Districts of Los Angeles County (Sanitation Districts) should be included in the evaluation. From this data set, only one of the additional 106 four-day averages exceeds the 5.2 µg/L CCC water quality standard for cyanide (see Appendix D - Table D1). Combining the two data sets results in nine exceedances of the CCC for cyanide out of 124 four-day averages. For a sample size from 118 to 129, Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than eleven. Therefore, cyanide for Reach 2 of the San Gabriel River should not be included on the 2008 303(d) List.

<sup>5</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

### FACT SHEET E

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Chlorpyrifos

**Listing:** Listed on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved or List – “Being Addressed by Actions Other Than TMDL”

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) included chlorpyrifos for Reach 6 of the Santa Clara River during the 2006 listing cycle. Their evaluation of available data indicated an impairment of the California Department of Fish Game four-day Criterion Continuous Concentration (CCC) threshold of 0.05 µg/L using data collected as part of the Surface Water Ambient Monitoring Program (SWAMP) study conducted in Bouquet Canyon Creek (SCTBQT) from 2001 through 2003.

#### *Existing Listing Reevaluation*

A contemporary analysis of available data from October 2001 to April 2008 yields two valid sample results collected by the SWAMP and 33 valid sample results collected by the Los Angeles County Department of Public Works (LADPW) at the Los Angeles County MS4 Mass Emission Santa Clara River Monitoring Station (S29 - San Francisquito Creek). This dataset along with the associated CCC objective can be found in Appendix E - Table E1. Evaluation of these samples for comparison to the CCC results in two observed exceedances of the four-day average with a sample size of 32. For a sample size from 28 to 36, Table 4.1 of the State's listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than two.

#### *Recategorization of Listing*

Finally, it should be noted that EPA has been phasing out all non-agricultural uses of chlorpyrifos with the cessation of sales of all indoor and outdoor residential use products by December 31, 2004. Consideration of data since January 1, 2005 yields 18 four-day average chlorpyrifos results with no exceedances of the 0.05 µg/L threshold. This listing should be moved to the “Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL” list since this residential use phase-out of chlorpyrifos is a regulatory action (other than a TMDL) and appears to be resulting in attainment of standards.

## ATTACHMENT 1

### FACT SHEET F

**Water Body:** San Gabriel River Estuary  
**Pollutant:** Nickel  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Insufficient Basis to List

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing to add nickel to the 2008 303(d) List for the San Gabriel River Estuary. The fact sheet for nickel in San Gabriel River Estuary states “13 of 47 samples exceed the California Toxics Rule Criterion Continuous Concentration (CCC)” and the “California Toxics Rule (CTR) lists a Criterion Continuous Concentration of 8.2 µg/L and a Criterion Maximum Concentration (CMC) of 74 µg/L for nickel to protect aquatic life in saltwater for the total fraction.”

#### *California Toxic Rule and State Water Resources Control Board Guidance*

Footnote m of the CTR, which is applicable to nickel, states that the CCC and CMC are expressed as the dissolved fraction of the metal, not the total concentration. The CTR states:

“These freshwater and saltwater criteria for metals are expressed in terms of the dissolved fraction of the metal in the water column.”<sup>6</sup>

The use of dissolved metal criteria and data to assess 303(d) listing was clearly stated by the State Water Resources Control Board (State Board) in response to comments for the 2006 303(d) listing cycle. The State Board stated:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>7</sup>

#### *Proposed Listing Reevaluation*

The analysis conducted to justify the nickel listing was incorrect. The analysis using the CTR was conducted by comparing the CCC and CMC against the total fraction of nickel. The correct approach is to assess whether there is an impairment by comparing dissolved nickel data to the CMC and CCC. The fact sheet states that data collected by the Sanitation Districts of Los Angeles County and Los Angeles Department of Water and Power were used for the listing. Both of these data sets contain only total nickel results for the San Gabriel River Estuary, so this data should not have been used to assess whether there is impairment. Since no data is available for the purposes of evaluating an impairment, nickel should not be added to the 2008 303(d) List for the San Gabriel River Estuary.

<sup>6</sup> Water Quality Standards; Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California; Rule, 40 CFR Part 131, page 31716, footnote m, May 18, 2000.

<sup>7</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

## ATTACHMENT 1

### FACT SHEET G

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Diazinon

**Listing:** Listed on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved or List – “Being Addressed by Actions Other Than TMDL”

The California Regional Water Quality Control Board, Los Angeles (Regional Board) included diazinon for Reach 6 of the Santa Clara River during the 2006 listing cycle because their evaluation of available data indicated that the California Department of Fish and Game (CADFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L diazinon<sup>8</sup> was exceeded in samples collected from Bouquet Canyon Creek. All of the utilized monitoring data was collected as part of a Surface Water Ambient Monitoring Program (SWAMP). A contemporary analysis of available data finds 2 valid samples available from the SWAMP program, 33 samples collected by the Los Angeles County Department of Public Works, and 25 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix G – Table G1.

#### *State Water Resource Control Board Guidance*

Section 6.1.5.3 of the Water Quality Control Policy for Developing California’s Clean Water Act Section 303(d) List states:

“If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered.”

#### *Existing Listing Reevaluation*

By December 31, 2004, Environmental Protection Agency (EPA) bans on sales of all indoor and outdoor non-agricultural products containing diazinon took effect. EPA’s action should be considered implementation of a significant management practice in Reach 6 of the Santa Clara River. Accordingly, only data collected since January 1, 2005 should only be used for listing reevaluation. If data generated after the residential use ban (January 1, 2005) to April 2007 is considered, only two four-day average diazinon results exceeded the CCC with a sample size of 29. For a sample size of 28-36, Table 4.1 of the State’s listing policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal or less than two. In addition, the most recently available data shows no exceedances were found in nine samples collected between April 2007 and July 2008. Therefore, diazinon in Reach 6 of the Santa Clara River should be removed from the 303(d) list.

#### *Recategorization of Listing*

In addition, prior to delisting this listing should be moved to the “Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL” category since the EPA residential use phase-out of diazinon is a regulatory action (other than a TMDL) and has been successful in attaining compliance with standards.

<sup>8</sup> At the time of original listing, the CADFG CCC for diazinon was 0.08 and was has since been modified to 0.10 µg/L diazinon.



## ATTACHMENT 1

### Fact Sheet H

**Water Body/Pollutant: San Gabriel River Reach 1 - Total Dissolved Solids  
Coyote Creek - Total Dissolved Solids and Sulfate  
Santa Clara River Reach 5 and 6 - Iron and Specific Conductivity**

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Beneficial Use is Wrong for Water Body; MCLs Do Not Apply

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing new 303(d) listing for the following water body/pollutant combinations: San Gabriel River Reach 1 for total dissolved solids; Coyote Creek total dissolved for solids and sulfate; and Santa Clara River Reaches 5 and 6 each for iron and specific conductivity. These listings are based on the application of the California Department of Health Services secondary drinking water standards based on the conditional potential municipal and domestic supply (P\* MUN) beneficial use of these reaches.

#### *P\*MUN Beneficial Use and State Water Resources Control Board Guidance*

These new listings are improperly based on the conditional potential municipal and domestic supply (P\* MUN) beneficial use. A federal court,<sup>9</sup> the State Water Resources Control Board (State Board), and the United States Environmental Protection Agency (USEPA) have all determined that the P\* MUN beneficial use designation has no legal effect at this time. Water quality objectives derived from the P\* MUN beneficial use should not be used to assess 303(d) listings.

#### *Proposed Listing Reevaluations*

No Basin Plan objectives or California Toxics Rule (CTR) standards apply to any of these water body/pollutant combinations. Since no objectives or standards are available for the purposes of evaluating potential impairments of these water body/pollutant combinations, they should not be added to the 2008 303(d) List.

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<sup>9</sup> *Cities of Los Angeles, Burbank, and Simi Valley, and County Sanitation Districts of Los Angeles County v. U.S. EPA, et al.*, U.S. District Court, Central District, Case No. 00-08919 R(RZx) (December 18, 2001)

## ATTACHMENT 1

### FACT SHEET I

**Water Body:** Coyote Creek  
**Pollutant:** Diazinon  
**Listing:** Listed on the 303(d) List (TMDL Required List)  
**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) included diazinon for Coyote Creek during the 2006 listing cycle because their evaluation of available data indicated that the California Department of Fish and Game (CDFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L diazinon<sup>10</sup> was exceeded in samples collected by the Los Angeles County Department of Public Works (LACDPW) and the Sanitation Districts of Los Angeles County (Sanitation Districts). A contemporary analysis of available data indicates that 31 diazinon samples are now available from the LACDPW and 42 diazinon samples are now available from the Sanitation Districts to reassess the listing. This dataset is attached as Appendix I– Table II.

#### *State Water Resource Control Board Guidance*

Section 6.1.5.3 of the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List states:

“If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered.”

#### *Existing Listing Reevaluation*

By December 31, 2004, Environmental Protection Agency (EPA) bans on sales of all indoor and outdoor non-agricultural products containing diazinon took effect. EPA's action should be considered implementation of a significant management practice in Coyote Creek, since the primary sources of water to Coyote Creek are non-agricultural and the ban has essentially eliminated urban sources of diazinon. Accordingly, only data collected since January 1, 2005 should be used for listing reevaluation. If data generated after the residential use ban (January 1, 2005) to April 2008 is considered, only three four-day average diazinon results exceeded the CCC with a sample size of 51. For a sample size from 48 to 59, Table 4.1 of the State's listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than four. Therefore, diazinon in Coyote Creek should be removed from the 303(d) list.

#### *Recategorization of Listing*

While the data indicate that this pollutant/water body combination should be delisted, at minimum it should be moved to the “Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL” category. The EPA residential use phase-out of diazinon is a regulatory action (other than a TMDL) that has been successful in significantly reducing diazinon concentrations in Coyote Creek.

<sup>10</sup> At the time of original listing, the CDFG CCC for diazinon was 0.08 and was has since been modified to 0.10 µg/L diazinon.

ATTACHMENT 1

FACT SHEET J

**Water Body:** Coyote Creek  
**Pollutant:** Copper

**Listing:** List on the 303(d) List (Being Addressed by an EPA-Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Coyote Creek is currently listed for copper under the category of being addressed by an EPA-approved TMDL. The original listing determination was made prior to 2006, using total copper data in the reach collected by the Los Angeles County Department of Public Works (LACDPW) and the Sanitation Districts of Los Angeles County (Sanitation Districts). EPA completed a TMDL for copper in March 2007.

*State Water Resource Control Board*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the State Board addressed the issue of using total metals data to assess impairments, stating:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>11</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>12</sup>

Finally, the State Board provided the following guidance on the appropriate hardness to use for listing assessment:

“Revisions were made to fact sheets in order to clarify how the hardness based criteria was calculated. In almost all cases, the criteria was calculated for each individual sample using the hardness value for that sample. However, there were a few instances where only the average hardness data was available and used. In cases where the average value was used, recommendations were to not list so using this average value did not result in any new listings.”<sup>13</sup>

<sup>11</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>12</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

<sup>13</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 171 (Comments:81.3), September 2006.

## ATTACHMENT 1

### *Existing Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available only for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

Using the concurrently measured hardness to evaluate the hardness-dependent CTR copper objectives, the chronic water quality objectives ranged from 4.3 to 42.8 µg/L for dissolved copper. For the purposes of calculating the hardness-dependent CTR copper objectives, concurrently measured hardness was used when available and the average of all hardness measurements collected at a location were used when concurrent hardness was not measured. To reevaluate the existing listing, total copper measurements collected and reported to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) by the Sanitation Districts in Coyote Creek during approximately the same time period (2004 through April 2007) should be considered in addition to the LACDPW dissolved copper data. A complete summary of the copper and hardness data along with the CTR hardness-dependent objective calculations can be found in Appendix J - Table J1. Although dissolved copper was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total copper was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts data with the MS4 data, there were no copper exceedances of the Criterion Maximum Concentration (CMC) observed out of sample size of 121 and one exceedance of the Criterion Continuous Concentration (CCC) was observed out of sample size of 111. For a sample size of 107 to 117, Table 4.1 of the State 303(d) listing policy recommends delisting a pollutant/water body combination if the number of exceedances are equal or less than nine. Therefore, copper in Coyote Creek should be delisted.

## ATTACHMENT 1

### Fact Sheet K

**Water Body:** Coyote Creek  
**Pollutant:** Lead

**Listing:** List on the 303(d) List (Being addressed by an EPA-approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing not to delist lead in Coyote Creek. The fact sheet for lead in Coyote Creek states, "based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list" and further indicates that seven of 45 samples exceeded the hardness-dependent California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for lead and zero of 75 samples exceeded the CCC for the total fraction. The fact sheet also states that the standard was compared against data collected at Los Angeles County MS4 Coyote Creek Monitoring Station (S13) for data collected from 1995 through April 2007. The Regional Board's assessment correctly utilized dissolved metal results and calculated the CCC using concurrently collected hardness. However, an error was detected in the Regional Board's CCC calculations provided in the fact sheet. Specifically, the four-day average dissolved lead was not evaluated against the four-day average CCC when two or more measurements were collected in a four-day period.

#### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

"The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions."<sup>14</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

"Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant."<sup>15</sup>

<sup>14</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>15</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

### *Fact Sheet Formula Error*

An error was found in Excel data file accompanying the 2008 listing fact sheet for Coyote Creek lead analysis. The formula in the Chronic Criteria data field is:

$$"=(EXP((1.23*LN(J2)-4.705))*(1.46203-LN(J2)*0.145712))"$$

The CTR defines the CCC objective equation as:

$$\begin{aligned} & \text{"CCC} = \text{WER} \times (\text{Acute Conversion Factor}) \times \exp\{m_c \ln(\text{hardness}) + b_c\} \\ & \text{where for lead: } m_c = 1.273, b_c = -4.705, \text{WER} = 1, \text{ and the Acute Conversion Factor (CF) is:} \\ & \text{"CF} = 1.46203 - [(\ln \{\text{hardness}\})(0.145712)] \end{aligned}$$

It appears the  $m_c$  value as 1.23 used in the Regional Board analysis is incorrect and should have been entered as 1.273.

### *The Weight of Evidence Section of the Fact Sheet states:*

"Seven of 45 samples exceeded the lead CTR Criterion Continuous Concentration for the dissolved fraction, zero out of 75 samples exceeded the lead CTR Criterion Continuous Concentration for the total fraction, and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy for the dissolved fraction."

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

The Regional Board's interpretation of the number of exceedances and number of samples in the weight of evidence section is clearly incorrect as the CTR does not have a total fraction CCC and dissolved fraction CCC. The CTR only includes a dissolved fraction CCC. The dissolved and total lead data sets should be combined for the purposes of assessing the lead listing when this is done, the data indicate seven exceedances of the dissolved fraction CCC out of 120 samples. For a sample size from 118 to 129, Table 4.1 of the State's listing policy recommends delisting a pollutant/water body combination if the number exceedances are equal or less than ten. Therefore, lead in Coyote Creek should be delisted.

Further, using the concurrently measured hardness to evaluate the hardness-dependent CTR lead objectives, the chronic water quality objectives ranged from 0.9 to 20.6  $\mu\text{g/L}$  for dissolved lead. For the purposes of calculating the hardness-dependent CTR lead objectives, concurrently measured hardness was used when available and the average of all location hardness measurements collected were used when concurrent hardness was not available. To reevaluate the existing listing, total lead measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the Coyote Creek during approximately the same time period (1995 through April 2007) should be considered. A complete summary of the lead and hardness data, along with the CTR hardness-dependent objective calculations, can be found in Appendix K - Table K1. Although dissolved lead was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total lead was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts data with

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the MS4 data, no exceedances of the Criterion Maximum Concentration (CMC) for lead were observed and nine exceedances of the CCC for lead were observed out of sample size of 195. For a sample size from 188 to 199 the State's listing policy, using the binomial distribution formula associated with Table 4.1, recommends delisting a pollutant/water body combination if the number of exceedances are equal to or less than sixteen. Therefore, lead in Coyote Creek should be delisted.

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Fact Sheet L

**Water Body:** San Gabriel River Reach 2  
**Pollutant:** Lead

**Listing:** List on the 303(d) List (Being addressed by an EPA-approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing not to delist lead in San Gabriel River Reach 2. The fact sheet for lead in San Gabriel River Reach 2 states "based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list" and further indicates that eight of 56 samples exceeded the hardness dependent California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for lead with no Criterion Maximum Concentration (CMC) exceedances. The fact sheet also states the standard was compared against data collected at Los Angeles County MS4 San Gabriel River Monitoring Station (S14) for data collected from 1995 through April 2007. The Regional Board's assessment correctly utilized dissolved metal results and calculated the CCC using concurrently collected hardness. However, an error was detected in the Regional Board's CCC calculations provided in the fact sheet. Specifically, the four-day average dissolved lead was not evaluated against the four-day average CCC when two or more measurements were collected in a four-day period.

*State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

"The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions."<sup>16</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

"Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant."<sup>17</sup>

<sup>16</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>17</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments: 107.19), September 2006.



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### *Fact Sheet Formula Error*

An error was found in Excel data file accompanying the 2008 listing fact sheet for San Gabriel River Reach 2 lead analysis. The formula in the Chronic Criteria data field is:

$$"=(EXP((1.23*LN(I2)-4.705))*(1.46203-LN(I2)*0.145712))"$$

The CTR defines the CCC objective equation as:

$$\begin{aligned} \text{"CCC} &= \text{WER} \times (\text{Acute Conversion Factor}) \times \exp\{m_c \ln(\text{hardness}) + b_c\} \\ \text{where for lead: } m_c &= 1.273, b_c = -4.705, \text{WER} = 1, \text{ and the Acute Conversion Factor (CF) is:} \\ \text{"CF} &= 1.46203 - [(\ln \{\text{hardness}\})(0.145712)] \end{aligned}$$

It appears the  $m_c$  value as 1.23 used in the Regional Board analysis is incorrect and should have been entered as 1.273.

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

Using the concurrently measured hardness to evaluate the hardness-dependent CTR lead objectives, the chronic water quality objectives ranged from 2.0 to 11.5  $\mu\text{g/L}$  for dissolved lead. For the purposes of calculating the hardness-dependent CTR lead objectives, concurrently measured hardness was used when available and the average of all location hardness measurements collected were used when concurrent hardness was not available. To reevaluate the existing listing, total lead measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the San Gabriel River Reach 2 during approximately the same time period (1995 through April 2007) should be considered. A complete summary of the lead and hardness data, along with the CTR hardness-dependent objective calculations, can be found in Appendix L - Table L1. Although dissolved lead was not measured in the Sanitation Districts data set, it is conservative to estimate that 100% of the measured total lead was in the dissolved form as described by the September 2006 State Board comments mentioned above. With these conservative assumptions, and combining the Sanitation Districts' data with the MS4 data, no exceedances of the Criterion Maximum Concentration (CMC) for lead were observed and ten exceedances of the Criterion Continuous Concentration (CCC) for lead were observed out of sample size of 191. For a sample size from 188 to 199, using the binomial distribution formula associated with Table 4.1, the State's Listing Policy recommends delisting a pollutant/water body combination if the number of exceedances are equal to or less than sixteen. Therefore, lead in San Gabriel River Reach 2 should be delisted.

### *Dissolved Lead Only Reevaluation*

A reevaluation of only the 1995 through April 2007 dissolved lead data using the corrected CCC formula and appropriate four-day averages indicates that dissolved lead concentrations exceeded the four-day average CCC only four times with a sample size of 63. For a sample size from 60 to 71, Table 4.1 of the State's Listing Policy recommends delisting a pollutant/water body combination if the number of exceedances are equal to or less than five. This further demonstrates that lead in San Gabriel River Reach 2 should be delisted.

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### Fact Sheet M

**Water Body:** Santa Clara River Reach 5 and 6  
**Pollutant:** Chlorodibromomethane  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that new listings for chlorodibromomethane be made to the 303(d) list for Santa Clara River Reaches 5 and 6. The proposed listings are based on application of California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms. Use of the human health “water plus organisms” criteria instead of criteria for consumption of “organisms only” relied on the presence of a Municipal and Domestic Water Supply (MUN) beneficial use in the water body. However, Santa Clara River Reaches 5 and 6 do not have an MUN beneficial use, but rather only have a conditional potential MUN designation that has no legal effect. Therefore use of the “water plus organisms” CTR criteria was inappropriate and the “organisms only” criteria should instead be used to evaluate listings.

#### *Applicable Water Quality Objective*

Both Reaches 5 and 6 of the Santa Clara River are designated for existing Water Contact Recreation (REC-1) beneficial use. The CTR Human Health for consumption of organism only criteria (34 µg/L) should be used to determine whether of these reaches are impaired.

#### *Proposed Listing Reevaluation Santa Clara River Reach 5*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, chlorodibromomethane measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) as well as data from the Newhall Ranch Sanitation District (Newhall) in the Santa Clara River Reach 5 were used. A complete summary of the chlorodibromomethane data for Reach 5 can be found in Appendix M – Table M1. In Santa Clara River Reach 5, no exceedances of the organism only criteria were observed out of a sample size of 57. For a sample size from 48 to 59, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number of exceedances are equal to or greater than five. Therefore, the proposed chlorodibromomethane listing in Santa Clara River Reach 5 should be rejected.

#### *Proposed Listing Reevaluation Santa Clara River Reach 6*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, chlorodibromomethane measurements collected and reported to the Regional Board by the Sanitation Districts in the Santa Clara River Reach 6 were used. A complete summary of the chlorodibromomethane data for Reach 6 can be found in Appendix M – Table M2. In Santa Clara River Reach 6, no exceedances of the organism only criteria were observed out of a sample size of 8. For a sample size from 2 to 24, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal to or greater than two. Therefore, the proposed chlorodibromomethane listing in Santa Clara River Reach 6 should be rejected.

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### Fact Sheet N

**Water Body:** Santa Clara River Reach 5 and 6  
**Pollutant:** Dichlorobromomethane

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that new listings for dichlorobromomethane be made to the 303(d) list Santa Clara River Reaches 5 and 6. The proposed listings are based on application of California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms. Use of the human health "water plus organisms" criteria instead of criteria for consumption of "organisms only" relied on the presence of a Municipal and Domestic Water Supply (MUN) beneficial use in the water body. However, Santa Clara River Reaches 5 and 6 do not have an MUN beneficial use, but rather only have a conditional potential MUN designation that has no legal effect. Therefore use of the "water plus organisms" CTR criteria was inappropriate and the "organisms only" criteria should instead be used to evaluate listings.

#### *Applicable Water Quality Objective*

Both Reaches 5 and 6 of the Santa Clara River are designated with an existing Water Contact Recreation (REC-1) beneficial use. The CTR Human Health for consumption of organism only criteria (46 µg/L) should be used to determine whether these reaches are impaired.

#### *Proposed Listing Reevaluation Santa Clara River Reach 5*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, dichlorobromomethane measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) as well as data from the Newhall Ranch Sanitation District (Newhall) in the Santa Clara River Reach 5 were used. A complete summary of the dichlorobromomethane data for Reach 5 can be found in Appendix N – Table N1. In Santa Clara River Reach 5, no exceedances of the organism only criteria were observed out of a sample size of 57. For a sample size from 48 to 59, Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number of exceedances are equal or greater than five. Therefore, the proposed dichlorobromomethane listing in Santa Clara River Reach 5 should be rejected.

#### *Proposed Listing Reevaluation Santa Clara River Reach 6*

To reevaluate the listing compared to the California Toxics Rule Human Health for consumption of organism only criteria, dichlorobromomethane measurements collected and reported to the Regional Board by the Sanitation Districts in the Santa Clara River Reach 6 were used. A complete summary of the dichlorobromomethane data for Reach 6 can be found in Appendix N – Table N2. In Santa Clara River Reach 6, no exceedances of the organism only criteria were observed out of a sample size of 8. For a sample size from 2 to 24, Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than two. Therefore, the proposed dichlorobromomethane listing in Santa Clara River Reach 6 should be rejected.

## ATTACHMENT 1

### Fact Sheet O

**Water Body:** San Jose Creek Reach 1  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by Actions Other than a TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Site-specific objectives (SSOs) for ammonia were developed for San Jose Creek Reach 1 and became effective and adopted into the Basin Plan on April 23, 2009. However, these objectives were approved by the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) in 2007 and subsequently approved by the State Water Resources Control Board in January 2008. Considering that the Regional Board has been aware of these impending changes to the Basin Plan Regional Board since 2007, the chronic ammonia water quality standards reflected in the SSO should have been used to evaluate ammonia listings for this 303(d) listing cycle.

#### *Existing Listing Reevaluation*

An examination of the San Jose Creek Reach 1 ammonia, pH, and temperature data provided to the Regional Board as part of their 303(d) listing review (March 2004 through February 2007) reveals that the four-day chronic SSO-adjusted Criterion Continuous Concentration (CCC) threshold for ammonia was exceeded in San Jose Creek Reach 1 on 14 occasions out of a total 282 measurements, as presented in Appendix O - Table O1. Furthermore, there were no exceedances of the Criterion Maximum Concentration (CMC) threshold out of 296 single sample measurements. For a sample size of 282 to 292, using the binomial distribution formula associated with Table 4.1, the State's 303(d) listing policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 24. Since 282 four-day average ammonia results show only 14 exceedances of the CCC, ammonia should be delisted from San Jose Creek Reach 1.

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FACT SHEET P

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by an EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Santa Clara River Reach 5 has been included on the 303(d) list for ammonia since at least 1998. Subsequently, nitrification/denitrification treatment upgrades at the Valencia Water Reclamation Plant were completed in October 2003 that resulted in significant reductions of ammonia loadings to Santa Clara River Reach 5.

*Existing Listing Reevaluation*

An examination of the Santa Clara River Reach 5 ammonia, pH, and temperature data collected concurrently and provided to the California Regional Quality Control Board, Los Angeles Region after implementation of nitrification/denitrification treatment upgrades at the Valencia Water Reclamation Plant (October 2003 through February 2007) by the Sanitation District of Los Angeles County (Sanitation Districts) as well as available data from the same time period collected by Newhall Ranch Sanitation District (Newhall) reveals that even without consideration of recently approved site-specific objectives for ammonia, the four-day chronic Criterion Continuous Concentration (CCC) threshold for ammonia was never exceeded out of a total 146 measurements, as presented in Appendix P Table P1. For a sample size of 142 to 152, using the binomial distribution formula associated with Table 4.1, the State 303(d) Listing Policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 12. Additionally, the single sample Criterion Maximum Concentration (CMC) was not exceeded out 218 samples collected. Since no exceedances of the water quality standards were observed in Santa Clara River Reach 5 out of 146 measurements, Santa Clara River Reach 5 should be delisted for ammonia.

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### FACT SHEET Q

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** Nitrite + Nitrate

**Listing:** Listed on the 303(d) List (Being Addressed by an EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Table 3-8 of the Basin Plan indicates that the nitrogen water quality objective for Santa Clara River Reach 5 is 5.0 mg/L. This objective is further defined in the table by footnote "d" as the sum of nitrate and nitrite. The original listing determination for this water body/pollutant combination was made in 1998. Since that time, extensive water reclamation plant (WRP) upgrades were implemented by the Sanitation Districts of Los Angeles County's (Sanitation Districts) Valencia WRP to specifically reduce nitrogen loadings into Santa Clara River Reach 5. The most significant of these upgrades included incorporation of nitrification/de-nitrification treatment beginning in October 2003.

#### *Existing Listing Reevaluation*

Nitrite and nitrate data for Santa Clara River Reach 5 provided to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) as part of their 303(d) listing review (March 2004 through February 2007) by the Sanitation Districts (104 results) and the Newhall Ranch Sanitation District (139 results) were evaluated for similar time periods. The evaluation revealed that the nitrite + nitrate water quality objective was exceeded in nine instances out of a total 243 measurements, as presented in Appendix Q Table Q1. For a sample size of 235 to 246 the State's 303(d) Listing Policy, using the binomial distribution formula associated with Table 4.1, recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than 20. Since only nine exceedances of the objective were observed, Santa Clara River Reach 5 should be delisted for nitrite + nitrate.

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FACT SHEET R

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Ammonia

**Listing:** Listed on the 303(d) List (Being Addressed by an EPA Approved TMDL)

**Comment & Recommendation:** Delist – Water Quality Objectives Being Achieved

Santa Clara River Reach 6 has been included on the 303(d) list for ammonia since at least 1998. Subsequently, nitrification/denitrification treatment upgrades at the Saugus Water Reclamation Plant were completed in October 2003 that resulted in significant reductions of ammonia loadings to Santa Clara River Reach 6.

*Existing Listing Reevaluation*

An examination of the Santa Clara River Reach 6 ammonia, pH, and temperature data collected concurrently and provided to the Regional Board after implementation of nitrification/denitrification treatment upgrades at the Saugus Water Reclamation Plant (October 2003 through February 2007) by the Sanitation District of Los Angeles County (Sanitation Districts) reveals that even without consideration of recently approved site-specific objectives for ammonia, the four-day chronic Criterion Continuous Concentration (CCC) threshold for ammonia was exceeded twice in a sample size of 73, as presented in Appendix R Table R1. For a sample size of 72 to 82, Table 4.1 of the State 303(d) Listing Policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances are equal to or fewer than six. Additionally, the single sample Criterion Maximum Concentration (CMC) was not exceeded out 78 samples collected. Since only two exceedances of the water quality standards were observed in Santa Clara River Reach 6 out of 74 measurements, Santa Clara River Reach 6 should be delisted for ammonia.

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### FACT SHEETS

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** Polychlorinated Biphenyls (PCBs)

**Listing:** List on the 303(d) List (TMDL required list)

**Comment & Recommendation:** Do Not List – Insufficient Basis to List

The California Regional Water Quality Control Board, Los Angeles (Regional Board) is proposing a new listing for polychlorinated biphenyls (PCBs) in Reach 5 of the Santa Clara River because their evaluation of available data indicated that the California Toxics Rule (CTR) four-day Criterion Continuous Concentration (CCC) threshold of 0.014 µg/L PCB was exceeded in 2 of 3 samples collected as part of Surface Water Ambient Monitoring Program (SWAMP). A contemporary analysis of available data finds 3 samples available from the SWAMP program, 46 samples collected by the Newhall Sanitation District (Newhall), and 18 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix S – Table S1.

#### *Consideration of all data*

All Sanitation Districts and Newhall data for PCBs for this period are non-detect; however the detection limits are above the applicable water quality criterion of 0.014 µg/L PCBs so the samples do not qualify for consideration under the State's 303(d) Listing Policy. However, if all samples were considered this would yield an additional 64 non-detect samples. For a sample size of 60 to 71, Table 3.1 of the State's listing policy recommends listing a pollutant/water body combination if the number of exceedances are equal to or greater than six.

#### *Spatial Representation*

The SWAMP sample collected from the Castaic Creek monitoring location on November 13, 2001 is not representative of conditions in Santa Clara River Reach 5 and does not meet Listing Policy guidelines for spatial representativeness. The SWAMP database for this sample states in the comments field, "slow trickle, not measurable flow, small pools of water." The proposed PCBs listing relies on this Castaic Creek SWAMP monitoring station sample, which was collected during non-measurable flows that are not representative of typical or long-term conditions within this water body and certainly not representative of typical or long-term conditions in Santa Clara River Reach 5.

Further, the SWAMP sample was collected from Castaic Creek but Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated beneficial uses that are independent of Santa Clara River Reach 5. Therefore the Castaic Creek sample does not meet the requirements of Section 6.1.5.2 of the State's 303(d) Listing Policy and is not representative of the water body segment of the Santa Clara River Reach 5. PCB data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for Santa Clara River Reach 5.

#### *Temporal Representation*

The SWAMP samples were taken only 14 days apart during a single season (wet season) in 2001. This does not meet the recommended criteria for temporal representation in the Listing Policy, and therefore should not be used as the sole basis for this new listing. Section 6.1.5.3 of the Listing Policy states, "In general, samples should be available from two or more seasons or from two or more events when effects



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or water quality exceedances would be expected to be clearly manifested." Therefore, the Sanitation Districts do not believe that sufficient information is available at this time to warrant placing Santa Clara River Reach 5 on the 303(d) list for PCBs. The information available does not meet the minimum number of exceedances required for listing per Table 3.1 of the State's 303(d) Listing Policy.

### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) considered a listing for Santa Clara River Reach 5 based on this SWAMP data and determined no listing was justified. The updated November 2006 fact sheet is included as Appendix S1. The State Board recommendation on this fact sheet is:

"After review of the available data and information, SWRCB staff concludes that the water body-pollutant combination should not be placed on the section 303(d) list because applicable water quality standards are not exceeded"

### *Proposed Listing Reevaluation*

Only the Santa Clara River Reach 5 SWAMP data collected at the Newhall Ranch Blue Cut monitoring station should only be used to assess impairments, not the Castaic Creek sample. This results in only 1 of 2 samples exceeding the CCC. Available Santa Clara River Reach 5 data do not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing, so no new listing is warranted for PCBs in Santa Clara River Reach 5.

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### FACT SHEET T

**Water Body:** Santa Clara River Reach 5  
**Pollutant:** DDT  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Insufficient Basis to List

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing a new listing for DDT in Reach 5 of the Santa Clara River because their evaluation of available data indicated that the California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms threshold of 0.00059 µg/L DDT was exceeded in 2 of 3 samples collected as part of the Surface Water Ambient Monitoring Program (SWAMP). A contemporary analysis of available data finds 3 samples available from the SWAMP program, 60 samples collected by the Newhall Sanitation District (Newhall), and 40 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix T – Table T1.

#### *Consideration of all data*

All Sanitation Districts and Newhall data for DDT for this period are non-detect; however the detection limits are above the applicable water quality criterion of 0.00059 µg/L DDT so the samples do not qualify for consideration under the State's 303(d) Listing Policy. However, if all samples were considered this would yield an additional 100 non-detect samples. For a sample size of 95 to 106, Table 3:1 of the State's listing policy recommends listing a pollutant/water body combination if the number of exceedances are equal to or greater than ten.

#### *Spatial Representation*

The SWAMP sample collected from the Castaic Creek monitoring location on November 13, 2001 is not representative of conditions in Santa Clara River Reach 5 and does not meet Listing Policy guidelines for spatial representativeness. The SWAMP database for this sample states in the comment field, "slow trickle, not measurable flow, small pools of water." The proposed DDT listing relies on this Castaic Creek SWAMP monitoring station sample, which was collected during non-measurable flows that are not representative of typical or long-term conditions within this water body and Certainly not representative of typical or long-term conditions in Santa Clara River Reach 5.

Further, the SWAMP sample was collected from Castaic Creek but Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated beneficial uses that are independent of Santa Clara River Reach 5. Therefore the Castaic Creek sample does not meet the requirements of Section 6.1.5.2 of the State's 303(d) Listing Policy and is not representative of the water body segment of the Santa Clara River Reach 5. DDT data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for Santa Clara River Reach 5.

#### *Temporal Representation*

The SWAMP samples were taken only 14 days apart during a single season (wet season) in 2001. This does not meet the recommended criteria for temporal representation in the Listing Policy, and therefore should not be used as the sole basis for this new listing. Section 6.1.5.3 of the Listing Policy states, "In general, samples should be available from two or more seasons or from two or more events when effects

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or water quality exceedances would be expected to be clearly manifested." Therefore, the Sanitation Districts do not believe that sufficient information is available at this time to warrant placing Santa Clara River Reach 5 on the 303(d) list for DDT. The information available does not meet the minimum number of exceedances required for listing per Table 3.1 of the State's 303(d) Listing Policy.

### *State Water Resource Control Board Guidance*

In September 2006, State Water Resources Control Board (State Board) considered a similar listing for Santa Clara River Reach 5 for PCB based on this SWAMP data. The State Board determined that only data from the Newhall Ranch Blue Cut monitoring station was suitable for evaluation in Santa Clara Reach 5, as reflected in the fact sheet included as Appendix S1. The State Board rejected use of the Castaic Creek SWAMP sample in assessing impairments in Santa Clara Reach 5.

### *Proposed Listing Reevaluation*

Santa Clara River Reach 5 SWAMP data collected at the Newhall Ranch Blue Cut monitoring station should only be used to assess impairment not the Castaic Creek sample. This results in only 1 of 1 samples exceeding the water quality standard. Available Santa Clara River Reach 5 data do not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing, so no new listing is warranted for DDT in Santa Clara River Reach 5.

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### FACT SHEET U

**Water Body:** Santa Clara River Reach 6  
**Pollutant:** Bis(2-ethylhexyl)phthalate (diethylhexyl phthalate or DEHP)  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Water Quality Basis is Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing a new listing for bis(2-ethylhexyl)phthalate (DEHP) in Reach 6 of the Santa Clara River. The proposed listing is based on application of a California Toxics Rule (CTR) criterion to protect human health with consumption of water and aquatic organisms. Use of the human health “water plus organisms” criterion instead of the criterion for consumption of “organisms only” relied on the presence of a Municipal and Domestic Water Supply (MUN) beneficial use in the water body. However, Santa Clara River Reach 6 does not have an MUN beneficial use, but rather only has a conditional potential MUN designation that has no legal effect. Therefore use of the “water plus organisms” CTR criteria was inappropriate and the “organisms only” criteria should instead be used to evaluate listings. Additionally, a contemporary analysis of available data finds 33 samples collected by the Los Angeles County Department of Public Works (LACDPW) and 13 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix U – Table U1.

#### *Applicable Water Quality Objective*

Reach 6 of the Santa Clara River is designated with an existing Water Contact Recreation (REC-1) beneficial use. The CTR Human Health for consumption of organism only criteria (5.9 µg/L) should be used to determine whether these reaches are impaired.

#### *Sample Contamination and Data Quality Assessment*

Phthalates are commonly encountered analytical contaminants. They are found in rubber gloves, plastic tubing, and nearly every plastic material. Therefore, phthalate contamination is a frequent laboratory interference and stringent procedures along with specialized sampling equipment are necessary to minimize this interference. EPA Method 625 for organic chemical analysis of municipal and industrial wastewater cautions that composite sampling equipment, particularly the use of Tygon tubing, is a significant source of phthalate contamination<sup>18</sup>. Furthermore, Standard Methods 6410 B specifically recommends using sampling equipment “as free as possible” of any plastic tubing and includes specific recommendations for minimizing contamination from peristaltic pump tubing<sup>19</sup>.

A review of LACDPW’s sampling data from 2001 to 2008 indicates that a significant sample contamination issue existed during the 2003-2004 sampling season. Between 2001 and 2008 LACDPW sampled 13 locations each year 5 to 7 times for DEHP. Table U1 lists the number times DEHP was detected at all sampling locations.

<sup>18</sup> Appendix A to Part 136 – Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, Method 625 Base/Neutrals and Acids. Section 9 – Sample Collection, Preservation, and Handling. Accessed from [accustandards.com](http://accustandards.com), EPA downloads

<sup>19</sup> Standard Methods for the Examination of Water and Wastewater, 21<sup>st</sup> Edition. Method 6410 B. Liquid-Liquid Extraction Gas Chromatographic/Mass Spectrometric Method. Page 6-66 and 6-67.

ATTACHMENT 1

TABLE U1  
LACDPW SAMPLING SEASON DETECTIONS OF DEHP

Season	Detections	Samples
2002-2003	0	72
2003-2004	57	72
2004-2005	10	84
2005-2006	0	84
2006-2007	0	84
2007-2008	0	86

The fact that DEHP was not detected a single time during the 2002-2003, 2005-2006-2007, 2006-2007, or 2007-2008 sampling seasons but was detected in 79% of samples during the 2003-2004 strongly indicates that these detections were the result of collection, handling, or analysis contamination. LACDPW was contacted regarding this data anomaly and commented that around the 2004 time frame a significant change was made in the equipment they used to collect samples. At that time, the practice of using "rubber buckets" was discontinued and LACDPW started using sterilized laboratory grade sampling equipment. Around this time, analytical laboratories across the California were making changes to address DEHP sample contamination. This includes the Sanitation Districts analytical laboratories, which switched from Tygon tubing to Teflon tubing for composite sampling and switched to phthalate-free gloves for handling phthalate samples. After the Sanitation Districts made these changes, dramatic reductions were seen in concentrations of DEHP detected during sampling.

Furthermore, it is highly unlikely that Santa Clara River Reach 6 contained excessive concentrations of DEHP for one or two years but in no other years, particularly as result of stormwater discharges. There are no known significant sources of DEHP in stormwater. Due to issue of sample contamination, particularly through use of plastic buckets to collect samples prior to the 2005-2006 sampling season, a weight of evidence evaluation indicates that the LACDPW results for DEHP prior to the 2005-2006 sampling season do not meet the data quality requirements of Section 6.1.4 of the State's 303(d) Listing Policy. In particular, this Section states, "the quality of the data used in the development of the section 303(d) list shall be of sufficient high quality to make determinations of water quality standards attainment." Additionally, Section 6.1.5.2 of the State's 303(d) Listing Policy states that if implementation of a management practice has resulted in a change in water body segment, only data collected since the management practice was implemented should be used. In this case, use of cleaner sampling methods should be considered a management practice and older data should be discarded.

*Proposed Listing Reevaluation*

Consideration of all data collected from July 2005 to July 2008 provides three years of data or 27 samples with no exceedances. The Santa Clara River Reach 6 DEHP data do not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing, so no new listing is warranted for bis(2-ethylhexyl)phthalate (DEHP) in Santa Clara River Reach 6.

ATTACHMENT 1

FACT SHEET V

**Water Body:** Walnut Creek  
**Pollutant:** Copper  
**Listing:** List on the 303(d) List (TMDL required list)  
**Comment & Recommendation:** Do Not List – Water Quality Objectives Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that a new listing for copper be made to the 303(d) list in Walnut Creek. The fact sheet for copper in Walnut Creek states three of seven samples "exceeded the CTR freshwater criteria (chronic) and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy". The fact sheet also states the standard was compared against data collected by the Los Angeles County Department of Public Works (LACDPW) from October 2006 through April 2007.

*State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

"The CTR mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions."<sup>20</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

"Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant."<sup>21</sup>

<sup>20</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

<sup>21</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments: 107.19), September 2006.

## ATTACHMENT 1

Finally, the State Board provided the following guidance on the appropriate hardness to use for listing assessment:

“Revisions were made to fact sheets in order to clarify how the hardness based criteria was calculated. In almost all cases, the criteria was calculated for each individual sample using the hardness value for that sample. However, there were a few instances where only the average hardness data was available and used. In cases where the average value was used, recommendations were to not list so using this average value did not result in any new listings.”<sup>22</sup>

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed; all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

For the purposes of calculating the hardness dependent CTR copper objectives, concurrently measured hardness was used. Using the concurrently measured hardness to evaluate the hardness-dependent CTR copper objectives, the chronic water quality objectives ranged from 5.8 to 14.8 µg/L for dissolved copper. A reevaluation of the data indicate that only one of six four-day average dissolved copper results exceeded the Criterion Continuous Concentration (CCC) and only one of seven results exceeded the Criterion Maximum Concentration (CMC). Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than two with a sample size of 2 to 24. Therefore, the proposed copper listing in Walnut Creek should be rejected. A complete summary of the copper and hardness data along with the CTR hardness dependant objective calculations can be found in Appendix V - Table V1.

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<sup>22</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 171 (Comments:81.3), September 2006.

ATTACHMENT 1

FACT SHEET W

**Water Body:** Santa Clara Estuary  
**Pollutant:** Arsenic

**Listing:** List on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Do Not List – Water Quality Objective Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing to add arsenic to the 2008 303(d) List for the Santa Clara Estuary. The fact sheet for arsenic in Santa Clara Estuary states "9 of 63 samples exceed the California Toxics Rule Criterion Maximum Concentration (CMC)" and the California Toxics Rule (CTR) lists a Criterion Continuous Concentration of 36 µg/L and a Criterion Maximum Concentration (CMC) of 59 µg/L for arsenic to protect aquatic life in saltwater.

*Proposed Listing Reevaluation*

An analysis of available data finds 63 samples collected by the City of Buenaventura. The evaluation reveals that the arsenic water quality objective was exceeded only twice out of the 63 measurements, as presented in Appendix W Table W1. For a sample size of 60 to 71, Table 3.1 of the State's 303(d) listing policy recommend a pollutant/water body combination be listed if the number of exceedances are equal or greater than six. Therefore, the proposed arsenic listing in the Santa Clara Estuary should be rejected.



## ATTACHMENT 1

### Fact Sheet X

**Water Body:** Walnut Creek  
**Pollutant:** Lead

**Listing:** List on the 303(d) List (TMDL Required List)

**Comment & Recommendation:** Do Not List – Water Quality Objective Being Achieved

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing to list lead in Walnut Creek. The fact sheet for lead in Walnut Creek states that “the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded” and further indicates that two of six samples exceeded the hardness dependent California Toxics Rule (CTR) Criterion Continuous Concentration (CCC) for lead with no Criterion Maximum Concentration (CMC) exceedances. The fact sheet also states the standard was compared against data collected by the Los Angeles County Department of Public Works from October 2006 through April 2007.

#### *State Water Resource Control Board Guidance*

In the September 2006 State Water Resources Control Board (State Board) evaluation of the 303(d) List, the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values were all discussed. Dissolved fraction metals data should be used for assessing listings when available, and total fraction data may be used only for listing reevaluation when dissolved fraction data is unavailable:

“The CTR [California Toxic Rule] mandates the criteria to be the dissolved fraction. Although a translator exists to convert dissolved criteria to total fraction effluent limit, no provision in the CTR allows calculating total metals fraction receiving water quality criterion. Staff has reevaluated listings where total metals data were applicable and would result in a change to the analysis. Use of total metals data were applied only to delisting evaluations and only in comparison with dissolved metals criteria. No translators were used to convert total metal fractions to dissolved metal fractions.”<sup>23</sup>

Also, the State Board stated in this report that both wet and dry weather data must be used to assess listings unless the Basin Plan includes specific wet and dry weather water quality standards:

“Wet and dry weather data were not separated for the purposes of this assessment because the water quality standards are not wet or dry weather specific. Additionally, the Basin Plan does not include any provisions for assessing data from wet or dry weather separately for this pollutant.”<sup>24</sup>

<sup>23</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 63 (Comments: 66.9, 73.17, 81.1, 83.5, 107.17, 107.6, 212.5, 228.5, 242.3), September 2006.

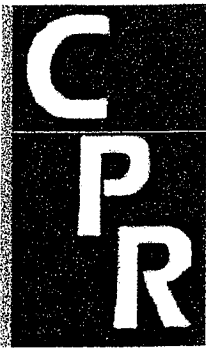
<sup>24</sup> Staff Report Volume IV Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments Response to Comments page 99 (Comments:107.19), September 2006.

## ATTACHMENT 1

### *Proposed Listing Reevaluation*

In accordance with the State Board's direction, when listings are assessed: all dry weather and wet weather data should be used; dissolved metals data should be used when available; total metals data may be used when dissolved metals data are not available for only reevaluation of listings; concurrent hardness values should be used when available; and average hardness should be used when concurrent hardness is not available.

For the purposes of calculating the hardness dependent CTR lead objectives, concurrently measured hardness was used. Using the concurrently measured hardness to evaluate the hardness-dependent CTR lead objectives, the CCC water quality objectives ranged from 1.4 to 4.7  $\mu\text{g/L}$  for dissolved lead and the practical quantitation limit (PQL) stated by LACDPW is 5.00  $\mu\text{g/L}$ . A reevaluation of the data from October 2006 through April 2007 indicates that the PQL was above the CCC for all samples, so no samples meet the requirements of section 6.1.5.5 of the State's Listing Policy for consideration against the CCC. The CMC water quality objectives ranged from 36.9  $\mu\text{g/L}$  to 121.7  $\mu\text{g/L}$  for dissolved lead. A reevaluation of the data from October 2006 through April 2007 indicates that no exceedances of the CMC occurred with a sample size of 7. Table 3.1 of the State's listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than two with a sample size of 2 to 24. Therefore, the proposed lead listing in Walnut Creek should be rejected. A complete summary of the lead and hardness data along with the CTR hardness dependant objective calculations can be found in Appendix X - Table X1.



# COALITION FOR PRACTICAL REGULATION

"Cities Working on Practical Solutions"

17 June 2009

Via Electronic and U.S. Mail

California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street  
Los Angeles, CA 90013  
Attn.: Man Voong  
E-mail: [mvoong@waterboards.ca.gov](mailto:mvoong@waterboards.ca.gov)

**Subject: Comment Letter – 2008 Federal Clean Water Act  
(CWA) Section 303(d) List**

Dear Chair Lutz and Members of the Board:

On behalf of the Coalition for Practical Regulation (CPR), an *ad hoc* group of 39 cities within Los Angeles County that have come together to address water quality issues, I would like to submit the following comments regarding the proposed Revision to Federal Clean Water Act Section 303(d) List of Water Quality Limited Segments for California.

First, CPR commends the Water Boards for updating the 303(d) list within the context of the Integrated Report. This approach presents a more comprehensive assessment of water quality within the region. In addition, we would like to thank the Regional Water Board for following the Listing/Delisting Policy established by the State Water Board. The establishment and use of this policy facilitates the continued improvement of the 303(d) list. One of the areas in which CPR would like to acknowledge improvement is in delisting, due to Regional Board staff's application of the Delisting Policy.

State Board staff previously recommended correcting past mistakes by delisting erroneously listed water segment-pollution combinations. These proposed corrections included listings for which data used to list a pollutant was actually from a different water body, listings for which an insufficient number of samples exceeded the CTR criteria, listings for which biological impacts documented were not associated with toxicity or pollutant concentrations, listings for which the listing was based on faulty data, and listings for which data used to list a waterbody could not be

ARCADIA  
ARTESIA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
CARSON  
CERRITOS  
COMMERCE  
COVINA  
DIAMOND BAR  
DOWNEY  
GARDENA  
HAWAIIAN GARDENS  
INDUSTRY  
IRVINDALE  
LA CAÑADA FLINTRIDGE  
LA MIRADA  
LAKEWOOD  
LAWDALE  
MONTEREY PARK  
NORWALK  
PALOS VERDES ESTATES  
PARAMOUNT  
PICO RIVERA  
POMONA  
RANCHO PALOS VERDES  
ROSEMEAD  
SANTA FE SPRINGS  
SAN GABRIEL  
SIERRA MADRE  
SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
SOUTH PASADENA  
VERNON  
WALNUT  
WEST COVINA  
WHITTIER

found. CPR is pleased to note that Regional Board staff recognizes the validity of those State Board suggestions. Many of the proposed delistings are the result of recognizing that there were flaws in the original listings. The delisting of waterbody-segment combinations that do not need to be addressed allows permittees to better focus water quality resources on real issues.

However, CPR continues to be concerned that additional work is required to ensure that the 303(d) list becomes a focused and technically defensible instrument. The proposed 2008 revision continues to include listings for conditions where actual pollutants have not been identified. Requiring permittees to treat for a condition rather than a listing is problematic at best; if the Regional Board staff and permittees do not have an understanding of *what* we should be controlling, and, by extension, how we should be controlling it, any attempts at source control or treatment will be unfocused and are unlikely to be successful. Further, the 303(d) list still contains listings that are based on potential future uses rather than probable future uses. As CPR has stated in the past, potentiality is an unreasonably broad concept on which to base listings. Erroneous listings such as these could trigger TMDLs for uses that do not exist and are not likely to exist and would be an extremely costly mistake that could potentially waste millions of dollars.

CPR requests that the Board direct staff to search out and remove any additional erroneous historic listings that were based on potential rather than probable future uses, and to remove all historic listings of conditions for which causative pollutants have not been identified. Given the absence of rules for listing before the Listing/Delisting Policy was adopted in September 2004, earlier listings were sometimes inconsistent, poorly documented, and ratified by the State Board without careful review. Additional work remains to ensure that all of the past listings are valid, supported by appropriate documentation, and based upon the application of a consistent set of standards. Further, because the determination of impairments is based on core beneficial uses associated with each waterbody segment, the beneficial uses defined in the Basin Plan should be thoroughly reviewed and revised as necessary before the next update to the 303(d) list.

CPR notes that the largest group of new listings in the 2008 303(d) list is for indicator bacteria. As acknowledged in the staff report, the "indicator bacteria" impairment category includes a range of bacterial indicators to protect water contact recreation and non-contact water recreation beneficial uses. Both the beneficial uses and the indicators of impairment require refinement to focus on existing and probable future beneficial uses and on human pathogens.

CPR is pleased to see that the subcategories of Water Quality Limited Segments Being Addressed by USEPA-Approved TMDL and Water Quality Limited Segments Being Addressed by Action Other than TMDL are being utilized in the 2008 list. Use of these subcategories implements suggestions made in the *State Guidance for Addressing*

*Impaired Waters* and provides encouragement to municipalities attempting to make improvements and comply with regulations.

CPR has a specific question about Los Cerritos Channel. In a meeting with stakeholders in the Los Cerritos Channel Watershed and Regional Board staff, Peter Kozelka from USEPA Region IX indicated that he thought that ammonia would be delisted for the channel during the current update to the 303(d) list. However, we do not see evidence that it was even considered for delisting. We would appreciate an explanation of the status of this listing and why there is no fact sheet for this waterbody/pollutant combination.

In conclusion, CPR acknowledges previously recommending that the State Board maintain leadership of the 303(d) listing process, but we are pleased to see the improvements made by the Regional Board in its application of the Listing/Delisting Policy. There are corrections and refinements yet to be made, but the proposed 2008 303(d) List produced by Regional Board staff represents a step in the right direction. Further, CPR appreciates staff's recommendation to solicit stakeholder comments on proposed criteria for the development of guidelines for listing waterbodies as impaired for biostimulative substances to be used in future updates of the 303(d) List. Developing a sound scientific basis for listing decisions is essential in order to focus resources on solving real water quality problems.

Thank you for the opportunity to provide these comments on the proposed Revision to Federal Clean Water Act Section 303(d) of Water Quality Limited Segments for California. We recognize that as soon as this 303(d) List is adopted, preparation of the next list will begin, and we look forward to continuing efforts by the State and Regional Water Boards to improve the list.

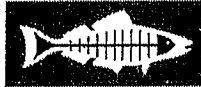
Sincerely,

COALITION FOR PRACTICAL REGULATION



Larry Forester  
CPR Steering Committee  
City Council Member, City of Signal Hill

cc: CPR Steering Committee  
CPR Members



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June 17, 2009

Ms. Tracy Egoscue  
Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013

**Re: Los Angeles Region Integrated Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters 2008 Update dated April 2009**

Dear Ms. Egoscue:

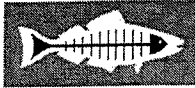
Heal the Bay hereby submits the following comments regarding the Los Angeles Regional Water Quality Control Board's ("Regional Board's" or "Board's") proposed update to the CWA §303(d) list of impaired waters (the "2008 List" or "303(d) List") as presented in the Draft Staff Report and Appendices ("Staff Report"). We appreciate the opportunity to provide comments.

Heal the Bay supports the proposed addition of 66 waterbody-pollutant segments in the Los Angeles Region (Region 4) to the 2008 List. Specifically, we strongly support the addition of invasive species listings for numerous waterbodies in the Malibu Creek Watershed and indicator bacteria listings at several impacted beaches. Regional Board staff correctly identified a negative trend in water quality in association with the proliferation of invasive species (specifically New Zealand Mudsnaills) and the associated degradation of the Aquatic Life Support core beneficial use. In the case of the proposed indicator bacteria listings, these listings are critical as beach bacteria water quality standards are clearly not being met and public health is at risk.

However, we have numerous specific concerns regarding some of the 22 proposed delistings in this region and a few of the decisions to *not* list a waterbody-pollutant combination based on readily available data. Specifically, we are very concerned that Index of Biological Integrity scores and toxicity data were not appropriately evaluated by staff. We also have concerns with some of the evaluation criteria used in the Staff Report. These concerns and other as outlined below.

**I. Data Evaluation Criteria**

**A. Index of Biological Integrity (IBI) Scores Should be Considered in the Listing/Delisting Process.**



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During the public solicitation of water quality data and information for the 2008 public comment period, Heal the Bay submitted seven Index of Biological Integrity (“IBI”) data sets from multiple sources.<sup>1</sup> As described below, these data sets provided sufficient information to necessitate listings for “biological community impairment.” However, there is no mention of any evaluation of these data in the Staff Report and no proposed new listings were made for biological community impairment in the Region. It is critical that these data not be overlooked and that IBI scores are used as a line of evidence in listing/delisting decisions. IBI scores are the best available data to make listing decisions for biological community impairment in streams and rivers.

The diversity and sensitivity of the various species within a stream environment are important indicators of stream health. For instance, healthy communities tend to have a diverse set of invertebrate species, while degraded communities often have fewer sensitive species and a higher proportion of hardy, pollution tolerant species. Based on these principles, an index of biological integrity focuses on specific metrics to provide a comprehensive measure of stream health.

The California Department of Fish and Game (“CDFG”) developed the Index of Biological Integrity in 2002 for the San Diego Region and adapted the methodology to all of southern California in 2005.<sup>2</sup> The IBI provides a quantitative means of evaluating the biotic conditions of a waterbody by analyzing seven metrics, including the number of different species present from the mayfly (*Ephemeroptera*), stonefly (*Plecoptera*) and caddisfly (*Trichoptera*) families and the number of different beetle species present.<sup>3</sup> The metrics are evaluated at a specific site and then converted to a score between 0 and 100 (zero being the worst case scenario). The study’s authors chose two standard deviations below the mean reference site score to develop the impairment threshold. An IBI score of 39 is established as the boundary between “fair” and “poor” biological conditions, and a score of 20 is the division between “poor” and “very poor” biological conditions.<sup>4</sup>

This is relevant because readily available IBI score data indicate biological community impairment in numerous stream reaches located in Region 4. Specifically, water segments with IBI data in the poor and very poor ranges meet the listing factors in sections 3.9 and 3.11 of the Listing Policy. Inherently, the IBI scoring system compares monitoring site conditions to reference sites. Thus, in accordance with Section 3.9, the IBI data indicate significant degradation in biological populations and/or communities as compared to reference sites. In addition, one sample is sufficient for considering IBI scores due to the extensive sampling protocol used in the IBI process, which takes into account site variability and is designed to

<sup>1</sup> See Heal the Bay submission dated February 27, 2007.

<sup>2</sup> Ode, P.R., A.C. Rehn and J.T. May., A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams, *Environmental Management*. 35:493-504 (2005).

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*



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combat sampling errors.<sup>5</sup> In essence, one IBI score is really multiple samples within a creek run. In other words, the Board does not need to use the Listing Policy's binomial distribution table to correct for these issues because the sampling methods are so rigorous.

Also, IBI scores can and should be evaluated using the situation-specific weight of evidence approach. Section 3.11 of the Listing Policy states that "if the weight of evidence indicates non-attainment [of water quality standards], the water segment shall be placed on the section 303(d) list." Listing Policy at 8. The IBI scores should be weighed heavily in conducting such an analysis. Water quality standards and beneficial uses are not being attained in waterbodies with an IBI score less than 39.

In sum, IBI data compiled and submitted by Heal the Bay in February 2007 are readily available and qualify as applicable listing factors in Sections 3.9 and 3.11 of the Listing Policy. Moreover, the State Board should support the IBI methodology developed by its sister agency, CDFG, and include these quantitative data in the listing analysis.

#### **B. The Regional Board Should Consider Listing for "biostimulatory substances" During the Current 2008 Listing Cycle.**

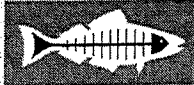
As acknowledged in the Staff Report, the Basin Plan's "nitrogen water quality objective does not protect waterbodies from impairments related to biostimulatory substances and eutrophication." Staff Report at 10. Thus, staff proposes to include waterbodies on the 303(d) List for biostimulatory substances "when both nutrient concentrations and one or more biological response indicators are at levels which characterize eutrophic conditions and/or beneficial uses of the waterbody are impaired." Staff Report at 11. We strongly support this approach and Tables 3.1 and 3.2 of the Staff Report which present various nutrient concentrations and associated biological response indicator criteria limits. Specifically, the Tables present thresholds that are representative of the concentrations at which one sees biostimulatory impacts in the Region. Criteria such as these are long overdue, as eutrophication and nutrient enrichment is one of the biggest water quality issues facing California and the Nation, and should be utilized in current 303(d) listing decisions.

Although the Staff Report outlines these recommendations for biostimulatory substances listings, the Regional Board fails to take any action on these pollutants during the current 2008 listing cycle. "In future updates, Regional Board staff is considering categorizing these impairments all as 'biostimulatory substances' using a Los Angeles Region specific, nutrient concentration/biological response method as described below. In this 2008 list update, however, no "biostimulatory substances" impairments have been included." Staff Report at 10.

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<sup>5</sup> Specifically, the study looks at a minimum linear area of 150 meters having at least 5 riffles. Within this area, the sampler randomly selects 3 out of 5 riffles where the transects will be taken. Within the 3 riffles, the samples are taken from three transects per riffle. A transect is comprised of three 1ft x 2 ft x 6 in deep samples within the randomly selected location on the riffle. Of note, the riffle habitat is the most productive habitat and therefore is the most conservative for documenting degradation of streams.





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It is inappropriate for the Regional Board to delay these critical listings to the next listing cycle. Thus, we urge the Regional Board to evaluate the current data sets using the criteria outlined in Tables 3.1 and 3.2.

**C. The Regional Board Should Use a Rolling 30 Day Geometric Mean when Evaluating Indicator Bacteria Impairments.**

The Staff Report states that when evaluating exceedances of bacteria limits, "...a calendar month approach as opposed to a rolling 30 day sample approach was used to assess geometric mean to maintain sample independence." Staff Report at 8. In other words, only one geomean was calculated per month as opposed to the four or five results one would produce when using a rolling calculation. Using a static time-frame like a calendar month to assess a very dynamic system is completely inappropriate, statistically unsound, and is not protective of public health. In fact, the state's Ocean Plan requires all indicator bacteria monitoring programs to meet beach water quality standards based on the 30 day rolling geometric mean. The Regional Board fails to provide any sound justification for taking a different approach and does not discuss how this could possibly be statistically superior to and more protective of public health than a rolling average when dealing with indicator bacteria. The end result of this approach will be far fewer beaches listed, far fewer TMDL violations, and far more beachgoer illness. Thus, we urge the Regional Board to evaluate indicator bacteria data using the rolling 30 day geometric mean.

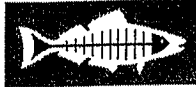
**D. The Methodology for Listing Beaches When Only AB 411 Data Exist Should be Clarified.**

The Staff Report states that "if [beach] water quality monitoring was conducted April 1 through October 31 only, a four percent exceedance percentage shall be used." The Staff Report continues to say that for delisting purposes, "A 19% exceedance percentage was used for water quality monitoring conducted April 1 through October 31...." Staff Report at 7. After talking to staff, it became clear that the provided exceedance percentages are used as the null hypothesis for the binomial distribution in the Listing Policy. This should be clarified within the Staff Report as it is not obvious as currently written.

**E. Toxicity Data from Publically Owed Treatment Works ("POTWs") Should Be Considered for the 2008 List and in Future 303(d) Listing Cycles.**

In January 2009, Heal the Bay released a report entitled *License to Kill*. During the eight and a half year study time period (2000-2008), among the 42 dischargers, there were there were 408 chronic and 64 acute toxicity exceedances among all receiving water testing stations.<sup>6</sup> Clearly

<sup>6</sup> Of note, in the Report an "exceedance" is a test result of 1 TUc or greater.



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beneficial uses are not being maintained in many of these waterbodies. Although this report was completed and submitted to Regional Board after the Regional Board's data submission deadline, these toxicity data are readily available to the Regional Board in discharger monitoring report submittals. However, there are only a few new proposed toxicity listings, and only one listing appears to use POTW monitoring data. It is unclear from the Staff Report if any other POTW toxicity data were assessed. We urge the Regional Board to review these data for 2008 listing decisions.

## **II. Proposed Delistings**

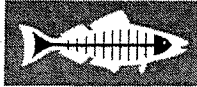
### **A. The Los Angeles Harbor – Inner Cabrillo Beach Area Should Not be Delisted for Copper Impairment.**

The Staff Report states that “[t]wo of 16 samples exceed the effects range median for copper for surface sediment samples and this exceeds the allowable frequency....However, current conditions have changed due to the new shallow water habitat created in Cabrillo Beach area and *may no longer* be negatively impacted due to copper.” Emphasis added. This reasoning for a delisting decision is inappropriate for several reasons.

First, the shallow water habitat did not cap the entire Cabrillo area, so some sediments may still be contaminated with high copper concentrations. Also there are still large sources of copper (namely boat paint) to the waterbody that have not been adequately addressed. Finally, burying a pollutant does not necessarily indicate that the pollutant will stop impacting beneficial uses. For example, species such as ghost shrimp and spoon worms go down a meter or more into the sediments. Thus, buried contaminated sediments can impact the benthic community. Also sediments can be dynamic and can move and be buried due to a single storm event. By stating that the waterbody “*may no longer* be negatively impacted due to copper”, the Regional Board appears to concur that the impacts are unknown. Delisting cannot occur without extensive data supporting the waterbody-pollutant removal. Thus, copper should remain on the 303(d) list for Los Angeles Harbor – Inner Cabrillo Beach Area until such a time new data is provided to justify delisting.

### **B. Ballona Creek Estuary Should be Listed for Silver (sediment).**

Staff asserts that silver sediment data were incorrectly applied to Ballona Creek, and the samples were actually collected in the Ballona Estuary. If this is actually true, it is unclear why staff did not propose that the Ballona Estuary be listed as impaired for silver due to the alleged mix-up. The samples came from either the Creek or the Estuary. So one or both are impaired. The State Board cannot delist this pollutant in the Creek on the basis of mis-location without then adding silver to the list for the Estuary if that is where the data was taken. Thus we urge the Regional Board to make this correction.



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**C. The Regional Board Should Clarify the Coyote Creek- Zinc Delisting Proposal.**

That Staff Report states that for zinc in Coyote Creek "The USEPA final decision was to not delist this water body-pollutant combination from the section 303(d) list for 2006, based on the information contained in the lines of evidence." However, it is unclear from the information provided by the Regional Board in the Staff Report why their proposal for the 2008 303(d) List differs from the previous USEPA decision. Are there new data available? The Regional Board should clarify the reasoning for this decision.

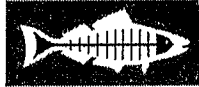
**D. The Regional Board Should Not Delist Los Angeles River Estuary (Queensway Bay) – Lead (sediment) and zinc (sediment).**

Staff proposes to delist the current lead and zinc sediment impairments listings for the Los Angeles River Estuary (Queensway Bay) because the available data includes surface and core sediment samples. How extensive were the sediment data spatially and temporally? How deep were the core samples? It is often important to examine the top layer and deeper layers of sediment in order to get sufficient insight on the ecological health of the water body and to determine if beneficial uses are maintained. Species such as ghost shrimp and spoon worms go down a meter or more into the sediments. Thus, buried sediments can impact the benthic community. Also sediments can be dynamic and can move and be buried due to a single storm event. Clearly, the Regional Board should consider deeper sediments and larger spatial areas in its listing and delisting decisions.

Further the Staff Report states that "[b]ased on the readily available data and information, the weight of evidence **indicates that there is sufficient justification against removing** this water segment-pollutant combination from the section 303(d) list in the Water Quality Limited Segments category." This statement appears to be in conflict with the fact sheet header that proposes to delist this waterbody-pollutant combination. We agree with staff's statement and they should clarify this inconsistency.

**E. Malibu Lagoon: Benthic Community Effects Should not be Placed in the "Being Addressed" Category.**

The Staff Report indicates that the Malibu Lagoon Benthic Community Effects listing should be moved to the 303(d) list's "being addressed by action other than TMDL" category. The reasoning provided is that "[t]he Malibu Lagoon Restoration Feasibility Study Final Alternatives Analysis describes restoration measures for Malibu Lagoon. These proposed restoration efforts, if fully implemented, is anticipated to correct the conditions which allow the negative indicator species to thrive." We are hopeful that the restoration efforts will improve benthic communities; however, it is premature to make this conclusion and move this listing. The



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Malibu Lagoon Restoration efforts have not started and the start date is uncertain because of the budget crisis. In addition, this listing change presumes that the benthic community problems are only a result of the lagoon's configuration and poor tidal flushing, and not any pollutant contribution. While this may be the case, it is simply premature to state this conclusively. Thus, the benthic community effects listing should remain on the main 303(d) List.

#### **F. The Proposed Walnut Creek Wash – Toxicity Delisting Should be Further Justified.**

The Staff Report appears to base the Walnut Creek Wash Toxicity delisting decision on the fact that the majority of exceedances were observed in older samples. Staff concludes that “[f]ive out of 42 samples exhibit toxicity to *Ceriodaphnia*. However, four toxic results occurred in samples from 1992-93. In between 2003 and 2007, only one of 38 samples exhibited toxicity, thus significant improvements in survival and reproduction endpoints have been observed in the most recent timeframe.... Based on the improving trend in water quality conditions and only one toxic result in the past four years, it is evident that beneficial uses are being supported.” While we understand staff’s reasoning, it appears that this is not a strict interpretation of the Listing Policy and opens the door to future misinterpretations of the Policy. The Staff Report indicates that section 4.6 of the Listing Policy is used for this delisting decision. This section of the Listing Policy states: “Water/Sediment Toxicity or associated water or sediment quality guidelines are not exceeded using the binomial distribution as described in section 4.1.” However by comparing the data to the binomial distribution, it is clear that the delisting should not occur. By only looking at the more recent data, staff is basically saying that the old data does not matter. This could be problematic, especially as tight monitoring budgets in the coming years reduce the amount of available newer data. We discourage the Regional Board from using this line of reasoning for listing/delisting decisions.

#### **G. Staff Should Clarify Their Intent for the San Pedro Bay – PAH Delisting.**

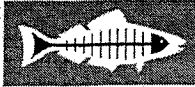
Staff proposes to delist PAHs in San Pedro Bay. However, there appears to still be some uncertainty about this decision, as the Staff Report appears to ask a question of staff: “zero of 27 surface sediment samples exceeded the *CONFIRM WITH PK* in marine sediment and this meets the allowable frequency....” Emphasis added. Please clarify what staff intends for this listing.

### **III. Conclusion**

In sum for all of the reasons set forth above, we urge the Regional Board to:

- (1) ensure that all readily available Index of Biological Integrity scores are evaluated;

7



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- (2) evaluate biostimulatory substances data for the current 2008 listing cycle;
- (3) utilize the rolling 30 day geomean for indicator bacteria listing/delisting decisions;
- (4) utilize POTW toxicity data for listing decisions;
- (5) reject the proposed delistings for the waterbody-pollutant combinations discussed above.

If you have any questions, please contact us at 310-451-1500.

Sincerely,

Kirsten James  
Water Quality Director

Mark Gold, D. Env  
President

06/16/09

To: California Regional Water Quality Control Board  
Los Angeles Region

Subject: Objections, Comments and Recommendations to the Draft 2008 303(d) pertaining to  
Lake Sherwood

I am writing on behalf of Lake Sherwood in response to the Draft 2008 California 303(d) / 305(b) Integrated Report. I am chairman of the Lake Sherwood Joint Advisory Committee (LSJAC), which is a voluntary committee comprised of homeowners, part-time consultants and a Lake Manager who advise the owners of Lake Sherwood on lake management issues. Lake Sherwood, a small lake within the Malibu Creek Watershed, is privately owned and maintained by the Sherwood Valley Homeowners Association (SVHOA). Sherwood Development Company, SVHOA, Lake Sherwood Management and the Lake Sherwood community at large have taken many steps necessary to maintain and improve this water body over the last 25 years. All the principals involved have the dedication and commitment to continue to strive towards the improvement and maintenance of Lake Sherwood in perpetuity.

## Objections

We are concerned with the State Water Resources Control Board and Los Angeles Regional Board's inadequate communication with the small stakeholder. This has been confirmed by the absence of the State and/or Regional Board's to notify Lake Sherwood lake management of the inclusion of Lake Sherwood in the following listings:

The 1998 California 303(d) List and TMDL Priority Schedule  
The 2002 CWA Section 303(d) List of Water Quality Limited Segment  
The 2006 CWA Section 303(d) List of Water Quality Limited Segment Requiring TMDLS  
The 2008 CWA Section 303(d) List of Water Quality Limited Sections

The State and Regional Board's have failed to provide Sherwood lake management any current evidence for listing Lake Sherwood as an impaired body of water. Additionally, the State and Regional Board's have repeatedly failed to notify Sherwood lake management of the request for solicitation of data and information. This lack of communication has effectively denied the owners, SVHOA, the opportunity to respond to and/or comply with the suggested impairments indicated in the California 303(d) List.

Lake Sherwood was included in the "Evaluation of Water Quality for Selected Lakes in the Los Angeles Hydrologic Basin" final report dated December 1994. The lake was subsequently listed on the 1998 California 303(d) List and TMDL Priority Schedule for Algae, Ammonia, Eutrophic, Mercury in fish tissue and Organic Enrichment/Low Dissolved Oxygen. Definitions for Algae and Eutrophic were not established at the time of the 1994 report. We believe that these impairments were listed in the 2008 List based on visual inspection and/or 14-year-old-data (1992/1993) and not based on actual water quality test data. This is a grossly inadequate effort and provides a fractional snapshot of the lake ecosystem in the 1992/1993 time period.

We do not believe that adequate efforts have been displayed by the Regional Board to communicate with the Lake Sherwood lake management in order to update the Regional Boards information of current Lake Sherwood lake management policies or actions. This is evidenced by the outdated generic listing of the sources for pollution in the Supporting Information section of the current draft 303(d) List that has been applied to all suggested impairments.

### Source (303(d) listing)

- Agriculture-animal
- Atmospheric Deposition

### Present Status

Significant reduction upstream, ongoing monitoring by SVHOA  
No data available (exception: Mercury)

- |   |  |
|---|--|
| • Golf Course Activities  | Ongoing monitoring by SVHOA                            |
| • Groundwater Loadings  | No data to confirm as source pollutant                 |
| • Irrigated Crop Production                                     | Discontinued, no data to confirm as source pollutant   |
| • Major Municipal Point Source-dry and/or wet weather discharge | Does not exist, no data to confirm as source pollutant |
| • Onsite Wastewater Systems (Septic Tanks)                      | Removed, septic tanks do not exist                     |
| • Urban Runoff/Storm Sewers                                     | Does not exist, no data to confirm as source pollutant |

It has become apparent that all communication originating from the Regional Board is aimed specifically towards industry, counties, municipalities and/or water districts. We believe communication focused solely towards the large stakeholder unfairly isolates the smaller stakeholder from participating in the process to contribute and partner with the Regional Board in establishing water quality standards that are reasonable, realistic and relate specifically to that water body. The small stakeholder, such as Lake Sherwood, requires ongoing communication with the Regional Board to provide timely, appropriate and accurate information in order to stay current in the important processes of water quality management.

### Existing Beneficial Uses

Lake Sherwood is listed as having the following designations and examples of how they apply:

**Municipal and Domestic Supply (MUN) (potential)**

*This water body is not used as a municipal or domestic water supply.*

**Ground Water Recharge (GWR)**

*We recognize the relationship between water level of the lake and the adjacent aquifer. All pumping of lake water for irrigation ceased approximately 1986. Lake Management has documented an annual fluctuation of water level between 2'-4' depending on seasonal conditions.*

**Navigation (NAV)**

*Lake use includes sailboat, paddleboat and motorboat activity.*

**Water Contact Recreation (REC-1)**

*Sherwood Development Company, SVHOA and LSJAC have mandated REC-1 body contact water quality standards as a water quality minimum and test accordingly.*

**Non-contact Water Recreation (REC-2)**

*Lake Management has established a catch and release fishing policy, maintains the community park and shoreline areas as a scenic resource and is noted by the Audubon Society as a haven for migratory waterfowl.*

**Warm Freshwater Habitat (WARM)**

**Wildlife Habitat (WILD)**

**Wetland Habitat (WET)**

*Sherwood Development Company, SVHOA and LSJAC have developed wetlands, enacted an erosion control program and promoted the growth wildlife habitat in order to maintain a natural environment and balanced ecosystem.*

## Proactive Measures for Water Quality Improvement

1984-1986	The lake was drained to inspect dam. The lake bottom was de-silted and the shoreline re-contoured.
1985-2000	Construction of de-siltation basins at all inflows.
1986	Installation of a community-wide sewer system.
1986-1988	Removal of existing septic tanks within the community.
1987	Lake refilled through natural runoff.
1987	Implementation of lake management plan by Lake Sherwood Ranch.
2000	Final lake management plan developed by Sherwood Development Company.
2002	Final lake management plan approved by the Ventura County Planning with the following Mission Statement: To create in perpetuity, a peaceful, scenic, natural area to fish, swim and boat. To maintain the beauty of the lake in order to preserve its simple elegance in accordance with the current Recreation I Standard.
2002	Establishment of the Joint Lake Management Committee to advise Sherwood Valley Homeowners Association on lake management concerns.
2004	Arundo Donax removal along Lake Sherwood shorelines.
2004	Update of the Lake Management Plan for the long term maintenance of Lake Sherwood.
2007	Review and update of the Lake Management Plan
2008	Installation of an aeration system.

### Ongoing maintenance program:

- Contract with Clean Lakes, Inc. to advise on the latest water quality standards; advise on Best Management Practices; develop Water Quality Monitoring Methods.
- Develop effective testing program using proposed Malibu Creek Watershed TMDL's
- Monthly Joint Lake Advisory Committee meeting to discuss lake issues and develop action plan.
- Daily removal of organic material.
- National Pollution Discharge Elimination System (NPDES) permit acquired and complied with for Aquatic Weed Control.
- Development of an Aquatic Weed Removal and Control Program.
- Development of an Algae Reduction and Control Program.
- Development of an Invasive Species Monitoring, Removal and Control Program: Arundo Donax
- Clearing of de-silting ponds as needed based on annual monitoring.
- Management of the aeration system to improve Dissolved Oxygen levels and aquatic habitat.
- Rec-1 Standard for body contact maintained and verified weekly during swimming season.
- Development of a Quagga Mussel prevention policy.
- On-going community education for preventative measures for the protection of lake water quality.
- Annual inspection of dam.
- Management of the Erosion Control Program.

It is the knowledge that has followed the discovery of the Evaluation of Water Quality for Selected Lakes in the Los Angeles Hydrologic Basin and the 303(d) listing that has, in great part, influenced the testing program initiated at Lake Sherwood. The LSJAC discovered both items by chance. This testing program has been developed in order to aid in recognizing and improving the lake water quality. Additionally, the testing program established a lake water quality database to offset detrimental data collected from other agencies. Over the years, the LSJAC has found that the vast majority of testing programs are under funded or poorly organized. Inadequate testing programs have led some agencies to take limited or incomplete data and stretch it to fit their criteria.



We believe that the water quality testing program at Lake Sherwood has developed sufficient data and information to justify removal from the 303(d) list for Ammonia, Total Nitrogen and in the next de-listing cycle Dissolved Oxygen. We feel that there is insufficient data to list Lake Sherwood for Eutrophic and Organic Enrichment as no criteria appears to exist for these pollutants in the documents provided on the LARWQCB website or elsewhere.

The development of Best Management Practices in a continuous review and update process by lake management has provided the ability to introduce new techniques and positive actions towards this maintenance effort. This effort includes a water quality testing program that has yielded long-term data to support de-listing from the 303(d) list. Unfortunately, due to a lack of notification by the Regional Board, Lake Sherwood lake management was not given the opportunity to present this data within the solicitation window for the 2008 de-listing. Lake management is now faced with an unacceptable and costly delay that requires continued testing until the solicitation period for 2010 is decided. This unnecessarily extends the period in which Lake Sherwood remains on the 303(d) list for an additional 2 to 4 years.

### **Action Request**

To aid the small stakeholders, including Lake Sherwood, in partnering with the Regional Board, we submit the following recommendation for the Regional Board to consider and adopt:

- Accept and analyze data from the small stakeholder for de-listing when the data is available. Waiting for a solicitation period is financially impractical. This burden limits the ability of the small stakeholder to contribute and participate with the Regional Board.
- We believe that the water quality testing program at Lake Sherwood has developed sufficient data and information to justify removal from the 303(d) List for Ammonia and Total Nitrogen. We request the Regional Board accept this data outside the solicitation period and remove Lake Sherwood from the 303(d) List for these items.
- We believe that there is insufficient data to list Lake Sherwood for Eutrophic and Organic Enrichment as no criteria appears to exist for these pollutants in the documents provided on the LARWQCB website or elsewhere. We request the Regional Board remove Lake Sherwood from the 303(d) List for these items.
- Establish one department with consistent staff to communicate with the small stakeholder on the 303(d) and TMDL process.
- Develop an ongoing, proactive communication effort specifically geared towards the small stakeholder to provide timely, appropriate and accurate information.
- Simplify and streamline the processes of the Regional Board when communicating with the small stakeholder. Agencies employing full-time staff that specializes in water related issues and standards have a distinct advantage in comprehending formulas and communicating with Regional staff. The small stakeholder does not possess the full-time staff to track the actions and decipher policies of the Regional Board. Our participation, and I am sure many other small stakeholders, has been hampered by confusing rhetoric and complicated processes.
- Partner with small stakeholders to encourage the development of testing programs and standards. Communicate with the stakeholder in order to minimize duplicate or erroneous efforts to maximize the budget potential for both the stakeholder and Regional Board.
- Develop clear cut definitions and criteria. We have, as an example, found it difficult to receive specific definitions on something as basic as Dissolved Oxygen levels.

- Consider the impact that Lake Sherwood has on the watershed, given that the lake does not discharge water into Potrero Creek except during high flows in the winter season. During these times of high flow, Dissolved Oxygen, Ammonia as N, Total Nitrogen, Total Phosphorus and Chlorophyll-a do not exceed TMDL standards developed by the USEPA as waters are well mixed. These waters either fall within objectives or the objectives currently do not exist.
- Maintain accurate data that is easily available to the small stakeholder. Update all information to a digital format for acquisition and viewing over the internet as Listing data cannot be located on the Regional Boards website. Adopted 2003 TMDL was not presented until 2008.

The Lake Sherwood Joint Advisory Committee thank you in advance for your consideration and plan to attend the public hearing you have scheduled for July 16, 2009. I am available to respond to your questions on this subject.

Timothy Bramet, Chairman  
Lake Sherwood Joint Advisory Committee

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cc: California State Water Resources Control Board  
US EPA  
SVHOA



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METROPOLITAN WATER  
DISTRICT  
OF SOUTHERN CALIFORNIA**

June 16, 2009

Ms. Tracy Egoscue, Esq.  
Los Angeles Regional Water Quality Control Board  
320 W. 4th Street, Suite 200,  
Los Angeles, California 90013

**Subject: Comments - 2008 Updated List of Impaired Waters, Los Angeles Basin**

Dear Ms. Egoscue,

On behalf of the Las Virgenes Municipal Water District and our Joint Powers Authority (JPA) partner Triunfo Sanitation District, we are pleased to provide our comments on the 2008 update of the Los Angeles Basin List of Impaired Waters pursuant to §305(j) and §303(d) of the Clean Water Act.

Since the last update in 2006, the JPA and other government and non-governmental agencies have invested substantial financial and staff resources to better understand the nature and sources of water quality impairments in the Malibu Creek watershed and other water bodies in our service area. As a result, the amount of available data on local water quality has grown substantially, including over 30 new sites sampled by multiple government and non-governmental organizations, in addition to data from special projects focused on specific water quality issues ranging from benthic macroinvertebrates to algal growth to endangered fish species. This new information provides an unprecedentedly detailed snapshot of water quality in local creeks and lakes, which we have used to assess the state 303(d) list update.

**Suggested Revisions**

Table 1 (attached) lists our recommended changes to the state's draft update for specific listings. The majority of our recommended changes to the state update are related to proposed listings that appear to be unsupported by the data in the state decision lines of evidence (LOE), or where data relevant to their decision may have been overlooked. The one exception is our recommendation to list Cold Creek for invasive species, which is based on our understanding of the invasive potential of the New Zealand mudsnail found in 2008 for the first time in the creek's headwaters.

Note we are recommending that the Regional Board not list several water bodies currently listed or proposed for listings for metals (selenium), nutrients, organic enrichment, and specific conductivity. Our findings strongly suggest that natural sources are responsible for the observed exceedances of the water quality objectives and guidelines for these pollutants in the affected water bodies. See our discussion of geological impacts on local water quality below.

## Lines of Evidence (LOE)

Lines of Evidence (LOE) for each JPA-recommended revision are provided electronically (separate submittal) in the same format as the state's draft update to facilitate their incorporation into the administrative record in the current listing cycle. Each JPA LOE is keyed to its respective state decision number.

The data used in the JPA LOEs derive primarily from three sources:

- NPDES permit monitoring data provide long time-series data (1978 – 2009) primarily from JPA monitoring stations located in the lower Malibu Creek watershed. Data QA/QC details are provided in JPA LOE 1 submitted electronically.
- Recent time series data (1998 – 2009) the upper watershed and nearby coastal streams were compiled from the Heal The Bay Stream Team website (<http://www.healthebay.org/streamteam/data/chem/query/>). Details are provided in JPA LOE 2 & 3, submitted electronically.
- Shorter but more recent timeseries data (2005 – 2007) were obtained from the Malibu Creek Watershed-Wide Monitoring Project, a Prop. 13 funded partnership of local cities and the JPA. Details are provided in JPA LOE 4 submitted electronically.

Other information sources consulted included:

- California Toxics Rule (CTR) data collected by the JPA
- USGS geological mapping (Yerkes & Campbell, 2000)
- Los Angeles County Hydro Unit Stream Gage records (F-130R)
- Peer-reviewed scientific and technical reports (footnoted where referenced)

Our review also included available datasets used in the state update pursuant to the CWA §305(j) biennial update requirement as an independent, JPA check on the state's listing decisions for the Malibu Creek watershed.

JPA staff also reviewed our comments on earlier 303(d) updates in 2002 and 2006 to determine which recommendations were addressed by the state and/or incorporated into the state's current draft update. Formal requests were submitted for both the 2002 and 2006 state updates to better document the 303(d) listing process, from source data to staff recommendation. *We are pleased to report substantial progress by the state* in this regard for the current 303(d) list update, although the traceability of pre-2006 listings remains extremely difficult.

## Biostimulatory Substances – Potential Criteria

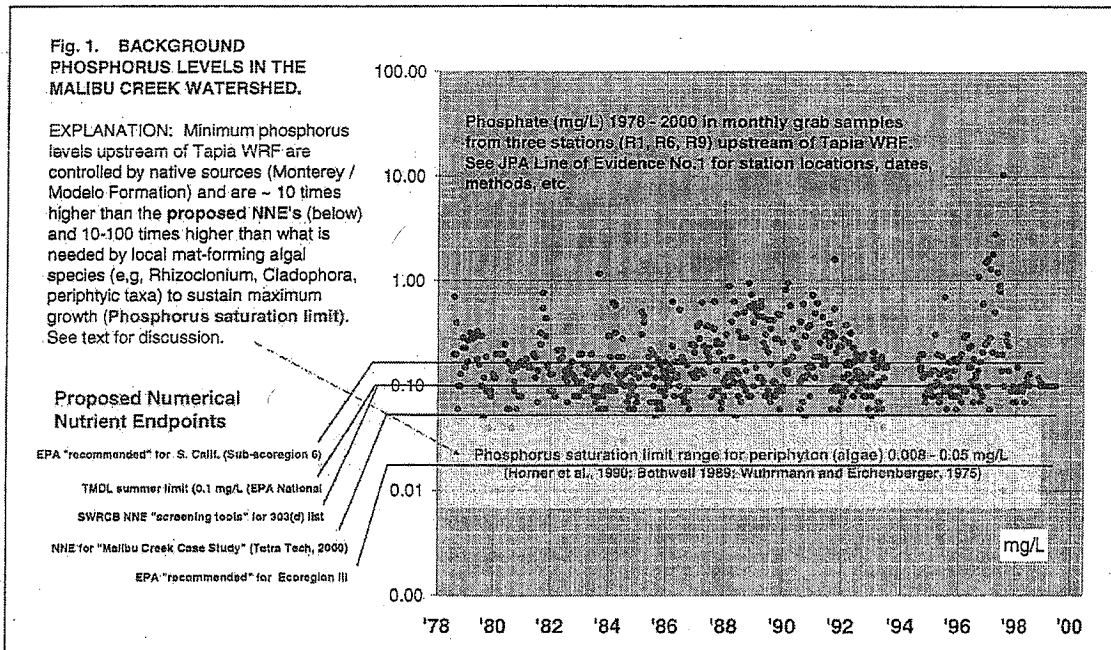
A long-standing problem throughout the country is how to translate narrative Biostimulatory Substances objectives into numerical thresholds – so called “Numerical Nutrient Endpoints, or NNE’s - for quantifying the levels at which biostimulatory substances impair beneficial uses. Both the state and the US EPA have tried to provide

national, regional and sub-regional guidance on this issue, as referenced in the 2008 Update Staff Report in Tables 3-2 and 3-3<sup>1</sup>. Some of this guidance is quite dated and/or unsupported by recent independent scientific peer review, and we therefore support the Regional Board's decision to defer adopting any of the potential criteria listed in Tables 3-2 and 3-3 in the current 303(d) listing cycle, pending further study by staff.

Nonetheless, we remain concerned that these criteria may be used in NPDES permits outside of the 303(d) listing process, or otherwise used to regulate JPA facilities. Our concerns center on three issues:

- (1) Application of "guidance" criteria without adequate regard for site-specific, natural conditions at the watershed level.

Significantly, all five of the proposed NNE's for phosphorus in the staff report are exceeded in the Malibu Creek watershed, including the US EPA *sub-ecoregional* guidelines (Fig 1). Reference to the scientific literature on algal growth shows that these nutrient levels are consistently higher than that needed to support maximum growth in local mat-forming algal species (Fig. 1, saturation limit overlay).



In the following section and in our previous comments for the Triennial Review, we provide evidence that the nutrient levels observed in the Malibu Creek watershed do not fall below levels determined by natural sources of marine sedimentary phosphatic shale (Monterey Formation).

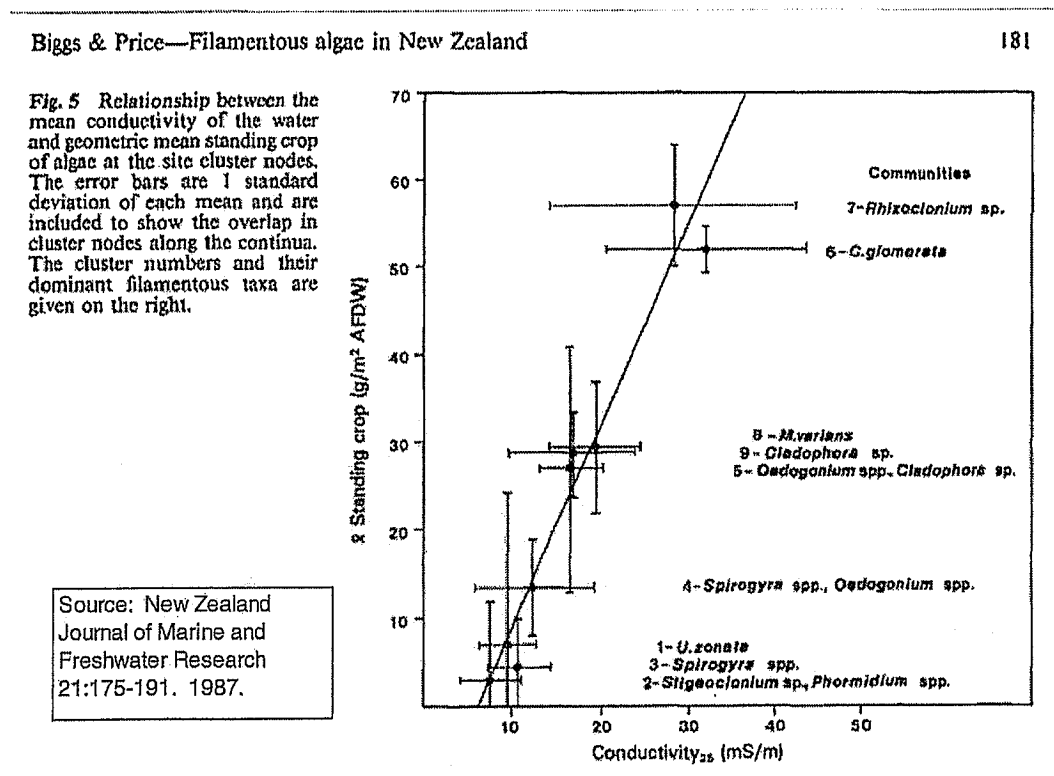
It is essential that the Regional Board acknowledge and address natural sources of nutrients, metals and salt within the current 303(d) listing cycle. Failure to do so may

<sup>1</sup> Note these two tables appear to have their titles reversed in the Regional Board staff report.

result in the subsequent promulgation of new regulations seeking to remedy water quality problems that are likely due to natural sources.

(2) Overly-narrow focus on phosphorus and nitrogen biostimulatory substances

For several decades regulators have focused almost exclusively on nitrogen and phosphorus compounds when applying and translating the biostimulatory narrative standard into water quality objectives. However, recent findings show that algal growth, particularly in those taxa responsible for the algal mats seen in local waters, is often better correlated with the specific conductivity of the waters in which they grow, with the highest growth seen in high conductivity waters (See Fig. 5 from Biggs and Price, 1987 below)<sup>2</sup>.



The precise mechanism behind this correlation is unknown<sup>3</sup>, although it appears to be independent of the particular ionic species that collectively contribute to overall water conductivity. Regardless, to date there have been five site-specific studies of algal growth in the Malibu Creek watershed; all five studies found better correlation of algal growth with specific conductivity. None of these studies were able to demonstrate a quantitative, causal relationship between “conventional” biostimulants – nitrogen and phosphorus – and algal growth, probably due to N and P levels in excess of that needed

<sup>2</sup> See our Triennial Review submission and associated electronic files regarding specific conductivity and algal growth.

<sup>3</sup> Potential mechanisms range from physiological advantages (e.g. better osmoregulation) to simple physical effects of saltier water (e.g. increased buoyancy = increased sunlight for attached algae that form floating algal mats).

for algal growth in the sites studied. This includes sites located in open spaces upstream of urban development.

- (3) Recent scientific literature on saturation levels of biostimulatory substances in algae.

The fundamental premise to NNE's is that algal growth can be limited by reducing the concentration of at least one essential algal nutrient in a water body to a level insufficient to sustain maximum algal growth. The key question, then, is how low must one reduce nutrient levels in a water body to reduce algal growth? This is the so-called limiting nutrient concentration or numerical nutrient endpoint (NNE).

Most of the guidance-based biostimulatory NNE's cited in Table 3-3 of the Staff Report are correlative in nature, meaning they are based on various statistical measures of ambient nutrient levels found in relatively unimpaired freshwater streams and lakes. As regulatory remedies for excessive algal growth, these NNE's assume that nutrient levels in waters with low algal growth would also result in low algal growth if applied elsewhere<sup>4</sup>. The efficacy of this approach depends on two conditions; (1) that the NNE's can be met by controlling human nutrient sources and (2) that the NNE's, if met, are in fact capable of limiting algal growth. Our findings show that neither condition is met in the Malibu Creek watershed.

In our review we searched the scientific literature for laboratory and field studies on the limiting concentrations of nutrients for the specific algal taxa responsible for floating algal mats (e.g. *Cladophora* and *Rhizoclonium*) and bottom-coating algal films (periphytic diatoms) in the Malibu Creek watershed. Concentrations of phosphate of 0.714 mg/L and 0.12 – 0.47 mg/L were sufficient to sustain maximum growth in *Cladophora glomerata* and periphytic diatoms, respectively (Stevenson et. al., 1996; Taylor et al., 2001)<sup>5</sup>.

As for the NNE's proposed by Regional Board staff in the Staff Report (Tables 3-2 & 3-3), these levels are consistently exceeded in the Malibu Creek watershed, including those locations upstream of all known point and non-point sources and presumably minimally impacted by human activities (see Fig. 1 and JPA LOEs 1-3). These levels are lower than all five of the NNE's proposed in the Staff Report.

We are not suggesting that the proposed NNE's are inappropriate for the entire Los Angeles basin. They may prove effective in those water bodies where algal impairments are related to algal species whose limiting nutrient levels are higher than the proposed NNE's, and where natural nutrient sources do not exceed these levels. We do note, however, that the algal species responsible for most occurrences of floating algal mats (e.g. *Cladophora glomerata* and *Rhizoclonium sp.*) are fairly widespread in the region, and can support sustained growth on relatively low levels of nutrients.

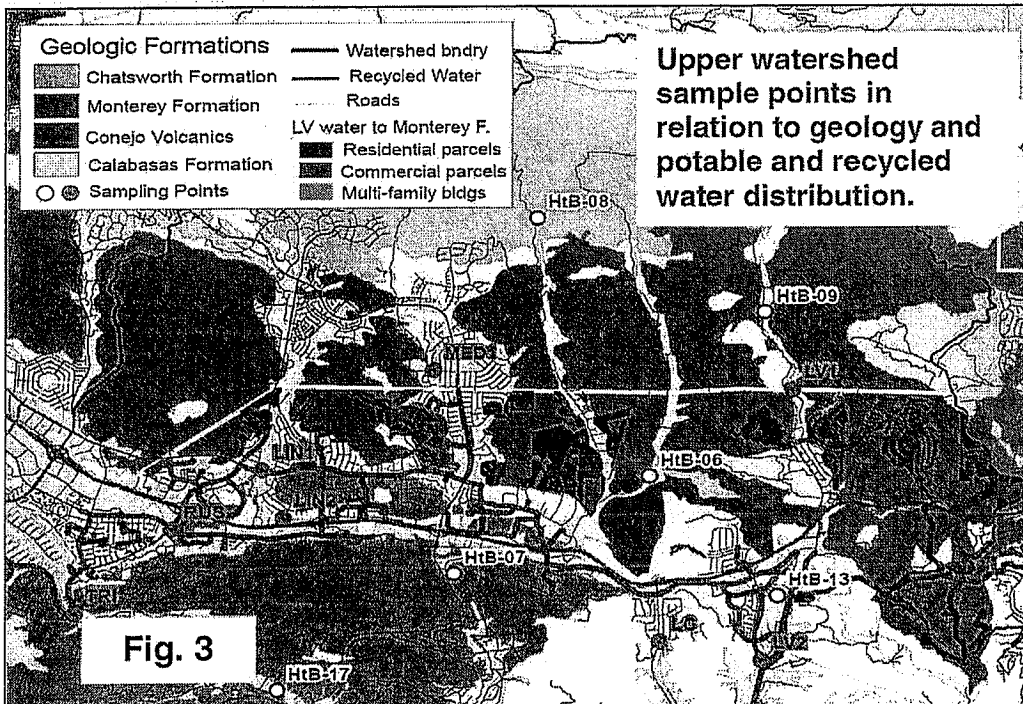
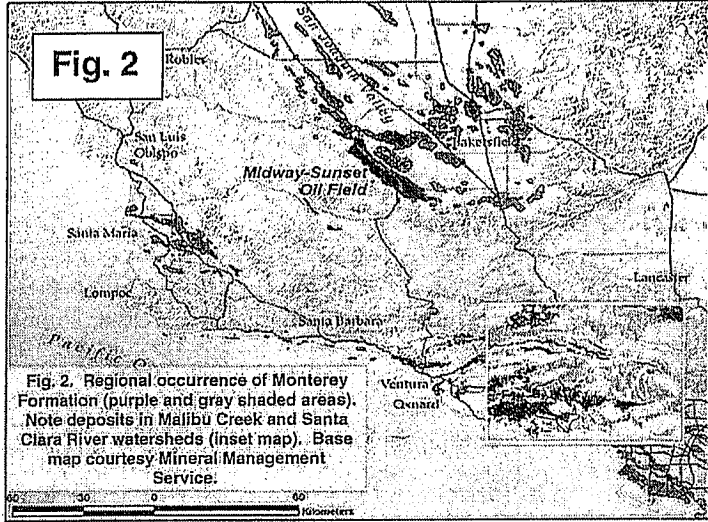
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<sup>4</sup> The sole exception is the US EPA National Guidance, which suggests NNEs of 1.0 and 0.1 mg/L for nitrogen and phosphorus respectively. However, this guidance is based on a very dated (1974) and simplistic desk-top estimate of the amount of N and P found in algae in relation to their amounts in treated sewage and other waters. It is not based on field work or laboratory study

<sup>5</sup> Stevenson, R. J., M. Bothwell, and R. L. Lowe (eds.). 1996. *Algal Ecology: Freshwater Benthic Ecosystems* Academic Press, San Diego, CA.; Taylor, R.; Fletcher, R. L.; Raven, J. A.. 2001. Preliminary Studies on the Growth of Selected 'Green Tide' Algae in Laboratory Culture: Effects of Irradiance, Temperature, Salinity and Nutrients on Growth Rate. *Botanica Marina* 44(4): 327-336.

**Geological sources of 303(d) listed pollutants (nutrients, metals and salts)**

Native geological sources of nutrients, metals and salts are well-known in the scientific literature (e.g. Isaacs & Rullkötter, 2001<sup>9</sup>), and their locations in the Los Angeles region are documented in US Geological Survey and Mineral Management Service maps (Fig. 2). Yet neither the current Basin Plan nor any of the completed nutrient TMDLs for the Los Angeles region mentions this known source of metals (e.g. Selenium), biostimulatory substances (e.g. phosphorus, high specific conductivity), and high levels of total organic carbon (TOC).





Aside from its high salt content (responsible for the remarkably high levels of specific conductivity shown in Figs. 5 & 6, below), the majority of the biogenic compounds in the Monterey Formation are associated with unusually high levels of organic sediment derived from marine algae (diatoms). It should therefore come as no surprise that local streams fed by Monterey Formation-derived groundwaters are naturally enriched in algal nutrients such as phosphorus and nitrogen (Figs. 5 & 6), even in areas upstream of all known point and point sources (Fig. 3).

The effects of geology on surface water quality in southern California native streams was noted by Southern California Coastal Water Research Project staff in a regional study of presumably unimpaired natural reference streams that included Cold Creek and Cheseboro Creek in the Malibu Creek watershed (Stein & Yoon, 2007)<sup>6</sup>:

“The combined effect of geology and hydrology may also explain the higher nutrient fluxes observed in the natural streams in this study compared to nation-wide averages reported from a study by Clark *et al.* (2000). Clark reported total annual loading of nutrients from 85 natural stream basins across the United States, with a median annual basin flux of ammonia, total nitrogen, orthophosphate, and total phosphorus of 8.1, 86, 2.8, and 8.5kg/km<sup>2</sup>, respectively (Table 27). At four of the five sites from this study, nutrient flux was three to four time greater than the basin median value reported by Clark *et al.* The higher phosphorus loadings at the natural streams may have resulted from mineral weathering of phosphorus-enriched sediments. For example, the TP loadings at Santiago Creek, where the dominant geologic type is a marine sedimentary rock, were three times higher than the values recorded in the Clark *et al.* (2000) stream basin study.”

[Emphasis by JPA]

In conclusion, the authors noted (p. 87) that,

“Concentrations of several nutrients were higher than the USEPA proposed nutrient guidelines for Ecoregion III, 6. It is important to note that the ultimate approach for nutrient 88 criteria adopted in the State of California will likely differ from the approach used in the proposed EPA guidelines. Furthermore, the proposed guidelines were based on a combination of both wet and dry weather data. Nevertheless, this result indicates that background nutrient levels in southern California may be higher than in other portions of the country.”

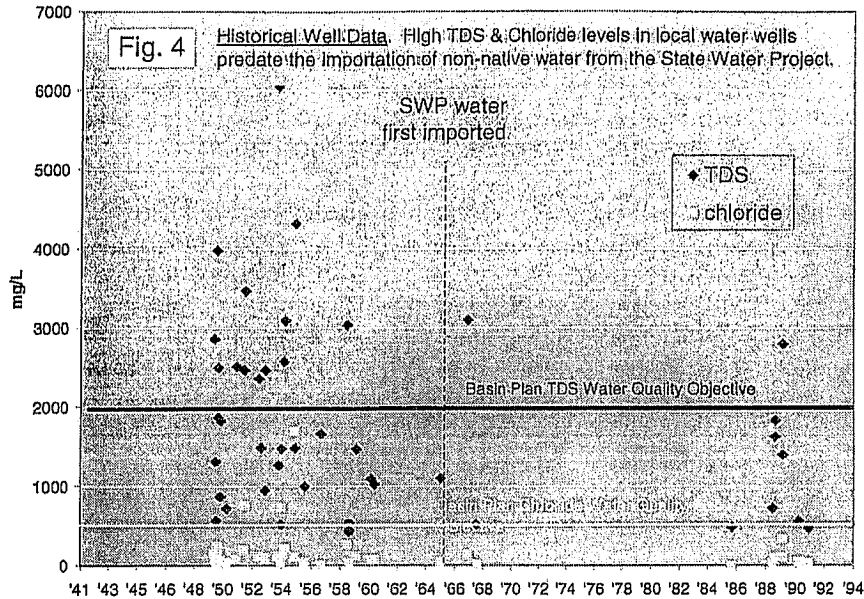
[Emphasis by Stein and Yoon]

It is also important to note that Stein and Yoon (2007) discussed potential geological effects in broad terms, noting that marine sedimentary rocks in general can contribute to high observed levels of TDS, nutrients and some metals. They did not specifically discuss Monterey Formation-fed streams, which show elevated levels of these pollutants significantly higher than the other marine sedimentary drainages in their study.

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<sup>6</sup> Stein, E. and V.K. Yoon. 2007. Assessment Of Water Quality Concentrations And Loads From Natural Landscapes. Southern California Coastal Water Research Project Report 500. Available at [www.sccwrp.org/pub/download/DOCUMENTS/TechnicalReports/500\\_natural\\_loading.pdf](http://www.sccwrp.org/pub/download/DOCUMENTS/TechnicalReports/500_natural_loading.pdf)

Several lines of evidence demonstrate that many of the proposed and existing 303(d) listings are due to this natural source. Historical water well logs often included basic water quality tests for total dissolved solids, conductivity and some metals. Well data from the Malibu Creek watershed show that Total Dissolved Solids (TDS) and chloride levels in excess of Basin Plan water quality objectives predate the importation of non-native State Water Project water the majority of the region's development (Fig. 4)<sup>7</sup>.



Two additional lines of evidence come from two independent studies of recent surface water quality monitoring results from sites located in undeveloped areas upstream of urban areas and potable and recycled water systems (See Fig. 3). In the Malibu Creek watershed these include creeks that lie within the Monterey Formation and immediately downstream of it (e.g. sites HTB-6, HTB-9 and LV-1), and also in similar undeveloped headwaters lying outside of the Monterey Formation (e.g. upper Cold Creek). Both datasets show that specific conductivity and phosphorus levels in the undeveloped Monterey Formation sites are substantially higher than similar sites in equally undeveloped areas underlain by other geology (Figs. 5-7)<sup>8</sup>.

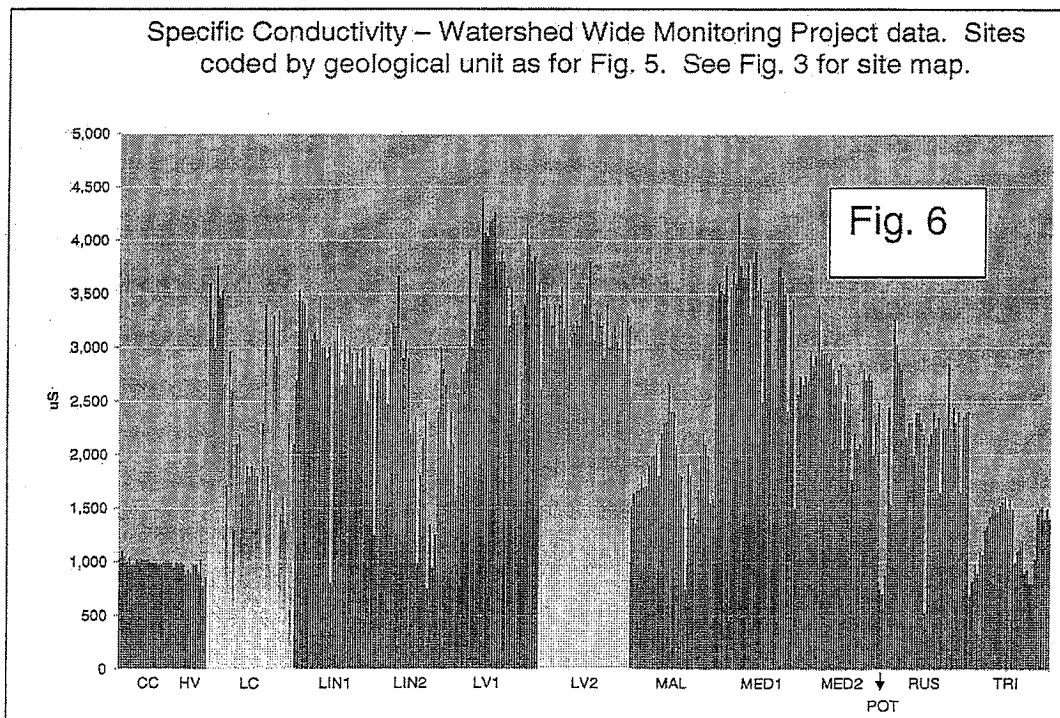
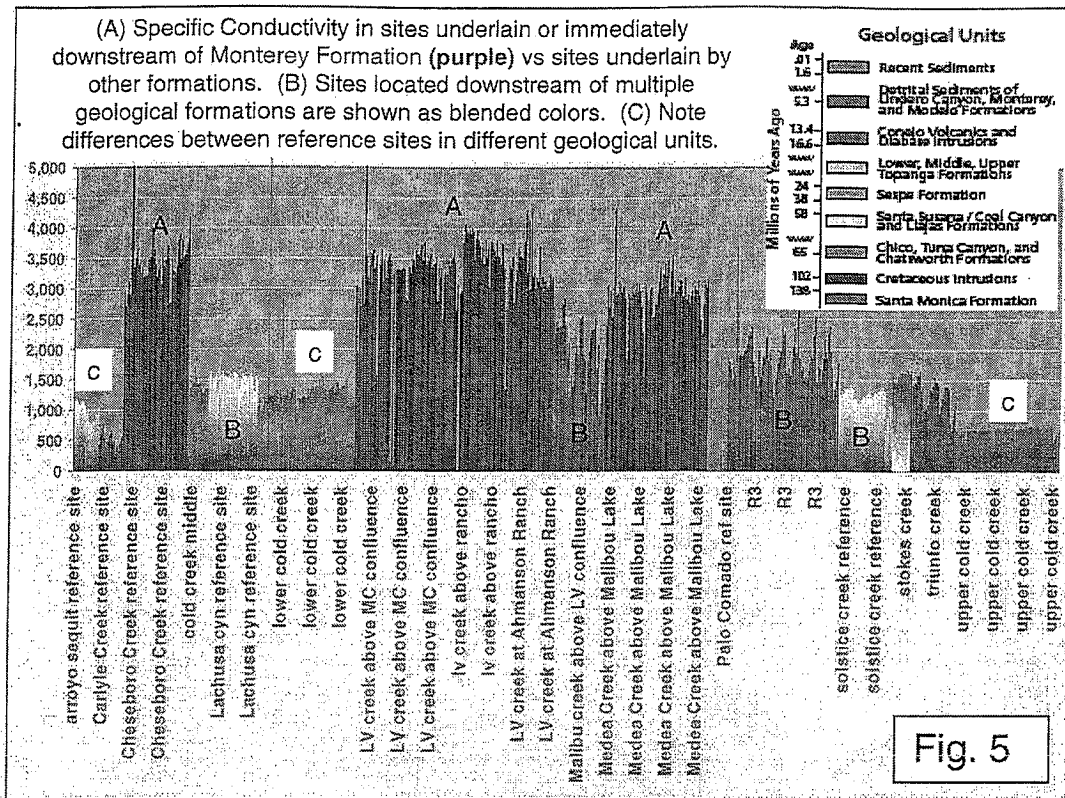
Aside from salts and nutrients, the Monterey Formation is a known source of sulfate and heavy metals (e.g. selenium) currently listed or proposed for listing in several tributary streams within the Monterey Formation or immediately downstream of it (see Table 1). Our CTR test results (Fig. 8) were consistent with this association, showing detectable levels of selenium and other metals known to occur in the Monterey Formation<sup>9</sup>, but non-detects for other organic compounds common in runoff from more developed areas<sup>10</sup>.

<sup>7</sup> See JPA LOE No. 5 (historical well data - electronic submission)

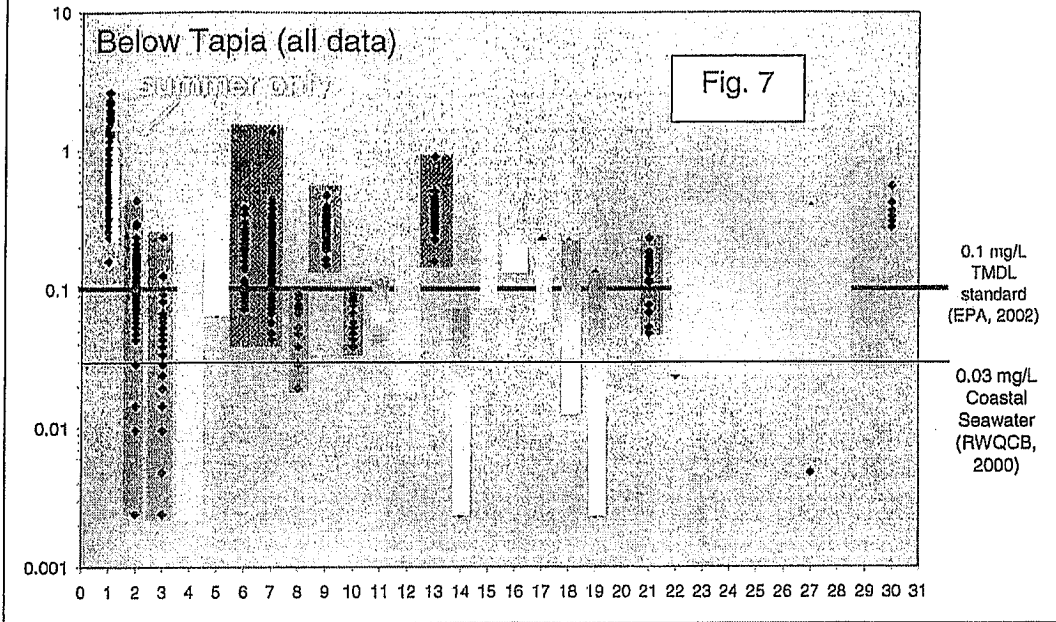
<sup>8</sup> See JPA LOE No. 2-3 (Heal The Bay Streamteam<sup>®</sup> data) & JPA LOE No. 4 (Malibu Creek Watershed-Wide Monitoring Project data), submitted electronically.

<sup>9</sup> Piper, D. Z and C. M. Isaacs. 2001. The Monterey Formation: Bottom-Water Redox Conditions and Photic-Zone Primary Productivity. In *The Monterey Formation: From Rocks to Molecules*. C.M. Isaacs & J. Rullkötter (eds). Columbia University Press. New York. 553 pp.

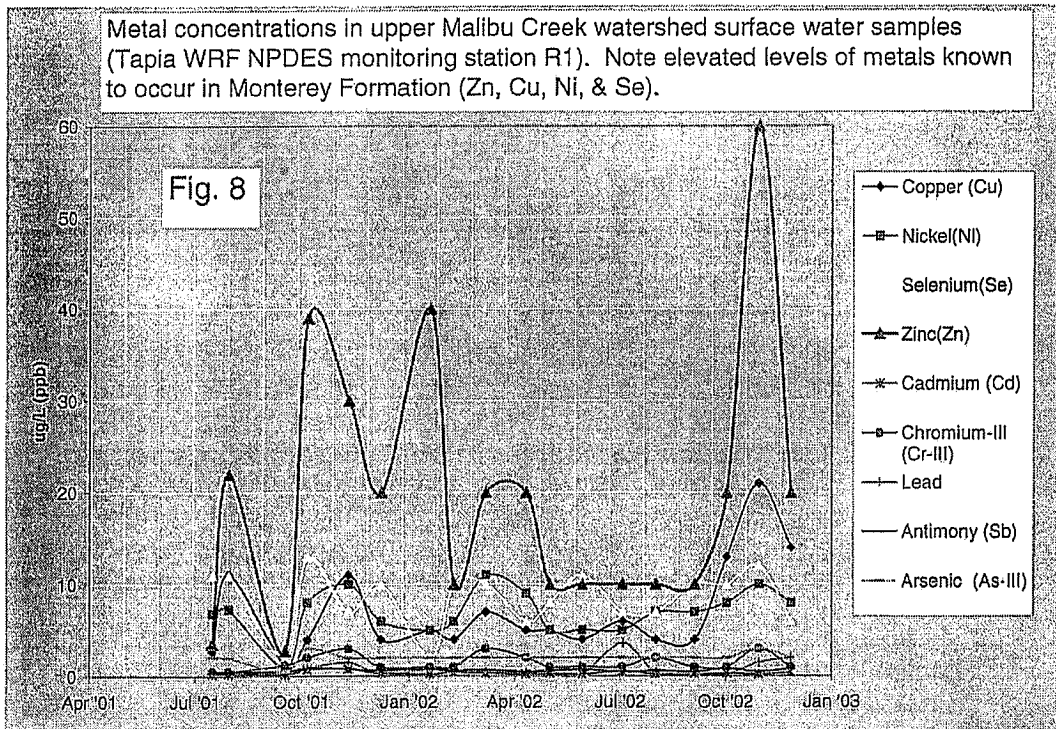
<sup>10</sup> See JPA LOE 6 (CTR test results – submitted electronically)



Phosphate (mg/L) in Malibu Creek watershed and nearby coastal reference streams (HTB stream team data). Note P levels in summer below Tapia (no discharge season) fall within range of upstream background levels influenced by Monterey Formation. Color coding by primary geologic unit as for Fig. 5.



Metal concentrations in upper Malibu Creek watershed surface water samples (Tapia WRF NPDES monitoring station R1). Note elevated levels of metals known to occur in Monterey Formation (Zn, Cu, Ni, & Se).



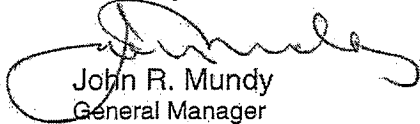
## Conclusion

In summary, the last decade has seen a substantial public investment in water quality monitoring in the Malibu Creek watershed and the JPA service area. We hope the Regional Board will carefully consider the findings presented here on the basis of these monitoring efforts, and incorporate these data and our recommendations for improving the accuracy of the state 303(d) list of impaired water bodies.

The JPA would welcome an opportunity to meet with your staff and other interested parties to review our findings, both with respect to the present 303(d) list update and the influence of native geology on local water quality. I am sure you can appreciate the need to fully vet these findings, particularly if they are to form the basis for specific listings or delistings in the 303(d) list, or to develop Site Specific Objectives (SSOs) for specific tributaries impacted by native geology.

As always, we appreciate the opportunity to comment. Please direct questions regarding our comments to Dr. Randal Orton in our Resource Conservation and Public Outreach Department. He can be reached at 818 / 251-2145 or via email at [rorton@lvmwd.com](mailto:rorton@lvmwd.com).

Sincerely,



John R. Mundy  
General Manager

c. JPA Board of Directors

Attachments

z:/my documents 303d list comments

TABLE 1. Las Virgenes Municipal Water District and Triunfo Sanitation District Joint Powers Authority (JPA) - 303(d) List Recommended Changes

State draft update

JPA Comments

Water Body	State decision No.	Impairment / Pollutant	State decision	Recommended revision	Rationale / Line of Evidence in support of revision
Lake Lindero (CAL4042300019990201145528)	7319	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting Information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-5 (submitted electronically)
	Not given	Selenium	Listed - TMDL required	Delist - Natural source	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkotter, 2007) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
	Not given	Chloride	Listed - TMDL required	Delist - Natural source	Elevated chloride levels predate imported water and are linked to marine phosphatic rock, a natural source. See JPA LOE 5 (submitted electronically). Also see comments for specific conductivity listing decisions (chloride is one constituent of Specific Conductivity).
	Not given	Specific Conductivity	Listed - TMDL required	Delist - Natural source	Specific Conductivity exceedances in the Malibu Creek watershed exclusive of Cold Creek is clearly due to natural sources (Issacs and Rullkotter, 2007; Staalner, Dunn & Gardner, 1992; Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 3 & 4.
Lake sherwood CAL4042600019990201154540	7332	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting Information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-5 (submitted electronically)
	7024	Organic Enrichment/Low Dissolved Oxygen	List on 303(d) list (being addressed by USEPA approved TMDL)	Delist - unsupported by weight of evidence, approved TMDL	No new data in support of this listing are provided in the Supporting Information. The TMDL referenced in state update does not cite any data from this waterbody, and it is not clear what the original basis was for this listing.
	7332	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting Information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-4 (submitted electronically)

**TABLE 1. Las Virgenes Municipal Water District and Triunfo Sanitation District Joint Powers Authority (JPA) - 303(d) List Recommended Changes**

Las Virgenes Creek (CAR4042201019990201141611)	7059	Nutrients (Algae)	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting information should indicate that phosphorus and possibly nitrogen levels as well exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-3 (this submittal).
	7108	Organic Enrichment/Low Dissolved Oxygen	List on 303(d) list (being addressed by USEPA approved TMDL)	Delist - unsupported by weight of evidence, approved TMDL	Recent data from 1998 - 2009 from multiple datasets including both daytime grab samples and 24 hr continuous monitoring provide no support for listing this tributary as impaired by low DO. Also, these two pollutants (organic enrichment, Low DO) should be separated until a causal linkage is demonstrated. See text for further discussion.
	Not given	Selenium	Listed	Delist - Natural source	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkötter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
Lindero Creek Reach 1 (CAR4042300019990201144612)	Not given	Selenium	Listed	Delist - Natural source	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkötter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
Lindero Creek Reach 2 (CAR4042500019990201150614)	Not given	Selenium	Listed	Delist - Natural source	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkötter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
Malibou Lake (CAL4042400019990201142748)	7243	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-4 (submitted electronically).
	7244	Organic Enrichment/Low Dissolved Oxygen	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting information should note that recent data from daytime grab samples provide no support for listing this tributary as impaired by low DO in winter (See DO worksheets in JPA LOE 2). Also, these two pollutants (organic enrichment, Low DO) should be separated until a causal linkage is demonstrated. See text for further discussion.

10-024

01-0014

**TABLE 1. Las Virgenes Municipal Water District and Triunfo Sanitation District Joint Powers Authority (JPA) - 303(d) List Recommended Changes**

Malibu Creek (CAR4042100019990201132825)	16265	Copper (dissolved)	Delist - TMDL	Delist - TMDL unnecessary	0 of 59 samples exceeded applicable standard (State Supporting Information)
	Not given	Selenium	Listed - TMDL required	Delist - Natural source	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkotter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
	Not given	Sulfates	Listed - TMDL required	Delist - TMDL unnecessary	Sulfate levels in surface waters reflect native groundwater levels influenced by high salt and mineral content of Monterey Formation. See text for further information.
Malibu Lagoon (40421000)	16265	Toxicity	Delist - TMDL	Delist - TMDL unnecessary	0 of 1 samples exceeded applicable standard
	7247	Nutrients (algae)	Delist - approved TMDL	List if Supporting Information revised (see right)	Supporting Information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-5 (submitted electronically)
	16282	Antimony   Arsenic   PAHs   C1-C4   Copper   Dibenz[a,h]anthracene   Lead   Phenanthrene   Pyrene   Zinc Sediment Toxicity	Delist - TMDL	Delist - TMDL unnecessary	0 of 3 samples exceeded applicable standard
Medea Creek Reach 1 (40424000)	16266	Sediment Toxicity	Delist - TMDL	Delist - TMDL unnecessary	0 of 3 samples exceeded applicable standard
	7252	Eutrophic	Delist - TMDL	List if Supporting Information revised (see right)	Supporting Information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-4 (submitted electronically)
	Not given	Selenium	Listed - TMDL required	Delist - Natural source	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkotter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).

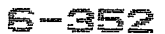
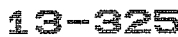




TABLE 1. Las Virgenes Municipal Water District and Triunfo Sanitation District Joint Powers Authority (JPA) - 303(d) List Recommended Changes

Medea Creek Reach 2 (40423000)	Not given	Selenium	Listed - TMDL required	List if Supporting Information revised (see right)	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkoffter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
Triunfo Canyon Creek Reach 1 (40424000)	16626	Invasive Species	Do not list	List for Invasive Species	The state supporting document omits important data from the Bay commission report that New Zealand mudsnails were in fact found for the first time in the highest reaches of Cold Creek in 2008. The state fact sheet cites to "applicable standards," but th
Westlake Lake (CAL40425000/19990201153000)	7025	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Supporting information should include data demonstrating that phosphorus levels exceed TMDL established-limits due to contributions from marine phosphatic rock (Monterey Formation). See text for discussion and JPA Lines of Evidence (LOE) 1-4 (submitted electronically)
Los Angeles River Reach 6 (40521000)	Not given	Selenium	Listed	List if Supporting Information revised (see right)	Selenium levels in the Malibu Creek watershed (and possibly the upper Los Angeles River) derive primarily from a natural source (Monterey Formation; Issacs and Rullkoffter, 2001) in the Malibu Creek watershed (Yerkes & Campbell, 2005). See Discussion in text and JPA LOE 6 (submitted electronically).
Cold Creek (CAR4042100020020130153315)	16623	Invasive Species	Do not list	List for Invasive Species	The state supporting document omits important data from the Bay commission report, specifically that New Zealand mudsnails were in fact found for the first time in the highest reaches of Cold Creek. The state fact sheet citation to "applicable standards" is unsupported - none exist. See discussion in text. Characterization of NZ mudsnail density as "low" in 2008 field surveys should be translated as "impaired" for this species given its ability to rapidly expand its range.

LOS PADRES CHAPTER OF THE SIERRA CLUB REQUEST TO ADD  
WATERSHED THAT DRAINS INTO ORMOND BEACH LAGOON TO THE LIST  
OF IMPAIRED WATERBODIES DEVELOPED PURSUANT TO SECTION 303(D)  
OF FEDERAL CLEANWATER ACT.

PREPARED BY TREVOR SMITH (CONSERVATION CHAIR)

Dear Mr. Voong,

It has come to our attention that the Oxnard Industrial Drain, J Street Drain and the Bubbling Springs water way are not included on the 303(d) list for monitoring purposes. Both the Oxnard Industrial Drain and the J street drain are manmade concrete lined water ways that drain a large area of Oxnard's residential, industrial and agriculture runoff into the Ormond Beach Lagoon which is at the south End of Perkins Rd., adjacent to the HALACO Superfund site. The bubbling Springs waterway is more natural in appearance but at it's terminus is pumped into the same lagoon. The apparent effect of the discharge of these waterways is to fill the lagoon to a maximum level that registers 7 feet on a depth gauge next to the foot bridge and is sometimes in contact with the bridge's structure.

During a month of observations of the area the water level has never lowered but seems to gradually rise. There is no outlet to the ocean at this time. During heavy rains and high surf the lagoon does occasionally breach and drains into the ocean. We have been told by city officials that sometimes bulldozers are used to arbitrarily create a breach for drainage. However this practice has implications to wildlife that may have not been considered in the past.

The J street drain has appeared to be dry or slightly wet in the center over the past month of observation. However there appears to be observable amounts of trash and debris in the channel as it runs several miles north. We have heard for years about promises to install a storm drain filter device in drains such waterways. In past years we have observed large amounts of trash in the lagoon after heavy rainstorms.

The Oxnard Industrial Drain appears to be constantly full of water that is within two feet of the bottom of the bridges on Hueneme Road. Today we followed this water way inland to Pleasant Valley Road, about one mile north of Saviors Road. The Edison high tension Power lines cross Hueneme road at this point. We observed standing water that appeared to be at least one-foot in depth. There were thick algae, much trash and a foul odor at this location. It is obvious that the Lagoon is full and the water is backed up miles inland. The water appears to be stagnant and most likely bacteria laden and a potential breeding ground for mosquitoes.

So far what we describe in layman's terms does not appear to pass the visual or smell test that are criteria of water quality permits. Apparently there is no professional testing of this waterway system. Sierra Club asks that the Waterboard makes the same visual observations and goes further to recommend testing and observation of this waterway system. We would be more than willing to act as your guides if you so desire.

We have more concerns about the Lagoon which is the receiving water of these manmade drainage channels. In addition to what has been described, the Abandoned HALACO building, paved area and Slag heap are all draining into the lagoon. The Slag Heap is in contact with the lagoon and Oxnard drain for hundreds of feet along the toe of the manmade mountain. As you know the site has been designated as a Superfund site and has been managed by Wayne Praskins for at least three years. During this time limited testing of the slag heap has found an abundance of heavy metals and radioactive isotopes (thorium).

When asked at a recent media event that we held that was publicized in newspapers and ABC TV, Mr. Praskins disclosed that no water samples or underwater sediment had been tested. Sierra Club asks that this testing be ordered as well as marine life tissue samples.

Sierra Club along with other groups has offered to clean up this visual blight of trash and debris but have been cautioned not to put volunteers into harms way i.e., inadvertent exposure to harmful toxins. How can anyone including city agencies put their workers and volunteers in harms way without the benefit of testing and disclosure of what hazards exist?

In conclusion The Los Padres Chapter of the Sierra Club joins all other groups in asking that this watershed, lagoon and Halaco site be added to the 303(d) list for the purpose of restoring the valuable habitat (ESHA) and eventually becoming safe for humans to maintain.

Sincerely,

Trevor Smith  
Conservation Chair  
Los Padres Chapter of the Sierra Club  
(805) 469-9765

**Man Voong - please add to my Sierra Club Comment letter**

---

**From:** "Trevor Smith" <trevor.smith@earthlink.net>  
**To:** <mvoong@waterboards.ca.gov>  
**Date:** 6/17/2009 2:55 PM  
**Subject:** please add to my Sierra Club Comment letter  
**Attachments:** VIDA NEWS 6-4-09 .pdf

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Dear Man,

At your request I am resending this attachment and asking you to submit to the record in addition to my Comment letter.

Sincerely,

Trevor Smith

# ORMOND WETLANDS AND HALACO SUPERFUND SITE



ABC TV Channel 7, the Hueneme Pilot and Ventura County Reporter and yours truly for Vida Newspaper. Also attending were representatives from local, state, federal agencies, the Sierra Club represented by Trevor Smith, Conservation Chair Los Padres Chapter, Jean Rountree and Lee Quaintance board member of Beacon Foundation, Allen Sanders of the Ormond Beach Observers Group, Gloria Roman and Beatriz Garcia from the Coastal Alliance for a United Sustainable Economy "CAUSE."

Denis O'Leary, member of the Oxnard School Board was also interviewed and mentioned that he and his family had lived close by in Port Hueneme when Halaco was operational and moved in part because of the toxic air. The Halaco site is located at the end of Perkins Road, off Hueneme Road. The now bankrupt Halaco site was used to recycle mostly magnesium and aluminium, but the waste of this type of recycling has resulted in a mountain of slag and heavy metals that had grown to over 700,00 cubic

By Paul Felix

On the morning of May 28th a coalition of environmental organizations lead a tour of the Ormond Beach Wetlands and a look at HALACO Oxnard's toxic Superfund clean-up site, as

designated by the U.S. government's own Environmental Protection Agency "EPA." Jim Hensley, deputy district #17 director Ventura County League of United Latin American Citizens "LULAC" organized the tour of the Halaco site.

Susan Jordan, Director of the California Coastal Protection Network

was interviewed by ABC7 Reporter Leo Stallworth. Ms. Jordan stated "We have this polluted toxic waste site on one of the amazing wetlands in the state. What we want is to restore it to its natural state."

Present at this tour were members of the media that include The Star,

FICTITIOUS BUSINESS NAME STATEMENT FILE No. 20090514-10007326-9 The following person(s) is/are doing business as:

HERRERA ENTERTAINMENT GROUP  
1990 PAVIN DR  
OXNARD, CA 93036  
COUNTY OF VENTURA  
Full Name of Registrant(s):  
JAIME HERRERA  
1990 PAVIN DR  
OXNARD, CA 93036  
VERONICA MARIE HERRERA  
1990 PAVIN DR  
OXNARD, CA 93036

This business is conducted by Husband and Wife. The registrant is not permitted to transact business under this fictitious business name or names listed herein. This statement was filed with the County Clerk of Ventura County on MAY 14, 2009.

By signing below, I declare that all information in this statement is true and correct. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime. (B & P Code § 17913)

SERVICES  
3161 PREBLE AVE  
VENTURA, CA 93003  
COUNTY OF VENTURA

Full Name of Registrant(s):  
CAROL F. PIERCE  
3161 PREBLE AVE  
VENTURA, CA 93003

This business is conducted by an individual. The registrant commenced to transact business under the fictitious business name or names listed above on (1) N/A; (2) November 1986. This statement was filed with the County Clerk of Ventura County on MAY 11, 2009.

By signing below, I declare that all information in this statement is true and correct. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime. (B & P Code § 17913)

By signing below, I declare that all information in this statement is true and correct. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime. (B & P Code § 17913)

listed above on 4-8-2004. This statement was filed with the County Clerk of Ventura County on APR 22, 2009. By signing below, I declare that all information in this statement is true and correct. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime. (B & P Code § 17913)

By signing below, I declare that all information in this statement is true and correct. A registrant who declares as true information, which he or she knows to be false, is guilty of a crime. (B & P Code § 17913)

NOTICE - In accordance with subdivision (c) of Section 17920, a fictitious business name generally expires at the end of five years from the date on which it was filed in the office of the county clerk, except, as provided in subdivision of section 17920, where it expires 40 days after any change in the facts set forth in the statement pursuant to section 17913 other than a change in residence address or registered owner. A new fictitious business name must be filed before the expiration. The filing of this statement does not itself authorize the use in this state of a fictitious business name in violation of the rights of another under Federal, State, or Common Law (see section 14411 ET SEQ., Business and Professions Code). PUBLISH: VCVN MAY 21, 28, JUN 04, 11, 2009 FICTITIOUS BUSINESS NAME STATEMENT FILE No. 20090512-10007198-9 The following person(s) is/are doing business as:

TRANS PRO  
1401 SO. OXNARD BLVD

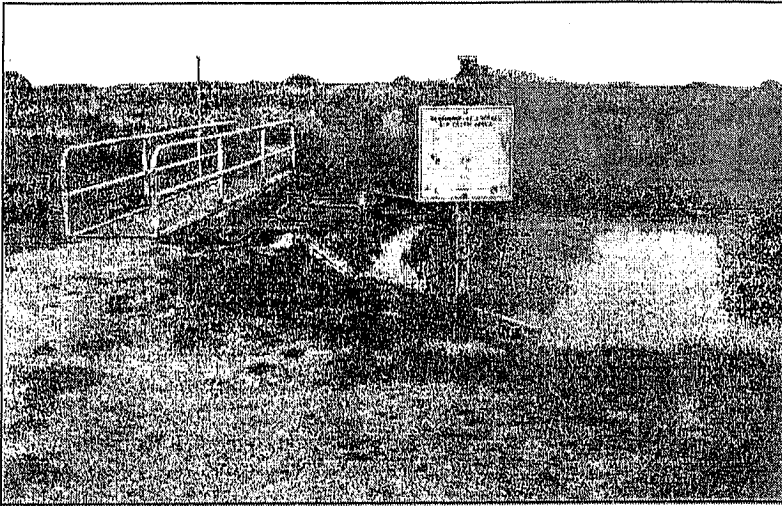
before the expiration. The filing of this statement does not itself authorize the use in this state of a fictitious business name in violation of the rights of another under Federal, State, or Common Law (see section 14411 ET SEQ., Business and Professions Code). PUBLISH: VCVN MAY 21, 28, JUN 04, 11, 2009 FICTITIOUS BUSINESS NAME STATEMENT FILE No. 20090518-10007477-4 The following person(s) is/are doing business as:

(1) CRAZY AZ BROWN BOARDS  
(2) DYSFUNCTIONAL FAMILY GAS MASK  
1436 SOUTH G STREET  
OXNARD, CA 93033  
COUNTY OF VENTURA  
Full Name of Registrant(s):  
MANUEL CORDOVA  
1436 SOUTH G STREET  
OXNARD, CA 93033

This business is conducted by an individual. The registrant has not yet begun to transact business under the fictitious business name or names

(are) doing business as:  
(1) URGENT ESCROW SERVICES  
(2) CALIFORNIA REAL ESTATE  
(3) NOTARY  
(4) OIE

6-357  
3-3294



yards. During Halaco's operation there, it was the target of repeated complaints about its waste water discharges and smoke stack emissions.

"The reason that LULAC has become involved in this cause is the injustice done to the people living near this superfund site as well restoring the Wetlands for all Californians. Beside protecting the environment, preserving history, the health of people and peace of mind that the air that they breath, or the ground that they live on will not kill them are concerning issues. The Federal Environmental Protection Agency E.P.A. became involved in 2006, two years after Halaco's closure," said O'Leary.

"People are stalling and have stalled for so long. We want it cleaned up, LULAC has helped spearhead the move to clean up and restore the Ormond Wetlands as it follows within our mission statement," said O'Leary.

#### LULAC MISSION STATEMENT:

The Mission of the League of United Latin American Citizens is to advance the economic condition, educational attainment, political influence, housing, health and civil rights of the Hispanic population of the United States. Based on our Mission Statement and responsibilities, we respectfully request the City of Oxnard's 2030 Plan be modified to treat the area as a historic treasure. Our research shows a Chumash Indian Village thrived on Ormond Beach and is thought to have existed for more than a thousand years. This historic issue is another reason the Ormond Beach Wetlands should be restored and protected as a state or national preserve/park land.

#### Environmental Coalition Wish List for HALACO/Ormond Beach Wetlands

1. All of the current wetlands property changed from private to public ownership, by eminent domain if necessary
2. Revision of Oxnard 2030 Plan Zoning from industrial to resource protection/ESHA "Environmental Sensitive Habitat Areas."
3. Expedite demolition of Halaco plant.
4. Expedite removal of slag heap and waste settlement ponds.
5. Removal of non-native species.
6. Restoration to natural state.
7. Convert Ormond Beach Wetlands area into a Protected Habitat State or National Park.
8. Ownership or management by a conservancy.
9. Protection of habitat and wildlife.
10. Remove one block of Perkins road and parking lot so riparian up land can be continued from Hueneme Road through the Halaco site.
11. US EPA Region 9 place into action the 1994 Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." <http://www.epa.gov/oswer/ej/html-doc/execordr.htm>
12. Establish a: "Cynthia Leak, Roma Armbrust & Jean Harris Memorial Ormond Beach Visitors Center"

(U & P Code § 179B)  
 M. ROY LYN DOWNS  
 PUBLISHED:  
 VCYN MAY 21, 2010 JUN 01, 2010

FICTITIOUS BUSINESS NAME  
 STATEMENT FILE No. 20090520-  
 10097089-0 The following person(s) is/are doing business as:  
 OTZ FARM  
 5500 VALENTINER RD  
 VENTURA, CA 93003  
 COUNTY OF VENTURA  
 File Name of Registrant(s):  
 RAL BAUTISTA ORTIZ  
 123 Nida Pl  
 PORT HUENEME, CA 93041  
 This business is conducted by a(n):

change to the facts set forth in the statement pursuant to section 17913 other than a change in residence address or registered owner. A new fictitious business name must be filed before the expiration. The filing of this statement does not constitute the use in this state of a fictitious business name in violation of the rights of another under Federal, State, or Common Law (see section 14411 ET SEQ., Business and Professions Code).  
 PUBLISHED:  
 VCYN MAY 21, 2010 JUN 01, 2010  
 FICTITIOUS BUSINESS NAME  
 STATEMENT FILE No. 20090520-  
 10097089-0 The following person(s) is/are doing business as:  
 M. ROY LYN DOWNS

within (a) of Section 17909, a fictitious name statement generally expires at the end of five years from the date on which it was filed in the office of the county clerk, except, as provided in subdivision (c) of section 17910, where it expires 49 days after any change in the facts set forth in the statement pursuant to section 17913 other than a change in residence address or registered owner. A new fictitious business name must be filed before the expiration. The filing of this statement does not constitute the use in this state of a fictitious business name in violation of the rights of another under Federal, State, or Common Law (see section 14411 ET

1607 DECKSD DR.  
 ESCONDIDO, CA 92025  
 This business is conducted by a general partnership. The registered controller of this business is/are the following business name or names:  
 (U & P Code § 17909)  
 M. ROY LYN DOWNS  
 NOTICE: In accordance with subdivision (a) of Section 17920, a fictitious

**From:** "Rich T. Handley" <rhandley@tnc.org>  
**To:** mvoong@waterboards.ca.gov  
**Date:** 6/15/2009 10:10:11 AM  
**Subject:** impaired waters request

Hello Mr Voong,  
I am requesting that the J - Street lagoon at Ormond Beach in South Oxnard be placed on the impaired waters list and receive a TMDL for trash. This area receives a tremendous amount of trash from both the Oxnard Industrial Drain and the J Street drain. I have attached photos of the lagoon.  
Thank you,  
Rich Handley

---

Richard Handley  
Land Manager L.A. - Ventura Project

rhandley@tnc.org  
(805) 642-0345 Ext. 512 (Phone)  
(805) 535-5533 (Mobile)  
(805) 642-0343 (Fax)

nature.org <<http://nature.org/>>  
Ventura Project Office  
3639 Harbor Blvd Suite 201  
Ventura, CA 93001

The Nature Conservancy



13-331

6-360





13-332

6-361

# NEWHALL LAND

The Newhall Land and Farming Company  
23823 Valencia Boulevard, Valencia, CA 91355  
Phone 661-255-4000 Fax 661-255-0761

June 17, 2009

*submitted via email (mvoong@waterboards.ca.gov)*

Ms. Tracy Egoscue  
Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Attention: Man Voong and LB Nye

Re: Comments on the RWQCB's Draft 2009 Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments

Dear Ms. Egoscue,

We appreciate the opportunity to comment on the Draft 2009 Revision of the Clean Water Act (CWA) Section 303(d) List of Water Quality Limited Segments (Draft List). The Newhall Land and Farming Company (Newhall) takes its responsibility to maintain and protect water quality very seriously, and works hard to meet its obligations. Our comments will focus on the listings that are proposed for the upper Santa Clara River (SCR) in Reaches 5 and 6, as shown on the attached figure.

We commend the Regional Water Quality Control Board (RWQCB) for making continued progress toward improving the clarity and objectivity of the 303(d) listing process through the development and implementation of the *Water Quality Control Policy for Developing California's Clean Water Act 303(d) List* (Listing Policy) (September 2004). We understand that the goal of the Listing Policy is to "establish a standardized approach for developing California's 303(d) list" and we support those efforts.

In general, we believe that several modifications should be made to the Draft List for the following purposes:

1. To accurately reflect the actual designated beneficial uses of the Santa Clara River (SCR);
2. To accurately reflect the actual water segment groupings according to Basin Plan reaches;
3. To assure that the listing analysis is based upon evaluation of water quality standards that are appropriate and applicable;
4. To take into account fairly recent "readily available"<sup>1</sup> water quality data that have been collected along the SCR and submitted to the Los Angeles Regional Water Quality Control Board (LARWQCB); and
5. To take into account age and trends in water quality data.

With respect to consideration of available water quality data, Newhall has collected monthly water samples in Reaches 4 and 5 of the SCR since May 2004 as part of a background receiving water monitoring program for its NPDES permit application for the proposed Newhall Ranch Water Reclamation Plant (NRWRP). In September of 2007, the RWQCB issued an NPDES permit for the

<sup>1</sup> Data submitted to Regional Water Quality Control Boards, such as NPDES data, is defined as readily available data in the Listing Policy. Listing Policy, Section 6.1.2.1, p. 18.

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proposed NRWRP. In accordance with the permit, semi-annual samples have been collected in reach 5 of the SCR. In addition, the County Sanitation Districts of Los Angeles County (LACSD) also collects monthly receiving water samples throughout Reaches 5 and 6 as part of their NPDES permit monitoring program for their Valencia and Saugus WRPs. These data were previously submitted to the RWQCB through quarterly and annual monitoring reports and are currently publicly available through the NPDES permit reporting program. We request that these data be included in the RWQCB's administrative record and 303(d) database, and that the RWQCB consider these datasets in making listing determinations.

Currently, the *conditional potential* MUN (MUN\*) designation is applied in the Basin Plan for SCR Reaches 5 and 6. The conditional potential MUN designation is not enforceable and cannot be used as the basis for regulatory actions. Recognition that the MUN use is not applicable to these receiving waters leads to the conclusion that the proposed listing for iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane; and bis(2-ethylhexyl)phthalate (based on application of California Toxics Rule (CTR) human health criteria using water plus organisms) is not warranted. The objectives used to support the proposed impairments for iron and specific conductance are *drinking* water quality standards (in fact, the standards used were Secondary Maximum Contaminant Levels (SMCL) – which are *aesthetic* drinking water standards that are meant for control of taste and odor). Specifically regarding the proposed iron and specific conductivity listings, the SMCLs that were used as the basis for these listings are “non-enforceable guidelines that are intended to assist public water systems in managing their drinking water for aesthetic considerations, such as taste, color and odor. Contaminants are not considered to present a risk to human health at the SMCL.”<sup>2</sup> Further, SMCLs are intended to be applied to drinking water at the point of delivery, and are an inappropriate standard for natural surface waters, particularly for waters without an MUN designation. Section 6.1.3 of the Listing Policy is instructive with respect to this point as it specifies the use of evaluation guidelines that are “applicable to the beneficial use.” Thus the water quality standards used to evaluate data and determine the potential for impairment of beneficial uses must be applicable and appropriate, to assure an accurate determination of water quality impairment. Therefore, we respectfully request that iron and specific conductivity not be listed in Reaches 5 and 6 since the MUN use is not applicable to those receiving waters. Similarly chlorodibromomethane, dichlorobromomethane; and bis(2-ethylhexyl)phthalate should not be listed in Reaches 5 and 6 since the MUN is not applicable to those receiving waters.

The following bullet points summarize Newhall's primary comments on specific proposed listings for Reaches 5 and 6 of the SCR. These comments are discussed more thoroughly in fact sheets attached to this letter (Attachment A). Attachment “A” and the fact sheets are incorporated into these comments by reference. The fact sheets were prepared to summarize additional available data and technical information pertinent to particular proposed listing decisions for RWQCB consideration.

- **De-list Ammonia, SCR Reach 5 and 6:** It is requested that ammonia be removed from the 303(d) list for Reaches 5 and 6 of the Santa Clara River because existing water quality data demonstrate that the Basin Plan water quality objectives are being met. (See Fact Sheet No.1)
- **De-list Nitrate plus Nitrite, SCR Reach 5:** It is requested that nitrate plus nitrite be removed from the 303(d) list for Reach 5 of the Santa Clara River because existing water quality data demonstrate that the criteria for de-listing has been met (only nine exceedances out of 243 measurements). In light of the data being equal to the delisting criterion, and Section 6.1.5.3 of

<sup>2</sup> Secondary Drinking Water Regulations: Guidance For Nuisance Chemicals EPA 810/K-92-001 (July 1992); 40 CFR 143 et seq.

the Listing Policy's direction to consider the change (improvement) in a water body segment following the implementation of NDN management measures by the Sanitation Districts as a result of the TMDL implementation plan, nitrate plus nitrite should be delisted. (See Fact Sheet No.1)

- **Do Not List Iron and Specific Conductivity, SCR Reach 5 and 6:** As discussed previously, the proposed listing of iron and specific conductivity in Reaches 5 and 6 of the Santa Clara River does not meet the listing standard since those reaches are designated potential conditional municipal (MUN). Therefore, iron and specific conductivity should not be listed because existing potential MUN beneficial use designation for these reaches has no legal effect and is inapplicable for listing purposes.
- **Do Not List Chlorodibromomethane, Dichlorobromomethane, SCR Reaches 5 and 6:** As discussed previously, the proposed listing of chlorodibromomethane and dichlorobromomethane in Reaches 5 and 6 of the Santa Clara River does not meet the listing standard since those reaches are designated potential conditional municipal (MUN). Therefore, chlorodibromomethane and dichlorobromomethane should not be listed because existing potential MUN beneficial use designation for these reaches has no legal effect and is inapplicable for listing purposes. In addition, evaluation of the existing data for Reaches 5 and 6 indicate that these water bodies do not meet the State listing criteria when using the CTR human health criteria for consumption of organism only.
- **Do Not List Bis(2ethylhexyl)phthalate (DEHP), SCR Reach 6:** As discussed previously, the proposed listing of bis(2-ethylhexyl)phthalate in Reaches 5 and 6 of the Santa Clara River does not meet the listing standard since those reaches are designated potential conditional municipal (MUN). Additionally, one LADPW sample season (2003-2004) used for the proposed listing appears to have been contaminated (79 percent of the samples) by sampling equipment (e.g. plastic tubing) and should not be applied in conjunction with the other four years where DEHP was not detected in any samples.
- **Delist Chlorpyrifos, SCR Reach 6:** Chlorpyrifos was added to the 303(d) list in 2006. There have been only two exceedances of the 4-day Criterion Continuous Concentration (CCC) threshold from a combined LADPW and SWAMP set of samples; two or less exceedances is the delisting criteria in the listing policy. In addition, chlorpyrifos has been phased out by EPA for non-agricultural uses, including the cessation of sales of all indoor and outdoor residential use products. In light of the data being equal to the delisting criterion, and Section 6.1.5.3 of the Listing Policy's direction to consider the change (improvement) in a water body segment following the implementation management measures, chlorpyrifos should be delisted. (See Fact Sheet No.2)
- **Do Not List Copper, SCR Reach 6:** The proposed listing of copper for Reach 6 is based on Staff's analysis of MS4 data only. When considered with data provided by the Sanitation District and others, only three exceedances of the CCC and two exceedances of the CMC were observed from sample lots of 69 and 71, respectively. Copper does not meet the minimum of six exceedances of the CCC and CMC as required by the Listing Policy. Therefore, copper should not be listed for Reach 6 because water quality objectives are currently being achieved. (See Fact Sheet No.3)
- **Delist Diazinon, SCR Reach 6:** More recent data for diazinon should be considered preferentially consistent with EPA guidance and the Listing Policy regarding temporal representation of data. Two substantial source controls for diazinon have been imposed:

USEPA's 2004 ban on residential use of the pesticide, and the provisions and conditions of the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region (Order No. R4-2005-0080) (the "Ag Waiver") adopted by the LARWQCB in 2005. Post-ban data demonstrate that only two of 29 samples exceeded the applicable threshold, thus the listing of diazinon for this reach is not warranted per the listing policy and should be delisted. Should the RWQCB maintain this proposed listing despite EPA Guidance and the Listing Policy, diazinon in Reach 6 should be listed under the "Water Quality Limited Segments Being Addressed" category due to the existing USEPA ban on diazinon sales for residential use and monitoring and control of diazinon required pursuant to the Ag. Waiver. Nonetheless, the small number of diazinon exceedances since the ban warrants delisting. (See Fact Sheet No.4)

- **Do Not List DDT, SCR Reach 5:** Pursuant to the draft 303(d) fact sheet for this proposed listing, SWAMP data for Castaic Creek was included in the primary data set supporting the proposed listing for SCR Reach 5. Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated uses that are independent of SCR Reach 5. Therefore DDT data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for SCR Reach 5. SCR Reach 5 data shows that only 1 of 2 samples exceeded the water quality standard. Thus available SCR Reach 5 data do not meet the Listing Policy requirements for number of exceedances, and no new listing is warranted for DDT in SCR Reach 5. A similar listing deficiency was acknowledged by Staff in 2006 when DDT in Reach 6 were not placed on the 303(d) list due to comparable circumstances from samples in Bouquet Creek. Furthermore, the 2001 SWAMP data does not appear to be representative of typical or long-term conditions within the waterbody (Santa Clara River Reach 5), as well as being collected from a separately-defined reach (Castaic Creek) by the Basin Plan. (See Fact Sheet No.5)
- **Do Not List PCBs, SCR Reach 5:** Pursuant to the draft 303(d) fact sheet for this proposed listing, SWAMP data for Castaic Creek was included in the primary data set supporting the proposed listing for SCR Reach 5. Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated uses that are independent of SCR Reach 5. Therefore PCB data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for SCR Reach 5. SCR Reach 5 data shows that only 1 of 2 samples exceeded the water quality standard. Thus available SCR Reach 5 data do not meet the Listing Policy requirements for number of exceedances, and no new listing is warranted for PCBs in SCR Reach 5. Furthermore, the 2001 SWAMP data does not appear to be representative of typical or long-term conditions within the waterbody (Santa Clara River Reach 5), as well as being collected from a separately-defined reach (Castaic Creek) by the Basin Plan. (See Fact Sheet No.6)
- **Do Not List Toxicity, SCR Reach 6:** Section 3.6 of the Listing Policy states, "If the pollutant causing or contributing to the toxicity is identified, the pollutant shall be included on the section 303(d) list as soon as possible (i.e., during the next listing cycle)." Appendix B of the 2005 SWAMP report *Water Quality in the Calleguas Creek and Santa Clara River Watersheds* identifies diazinon as the probable cause of toxicity in the Reach 6 (Bouquet Creek) samples. Therefore, the proposed toxicity listing in Reach 6 should be replaced with diazinon, consistent with these scientific findings and the guidelines of the Listing Policy. However, due to the existing USEPA diazinon ban, diazinon should either not be listed (since by preferentially using post-ban data only, listing would not be warranted), or be listed under the "Water Quality Limited

# NEWHALL LAND

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Segments Being Addressed" category (see above comments on Reach 6 proposed diazinon listing).

Pursuant to the RWQCB staff report Section 3.3.3, comments were solicited on the possible use of biostimulatory substances in future impairment determinations. Any establishment of water quality objectives involving biostimulatory substances (nitrogen, phosphorus and other compounds that stimulate growth) or other physical parameters (dissolved oxygen, temperature, etc) should be subject to detailed analysis under the State Basin Plan amendment process, including compliance with the California Environmental Quality Act (CEQA) and other requirements under State law.

In addition, the Newhall Ranch Sanitation District NDPES discharge permit incorporates nutrient-related water quality objectives, including algal biomass. Furthermore, the RWQCB should wait until the SWRCB releases its Nutrient Numeric Endpoint guidance, which is currently under peer review. Nutrient criteria developed by the SWRCB and USEPA Region 9 is described in the report, "Technical Approach to Develop Nutrient Numeric Endpoints for California" ("CA NNE"), released in 2006.

Thank you again for the opportunity to comment on the Draft List. We would be happy to discuss our comments in a follow-up meeting with RWQCB staff. Please contact me at 661-255-4259 to discuss our comments or any address questions you may have.

Sincerely,  
**THE NEWHALL LAND & FARMING COMPANY**



Matt Carpenter  
Director, Environmental Resources

#### Attachments

cc: LB Nye  
M. Voong  
M. Subbotin



## ATTACHMENT

### FACT SHEETS ON SPECIFIC LISTINGS

Fact Sheet #1: Ammonia/Nitrate+Nitrite

Fact Sheet #2: Chlorpyrifos

Fact Sheet #3: Copper

Fact Sheet #4: Diazanone

Fact Sheet #5: DDT

Fact Sheet #6: PCBs



COMMENTS ON SPECIFIC LISTINGS  
FACT SHEET NO. 1

**LISTING: Ammonia in SCR Reaches 5 and 6**  
**Nitrate + Nitrite Reach 5**

**Listed on the 303(d) list (Being Addressed by an EPA Approved TMDL)**

**RECOMMENDATION:**

**De-list-Water Quality Objectives Currently Being Achieved**

**REASON:**

Current data show attainment of water quality standard  
Data does not meet requirements of Table 3.1 for Listing  
Data meet requirements of Table 4.1 for De-Listing

We request that Santa Clara River Reaches 5 (Blue Cut to West Pier Hwy 99) and 6 (West Pier Hwy 99 to Bouquet Canyon Road Bridge) be removed from the 303(d) list as impaired due to ammonia and Nitrate+Nitrite. Current water quality data show that the Basin Plan's water quality objectives for ammonia and Nitrate+Nitrite are being met and, therefore, no impairment exists.

The nitrification/denitrification treatment upgrades at the Valencia Water Reclamation Plant completed in October 2003 have resulted in significant reductions in ammonia and associated Nitrate and Nitrite loadings to Santa Clara River Reaches 5 and 6.

Santa Clara River Reaches 5 and 6 ammonia, nitrate and nitrite, pH, and temperature data (October 2003 through February 2007) collected by the Sanitation District of Los Angeles County (Sanitation Districts), as well as data from Newhall Land (Newhall Ranch Sanitation District background data collection reach 5 only), show the four-day chronic Criterion Continuous Concentration (CCC) threshold for ammonia was never exceeded in Reach 5 out of a total of 146 measurements, as shown in Appendix A, Table 1 and only twice in Reach 6 out of a total of 73 measurements, as shown in Appendix A, Table 2).

The data set supports de-listing ammonia for Santa Clara River Reach 5, even without consideration of the recently approved site-specific objectives for ammonia. For a sample size of 142 to 152, using the binomial distribution formula associated with Table 4.1, the State 303(d) Listing Policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances is equal to, or fewer than 12. For a sample size of 72 to 82, Table 4.1 recommends de-listing if the number of exceedances are equal to or fewer than six. Additionally, the single sample Criterion

Maximum Concentration (CMC) was not exceeded out of 218 samples collected on Reach 5 and 78 samples on Reach 6.

Since no exceedances of the water quality standards were observed in Santa Clara River Reach 5 out of 146 measurements, Santa Clara River Reach 5 should be de-listed for ammonia. Since only two exceedances of the water quality standards were observed in Santa Clara River Reach 6 out of 73 measurements, Santa Clara River Reach 6 should also be delisted for ammonia.

The water quality objective for nitrate + nitrite is based on historic water quality conditions and requires a mean 30-day nitrate + nitrite concentration less than 5.0 mg/L as N. For the data review period (March 2004 through September 2007), 104 results from Sanitation Districts and 139 results from Newhall Land data (Newhall Ranch Sanitation District background data) were available for evaluation. As shown in Appendix A, Table 3, the evaluation revealed that the nitrate + nitrite water quality objective was exceeded nine times, out of a total of 243 measurements. For a sample size of 235 to 246 the State's 303(d) Listing Policy, delisting is recommended if exceedances are equal to or fewer than 20. Therefore, Santa Clara River Reach 5 should be de-listed for nitrate + nitrite.

It is clear that exceedances are infrequent and limited only to stations RD and RE (immediately downstream of the Valencia WRP). Furthermore, it should be noted that exceedances have been rarer since the implementation of nitrification-denitrification (NDN) processes at the Valencia and Saugus WRPs, which were on line as of September 2003. The more recent data (i.e., after NDN implementation) should be used preferentially, consistent with Section 6.1.5.3 of the Listing Policy, which further supports removal of the proposed listings. Summarized data, as provided by County Sanitation District, is provided in Appendix A, Table 3. Section 6.1.5.3 of the Listing Policy states, "If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered."

Appendix A, Table 2

SANTA CLARA RIVER REACH 6 - AMMONIA

Sample Date	Source	Location	pH	Temp (C)	Qualifier	Ammonia (mg/L)	4-Day Average Ammonia (mg/L)	CMC (mg/L)	CCC No SSO (mg/L)	4-Day CCC (mg/L)	Does Sample Exceed CMC? (1=Yes)	Does Sample Exceed 4-Day CCC? (1=Yes)
10/15/2003	LACSD	RB	7.34	27.3		3.38	*	24.90	2.17	*		*
10/19/2003	LACSD	RB	7.47	26.5		1.49	2.44	20.79	2.07	2.12		1
10/20/2003	LACSD	RB	7.35	27.2		1.16	1.33	24.58	2.17	2.12		
2/11/2004	LACSD	RB	7.35	27.9		1.50	1.50	24.58	2.07	2.07		
2/11/2004	LACSD	RB01	7.88	22.7	<	0.10	0.10	10.51	1.69	1.69		
4/14/2004	LACSD	RB	7.36	21.6	<	0.10	*	24.25	3.10	*		*
4/14/2004	LACSD	RB	7.36	21.6	<	0.10	0.10	24.25	3.10	3.10		
4/14/2004	LACSD	RB01	7.90	23.7	<	0.10	0.10	10.13	1.55	1.55		
5/12/2004	LACSD	RB	7.35	30.5		0.50	0.50	24.58	1.75	1.75		
5/12/2004	LACSD	RB01	7.94	31.8	<	0.10	0.10	9.41	0.87	0.87		
6/9/2004	LACSD	RB	7.37	32.8	<	0.10	0.10	23.93	1.49	1.49		
8/11/2004	LACSD	RB	7.37	28.6	<	0.10	0.10	23.93	1.95	1.95		
8/11/2004	LACSD	RB01	7.76	23.0	<	0.10	0.10	13.02	1.93	1.93		
9/15/2004	LACSD	RB	7.62	28.7		0.10	0.10	16.49	1.56	1.56		
9/15/2004	LACSD	RB01	7.83	21.0	<	0.10	0.10	11.51	2.02	2.02		
10/13/2004	LACSD	RB	7.74	27.0		0.20	0.20	13.48	1.53	1.53		
10/13/2004	LACSD	RB01	8.00	19.5	<	0.10	0.10	8.41	1.77	1.77		
11/10/2004	LACSD	RB	7.34	24.7		2.60	2.60	24.90	2.56	2.56		1
11/10/2004	LACSD	RB01	7.88	17.7		0.20	0.20	10.51	2.34	2.34		
12/16/2004	LACSD	RB	7.47	23.0	<	0.10	0.10	20.79	2.59	2.59		
12/16/2004	LACSD	RB01	7.73	16.0	<	0.10	0.10	13.72	3.14	3.14		
2/2/2005	LACSD	RB	7.27	21.5		1.60	1.60	27.21	3.30	3.30		
2/2/2005	LACSD	RB01	7.80	17.5	<	0.10	0.10	12.14	2.63	2.63		
2/9/2005	LACSD	RB	7.36	21.6		0.20	0.20	24.25	3.09	3.09		
2/16/2005	LACSD	RB01	8.00	19.9		0.10	0.10	8.41	1.72	1.72		
3/2/2005	LACSD	RB	7.46	21.5		0.90	0.90	21.10	2.88	2.88		
3/10/2005	LACSD	RB01	8.29	22.8	<	0.10	0.10	4.81	0.91	0.91		
4/13/2005	LACSD	RA	8.42	28.9		0.20	0.20	3.74	0.49	0.49		
4/13/2005	LACSD	RB	7.57	22.1		0.20	0.20	17.86	2.51	2.51		
4/13/2005	LACSD	RB01	8.09	22.5	<	0.10	0.10	7.08	1.27	1.27		
5/18/2005	LACSD	RB	7.61	23.6		2.10	2.10	16.76	2.19	2.19		
5/18/2005	LACSD	RB01	7.95	25.9	<	0.10	0.10	9.23	1.26	1.26		
6/15/2005	LACSD	RB	7.47	25.3		0.50	0.50	20.79	2.24	2.24		
6/15/2005	LACSD	RB01	7.89	26.4	<	0.10	0.10	10.32	1.32	1.32		
7/20/2005	LACSD	RB	7.30	26.6		0.80	0.80	26.21	2.33	2.33		
7/20/2005	LACSD	RB01	7.92	26.7	<	0.10	0.10	9.76	1.24	1.24		
8/17/2005	LACSD	RB	7.35	27.1		0.90	0.90	24.58	2.18	2.18		
8/17/2005	LACSD	RB01	7.87	25.4	<	0.10	0.10	10.70	1.44	1.44		
9/14/2005	LACSD	RB	7.32	26.5		1.10	1.10	25.56	2.31	2.31		
9/14/2005	LACSD	RB01	7.91	22.9	<	0.10	0.10	9.95	1.61	1.61		
10/26/2005	LACSD	RB	7.18	25.4	<	0.10	0.10	30.21	2.70	2.70		
10/26/2005	LACSD	RB01	7.61	21.3	<	0.10	0.10	16.76	2.55	2.55		
11/29/2005	LACSD	RB01	7.84	16.8	<	0.10	0.10	11.30	2.62	2.62		
11/30/2005	LACSD	RB	7.44	23.6		0.20	*	21.72	2.55	*		*
11/30/2005	LACSD	RB	7.44	23.6		0.10	0.15	21.72	2.55	2.55		
12/20/2005	LACSD	RB01	7.90	16.7	<	0.10	0.10	10.13	2.44	2.44		
12/21/2005	LACSD	RB	7.41	22.8		0.90	0.90	22.66	2.76	2.76		
1/17/2006	LACSD	RB01	7.86	17.6	<	0.10	0.10	10.90	2.43	2.43		
1/18/2006	LACSD	RA	7.92	17.7		0.10	0.10	9.76	2.21	2.21		
1/18/2006	LACSD	RB	7.27	21.7		1.00	1.00	27.21	3.26	3.26		

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

**Appendix A, Table 2**  
**SANTA CLARA RIVER REACH 6 - AMMONIA**

2/14/2006	LACSD	RB01	7.74	19.2	<	0.10	0.10	13.48	2.53	2.53		
2/15/2006	LACSD	RA	8.18	17.5		0.10	0.10	5.95	1.53	1.53		
2/15/2006	LACSD	RB	7.57	22.2		1.10	1.10	17.86	2.50	2.50		
3/14/2006	LACSD	RB01	7.87	20.6	<	0.10	0.10	10.70	1.97	1.97		
3/14/2006	LACSD	RB01	7.87	20.6	<	0.10	0.10	10.70	1.97	1.97		
3/15/2006	LACSD	RA	8.22	20.6	<	0.10	0.10	5.51	1.17	1.17		
3/15/2006	LACSD	RB	7.44	21.4		1.20	1.20	21.72	2.94	2.94		
4/18/2006	LACSD	RB01	7.82	19.3	<	0.10	0.10	11.71	2.28	2.28		
4/19/2006	LACSD	RA	8.09	24.4	<	0.10	0.10	7.08	1.13	1.13		
4/19/2006	LACSD	RB	7.59	23.1		0.71	0.71	17.31	2.31	2.31		
5/16/2006	LACSD	RB01	7.91	25.0	<	0.10	*	9.95	1.40	*		*
5/16/2006	LACSD	RB01	7.91	25.0	<	0.10	0.10	9.95	1.40	1.40		
5/17/2006	LACSD	RA	8.00	26.8	<	0.10	0.10	8.41	1.10	1.10		
5/17/2006	LACSD	RB	6.88	24.2		0.56	0.56	39.75	3.29	3.29		
6/21/2006	LACSD	RB	7.52	26.7		0.74	0.74	19.30	1.96	1.96		
7/19/2006	LACSD	RA	7.67	18.6	<	0.10	0.10	15.19	2.84	2.84		
7/19/2006	LACSD	RB	7.40	27.5		1.20	1.20	22.97	2.05	2.05		
8/23/2006	LACSD	RA	7.66	19.3	<	0.10	0.10	15.44	2.74	2.74		
8/23/2006	LACSD	RB	7.48	27.9		0.96	*	20.49	1.87	*		*
8/23/2006	LACSD	RB	7.48	27.9		1.10	1.03	20.49	1.87	1.87		
9/13/2006	LACSD	RB	7.57	27.7		0.86	0.86	17.86	1.75	1.75		
10/18/2006	LACSD	RB	7.60	26.2	<	0.10	0.10	17.03	1.88	1.88		
10/18/2006	LACSD	RB01	7.70	18.4		0.13	0.13	14.44	2.78	2.78		
11/15/2006	LACSD	RB	7.03	25.8		1.00	1.00	35.14	2.83	2.83		
11/15/2006	LACSD	RB01	7.22	18.8	<	0.10	0.10	28.87	4.05	4.05		
12/20/2006	LACSD	RB	7.47	23.2	<	0.10	0.10	20.79	2.56	2.56		
2/14/2007	LACSD	RB	7.59	22.3		1.08	1.08	17.31	2.43	2.43		
2/28/2007	LACSD	RB	7.40	22.2		0.98	0.98	22.97	2.88	2.88		

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land  
LACSD - Sanitation Districts of Los Angeles County

**2 of 73 4-day averages exceed  
Criterion Continuous Concentration (CCC)**

\* - Data used in calculation of a 4 day average

**0 of 78 samples exceed  
Criterion Maximum Concentration (CMC)**

**Appendix A, Table 3**  
**SANTA CLARA RIVER REACH 5 - NITRATE + NITRITE**

Sample Date	Source	Location	Qualifier	Nitrite (mg/L)	Nitrate (mg/L)	Nitrite + Nitrate (mg/L)	Nitrite + Nitrate BPO (mg/L)	Does Sample Exceed BPO (1=Yes)
5/17/2004	Newhall	NR1	<	0.1	3.52	3.62	5.0	
5/17/2004	Newhall	NR3	<	0.1	2.94	3.04	5.0	
5/18/2004	Newhall	NR1	<	0.1	3.06	3.16	5.0	
5/18/2004	Newhall	NR3	<	0.1	2.98	3.08	5.0	
5/19/2004	Newhall	NR1	<	0.1	3.45	3.55	5.0	
5/19/2004	Newhall	NR3	<	0.1	3.69	3.79	5.0	
5/20/2004	Newhall	NR1	<	0.1	3.52	3.62	5.0	
5/20/2004	Newhall	NR3	<	0.1	2.85	2.95	5.0	
5/21/2004	Newhall	NR1	<	0.1	4.01	4.11	5.0	
5/21/2004	Newhall	NR3	<	0.1	4.01	4.11	5.0	
6/9/2004	LACSD	RC		0.028	2.41	2.438	5.0	
6/9/2004	LACSD	RD		0.17	4.86	5.03	5.0	1
6/9/2004	LACSD	RE		0.192	6.09	6.282	5.0	1
6/17/2004	Newhall	NR1	<	0.1	4.56	4.66	5.0	
6/17/2004	Newhall	NR3	<	0.1	4.05	4.15	5.0	
7/15/2004	Newhall	NR1	<	0.1	4.9	5	5.0	
7/15/2004	Newhall	NR3	<	0.1	4.64	4.74	5.0	
7/28/2004	LACSD	RC		0.028	2.06	2.088	5.0	
7/28/2004	LACSD	RD		0.09	5.7	5.79	5.0	1
7/28/2004	LACSD	RE		0.053	4.54	4.593	5.0	
8/9/2004	Newhall	NR1	<	0.1	4.28	4.38	5.0	
8/9/2004	Newhall	NR3	<	0.1	3.75	3.85	5.0	
8/10/2004	Newhall	NR1	<	0.1	4.4	4.5	5.0	
8/10/2004	Newhall	NR3	<	0.1	4.03	4.13	5.0	
8/11/2004	LACSD	RC		0.024	1.93	1.954	5.0	
8/11/2004	LACSD	RD		0.101	4.75	4.851	5.0	
8/11/2004	LACSD	RE		0.06	3.94	4	5.0	
8/11/2004	Newhall	NR1	<	0.1	4.41	4.51	5.0	
8/11/2004	Newhall	NR3	<	0.1	4.24	4.34	5.0	
8/12/2004	Newhall	NR1	<	0.1	4.72	4.82	5.0	
8/12/2004	Newhall	NR3	<	0.1	5.12	5.22	5.0	1
8/13/2004	Newhall	NR1	<	0.1	3.25	3.35	5.0	
8/13/2004	Newhall	NR3	<	0.1	3.63	3.73	5.0	
9/15/2004	LACSD	RC	<	0.02	2.12	2.14	5.0	
9/15/2004	LACSD	RD		0.114	5.31	5.424	5.0	1
9/15/2004	LACSD	RE		0.021	4.36	4.381	5.0	
9/20/2004	Newhall	NR1	<	0.1	2.59	2.69	5.0	
9/20/2004	Newhall	NR3	<	0.1	2.55	2.65	5.0	
10/13/2004	LACSD	RC	<	0.02	2.49	2.51	5.0	
10/13/2004	LACSD	RD		0.12	4.73	4.85	5.0	
10/13/2004	LACSD	RE		0.022	3.74	3.762	5.0	
10/14/2004	Newhall	NR1	<	0.1	3.21	3.31	5.0	
10/14/2004	Newhall	NR3	<	0.1	3	3.1	5.0	
11/8/2004	Newhall	NR1	<	0.1	3.32	3.42	5.0	
11/8/2004	Newhall	NR3		0.167	2.83	2.997	5.0	
11/9/2004	Newhall	NR1		0.102	3.03	3.132	5.0	
11/9/2004	Newhall	NR3	<	0.1	3.31	3.41	5.0	
11/10/2004	LACSD	RC		0.031	2.37	2.401	5.0	
11/10/2004	LACSD	RD		0.041	6.66	6.701	5.0	1
11/10/2004	LACSD	RE		0.065	4.99	5.055	5.0	1

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

**Appendix A, Table 3**  
**SANTA CLARA RIVER REACH 5 - NITRATE + NITRITE**

Sample Date	Source	Location	Qualifier	Nitrite (mg/L)	Nitrate (mg/L)	Nitrite + Nitrate (mg/L)	Nitrite + Nitrate BPO (mg/L)	Does Sample Exceed BPO (1=Yes)
11/10/2004	Newhall	NR1		0.209	3.88	4.089	5.0	
11/10/2004	Newhall	NR3		0.164	4.22	4.384	5.0	
11/11/2004	Newhall	NR1		0.14	3.79	3.93	5.0	
11/11/2004	Newhall	NR3		0.135	3.98	4.115	5.0	
11/12/2004	Newhall	NR1		0.169	3.37	3.539	5.0	
11/12/2004	Newhall	NR3		0.154	3.78	3.934	5.0	
12/8/2004	Newhall	NR1	<	0.1	3.49	3.59	5.0	
12/8/2004	Newhall	NR3	<	0.1	3.73	3.83	5.0	
12/16/2004	LACSD	RC		0.05	2.51	2.56	5.0	
12/16/2004	LACSD	RD		0.07	5.16	5.23	5.0	1
12/16/2004	LACSD	RE		0.07	3.99	4.06	5.0	
1/24/2005	Newhall	NR1	<	0.1	2.58	2.68	5.0	
1/24/2005	Newhall	NR3	<	0.1	2.78	2.88	5.0	
2/2/2005	LACSD	RC		0.04	1.77	1.81	5.0	
2/2/2005	LACSD	RD		0.06	6.31	6.37	5.0	1
2/2/2005	LACSD	RE		0.07	3.54	3.61	5.0	
2/9/2005	LACSD	RC	<	0.03	1.91	1.94	5.0	
2/9/2005	LACSD	RD		0.03	3.18	3.21	5.0	
2/9/2005	LACSD	RE		0.05	4.26	4.31	5.0	
2/14/2005	Newhall	NR1	<	0.1	2.18	2.28	5.0	
2/14/2005	Newhall	NR3	<	0.1	2.38	2.48	5.0	
2/15/2005	Newhall	NR1	<	0.1	2.57	2.67	5.0	
2/15/2005	Newhall	NR3	<	0.1	2.58	2.68	5.0	
2/16/2005	Newhall	NR1	<	0.1	2.76	2.86	5.0	
2/16/2005	Newhall	NR3	<	0.1	2.62	2.72	5.0	
2/17/2005	Newhall	NR1	<	0.1	2.52	2.62	5.0	
2/17/2005	Newhall	NR3	<	0.1	2.57	2.67	5.0	
2/18/2005	Newhall	NR3	<	0.1	1.38	1.48	5.0	
3/2/2005	LACSD	RC	<	0.03	2.1	2.13	5.0	
3/2/2005	LACSD	RD	<	0.03	2.06	2.09	5.0	
3/2/2005	LACSD	RE	<	0.03	0.69	0.72	5.0	
3/9/2005	Newhall	NR1	<	0.1	0.97	1.07	5.0	
3/9/2005	Newhall	NR3	<	0.1	1.26	1.36	5.0	
4/13/2005	LACSD	RC	<	0.03	1.42	1.45	5.0	
4/13/2005	LACSD	RD	<	0.03	2.26	2.29	5.0	
4/13/2005	LACSD	RE	<	0.03	0.48	0.51	5.0	
4/13/2005	Newhall	NR1	<	0.1	1.92	2.02	5.0	
4/13/2005	Newhall	NR3	<	0.1	2.42	2.52	5.0	
5/9/2005	Newhall	NR1	<	0.1	1.63	1.73	5.0	
5/9/2005	Newhall	NR3	<	0.1	1.95	2.05	5.0	
5/10/2005	Newhall	NR1	<	0.1	1.86	1.96	5.0	
5/10/2005	Newhall	NR3	<	0.1	2.2	2.3	5.0	
5/11/2005	Newhall	NR1	<	0.1	2.28	2.38	5.0	
5/11/2005	Newhall	NR3	<	0.1	2.79	2.89	5.0	
5/12/2005	Newhall	NR1	<	0.1	2	2.1	5.0	
5/12/2005	Newhall	NR3	<	0.1	2.41	2.51	5.0	
5/13/2005	Newhall	NR1	<	0.1	1.57	1.67	5.0	
5/13/2005	Newhall	NR3	<	0.1	1.9	2	5.0	
5/18/2005	LACSD	RC	<	0.03	1.7	1.73	5.0	
5/18/2005	LACSD	RD	<	0.03	3.79	3.82	5.0	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

Appendix A, Table 3

SANTA CLARA RIVER REACH 5 - NITRATE + NITRITE

Sample Date	Source	Location	Qualifier	Nitrite (mg/L)	Nitrate (mg/L)	Nitrite + Nitrate (mg/L)	Nitrite + Nitrate BPO (mg/L)	Does Sample Exceed BPO (1=Yes)
5/18/2005	LACSD	RE	<	0.03	0.92	0.95	5.0	
6/15/2005	LACSD	RC	<	0.03	1.45	1.48	5.0	
6/15/2005	LACSD	RD	<	0.03	3.02	3.05	5.0	
6/15/2005	LACSD	RE	<	0.03	1.1	1.13	5.0	
6/15/2005	Newhall	NR1	<	0.1	1.96	2.06	5.0	
6/15/2005	Newhall	NR3	<	0.1	2.01	2.11	5.0	
7/20/2005	LACSD	RC	<	0.03	1.34	1.37	5.0	
7/20/2005	LACSD	RD		0.06	2.35	2.41	5.0	
7/20/2005	LACSD	RE	<	0.03	0.58	0.61	5.0	
7/20/2005	Newhall	NR1	<	0.1	1.67	1.77	5.0	
7/20/2005	Newhall	NR3	<	0.1	1.75	1.85	5.0	
8/8/2005	Newhall	NR1	<	0.1	1.08	1.18	5.0	
8/8/2005	Newhall	NR3	<	0.1	1.11	1.21	5.0	
8/9/2005	Newhall	NR1	<	0.1	1.22	1.32	5.0	
8/9/2005	Newhall	NR3	<	0.1	1.2	1.3	5.0	
8/10/2005	Newhall	NR1	<	0.1	1.19	1.29	5.0	
8/10/2005	Newhall	NR3	<	0.1	1.41	1.51	5.0	
8/11/2005	Newhall	NR1	<	0.1	1.23	1.33	5.0	
8/11/2005	Newhall	NR3	<	0.1	1.36	1.46	5.0	
8/12/2005	Newhall	NR1	<	0.1	1.3	1.4	5.0	
8/12/2005	Newhall	NR3	<	0.1	1.2	1.3	5.0	
8/17/2005	LACSD	RC	<	0.03	1.61	1.64	5.0	
8/17/2005	LACSD	RD		0.06	3.47	3.53	5.0	
8/17/2005	LACSD	RE		0.06	3.06	3.12	5.0	
9/14/2005	LACSD	RC	<	0.03	1.31	1.34	5.0	
9/14/2005	LACSD	RD		0.06	3.05	3.11	5.0	
9/14/2005	LACSD	RE		0.05	2.73	2.78	5.0	
9/14/2005	Newhall	NR1	<	0.1	3.48	3.58	5.0	
9/14/2005	Newhall	NR3	<	0.1	4.25	4.35	5.0	
10/12/2005	Newhall	NR1	<	0.1	2.58	2.68	5.0	
10/12/2005	Newhall	NR3	<	0.1	3.06	3.16	5.0	
10/26/2005	LACSD	RC	<	0.03	1.67	1.7	5.0	
10/26/2005	LACSD	RD		0.07	3.19	3.26	5.0	
10/26/2005	LACSD	RE		0.09	2.97	3.06	5.0	
11/7/2005	Newhall	NR1	<	0.1	3.22	3.32	5.0	
11/7/2005	Newhall	NR3	<	0.1	3.15	3.25	5.0	
11/8/2005	Newhall	NR1	<	0.1	3.73	3.83	5.0	
11/8/2005	Newhall	NR3	<	0.1	3.56	3.66	5.0	
11/9/2005	Newhall	NR1	<	0.1	3.35	3.45	5.0	
11/9/2005	Newhall	NR3	<	0.1	3.53	3.63	5.0	
11/10/2005	Newhall	NR1	<	0.1	4.78	4.88	5.0	
11/10/2005	Newhall	NR3	<	0.1	2.91	3.01	5.0	
11/11/2005	Newhall	NR1	<	0.1	2.97	3.07	5.0	
11/11/2005	Newhall	NR3	<	0.1	2.95	3.05	5.0	
11/30/2005	LACSD	RC	<	0.03	1.89	1.92	5.0	
11/30/2005	LACSD	RD		0.03	3.46	3.49	5.0	
11/30/2005	LACSD	RE		0.06	3.3	3.36	5.0	
12/14/2005	Newhall	NR1	<	0.1	3.34	3.44	5.0	
12/14/2005	Newhall	NR3	<	0.1	3.56	3.66	5.0	
12/21/2005	LACSD	RC	<	0.03	1.94	1.97	5.0	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

**Appendix A, Table 3**  
**SANTA CLARA RIVER REACH 5 - NITRATE + NITRITE**

Sample Date	Source	Location	Qualifier	Nitrite (mg/L)	Nitrate (mg/L)	Nitrite + Nitrate (mg/L)	Nitrite + Nitrate BPO (mg/L)	Does Sample Exceed BPO (1=Yes)
12/21/2005	LACSD	RC	<	0.03	1.91	1.94	5.0	
12/21/2005	LACSD	RD		0.06	3.46	3.52	5.0	
12/21/2005	LACSD	RE		0.08	3.54	3.62	5.0	
1/11/2006	Newhall	NR1	<	0.1	1.95	2.05	5.0	
1/11/2006	Newhall	NR3	<	0.1	2.07	2.17	5.0	
1/18/2006	LACSD	RC	<	0.03	1.9	1.93	5.0	
1/18/2006	LACSD	RD		0.04	3.34	3.38	5.0	
1/18/2006	LACSD	RD		0.04	3.34	3.38	5.0	
1/18/2006	LACSD	RE	<	0.03	0.12	0.15	5.0	
2/13/2006	Newhall	NR1	<	0.1	1.88	1.98	5.0	
2/13/2006	Newhall	NR3	<	0.1	2.17	2.27	5.0	
2/14/2006	Newhall	NR1	<	0.1	1.88	1.98	5.0	
2/14/2006	Newhall	NR3	<	0.1	2.45	2.55	5.0	
2/15/2006	LACSD	RC		0.04	2.13	2.17	5.0	
2/15/2006	LACSD	RD		0.05	3	3.05	5.0	
2/15/2006	LACSD	RE	<	0.03	0.22	0.25	5.0	
2/15/2006	LACSD	RE	<	0.03	0.22	0.25	5.0	
2/15/2006	Newhall	NR1	<	0.1	2.04	2.14	5.0	
2/15/2006	Newhall	NR3	<	0.1	2.58	2.68	5.0	
2/16/2006	Newhall	NR1	<	0.1	2.29	2.39	5.0	
2/16/2006	Newhall	NR3	<	0.1	2.86	2.96	5.0	
2/17/2006	Newhall	NR1	<	0.1	1.86	1.96	5.0	
2/17/2006	Newhall	NR3	<	0.1	2.27	2.37	5.0	
3/15/2006	LACSD	RC	<	0.03	1.92	1.95	5.0	
3/15/2006	LACSD	RD		0.03	2.56	2.59	5.0	
3/15/2006	LACSD	RE	<	0.03	0.53	0.56	5.0	
3/15/2006	Newhall	NR1		0.114	2.51	2.624	5.0	
3/15/2006	Newhall	NR3		0.105	2.91	3.015	5.0	
4/18/2006	Newhall	NR3	<	0.10	1.72	1.82	5.0	
4/19/2006	LACSD	RC	<	0.03	2.17	2.2	5.0	
4/19/2006	LACSD	RD	<	0.03	2.26	2.29	5.0	
4/19/2006	LACSD	RE	<	0.03	0.34	0.37	5.0	
4/24/2006	Newhall	NR1	<	0.1	1.73	1.83	5.0	
5/15/2006	Newhall	NR1		0.04	1.76	1.796	5.0	
5/15/2006	Newhall	NR3		0.02	1.92	1.944	5.0	
5/16/2006	Newhall	NR1		0.07	1.81	1.88	5.0	
5/16/2006	Newhall	NR3		0.05	1.92	1.97	5.0	
5/17/2006	LACSD	RC	<	0.03	2.18	2.21	5.0	
5/17/2006	LACSD	RD		0.06	3.28	3.34	5.0	
5/17/2006	LACSD	RE		0.05	2.07	2.12	5.0	
5/17/2006	Newhall	NR1		0.059	1.79	1.849	5.0	
5/17/2006	Newhall	NR3		0.05	1.94	1.993	5.0	
5/18/2006	Newhall	NR1		0.06	1.71	1.775	5.0	
5/18/2006	Newhall	NR3		0.06	1.85	1.909	5.0	
5/19/2006	Newhall	NR1		0.06	1.71	1.768	5.0	
5/19/2006	Newhall	NR3		0.05	1.83	1.881	5.0	
6/21/2006	LACSD	RC	<	0.03	2.02	2.05	5.0	
6/21/2006	LACSD	RD		0.06	2.89	2.95	5.0	
6/21/2006	LACSD	RE		0.05	2.8	2.85	5.0	
6/21/2006	Newhall	NR1		0.07	2.38	2.45	5.0	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land



Appendix A, Table 3

SANTA CLARA RIVER REACH 5 - NITRATE + NITRITE

Sample Date	Source	Location	Qualifier	Nitrite (mg/L)	Nitrate (mg/L)	Nitrite + Nitrate (mg/L)	Nitrite + Nitrate BPO (mg/L)	Does Sample Exceed BPO (1=Yes)
6/21/2006	Newhall	NR3		0.07	2.51	2.58	5.0	
7/18/2006	Newhall	NR1		0.11	2.04	2.15	5.0	
7/18/2006	Newhall	NR3		0.10	2.06	2.16	5.0	
7/19/2006	LACSD	RC	<	0.03	2.11	2.14	5.0	
7/19/2006	LACSD	RD		0.06	2.97	3.03	5.0	
7/19/2006	LACSD	RE		0.05	2.73	2.78	5.0	
8/21/2006	Newhall	NR1		0.03	1.26	1.29	5.0	
8/21/2006	Newhall	NR3		0.04	1.32	1.36	5.0	
8/22/2006	Newhall	NR1		0.04	1.25	1.29	5.0	
8/22/2006	Newhall	NR3		0.03	1.18	1.21	5.0	
8/23/2006	LACSD	RC	<	0.03	1.88	1.91	5.0	
8/23/2006	LACSD	RD		0.04	2.25	2.29	5.0	
8/23/2006	LACSD	RE		0.04	2.17	2.21	5.0	
8/23/2006	Newhall	NR1		0.03	1.66	1.69	5.0	
8/23/2006	Newhall	NR3		0.04	2.26	2.3	5.0	
8/24/2006	Newhall	NR1	<	0.05	1.89	1.94	5.0	
8/24/2006	Newhall	NR3	<	0.05	2.02	2.07	5.0	
8/25/2006	Newhall	NR1	<	0.05	1.89	1.94	5.0	
8/25/2006	Newhall	NR3	<	0.05	1.82	1.87	5.0	
9/13/2006	LACSD	RC	<	0.03	1.65	1.68	5.0	
9/13/2006	LACSD	RD		0.04	2.39	2.43	5.0	
9/13/2006	LACSD	RE		0.04	2.18	2.22	5.0	
9/13/2006	LACSD	RE		0.04	2.16	2.2	5.0	
9/19/2006	Newhall	NR1	<	0.01	1.93	1.94	5.0	
9/19/2006	Newhall	NR3	<	0.01	1.83	1.84	5.0	
10/18/2006	LACSD	RC	<	0.03	2.04	2.07	5.0	
10/18/2006	LACSD	RC	<	0.03	2.03	2.06	5.0	
10/18/2006	LACSD	RD		0.06	2.25	2.31	5.0	
10/18/2006	LACSD	RE		0.06	2.09	2.15	5.0	
10/18/2006	Newhall	NR1	<	0.01	1.97	1.98	5.0	
10/18/2006	Newhall	NR3	<	0.01	2.09	2.1	5.0	
11/15/2006	LACSD	RE		0.04	2.55	2.59	5.0	
11/29/2006	LACSD	RC	<	0.03	2.6	2.63	5.0	
11/29/2006	LACSD	RD		0.06	3.06	3.12	5.0	
12/20/2006	LACSD	RC	<	0.03	2.24	2.27	5.0	
12/20/2006	LACSD	RD		0.04	2.73	2.77	5.0	
12/20/2006	LACSD	RE		0.08	2.77	2.85	5.0	
2/14/2007	LACSD	RC	<	0.03	2.13	2.16	5.0	
2/14/2007	LACSD	RD		0.04	2.89	2.93	5.0	
2/14/2007	LACSD	RE		0.07	2.96	3.03	5.0	
2/28/2007	LACSD	RC		0.03	2.55	2.58	5.0	
2/28/2007	LACSD	RD	<	0.03	2.18	2.21	5.0	
2/28/2007	LACSD	RE		0.06	2.77	2.83	5.0	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

LACSD - Sanitation Districts of Los Angeles County  
 Newhall - Newhall Ranch Sanitation District

9 of 243 samples exceed the  
 Basin Plan Objective (BPO)

COMMENTS ON SPECIFIC LISTINGS  
FACT SHEET NO. 2

**LISTING: Chlorpyrifos in SCR Reach 6**

**Listed on the 303(d) list (added in 2006)**

**RECOMMENDATION:**

**De-list-Water Quality Objectives Currently Being Achieved**

**REASON:**

Current data show attainment of water quality standard  
Data does not meet requirements of Table 3.1 for Listing  
Data meet requirements of Table 4.1 for De-Listing

The California Regional Water Quality Control Board, Los Angeles (Regional Board) included chlorpyrifos for Reach 6 of the Santa Clara River during the 2006 listing cycle because their evaluation of available data indicated that the California Department of Fish and Game (CDFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.05 µg/L Chlorpyrifos was exceeded in samples collected from Bouquet Canyon Creek. All of the utilized monitoring data was collected as part of a Surface Water Ambient Monitoring Program (SWAMP).

An analysis of available data finds 2 valid samples available from the SWAMP program and 33 samples collected by the Los Angeles County Department of Public Works at the Los Angeles County MS4 Mass Emission Santa Clara River Monitoring Station (S29 - San Francisquito Creek). Evaluation of these samples for comparison to the CCC results in two observed exceedances of the four-day average with a sample size of 32. For a sample size from 28 to 36, Table 4.1 of the State's listing policy recommends delisting a previously listed pollutant/water body combination if the number exceedances are equal or less than two. This dataset is attached as Appendix A, Table 4.

The EPA has been phasing out all non-agricultural uses of chlorpyrifos with the cessation of sales of all indoor and outdoor residential use products by December 31, 2004. Data since 2005 shows that there have been no exceedances of the four-day average threshold of 0.05 µg/L chlorpyrifos out of 18 samples. EPA's action should be considered implementation of a significant management practice in Reach 6 of the Santa Clara River under Section 6.1.5.3 of the Water Quality Control Policy for Developing California's Clean Water Act. Section 6.1.5.3 states "If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered." At a minimum, this listing should be moved to the "Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL" list since this residential use phase-

out of chlorpyrifos is a regulatory action (other than a TMDL) and appears to be resulting in attainment of standards.

With respect to the accurate reflection of water body segment water quality, several listings proposed for SCR Reaches 5 and 6, including listings for diazinon, chlorpyrifos and PCBs rely on sample data and exceedances not from the SCR, but from other water quality segments, such as Bouquet Canyon and Castaic Creeks. While these creeks are within the SCR watershed, sample results in these creeks are not as a scientific matter necessarily indicative of water quality status in the SCR mainstem. Whether the sample data in these creeks is indicative of water quality in SCR reaches 5 and 6 depends upon a number of confounding factors, including hydrologic conditions, flow rates and volumes, and natural water quality function within the various surface water body segments. Pursuant to EPA's Guidance for 2004 Assessment, Listing and Reporting Requirements (July 2003), data that is not representative of current water quality conditions should not be used to support listing of a water body. Similarly, the Listing Policy requires use of accurate data to support listings. In addition, federal Clean Water Act regulations provide for the evaluation of listings based on analysis of water quality status associated with water body segments. 40 CFR 130.2(j). Similarly, the Listing Policy makes it clear that "At a minimum, data shall be aggregated by the water body segments as defined in the Basin Plans," and "data must be measured at one or more sites in the water segment in order to place a water segment on the section 303(d) list." These rules make sense because they are designed to assure that the data used to support a listing are representative of, and accurately depict the status of the water body segment proposed for listing. Pursuant to these rules and consistent with appropriate technical practices, samples and exceedances collected and recorded from other water bodies, defined in the Basin Plan separately and distinctly from SCR Reaches 5 and 6, should be evaluated separately, and should not be used as the primary line of evidence supporting a listing for the SCR mainstem.

## Appendix A, Table 4

### SANTA CLARA RIVER REACH 6 - CHLORPYRIFOS

Sample Date	Source	Location	Qualifier	Chlorpyrifos (ug/L)	Method	PQL/RL (ug/L)	QA/QC	Fish and Game 4-Day CCC	Is Sample Usable? (1=Yes)	Qualifier	4-Day Average Concentration (ug/L)	Does 4-Day Average Exceed CCC? (1=Yes)
10/31/2001	SWAMP	SCTBQT		0.059	ELISA	0.05	Pass	0.05	1		0.059	1
10/31/2001	SWAMP	SCTBQT	<	0.05	EPA 8141A	0.05	Fail	0.05			**	
11/15/2001	SWAMP	SCTBQT		0.077	ELISA	0.05	Pass	0.05	1		0.077	1
8/5/2002	SWAMP	SCTBQT		0.068	ELISA	0.05	Fail	0.05			**	
8/5/2002	SWAMP	SCTBQT		0.053	ELISA	0.05	Fail	0.05			**	
8/20/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
8/28/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
8/28/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
9/4/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
9/4/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
9/19/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
9/19/2002	SWAMP	SCTBQT		0.055	ELISA	0.05	Fail	0.05			**	
10/4/2002	SWAMP	SCTBQT		0.051	ELISA	0.05	Fail	0.05			**	
10/4/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
10/10/2002	LACDPW	S29	<	0.05	EPA 505	0.05	Pass	0.05	1	<	0.05	
10/19/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
10/19/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
11/7/2002	SWAMP	SCTBQT		0.061	ELISA	0.05	Fail	0.05			**	
11/8/2002	LACDPW	S29	<	0.05	EPA 501	0.05	Pass	0.05	1	<	0.05	
11/18/2002	SWAMP	SCTBQT		0.067	ELISA	0.05	Fail	0.05			**	
12/3/2002	SWAMP	SCTBQT		0.061	ELISA	0.05	Fail	0.05			**	
12/16/2002	LACDPW	S29	<	0.05	EPA 502	0.05	Pass	0.05	1	<	0.05	
12/18/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
12/18/2002	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
1/2/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
1/2/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
1/13/2003	SWAMP	SCTBQT	<	0.05	EPA 8141A	0.05	Fail	0.05			**	
1/17/2003	SWAMP	SCTBQT		0.051	ELISA	0.05	Fail	0.05			**	
1/17/2003	SWAMP	SCTBQT		0.062	ELISA	0.05	Fail	0.05			**	
2/1/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
2/1/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
2/11/2003	LACDPW	S29	<	0.05	EPA 503	0.05	Pass	0.05	1	<	0.05	
2/16/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
2/16/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
3/3/2003	SWAMP	SCTBQT		0.096	ELISA	0.05	Fail	0.05			**	
3/3/2003	SWAMP	SCTBQT		0.07	ELISA	0.05	Fail	0.05			**	
3/15/2003	LACDPW	S29	<	0.05	EPA 504	0.05	Pass	0.05	1	<	0.05	
3/18/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
4/2/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
4/2/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
4/17/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
4/17/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
4/30/2003	LACDPW	S29	<	0.05	EPA 506	0.05	Pass	0.05	1	<	0.05	
5/2/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
5/2/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
5/17/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
5/17/2003	SWAMP	SCTBQT	<	0.05	ELISA	0.05	Fail	0.05			**	
10/28/2003	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
10/31/2003	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
12/25/2003	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
1/1/2004	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
1/13/2004	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
10/17/2004	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
10/26/2004	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
<b>EPA ceased sale of all indoor and outdoor non-agricultural products containing chlorpyrifos on December 31, 2004.</b>												
1/7/2005	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
3/9/2005	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
10/17/2005	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
11/29/2005	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
12/31/2005	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
1/14/2006	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
2/17/2006	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
4/25/2006	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
10/31/2006	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
12/9/2006	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

### Appendix A, Table 4

#### SANTA CLARA RIVER REACH 6 - CHLORPYRIFOS

Sample Date	Source	Location	Qualifier	Chlorpyrifos (ug/L)	Method	PQL/RL (ug/L)	QA/QC	Fish and Game 4-Day CCC	Is Sample Usable? (1=Yes)	Qualifier	4-Day Average Concentration (ug/L)	Does 4-Day Average Exceed CCC? (1=Yes)
12/16/2006	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
1/30/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
2/19/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1		*	
2/22/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
4/2/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
9/21/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
11/25/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1		*	
11/29/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
12/6/2007	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	
4/9/2008	LACDPW	S29	<	0.05	EPA 507	0.05	Pass	0.05	1	<	0.05	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

\* = Data averaged for 4-Day average

\*\* = Data failed QAPP provisions

LACDPW - Los Angeles County Department of Public Works

SWAMP - Surface Water Ambient Monitoring Program

Fish and Game - California Department of Fish and Game

2 of 32 4-day averages exceed  
Criterion Continuous Concentration (CCC)

0 of 18 4-day averages exceed CCC  
since December 31, 2004 EPA ban on sales

COMMENTS ON SPECIFIC LISTINGS  
FACT SHEET NO. 3

LISTING: Copper in SCR Reach 6

**Listed on 303(d) list (TMDL required list)**

RECOMMENDATION:

**Do not list – Water Quality Objectives Currently Being Achieved**

REASON:

Current Data show attainment of water quality standard

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is currently proposing that a new listing for copper be made to the 303(d) list in Santa Clara River Reach 6. The fact sheet for copper in Santa Clara River Reach 6 states six of 21 samples exceeded the “CTR [California Toxics Rule] water quality standard for copper (acute) that is 13.44 ppb. The standard is hardness dependent based on a hardness value of 100.”

In the 2006 Listing cycle, the State Water Resources Control Board (State Board) issued guidance regarding the evaluation of metals data, particularly in regards to consideration of the use of wet and dry weather data, the use of concurrent or average hardness values and the appropriate use of total fraction data in the absence of dissolved fraction data.

In accordance with the State Board’s direction, using concurrently measured hardness values, the chronic water quality objectives ranged from 8.2 to 36.6 µg/L for dissolved copper. The average of all location hardness measurements collected were used when concurrent hardness was not measured.

We believe the copper listing in Reach 6 should be evaluated with total copper measurements collected and reported to the Regional Board by the Sanitation Districts of Los Angeles County (Sanitation Districts) in the Santa Clara River Reach 6 during approximately the same time period (2004 through April 2007). Although dissolved copper was not measured, use of total copper data is appropriate pursuant to the 2006 State Board guidance. Using a conservative value of 100% of the total copper equaling the dissolved fraction, and combining the Sanitation Districts’ data with the County’s MS4 data, a total of three copper exceedances of the Criterion Continuous Concentration (CCC) were observed out of sample size of 69 and two copper exceedances of the Criterion Maximum Concentration (CMC) were observed out of sample size of 71. For a sample size from 60 to 71, Table 3.1 of the State’s listing policy recommends a pollutant/water body combination be listed if the number exceedances are equal or greater than six. Therefore, the copper does not meet the listing criteria in Santa Clara

River Reach 6. A complete summary provided of the copper and hardness data along with the CTR hardness dependant objective calculations by Sanitation Districts can be found in Appendix A - Table 5A and 5B.

**Appendix A, Table 5A  
Hardness Data**

Date	Location	Hardness	Source
1/17/2005	RA	385	LACSD
2/9/2005	RA	476	LACSD
2/17/2005	RA	188	LACSD
4/13/2005	RA	385	LACSD
4/13/2005	RA	433	LACSD
4/14/2005	RA	344	LACSD
7/8/2005	RA	197	LACSD
1/18/2006	RA	249	LACSD
1/18/2006	RA	260	LACSD
1/19/2006	RA	326	LACSD
2/21/2006	RA	83	LACSD
2/23/2006	RA	220	LACSD
4/17/2006	RA	295	LACSD
4/19/2006	RA	282	LACSD
4/20/2006	RA	282	LACSD
4/21/2006	RA	274	LACSD
7/5/2006	RA	279	LACSD
7/7/2006	RA	351	LACSD
7/10/2006	RA	325	LACSD
7/19/2006	RA	182	LACSD
7/19/2006	RA	319	LACSD
Average			292
12/6/2004	RB	198	
1/6/2005	RB	250	
1/17/2005	RB	294	
2/7/2005	RB	224	
2/9/2005	RB	238	
2/9/2005	RB	243	
2/10/2005	RB	226	
2/10/2005	RB	325	
2/10/2005	RB	281	
2/10/2005	RB	248	
2/17/2005	RB	245	
2/17/2005	RB	260	
2/17/2005	RB	289	
2/17/2005	RB	319	
2/28/2005	RB	249	
3/2/2005	RB	261	
3/7/2005	RB	235	
3/10/2005	RB	238	
3/10/2005	RB	315	
3/10/2005	RB	283	
3/10/2005	RB	246	
3/11/2005	RB	232	
3/21/2005	RB	220	
3/31/2005	RB	233	
4/1/2005	RB	236	
4/5/2005	RB	229	
4/13/2005	RB	237	
4/13/2005	RB	276	
4/14/2005	RB	316	
4/14/2005	RB	300	
4/14/2005	RB	268	
5/5/2005	RB	228	
5/5/2005	RB	243	
5/12/2005	RB	235	
5/12/2005	RB	238	
5/18/2005	RB	251	
5/19/2005	RB	238	
7/6/2005	RB	199	
7/11/2005	RB	203	
7/20/2005	RB	198	
7/20/2005	RB	204	
7/21/2005	RB	211	
7/21/2005	RB	260	
7/21/2005	RB	325	
7/22/2005	RB	201	
7/25/2005	RB	191	
7/27/2005	RB	239	
7/29/2005	RB	196	
10/3/2005	RB	204	
10/5/2005	RB	204	
10/6/2005	RB	314	
10/6/2005	RB	275	
10/6/2005	RB	212	
10/7/2005	RB	196	
10/14/2005	RB	220	
10/21/2005	RB	248	
10/24/2005	RB	243	
10/26/2005	RB	252	
10/26/2005	RB	257	
1/9/2006	RB	245	
1/11/2006	RB	229	
1/13/2006	RB	210	
1/16/2006	RB	213	
1/18/2006	RB	222	
4/17/2006	RB	233	
4/19/2006	RB	248	
4/20/2006	RB	233	
4/21/2006	RB	238	
7/5/2006	RB	172.3	
7/7/2006	RB	230	
7/10/2006	RB	210	
7/17/2006	RB	192	
7/19/2006	RB	195	
7/21/2006	RB	180	
7/24/2006	RB	192	
7/26/2006	RB	194	
7/28/2006	RB	192	
10/16/2006	RB	196	
10/18/2006	RB	211	
10/18/2006	RB	209	
10/20/2006	RB	202	
1/3/2007	RB	203	
1/4/2007	RB	192	
1/7/2007	RB	246	
1/8/2007	RB	222	
2/14/2007	RB	232	
4/2/2007	RB	202	
4/4/2007	RB	209	
4/6/2007	RB	199	
4/11/2007	RB	235	
Average			226
1/7/2004	RB	205	
1/9/2004	RB	190	
1/12/2004	RB	197	
1/14/2004	RB	520	
1/19/2004	RB	150	
1/23/2004	RB	186	
1/26/2004	RB	169	
1/28/2004	RB	188	
1/30/2004	RB	180	
4/12/2004	RB	153	
4/14/2004	RB	160	
4/14/2004	RB	175	
4/16/2004	RB	157	
7/1/2004	RB	177	
7/6/2004	RB	176	
7/14/2004	RB	181	
10/13/2004	RB	193	
10/13/2004	RB	194	
10/14/2004	RB	215	
10/14/2004	RB	285	
11/1/2004	RB	211	
11/3/2004	RB	178	
11/4/2004	RB	201	
11/5/2004	RB	183	
12/1/2004	RB	175	
12/2/2004	RB	205	
12/3/2004	RB	193	

Source: LA County Sanitation Districts



**Appendix A, Table 5B**  
**SANTA CLARA RIVER REACH 6 - COPPER**

Sample Date	Source	Location	Qualifier	Total Copper (ug/L)	Dissolved Copper (ug/L)	PQL/RL (ug/L)	Method	Is Sample Usable? (1=Yes)	Conservative Dissolved Copper Concentration	4-Day Average Concentration	Hardness	Dissolved Copper CMC (ug/L)	Dissolved Copper CCC (ug/L)	Does Sample Exceed CMC (1=Yes)	Does Sample Exceed CCC (1=Yes)
10/28/2003	LACDPW	S29		13.50	3.55	5.00	EPA200.8	1	3.55	*	400	49.6	29.3		
10/31/2003	LACDPW	S29		30.40	10.60	5.00	EPA200.8	1	10.60	7.08	200	25.8	16.2		
12/25/2003	LACDPW	S29		53.30	4.88	5.00	EPA200.8	1	4.88	4.88	170	22.2	14.1		
1/1/2004	LACDPW	S29		10.20	7.36	5.00	EPA200.8	1	7.36	7.36	140	18.5	11.9		
1/13/2004	LACDPW	S29		5.96	3.54	5.00	EPA200.8	1	3.54	3.54	450	55.4	32.4		
1/14/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	520	63.5	36.6		
2/11/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
3/10/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
4/14/2004	LACSD	RB	E	4.00	NA	8.00	EPA200.8	1	8.00	8.00	175	22.8	14.4		
5/12/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
6/9/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
7/14/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	181	23.5	14.9		
8/11/2004	LACSD	RB	<	8.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
9/15/2004	LACSD	RB	E	3.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
10/13/2004	LACSD	RB	E	3.00	NA	8.00	EPA200.8	1	8.00	8.00	193	25.0	15.7		
10/17/2004	LACDPW	S29		15.70	5.90	5.00	EPA200.8	1	5.90	5.90	428	52.9	31.0		
10/26/2004	LACDPW	S29		28.00	22.60	5.00	EPA200.8	1	22.60	22.60	90	12.2	8.2	1	1
11/10/2004	LACSD	RB	E	6.00	NA	8.00	EPA200.8	1	8.00	8.00	226***	28.2	17.6		
12/16/2004	LACSD	RB		5.50	NA	0.50	EPA200.8	1	5.50	5.50	226***	28.2	17.6		
1/17/2005	LACDPW	S29		19.50	17.20	5.00	EPA200.8	1	17.20	17.20	110	14.7	9.7	1	1
2/2/2005	LACSD	RB		2.70	NA	0.50	EPA200.8	1	2.70	2.70	226***	28.2	17.6		
2/9/2005	LACSD	RB		2.90	NA	0.50	EPA200.8	1	2.90	2.90	243	31.0	19.1		
3/2/2005	LACSD	RA		28.00	NA	0.50	EPA200.8	1	28.00	28.00	292**	35.7	21.7	1	1
3/2/2005	LACSD	RB		1.90	NA	0.50	EPA200.8	1	1.90	1.90	261	33.2	20.3		
3/9/2005	LACDPW	S29		18.50	3.83	5.00	EPA200.8	1	3.83	3.83	460	56.6	33.0		
4/13/2005	LACSD	RA		29.00	NA	0.50	EPA200.8	1	29.00	29.00	433	53.5	31.3		
4/13/2005	LACSD	RB		3.60	NA	0.50	EPA200.8	1	3.60	3.60	276	35.0	21.3		
5/18/2005	LACSD	RB		1.80	NA	0.50	EPA200.8	1	1.80	1.80	251	32.0	19.7		
6/15/2005	LACSD	RB		3.20	NA	0.50	EPA200.8	1	3.20	3.20	220	28.2	17.6		
7/20/2005	LACSD	RB		6.40	NA	0.50	EPA200.8	1	6.40	6.40	204	26.3	16.5		
8/17/2005	LACSD	RB		3.70	NA	0.50	EPA200.8	1	3.70	3.70	226***	28.2	17.6		
9/14/2005	LACSD	RB		7.00	NA	0.50	EPA200.8	1	7.00	7.00	220	28.2	17.6		
10/17/2005	LACDPW	S29		37.30	8.17	5.00	EPA200.8	1	8.17	8.17	128	17.0	11.1		
10/26/2005	LACSD	RB		7.90	NA	0.50	EPA200.8	1	7.90	7.90	257	32.7	20.1		
11/29/2005	LACDPW	S29		7.40	2.36	5.00	EPA200.8	1	2.36	2.36	408	50.6	29.8		
11/30/2005	LACSD	RB		4.20	NA	0.50	EPA200.8	1	4.20	4.20	226***	28.2	17.6		
12/21/2005	LACSD	RB		4.20	NA	0.50	EPA200.8	1	4.20	4.20	226***	28.2	17.6		
12/31/2005	LACDPW	S29		10.80	4.59	5.00	EPA200.8	1	4.59	4.59	90	12.2	8.2		
1/14/2006	LACDPW	S29		10.00	6.04	5.00	EPA200.8	1	6.04	6.04	245	31.3	19.3		
1/18/2006	LACSD	RA		0.80	NA	0.50	EPA200.8	1	0.80	0.80	249	31.7	19.5		
1/18/2006	LACSD	RB		4.60	NA	0.50	EPA200.8	1	4.60	4.60	222	28.5	17.7		

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

Appendix A, Table 5B  
County Sanitation District Supplied Data Table

APPENDIX C - TABLE C1  
SANTA CLARA RIVER REACH 6 - COPPER

Sample Date	Source	Location	Qualifier	Total Copper (ug/L)	Dissolved Copper (ug/L)	PQL/RL (ug/L)	Method	Is Sample Usable? (1=Yes)	Conservative Dissolved Copper Concentration	4-Day Average Concentration	Hardness	Dissolved Copper CMC (ug/L)	Dissolved Copper CCC (ug/L)	Does Sample Exceed CMC (1=Yes)	Does Sample Exceed CCC (1=Yes)
2/15/2006	LACSD	RA		1.63	NA	0.50	EPA200.8	1	1.63	1.63	292**	35.7	21.7		
2/15/2006	LACSD	RB		7.21	NA	0.50	EPA200.8	1	7.21	7.21	226***	28.2	17.6		
2/17/2006	LACDPW	S29		7.33	3.32	5.00	EPA200.8	1	3.32	3.32	340	42.6	25.5		
3/15/2006	LACSD	RA		1.42	NA	0.50	EPA200.8	1	1.42	1.42	292**	35.7	21.7		
3/15/2006	LACSD	RB		3.75	NA	0.50	EPA200.8	1	3.75	3.75	226***	28.2	17.6		
4/19/2006	LACSD	RA		15.90	NA	0.50	EPA200.8	1	15.90	15.90	282	35.7	21.7		
4/19/2006	LACSD	RB		3.64	NA	0.50	EPA200.8	1	3.64	3.64	248	31.6	19.5		
4/25/2006	LACDPW	S29		33.50	2.52	5.00	EPA200.8	1	2.52	2.52	360	44.9	26.8		
5/17/2006	LACSD	RA		1.04	NA	0.50	EPA200.8	1	1.04	1.04	292**	35.7	21.7		
5/17/2006	LACSD	RB		4.67	NA	0.50	EPA200.8	1	4.67	4.67	226***	28.2	17.6		
6/21/2006	LACSD	RB		2.71	NA	0.50	EPA200.8	1	2.71	2.71	226***	28.2	17.6		
7/19/2006	LACSD	RA		0.80	NA	0.50	EPA200.8	1	0.80	0.80	319	40.1	24.1		
7/19/2006	LACSD	RB		2.10	NA	0.50	EPA200.8	1	2.10	2.10	195	25.2	15.8		
8/23/2006	LACSD	RA		1.10	NA	0.50	EPA200.8	1	1.10	1.10	292**	35.7	21.7		
8/23/2006	LACSD	RB		3.64	NA	0.50	EPA200.8	1	3.64	3.64	226***	28.2	17.6		
9/13/2006	LACSD	RB		3.60	NA	0.50	EPA200.8	1	3.60	3.60	226***	28.2	17.6		
10/18/2006	LACSD	RB		3.73	NA	0.50	EPA200.8	1	3.73	3.73	373	46.5	27.6		
10/31/2006	LACDPW	S29		22.40	2.19	5.00	EPA200.8	1	2.19	2.19	430	53.1	31.1		
11/15/2006	LACSD	RB		4.30	NA	0.50	EPA200.8	1	4.30	4.30	226***	28.2	17.6		
12/9/2006	LACDPW	S29		50.30	5.08	5.00	EPA200.8	1	5.08	5.08	250	31.9	19.6		
12/16/2006	LACDPW	S29		28.30	4.99	5.00	EPA200.8	1	4.99	4.99	370	46.1	27.4		
12/20/2006	LACSD	RB		5.92	NA	0.50	EPA200.8	1	5.92	5.92	226***	28.2	17.6		
1/30/2007	LACDPW	S29		38.20	6.10	5.00	EPA200.8	1	6.10	6.10	310	39.0	23.5		
2/14/2007	LACSD	RB		8.99	NA	0.50	EPA200.8	1	8.99	8.99	232	29.7	18.4		
2/19/2007	LACDPW	S29		31.90	4.68	5.00	EPA200.8	1	4.68	*	210	27.0	16.9		
2/22/2007	LACDPW	S29		50.50	5.13	5.00	EPA200.8	1	5.13	4.91	160	20.9	13.4		
2/28/2007	LACSD	RB		8.03	NA	0.50	EPA200.8	1	8.03	8.03	226***	28.2	17.6		
3/14/2007	LACSD	RB		6.26	NA	0.50	EPA200.8	1	6.26	6.26	226***	28.2	17.6		
4/2/2007	LACDPW	S29		22.10	2.88	5.00	EPA200.8	1	2.88	2.88	440	54.3	31.8		
4/11/2007	LACSD	RB		6.43	NA	0.50	EPA200.8	1	6.43	6.43	235	30.1	18.6		

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land  
LACSD - Sanitation Districts of Los Angeles County  
LACDPW - Los Angeles County Department of Public Works  
\* - Data is used in calculation of a 4-day average  
\*\* - Average RA hardness used when concurrent hardness was unavailable  
\*\*\* - Average RB hardness used when concurrent hardness was unavailable

3 of 69 4-day averages exceed  
Criterion Continuous Concentration (CCC)  
2 of 71 samples exceed  
Criterion Maximum Concentration (CMC)

10-057

01-08-00

COMMENTS ON SPECIFIC LISTINGS  
FACT SHEET NO. 4

LISTING: Diazinon in SCR Reach 6

**Listed on the 303(d) list (Being Addressed by an EPA Approved TMDL)**

RECOMMENDATION:

**De-list – Water Quality Objectives Currently Being Achieved**

REASON: Current data show attainment of water quality standard  
Recent data does not meet the requirements of Table 3.1 for Listing  
Diazinon is being addressed by actions other than TMDL (banned)

The California Regional Water Quality Control Board, Los Angeles (Regional Board) included diazinon for Reach 6 of the Santa Clara River during the 2006 listing cycle because their evaluation of available data indicated that the California Department of Fish and Game (CDFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L diazinon<sup>1</sup> was exceeded in samples collected from Bouquet Canyon Creek. All of the utilized monitoring data was collected as part of a Surface Water Ambient Monitoring Program (SWAMP).

An analysis of available data finds 2 valid samples available from the SWAMP program, 33 samples collected by the Los Angeles County Department of Public Works, and 25 samples collected by the Sanitation Districts of Los Angeles County (Sanitation Districts). This dataset is attached as Appendix A, Table 6.

The EPA has been phasing out all non-agricultural uses of diazinon with the cessation of sales of all indoor and outdoor residential use products by December 31, 2004. Recent (i.e., post-diazinon ban) water quality data from Santa Clara River Reach 6 (West Pier Hwy 99 to Bouquet Canyon Road Bridge) show that the Basin Plan's water quality objective for diazinon is met. Diazinon has a short half-life in soil, so that concentrations have declined rapidly following the ban. EPA's action should be considered implementation of a significant management practice in Reach 6 of the Santa Clara River under Section 6.1.5.3 of the Water Quality Control Policy for Developing California's Clean Water Act. In addition to the phase out of diazinon discussed above, the conditional irrigated lands waiver adopted by the LARWQCB in 2005 (Order No. R4-2005-0080) is another source control that should reduced the loading of the pollutant in the watershed. Section 6.1.5.3 states "If the implementation of a management practice(s) has resulted in a change in the water body segment, only recently collected data [since the implementation of the management measure(s)] should be considered". Accordingly,

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<sup>1</sup> At the time of original listing, the CDFG CCC for diazinon was 0.08 and was has since been modified to 0.10 µg/L diazinon.

only data collected since January 1, 2005 should be considered for listing reevaluation. If data generated after the residential use ban (January 1, 2005) to April 2007 is considered, only two four-day average diazinon results exceeded the CCC with a sample size of 29. For a sample size of 28-36, Table 4.1 of the State's listing policy recommends delisting a previously listed pollutant/water body combination if the number of exceedances is equal to or less than two. In addition, the most recently available data shows no exceedances were found in nine samples collected between April 2007 and July 2008. Therefore, diazinon in Reach 6 of the Santa Clara River should be removed from the 303(d) list.

In addition, prior to delisting this listing should be moved to the "Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL" category since the EPA residential use phase-out of diazinon is a regulatory action (other than a TMDL) and has been successful in attaining compliance with standards.

With respect to the accurate reflection of water body segment water quality, several listings proposed for SCR Reaches 5 and 6, including listings for diazinon, chlorpyrifos and PCBs rely on sample data and exceedances not from the SCR, but from other water quality segments, such as Bouquet Canyon and Castaic Creeks. While these creeks are within the SCR watershed, sample results in these creeks are not as a scientific matter necessarily indicative of water quality status in the SCR mainstem. Whether the sample data in these creeks is indicative of water quality in SCR reaches 5 and 6 depends upon a number of confounding factors, including hydrologic conditions, flow rates and volumes, and natural water quality function within the various surface water body segments. Pursuant to EPA's Guidance for 2004 Assessment, Listing and Reporting Requirements (July 2003), data that is not representative of current water quality conditions should not be used to support listing of a water body. Similarly, the Listing Policy requires use of accurate data to support listings. In addition, federal Clean Water Act regulations provide for the evaluation of listings based on analysis of water quality status associated with water body segments. 40 CFR 130.2(j). Similarly, the Listing Policy makes it clear that "At a minimum, data shall be aggregated by the water body segments as defined in the Basin Plans," and "data must be measured at one or more sites in the water segment in order to place a water segment on the section 303(d) list." These rules make sense because they are designed to assure that the data used to support a listing are representative of, and accurately depict the status of the water body segment proposed for listing. Pursuant to these rules and consistent with appropriate technical practices, samples and exceedances collected and recorded from other water bodies, defined in the Basin Plan separately and distinctly from SCR Reaches 5 and 6, should be evaluated separately, and should not be used as the primary line of evidence supporting a listing for a the SCR mainstem.

Appendix A, Table 6

SANTA CLARA RIVER REACH 6 - DIAZINON

Date	Source	Location	Qualifier	Diazinon (ug/L)	Method	PQL/RL (ug/L)	QA/QC	CCC (ug/L)	Is Sample Usable? (1=Yes)	Qualifier	4-day Average (ug/L)	Exceeds CCC (1 = Yes)
10/31/2001	SWAMP	403STCBQT		2	ELISA	0.03	Pass	0.1	1		2	1
10/31/2001	SWAMP	403STCBQT		2.25	EPA 8141A	0.02	Fail	0.1			**	
11/15/2001	SWAMP	403STCBQT		1.69	ELISA	0.03	Pass	0.1	1		1.69	1
8/5/2002	SWAMP	403STCBQT		4.29	ELISA	0.03	Fail	0.1			**	
8/5/2002	SWAMP	403STCBQT		4.14	ELISA	0.03	Fail	0.1			**	
8/20/2002	SWAMP	403STCBQT		6.7	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403BQT104		0.858	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403BQT105		0.435	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403BQT106		4.07	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403BQT106		3.98	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403BQT109		0.862	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403STCBQT		5.74	ELISA	0.03	Fail	0.1			**	
8/28/2002	SWAMP	403STCBQT		5.75	ELISA	0.03	Fail	0.1			**	
9/4/2002	SWAMP	403STCBQT		6.05	ELISA	0.03	Fail	0.1			**	
9/4/2002	SWAMP	403STCBQT		5.57	ELISA	0.03	Fail	0.1			**	
9/19/2002	SWAMP	403STCBQT		1.29	ELISA	0.03	Fail	0.1			**	
9/19/2002	SWAMP	403STCBQT		1.23	ELISA	0.03	Fail	0.1			**	
10/4/2002	SWAMP	403STCBQT		1.52	ELISA	0.03	Fail	0.1			**	
10/10/2002	LADPW	S29	<	0.01	EPA505	0.01	Pass	0.1	1	<	0.01	
10/19/2002	SWAMP	403STCBQT		2.67	ELISA	0.03	Fail	0.1			**	
10/19/2002	SWAMP	403STCBQT		2.55	ELISA	0.03	Fail	0.1			**	
11/7/2002	SWAMP	403STCBQT		0.813	ELISA	0.03	Fail	0.1			**	
11/8/2002	LADPW	S29		0.43	EPA501	0.01	Pass	0.1	1		0.43	1
11/18/2002	SWAMP	403STCBQT		1.07	ELISA	0.03	Fail	0.1			**	
12/3/2002	SWAMP	403STCBQT		0.479	ELISA	0.03	Fail	0.1			**	
12/16/2002	LADPW	S29	<	0.01	EPA502	0.01	Pass	0.1	1	<	0.01	
12/18/2002	SWAMP	403STCBQT		1.67	ELISA	0.03	Fail	0.1			**	
12/18/2002	SWAMP	403STCBQT		1.57	ELISA	0.03	Fail	0.1			**	
1/2/2003	SWAMP	403STCBQT		0.499	ELISA	0.03	Fail	0.1			**	
1/2/2003	SWAMP	403STCBQT		0.382	ELISA	0.03	Fail	0.1			**	
1/13/2003	SWAMP	403STCBQT		0.4	EPA 8141A	0.02	Fail	0.1			**	
1/17/2003	SWAMP	403STCBQT		0.321	ELISA	0.03	Fail	0.1			**	
1/17/2003	SWAMP	403STCBQT		0.277	ELISA	0.03	Fail	0.1			**	
2/1/2003	SWAMP	403STCBQT		0.805	ELISA	0.03	Fail	0.1			**	
2/1/2003	SWAMP	403STCBQT		0.718	ELISA	0.03	Fail	0.1			**	
2/11/2003	LADPW	S29		0.265	EPA503	0.01	Pass	0.1	1		0.265	1
2/16/2003	SWAMP	403STCBQT		0.623	ELISA	0.03	Fail	0.1			**	
2/16/2003	SWAMP	403STCBQT		0.556	ELISA	0.03	Fail	0.1			**	
3/3/2003	SWAMP	403STCBQT		5.52	ELISA	0.03	Fail	0.1			**	
3/3/2003	SWAMP	403STCBQT		4.97	ELISA	0.03	Fail	0.1			**	
3/15/2003	LADPW	S29		0.05	EPA504	0.01	Pass	0.1	1		0.05	
3/18/2003	SWAMP	403STCBQT		0.054	ELISA	0.03	Fail	0.1			**	
4/2/2003	SWAMP	403STCBQT		0.979	ELISA	0.03	Fail	0.1			**	
4/2/2003	SWAMP	403STCBQT		0.947	ELISA	0.03	Fail	0.1			**	
4/17/2003	SWAMP	403STCBQT		0.315	ELISA	0.03	Fail	0.1			**	
4/17/2003	SWAMP	403STCBQT		0.35	ELISA	0.03	Fail	0.1			**	
4/30/2003	LADPW	S29		0.023	EPA506	0.01	Pass	0.1	1		0.023	
5/2/2003	SWAMP	403STCBQT		0.512	ELISA	0.03	Fail	0.1			**	
5/2/2003	SWAMP	403STCBQT		0.499	ELISA	0.03	Fail	0.1			**	
5/17/2003	SWAMP	403STCBQT		1.32	ELISA	0.03	Fail	0.1			**	
5/17/2003	SWAMP	403STCBQT		1.33	ELISA	0.03	Fail	0.1			**	
10/28/2003	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1		*	
10/31/2003	LADPW	S29		0.082	EPA507	0.01	Pass	0.1	1	<	0.05	
12/25/2003	LADPW	S29		0.021	EPA507	0.01	Pass	0.1	1		0.021	
1/1/2004	LADPW	S29		0.028	EPA507	0.01	Pass	0.1	1		0.028	
1/7/2004	LACSD	RB		0.39	SW8141	0.05	Pass	0.1	1		0.39	1
1/13/2004	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
4/14/2004	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
10/17/2004	LADPW	S29		0.41	EPA507	0.01	Pass	0.1	1		0.41	1
10/26/2004	LADPW	S29		0.03	EPA507	0.01	Pass	0.1	1		0.03	
11/1/2004	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

Appendix A, Table 6

SANTA CLARA RIVER REACH 6 - DIAZINON

Date	Source	Location	Qualifier	Diazinon (ug/L)	Method	PQL/RL (ug/L)	QA/QC	CCC (ug/L)	Is Sample Usable? (1=Yes)	Qualifier	4-day Average (ug/L)	Exceeds CCC (1 = Yes)
12/22/2004	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
<b>EPA ceased sale of all indoor and outdoor non-agricultural products containing diazinon on December 31, 2004.</b>												
1/7/2005	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
1/17/2005	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
2/7/2005	LACSD	RB		0.51	SW8141	0.05	Pass	0.1	1	<	0.51	1
2/9/2005	LACSD	RA	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
3/9/2005	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
4/13/2005	LACSD	RA	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
4/13/2005	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
7/6/2005	LACSD	RB	<	0.1	SW8141	0.1	Pass	0.1	1	<	0.1	
10/3/2005	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
10/17/2005	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
11/29/2005	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
12/31/2005	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
1/9/2006	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
1/14/2006	LADPW	S29		0.11	EPA507	0.01	Pass	0.1	1		0.11	1
2/17/2006	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
4/17/2006	LACSD	RA	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
4/17/2006	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
4/20/2006	LACSD	RA	<	0.05	SW8141	0.05	Pass	0.1	1		*	
4/25/2006	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
7/5/2006	LACSD	RA	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
7/5/2006	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
10/16/2006	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
10/31/2006	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
12/9/2006	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
12/16/2006	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
1/3/2007	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
1/30/2007	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
2/19/2007	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
2/22/2007	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1		*	
4/2/2007	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
4/2/2007	LADPW	S29	<	0.01	EPA507	0.01	Pass	0.1	1	<	0.01	
7/16/2007	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
9/21/2007	LADPW	S29	<	0.05	EPA 507	0.01	Pass	0.1	1	<	0.05	
10/15/2007	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
11/25/2007	LADPW	S29	<	0.05	EPA 507	0.01	Pass	0.1	1		*	
11/29/2007	LADPW	S29	<	0.05	EPA 507	0.01	Pass	0.1	1	<	0.05	
12/6/2007	LADPW	S29	<	0.05	EPA 507	0.01	Pass	0.1	1	<	0.05	
1/9/2008	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
4/7/2008	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	
4/9/2008	LADPW	S29	<	0.05	EPA 507	0.01	Pass	0.1	1	<	0.05	
7/14/2008	LACSD	RB	<	0.05	SW8141	0.05	Pass	0.1	1	<	0.05	

Source: LA County Sanitation Districts, LA County Department of Public Works, Newhall Land

\* = Data averaged for 4-Day average

\*\* = Data failed QAPP provisions

LADPW - Los Angeles Department of Public Works

SWAMP - Surface Water Ambient Monitoring Program

LACSD - Sanitation Districts of Los Angeles County

2 of 29 4-day averages from January 1, 2005 to April 2, 2007 exceed Criterion Continuous Concentration (CCC)

2 of 38 4-day averages from January 1, 2005 to July 14, 2008 exceed Criterion Continuous Concentration (CCC)

COMMENTS ON SPECIFIC LISTINGS  
FACT SHEET NO. 5

**LISTING: DDT in SCR Reach 5**

**Listed on the 303(d) list (TMDL required list)**

**RECOMMENDATION:**

**Do-not list - Does not meet listing requirements**

**REASON:**

Current data show attainment of water quality standard  
Data does not meet requirements of Table 3.1 for Listing

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing a new listing for DDT in Reach 5 of the Santa Clara River because their evaluation of available data indicated that the California Toxic Rule (CTR) criteria to protect human health with consumption of water and aquatic organisms threshold of 0.00059 µg/L DDT was exceeded in 2 of 3 samples collected as part of the Surface Water Ambient Monitoring Program (SWAMP).

The proposed DDT listing for SCR Reach 5 rely on sample data and exceedances not from the SCR, but from other water quality segments, particularly, Castaic Creek. While Castaic creek is within the SCR watershed, sample results are not, as a scientific matter, necessarily indicative of water quality status in the SCR mainstem. Although Section 303(d) does not contain a specific scientific standard to be applied to listing determinations, the Supplemental Report of the 2001 Budget published by the California Legislature, which provided one basis for the development of the Listing Policy by the SWRCB, required that the SWRCB establish criteria to "ensure that data and information used for identification of impaired water bodies are accurate and verifiable." Section 6.1.4 of the Listing Policy states that "the quality of the data used in development of the section 303(d) list shall be of sufficient high quality to make determinations of water quality standards attainment." Further, EPA regulations, 40 C.F.R. 131.11(a), require that water quality criteria must be based on "sound scientific rationale." The proposed listing of DDT does not appear to be based on accurate data for the reasons discussed below.

Whether the sample data in the creek is indicative of water quality in SCR reach 5 depends upon a number of confounding factors, including hydrologic conditions, flow rates and volumes, and natural water quality function within the various surface water body segments. Pursuant to EPA's Guidance for 2004 Assessment, Listing and Reporting

Requirements (July 2003), data that is not representative of current water quality conditions should not be used to support listing of a water body. Similarly, the Listing Policy requires use of accurate data to support listings. In addition, federal Clean Water Act regulations provide for the evaluation of listings based on analysis of water quality status associated with water body segments (see 40 CFR 130.2(j)). Similarly, the Listing Policy makes it clear that "At a minimum, data shall be aggregated by the water body segments as defined in the Basin Plans," and "data must be measured at one or more sites in the water segment in order to place a water segment on the section 303(d) list." These rules make sense because they are designed to assure that the data used to support a listing are representative of, and accurately depict the status of the water body segment proposed for listing. Pursuant to these rules and consistent with appropriate technical practices, samples and exceedances collected and recorded from other water bodies, defined in the Basin Plan separately and distinctly from SCR Reach 5 should be evaluated separately, and should not be used as the primary line of evidence supporting a listing for a the SCR mainstem.

Also of note, the SWAMP samples were taken only 14 days apart during a single season (wet season) in 2001. This does not meet the recommended criteria for temporal representation in the Listing Policy, and therefore should not be used as the sole basis for this new listing. Section 6.1.5.3 of the Listing Policy states, "In general, samples should be available from two or more seasons or from two or more events when effects or water quality exceedances would be expected to be clearly manifested." The SWAMP sample collected from the Castaic Creek monitoring location on November 13, 2001 is from a separate Basin Plan defined reach, and is not representative of conditions and does not meet Listing Policy guidelines for spatial representativeness. The SWAMP database for this sample states in the comments field, "slow trickle, not measurable flow, small pools of water." The proposed DDT listing relies on this Castaic Creek SWAMP monitoring station sample, which was collected during non-measurable flows that are not representative of typical or long-term conditions within this water body. The SWAMP sample collected from Castaic Creek should not be included as Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated beneficial uses that are independent of Santa Clara River Reach 5. Therefore the Castaic Creek sample does not meet the requirements of Section 6.1.5.2 of the State's 303(d) Listing Policy and is not representative of the water body segment of the Santa Clara River Reach 5. DDT data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in retaining a listing for Santa Clara River Reach 5.

Only the Santa Clara River Reach 5 SWAMP data collected at the Newhall Ranch Blue Cut monitoring station should be used to assess impairments. Therefore only 1 of 1 samples exceeded the CCC, which does not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing. No new listing is warranted for DDT in Santa Clara River Reach 5.



COMMENTS ON SPECIFIC LISTINGS  
FACT SHEET NO. 6

**LISTING: Polychlorinated Biphenyls (PCBs) in SCR Reach 5**

**Listed on the 303(d) list (TMDL required list)**

**RECOMMENDATION:**

**Do-not list - Does not meet listing requirements**

**REASON:**

Data does not meet requirements of Table 3.1 for Listing

The proposed PCB listing for SCR Reach 5 rely on sample data and exceedances not from the SCR, but from other water quality segments, such as Bouquet Canyon and Castaic Creeks. While these creeks are within the SCR watershed, sample results in these creeks are not, as a scientific matter, necessarily indicative of water quality status in the SCR mainstem. Although Section 303(d) does not contain a specific scientific standard to be applied to listing determinations, the Supplemental Report of the 2001 Budget published by the California Legislature, which provided one basis for the development of the Listing Policy by the SWRCB, required that the SWRCB establish criteria to "ensure that data and information used for identification of impaired water bodies are accurate and verifiable." Section 6.1.4 of the Listing Policy states that "the quality of the data used in development of the section 303(d) list shall be of sufficient high quality to make determinations of water quality standards attainment." Further, EPA regulations, 40 C.F.R. 131.11(a), require that water quality criteria must be based on "sound scientific rationale." The proposed listing of PCBs does not appear to be based on accurate data for the reasons discussed below.

Whether the sample data in these creeks is indicative of water quality in SCR reach 5 depends upon a number of confounding factors, including hydrologic conditions, flow rates and volumes, and natural water quality function within the various surface water body segments. Pursuant to EPA's Guidance for 2004 Assessment, Listing and Reporting Requirements (July 2003), data that is not representative of current water quality conditions should not be used to support listing of a water body. Similarly, the Listing Policy requires use of accurate data to support listings. In addition, federal Clean Water Act regulations provide for the evaluation of listings based on analysis of water quality status associated with water body segments (see 40 CFR 130.2(j)). Similarly, the Listing Policy makes it clear that "At a minimum, data shall be aggregated by the water body segments as defined in the Basin Plans," and "data must be measured at one or more sites in the water segment in order to place a water segment on the section 303(d) list." These

rules make sense because they are designed to assure that the data used to support a listing are representative of, and accurately depict the status of the water body segment proposed for listing. Pursuant to these rules and consistent with appropriate technical practices, samples and exceedances collected and recorded from other water bodies, defined in the Basin Plan separately and distinctly from SCR Reach 5 should be evaluated separately, and should not be used as the primary line of evidence supporting a listing for a the SCR mainstem.

Furthermore, as discussed above, The SWAMP sample collected from the Castaic Creek monitoring location on November 13, 2001 is from a separate Basin Plan defined reach, is not representative of conditions and does not meet Listing Policy guidelines for spatial representativeness. The SWAMP database for this sample states in the comments field, "slow trickle, not measurable flow, small pools of water." The proposed PCBs listing relies on this Castaic Creek SWAMP monitoring station sample, which was collected during non-measurable flows that are not representative of typical or long-term conditions within this water body. The SWAMP sample collected from Castaic Creek should not be included as Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated beneficial uses that are independent of Santa Clara River Reach 5. Therefore the Castaic Creek sample does not meet the requirements of Section 6.1.5 .2 of the State's 303(d) Listing Policy and is not representative of the water body segment of the Santa Clara River Reach 5. PCB data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in retaining a listing for Santa Clara River Reach 5.

Also of note, the SWAMP samples were taken only 14 days apart during a single season (wet season) in 2001. This does not meet the recommended criteria for temporal representation in the Listing Policy, and therefore should not be used as the sole basis for this new listing. Section 6.1.5.3 of the Listing Policy states, "In general, samples should be available from two or more seasons or from two or more events when effects or water quality exceedances would be expected to be clearly manifested."

Overall, we do not believe that sufficient information is available at this time to warrant placing Santa Clara River Reach 5 on the 303(d) list for PCBs. The information available does not meet the minimum number of exceedances required for listing per Table 3.1 of the State's 303(d) Listing Policy. Only the Santa Clara River Reach 5 SWAMP data collected at the Newhall Ranch Blue Cut monitoring station should be used to assess impairments. Therefore only 1 of 2 samples exceeded the CCC, which does not meet the Listing Policy requirements of Table 3.1 for two or greater exceedances for any new listing. No new listing is warranted for PCBs in Santa Clara River Reach 5.

A similar proposed listing of PCB for Santa Clara River Reach 6 was removed after further review by the State Water Resources Control Board (State Board). In September 2006, the State Board considered a listing for Santa Clara River Reach 5 based on this SWAMP data and determined no listing was justified. The State Board recommendation

on this fact sheet is: "After review of the available data and information, SWRCB staff concludes that the water body pollutant combination should not be placed on the section 303(d) list because applicable water quality standards are not exceeded and a pollutant contributes to or causes the problem."

**From:** "hensleyjim" <hensleyjim@roadrunner.com>  
**To:** mvoong@waterboards.ca.gov  
**Date:** 6/17/2009 9:01:34 AM  
**Subject:** FW: Trash from OID etc. at Ormond Beach

Good Morning Mr. Voong, Director;  
CA Regional Water Quality Control Board

We as members of Ormond Beach Wetlands Environmental Coalition are rushing to contact you about the deplorable health and environmental conditions of the Ormond Beach Wetlands, lagoons, canals and Oxnard Industrial drains that flow trash filled contaminated water into the Wetlands.

We have been alerted that somehow the Southern California Regional Water Board has not been made aware of toxic cesspool problems that suffers one of our few remaining wetlands areas in California. Please place this issue in your upcoming agenda as an emergency action item. If you wish any of us to testify please advise.

As you can see from the attached photos, the area is an amazing habitat for coastal wildlife and a very attractive area for families to enjoy a day at the beach. The lagoon visually offers a family what might appear to be a safe wading area for small children.

However as far as we know, no agency has been testing the water quality at the Ormond Wetlands and there are no warning signs in Spanish and English foretelling of probably pollution.

Trash from local throwaways, picnickers', homeless is adding to the continual flow of trash from two or three Oxnard farmland and industrial drains that empty into the wetlands. As you can see by the attached photos this trash is a serious detriment to the water quality and has been a long term health hazard to those unaware who take their families to enjoy a day at the beach and lagoon.

Likewise, the estimated 700 thousand tons of toxic heavy metal slag hill that creates a double sized football field approximately sixty feet high and it's large footprint expanding underwater and sinking into the wetlands has been reported leaking contamination. By one EPA report the abandoned smelter and slag hill may harbor radio-isotopic materials that are blending into the local aquifers as well as the tidal action that pulls the toxic substances into the ocean at reach tide.

Several of our local and state organizations have formed an environmental coalition, to start immediate clean up of the water borne trash and restoration of the water ways and wetlands as well as the removal of the smelter and slag hill.

Please see this issue is addressed in your preliminary report of this week's CA Regional Water Quality Control Board meeting. Environmental, wildlife and human health and well being is at stake here. The water needs regular testing, and if contaminated [it looks pretty obvious that severe contamination abounds, when one takes a tour through the area.]

Please allow us to offer you an invitation to take you or some of your representatives on a tour of the deserted Halaco smelter, slag heap, lagoons and waterways. Name any time and some of our environmental coalition members will be happy to meet you at the site and tour you around the area.

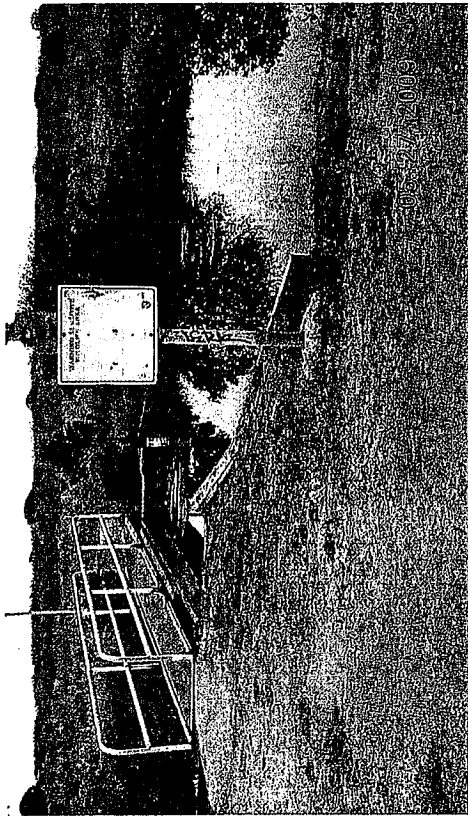
Please keep us in your communication list.

Cordially

Jim Hensley, Ormond Beach Wetlands Environmental Coalition  
& Deputy District Director "LULAC"  
League of United Latin American Citizens  
128 Santa Paula Avenue  
Channel Islands Beach, CA 93035-4585  
o/h; 805-382-7659  
c. 805-794-0517  
hensleyjim@roadrunner.com

If you wish to be deleted from this list, click on reply and type or paste  
"PLEASE DELETE"

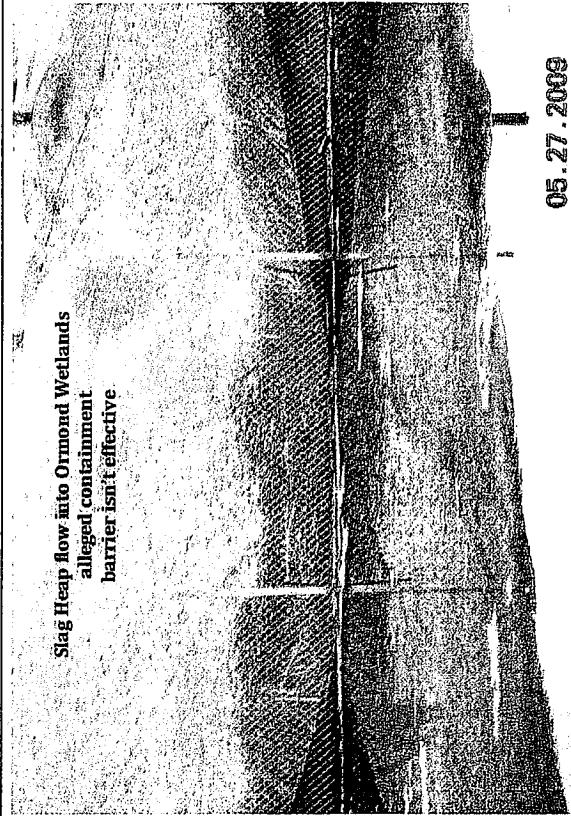
**Bridge to Ormond  
Beach Wetlands**



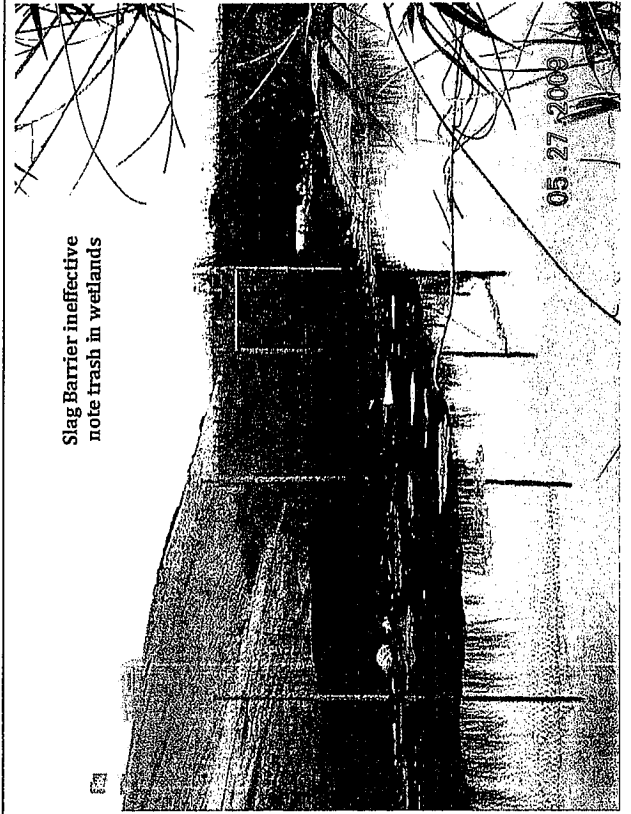
**Note trash in Ormond Beach Wetlands**



**Slag Heap flow into Ormond Wetlands  
alleged containment  
barrier isn't effective.**



**Slag Barrier ineffective  
note trash in wetlands**



Ventura Star Sunday, June 3, 2007  
Halaco: What went wrong?

Ormond Beach smelter spewed corrosive brew for decades as owners beat back efforts by regulators and neighbors to make them stop

By Scott Hadly (Contact)

The Halaco Files



Visit our Halaco Web site for more information and background on the Halaco site.

[VenturaCountyStar.com/halaco](http://VenturaCountyStar.com/halaco) »

Stories in this series

**DAY 1**

Halaco: What went wrong?

Costly cleanup process has many steps

Halaco's history

About this series

**DAY 2**

Future of Halaco's mountainous mess is uncertain

Dirty, dangerous job for workers

Gary Moss felt the soot in his throat before he saw the blue cloud descend on the back lot like a heavy fog. His eyes burned. His fillings hurt. His co-workers gasped for air as the pungent metallic tang assaulted their noses and throats.

"It was unlike anything I'd ever smelled," said Moss, his dark skin wrinkled from a life of working outside.

That day on the job in 1970 at Western Kraft, a paper recycling plant near Ormond Beach, was Moss' introduction to neighboring Halaco Engineering.

"It was usually worse at night," said Moss, a maintenance mechanic at what is now Weyerhaeuser, which is across McWane Road from the silent Halaco smelters.

Like many people who lived or worked in that part of town, his first whiff of the sprawling, beat-up magnesium and aluminum recycling plant was overpowering.

As officials with U.S. Environmental Protection Agency consider including the bankrupt metals recycling plant on a list of hazardous Superfund cleanup sites, some of those people are looking back at the years of seeming inaction and wondering what took so long.

The reason Halaco operated for 40 years is that the company followed the law and wasn't polluting, said Dave Gable, the former general manager.



Photo by Jason Redmond

"They kept doing this stuff for all that time and nobody ever did anything to stop them," says Gary Moss, who has worked near the Halaco plant for more than 30 years.

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Ventura Star Sunday, June 3, 2007  
Halaco: What went wrong?

"Magnesium is the least harmful of any metals," said Gable, pointing out that the 710,000 cubic yards of waste at the site is primarily magnesium oxide. "Have you ever heard of milk of magnesia?"

The active ingredient in the over-the-counter heartburn medicine is magnesium hydroxide, while Halaco's waste pile is primarily magnesium oxide. Gable is correct when he says magnesium oxide is mostly harmless, but the other constituents in the waste pile are anything but benign, according to federal officials.

Along with magnesium, the pile contains arsenic, barium, beryllium, cadmium, chromium, copper, mercury, lead and zinc. And laced in the melange of metals is an undetermined amount of low-level radiation.

Part of what will happen in coming years is to determine in more detail what is in the pile, what sort of threat it poses, and who will pay to clean it up.

Meanwhile, Halaco's rusty, graffiti-covered corrugated-metal-and-concrete buildings remain. Built atop the old Oxnard city dump, the company's cavernous bag house, where the smoke was sent through filters, smelter building and squat offices cover a vast uneven cement slab. Across the narrow gray water of the Oxnard Industrial Drain looms the four-story high, 28-acre slag heap, containing enough waste to fill the Rose Bowl twice.

The almost 40-acre property is in the industrial corner on the southern edge of Oxnard, where Perkins Road dead-ends at Ormond Beach. Within a mile are the ocean, wetlands, a few dozen industrial operations, Oxnard's sewer plant, farm fields, beachside condos and several thousand people living in the working-class neighborhoods near Hueneme Road.

"I couldn't understand it," said Moss, wearing dirty white coveralls one day after work. "They kept doing this stuff for all that time and nobody ever did anything to stop them."

#### Signs of decay

For almost 40 years, Moss and hundreds of others complained about what spewed from Halaco's smokestacks or out of its pipes and into its settling pond, around which a gray mound of waste slowly grew.

No plants lived on that pile.

Kids soon wore crisscrossing trails into the lifeless gray dust, where they would trek on hunts for old bottles or ride bikes.

Along with the metallic smell, Halaco would pump out brutal whiffs of ammonia or hydrochloric acid. Periodically, a thick blue, gray or even purple cloud would drift from Halaco's little smokestack and creep low to the earth, raining gray flakes in its path that corroded any paint or metal in its way, according to people who worked there and various agency reports.

Sometimes when the emissions interacted with moisture in the air a chemical reaction would occur, creating a white cloud of ammonia or acid.

At Oxnard's nearby sewage treatment plant, employees said Halaco's fumes had pitted the metal on the side of the flagpole that faces the smelters.

"I cannot name a smell more acrid," said Katie Greenstreet, a boisterous, silver-haired woman with a raspy voice.

"It was like if you're not a cigarette smoker and you go into a room with a bunch of smokers, and your throat, eyes and lungs burn. It was like that, but a thousand times worse. You'd just go ahhhhhhh and run in the house and slam the door."

Greenstreet, who lives in the Surfside condominiums at Hueneme Beach near Halaco's smelters, was among the people who complained to whomever would listen. She and her neighbors signed petitions, took notes on what they saw and even manned picket lines with signs that said, "Halaco, You Stink."

"I think that somebody dropped the ball, and I checked and it wasn't my job," Greenstreet said. "But it's like anything, you have to make noise to get the government to pay attention. It just took a while a long while."

When the company pulled up stakes and declared bankruptcy three years ago, many were not surprised that taxpayers might end up paying for the cleanup.



Ventura Star Sunday, June 3, 2007  
Halaco: What went wrong?



Kesa Ryono and her daughter Dharma Murphy, 10, at Hueneme Beach near their home. Ryono is one of many people in neighboring condominiums who worked to stop Halaco from polluting.

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Kesa Ryono, 44, a single mother of two, worked for years to draw attention to the problems created by the company.

"I knew they'd declare bankruptcy," Ryono said. "You could just tell by looking at the plant that they weren't putting any money into it. I didn't have any hope that they'd stay and do the right thing."

### Pickleweed and pollution

Halaco changed its operation little during the four decades it was open in Oxnard.

The company melted tens of millions of aluminum cans, magnesium aircraft parts, engine parts and borings from metal fabricators.

The kind of pollution it created in the 1960s was the same kind of pollution it created until it closed its doors in 2004, reports by several regulatory agencies show.

Throughout its existence, more than a dozen government departments nipped at Halaco's tail. None ever brought the company to heel, but it wasn't for lack of trying.

The Los Angeles Regional Water Quality Control Board's file on Halaco has more than 40,000 pages of reports, memos, letters and records of attempted enforcement actions.

The EPA's files are equally voluminous.

There are also boxes of dusty files at the Ventura County Air Pollution Control District, Oxnard Fire Department, Ventura County Environmental Health Department, state Department of Fish and Game, U.S. Fish and Wildlife Services, U.S. Army Corps of Engineers, state Department of Toxic Substance Control and state Coastal Commission.

"There is a pendulum that swings back and forth between working with people (at a business) to get them into compliance and using enforcement," said Jonathan Bishop, executive officer for the Los Angeles Regional Water Quality Control Board. "Looking back, I think we went too far in the direction of working with them (Halaco)."

When the agencies tried to be more aggressive, Halaco sued.

In 1979, the U.S. Army Corps of Engineers tried to stop Halaco from dumping waste into what it called a wetland on the north end of Halaco's property. Art Fine, the company's attorney and son of its co-founder, Les Fine, sued. The agency dropped the effort, and stopped referring to it as a wetland.

Two years later, the California Department of Toxic Substance Control found the company's waste exceeded state limits for copper and zinc. Fine sued again. The department responded by exempting Halaco from the limits on copper and stopped referring to the company's waste as "hazardous."

When the California Coastal Commission argued in the early 1980s that Halaco needed a permit to operate in the coastal zone, Fine sued again. The case went to the state Supreme Court, where Halaco won.

In 2001, David Nahai, chairman of the Regional Water Quality Control Board, marveled at Halaco's litigiousness, telling Fine, "You said that during the last decade, you've (Halaco has) been subject to investigation and inquiry and criticism and even worse by a number of agencies and by a number of governmental entities. Wouldn't it be easier to comply?"

Several government officials attribute the company's ability to continue its operations to Art Fine's skill in the courtroom.

## Ventura Star Sunday, June 3, 2007 Halaco: What went wrong?

Ventura Deputy District Attorney Mitch Disney, who successfully prosecuted the company for violating air pollution rules in 2003, said Fine was always well-prepared and often knew the regulations better than the regulators.

But another attorney, Daniel Cooper, who is representing the Environmental Defense Center and Santa Barbara Channelkeeper in a civil suit against Halaco, said Fine was "lucky."

Fine said his success had little to do with skill or luck.

"We weren't violating any laws and regulations that applied, and we demonstrated that in court, whether it was against the EPA or the Department of Toxic Substance Control," he said.

Halaco's problems with government agencies had more to do with changing times, said Marvin Burns, an attorney now representing 92-year-old Clarence Haack, company co-founder. The company started operating before the state's passage of the Coastal Act, before the federal Clean Air Act, the federal Clean Water Act, and the federal Endangered Species Act.

And not all of Halaco's neighbors had problems with the plant. Jim Measures, personnel director for the paper recycling company when it was owned by a different company, said Halaco wasn't so bad.

"I'm not a doctor or a scientist so I couldn't tell you if the fumes were dangerous," said Measures. "I'm a glass-half-full kind of guy. I don't buy into that conspiracy stuff."

But the company couldn't win over everyone and the persistent complaints began when Halaco started its operations and didn't end until the company closed.

### A history of problems

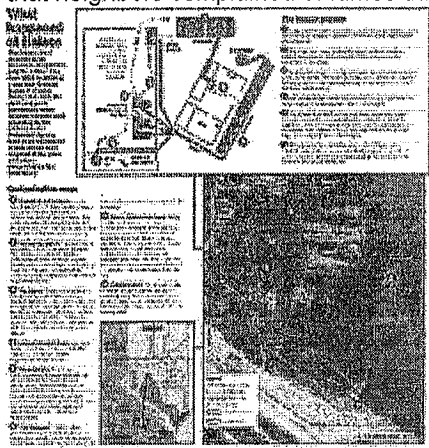
As far back as the mid-1950s, when the company was in Gardena, Halaco had problems.

The Los Angeles County's Industrial Waste Division told Halaco in 1955 that its wastewater loaded with ammonia and a long list of metallic oxides couldn't be discharged into local waterways.

Just as it did in Oxnard, the company had permits to recycle magnesium alloyed with radioactive thorium. But, according to a 1997 Nuclear Regulatory Commission document, Halaco didn't dispose of the waste properly and likely contaminated the Gardena Harbor dump in the late 1950s.

Halaco moved to Oxnard because of complaints by neighbors in Gardena, according to court records. Company officials thought the Perkins Road site would allow them to dump Halaco's waste in the ocean and be far enough away from people to avoid problems.

But problems with the company emerged here as soon as the Halaco began operations. Records show that neighbors complained of fumes throughout the 1960s.



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It wasn't just fumes, either. In a 1970 study, state biologists placed fish in water taken from the canal next to the plant. The fish died in 10 minutes. Halaco challenged the study, arguing that the ammonia that presumably caused the toxicity came from nearby farm fields.

The Regional Water Quality Control Board stopped the company from dumping its wastewater directly into the Oxnard Industrial Drain in the 1970s. To deal with its waste, the company began pumping it into a settling pond where the water would evaporate, leaving solids that were scooped out and added to a growing pile of dust-like waste.

Halaco: What went wrong?

In a 1981 EPA survey, crews noticed that "freshly deposited solids ... were observed to produce heat, emit crackling sounds, and produce gases."

The stuff smelled of ammonia and remained hot and "reactive" for up to half a year. When the EPA attempted to stop Halaco from dumping the waste, the company sued and succeeded in getting the federal agency to back off.

Despite those early studies, the Regional Water Quality Control Board sent a letter to Halaco in the mid-1980s, noting that its waste was essentially "inert."

Ten years later, the board reversed itself and said the waste contained "hazardous substances."

Halaco's studies stated that the waste was a "harmless product and demonstrates a remarkable lack of toxicity." In the mid-1980s, a lab hired by Halaco went so far as to rub the waste on shaved rabbits and feed it to rats to show it had no ill effects.

Co-founder Les Fine referred to the waste as "salts and dirt." Five years ago, Dave Gable, the former general manager, said that radiation in the pile was of such a low level that a person "could have slept on a sheet of it all of your life and not had a problem."

**Neighborhood fixture**

Halaco's waste pile was right next to wetlands, a football field away from the beach and a few blocks from the neighborhood where Mike Johnson grew up.

As kids in the 1970s, he and his friends used to play there.

"The Halaco site had been a city dump beforehand so we'd find all kinds of old jars and glass bottles," said Johnson, who works on a tugboat at the Port of Hueneme.

Sometimes the boys would come across chunks of metal or pots of slag hissing and crackling as they cooled in what Halaco workers referred to as "the boneyard," just north of the waste pile.

As Johnson got older, he started surfing in front of Halaco. Surfers would run across the waste pile or wade through the mucky lagoon next to the plant to get to the beach.

At home, Halaco's presence could be felt when the wind blew in the right direction.

"It was a pretty nasty," said Johnson, who said as a kid he would get two or three bad bouts of bronchitis each year.

When Halaco ran its massive silo-sized tumblers to wash the chunks of scrap metal and dirt-like leftovers from previous smelting, thuds would echo through South Oxnard. It sounded like a huge dryer into which someone had dropped bowling balls, said David Swingler, who lives about two miles from the plant.

Swingler, a father of 10 who started taking long walks in the 1990s as therapy for a back problem, was quickly drawn to the mound. He noticed all sorts of debris when walking along the edge of the mound.

"Hundreds and hundreds of automobile engine parts, door handles little pieces of machines," he said. "Millions of broken bits of everything."

Once he walked along the top of the pile, smelling what he thought was muriatic acid. What he saw astounded him: a lake in the middle of the pile off of which wafted fog.

"It smelled acidic and I walked through the fog without breathing, but halfway through it my eyes started burning," he said. "I thought, Whoa, that's a whole pond of acid there.' "

About 20 minutes later the skin on one arm and the side of his face where the fog had hit burned and were red, he said.

Over a 15-year period from 1989 to 2004, the Ventura County Air Pollution Control District received 322 complaints concerning Halaco. The company consistently was the target of more air nuisance complaints than any other county business, said Keith Duvall, manager for compliance and engineering for the district.

Looking back now, Mike Johnson said he isn't surprised by how Halaco operated.

"It's a testament to big money," Johnson said. "There's a whole lot back then that could have been done. But frankly we were from a lower economic class, a working-class neighborhood, and there were more pressing concerns."

**The Halaco series**

**Today:** Halaco Engineering operated at Ormond Beach for 40 years despite years of complaints from neighbors.

**Ventura Star Sunday, June 3, 2007**  
**Halaco: What went wrong?**

**Monday:** The EPA has stepped in to figure out how to clean up a mountain of contaminated waste. Also, former employees, like Gary Howe, right, were not surprised the company closed.

**About this series**

After the U.S. Environmental Protection Agency recommended including the site of the shuttered Halaco Engineering company smelting operation on a list of Superfund hazardous waste cleanup sites in January, Ventura County Star Staff Writer Scott Hadly began digging into what led to the contamination at the south Oxnard property.

He spent five months combing through court documents and thousands of pages of local, state and federal enforcement files. He contacted more than 100 people, including former employees, government regulators, attorneys and neighbors of the old metals recycling company. About 50 of those individuals were interviewed for these stories.

Hadly details how the company fended off regulators for 40 years, which frustrated some people who lived and worked near the plant.

Ventura County Star June 4, 2007  
HALACO Series Mountainous Mess Uncertain

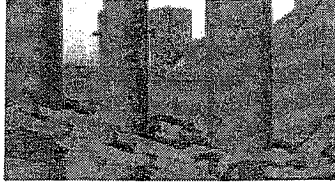
Future of Halaco's mountainous mess is uncertain

Environmental Protection Agency officials have taken charge of the polluted property

By Scott Hadly (Contact)

Monday, June 4, 2007

The Halaco Files



Visit our Halaco Web site for more information and background on the Halaco site.

[VenturaCountyStar.com/halaco](http://VenturaCountyStar.com/halaco) »

Stories in this series

**DAY 1**

Halaco: What went wrong?

Costly cleanup process has many steps

Halaco's history

About this series

**DAY 2**

**Future of Halaco's mountainous mess is uncertain**

**Dirty, dangerous job for workers**

Al Sanders carefully trudged through the flowering yellow beach primroses along the edge of the Ormond Beach dunes where endangered least terns and snowy plover make their nests.

Sanders, his hair tied back in a stringy ponytail and a camouflage baseball cap on his head, stopped about a softball pitch away from what he'd been walking toward for 15 minutes what you couldn't ignore even from a mile away.

"Look at it," he said, scrunching his nose under slightly opaque glasses on a sunny day last month. "It's as big as the pyramids of Giza."

Halaco's slag heap rises four stories out of the Ormond Beach wetlands on the south side of Oxnard.

The 28-acre pile, and a collection of rust- and graffiti-covered buildings on an adjacent 11-acre plot, are what company officials left behind when Halaco went bankrupt and closed three years ago.

The Environmental Protection Agency stepped in earlier this year, not long after the company began liquidating its meager assets.

Spending more than \$5 million, the EPA's emergency response crews have carefully graded the mountain of waste laden with metals and radioactive isotopes. They pulled back its crumbling edges, covering the whole thing with a massive, tan jute blanket to prevent the contamination from seeping and drifting into surrounding wetlands, the Ormond Beach lagoon and the ocean beyond.

As Sanders stood marveling at the mound, an EPA worker putting in a fence around the property approached dressed in a hard hat, respirator and a white hazardous materials suit.

"You really shouldn't get any closer; it's not safe here," the worker said after pulling down his mask.

"I've been coming out here just about every day for 20 years," said Sanders, a Sierra Club member who works on wetlands restoration. "I guess I'm in trouble."

**A continuing risk**

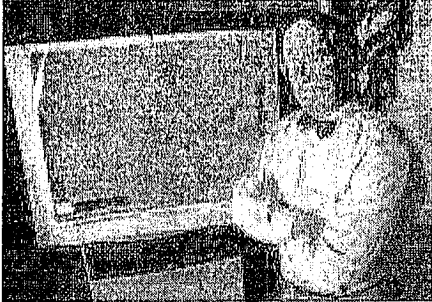
On a Sunday three weeks ago, Daniel Cooper watched somewhat amazed as two guys on motorcycles roared across the ridge of Halaco's old waste pile.

The wiry and aggressive environmental attorney with San Francisco-based Lawyers for Clean Water visited the shuttered Halaco facility, noting a gaping hole in the fence EPA had erected and the fresh graffiti on the old buildings.



Jason Redmond / Star staff Al Sanders of the Sierra Club stands next to Halaco in the wetlands he has worked for two decades to restore. The tan hill behind him is the jute-covered waste pile that he says is "as big as the pyramids of Giza."

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Photos by Jason Redmond / Star staff "Expense is not the issue. The question should be What's the right thing to do?" says Peter Brand, a senior project manager for the California Coastal Conservancy. Behind him is an aerial map of the Ormond Beach Wetland Restoration Project, on which he has worked for more than a decade.

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"Every time I go out there I see people," said Cooper.

For Cooper, the Halaco property still poses risks for people who use the beach and wetlands, not to mention the surrounding wildlife.

"I don't have particular examples of people dying of cancer after playing on the waste pile, but children playing around radioactive thorium and heavy metals and people fishing in the contaminated lagoon can't be good," he said.

That belief also gives Cooper a sort of avenging angel edge to his work.

Cooper filed a citizen's suit in federal court in November on behalf of the Environmental Defense Center and the Santa Barbara Channelkeeper. Unlike a suit filed in 2002 against Halaco, this one names the four former owners, Clarence Haack, his two grown sons, John and Robert, and the former general manager, David Gable.

"The Haacks can't walk away from this," said Cooper.

Adding up the claims and the associated daily fines attached to each claim could put the former owners on the hook for tens of millions of dollars in damages, potentially more money than Halaco generated in profits over the course of its existence, former company officials said.

"They won't be happy until we're broke, dead or both," said Gable.

Gable, a widower with an adult son who repeatedly had to be kicked off the grounds of the old Halaco plant by EPA workers after sneaking in to sleep, said he hasn't had an income for the last two or three years.

"I'm living off my Social Security and hoping that this will all blow over," he said.

The EPA is considering including the plant on a list of hazardous Superfund cleanup sites something Gable said he never saw coming.

#### Invited by Oxnard

"We thought we were doing the right thing," said Gable. "We were asked to take over that (Oxnard City) dump site. They (the city of Oxnard) asked us to come and that's why we always thought we were right."

He said he didn't believe the company had polluted the environment or left behind hazardous material.

Printer friendly

Ventura County Star June 4, 2007  
HALACO Series Mountainous Mess Uncertain

In a short interview, 92-year-old Clarence Haack, who until late last month continued to go to his cluttered office at the closed Halaco plant, said he had cooperated with the EPA and attempted to find a solution to the cleanup issue. Since the EPA swooped in and took control of the old plant, what happens next is out of his hands, he said.

The company is under bankruptcy protection, which requires each government agency to file claims for the potential cleanup costs in U.S. Bankruptcy Court. The state of California's claim alone amounts to more than \$19 million. But the EPA and the state essentially have to get in line with every other creditor for what will in all likelihood be pennies on the dollar.

Over the summer, attorneys with the EPA sent each of the four former owners notices saying they were "potentially responsible parties," a designation that could put them on the hook for the costs of cleanup.

In court documents filed in Cooper's case as well as in the bankruptcy case, there are allegations that the Haacks and Gable took Halaco assets a furnace, customer lists and the company's technology for recycling the material to Tennessee. There, they have started another company, MagPro, to recycle magnesium.

Gable said that's not true. Although it has offices and a handful of employees, MagPro isn't really up and running.

The company declared bankruptcy because it ran out of money, not to escape responsibility, Gable said. "It's not like we thought we were getting away with something," he said.

Now that the company is gone and the federal government has stepped in, there are hopes the mountain of waste and beat-up buildings will be hauled away.

In late May, a scrap company out of Los Angeles began cutting up the big pieces of metal that remained at the plant and weren't coated with contamination. Workers had to char some of the scraps with gusts of fire to burn off the hazardous residue, but much of the material was too contaminated to take.

### Hope and frustration

Fresh from a tour of the site several weeks before, Peter Brand, a senior project manager for the California Coastal Conservancy, explained the pent-up hope mixed with frustration that a lot of people feel.

"I know for me and my colleagues, we walked away with a sense of anger," said Brand, who has worked for more than a decade on an effort to restore the Ormond Beach wetlands surrounding the property. "There's an element of environmental justice here. The people of Oxnard for many decades have lived with this mess that has contaminated their wetlands, possibly contaminated their community, and possibly poisoned some of the residents who worked at Halaco. And no one came to help for decades.

"Some people tried and they weren't successful and a lot of people are not going to be happy if they're told it's too expensive to remove the pile," Brand said. "Expense is not the issue. The question should be What's the right thing to do?"

The history of inaction at the site doesn't engender confidence among some residents.

At a recent meeting of local activists working on issues surrounding the Ormond Beach wetlands, Tisha Munro, a botanist with the California Native Plant Society, was concerned the company would be able to flimflam the government.

"I'm worried they're going to leave and force taxpayers to pay for the cleanup, and in the end the land will be developed for houses," she said.

The future of this remote corner of Oxnard is far from clear.

Unofficial estimates for the cost to clean up the old plant range wildly from \$10 million to \$70 million and even more.

There are 1,304 other Superfund sites across the country. The account to clean them up is overcommitted, and the federal government may be unable to save the day here, as some local politicians and activists hope.

The nonprofit and nonpartisan Center for Public Integrity recently detailed how the Superfund program is starved for cash.

"Just because a site makes the list doesn't mean it's going to be cleaned up," said Joaquin Sapien, a researcher with the group.

Sapien said there are many sites with "very pressing" pollution that have been on the list for almost two decades.

The Superfund was created in 1980 through the Comprehensive Environmental Response, Compensation and Liability Act. The trust fund set up to pay for cleanup of those sites came from a tax on polluters, but when the tax expired in 1995, Congress did not renew it.

### A scramble for funds

Since then, the \$3.5 billion in the trust account has slowly dried up. What's left amounts to "couch change," from what federal officials are able to collect from the companies responsible for the pollution, Sapien said.

This has forced the EPA into a sort of triage of hazardous waste cleanup, delaying work and looking for the cheapest options, according to the research done by the Center for Public Integrity.

Peter Guria, chief of the EPA's emergency response program in the western U.S., speculated that the size of the Halaco waste pile limited options. Whatever is ultimately done it will have to ensure the waste doesn't move into groundwater or surface water, he said.

"More than likely it's so large that it would be cost-prohibitive to move it," Guria said on a visit to Halaco in early March.

Even if the EPA finds the money and decides to haul the mess away, it could take a decade or longer to do the work.

Back at the base of the Halaco waste pile, Sanders ruminated on the different possibilities for the land.

With his binoculars at the ready to spot the dozen or so species of waterfowl and other birds that darted in and out of the stands of mule fat and bulrush in the wetlands nearby, he shook his head as he looked over at the barren mound of waste.

"I'm not so sure this will have a happy ending," said Sanders.





# League of United Latin American Citizens

Dave Rodriguez, California State Deputy Director

P.O. Box 23291 Ventura, CA 93002

805-258-1800 daverodriquez80@hotmail.com

Over 80 years of advocacy on behalf of the Latino community

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Sunday, May 24, 2009

Re: City of Oxnard, 2030 Plan - Modification Request

- Ormond Beach

CITY OF OXNARD

MR. CHRISTOPHER WILLIAMSON

e-mail: CHRIS.WILLIAMSON@CI.OXNARD.CA.US

SENIOR PLANNER

214 SOUTH "C" STREET OXNARD, CA 93030

DEAR MR WILLIAMSON;

**LULAC MISSION STATEMENT:** The Mission of the League of United Latin American Citizens is to advance the economic condition, educational attainment, political influence, housing, health and civil rights of the Hispanic population of the United States.

Based on our Mission Statement and responsibilities, we respectfully request the City of Oxnard's 2030 Plan be modified to treat the area as a historic treasure. Our research shows a Chumash Indian Village thrived on Ormond Beach and is thought to have existed for more than a thousand years. This historic issue is another reason the Ormond Beach Wetlands should be restored and protected as a state or national preserve/park land.

Allowing any further building on the coastal side of Hueneme Road in the Ormond Beach area would be a travesty to our citizens. The only possible construction that should be permitted after the clean up and restoration, would be for a visitor's center with a museum expressing the history and explain the habitat of Ormond Beach Wetlands and possibly a nature board walk so visitors can view sensitive areas without leaving a footprint.

This area represents an important period in our history and it must be preserved for the use and benefit of our citizens. If properly developed; Ormond Beach will become nationally known wetlands that could be an important destination when visitors come to Southern California.

- Oxnard enjoys a 60 – 70% + ratio of Hispanics, many of which are in the lower income levels. It has been stated that; *"California has the highest concentration of minorities living near hazardous waste facilities in the U.S"*.
- The Oxnard area has a very high ratio of Latinos and the most hazardous waste sites per-capita. In addition LULAC believes that this is an issue of environmental justice.
- The Ormond Beach Wetlands area is an essential element in protecting our legacy and future. LULAC has joined a coalition of likeminded environmental and social justice organizations and our coalition has drafted the below "HALACO/Ormond Beach Wetlands Wish List:

**Environmental Coalition HALACO/Ormond Beach Wetlands Wish List:**

1. All of the current wetlands property changed from private to public ownership, by eminent domain if necessary
2. Revision of Oxnard 2030 Plan Zoning from industrial to resource protection/ESHA. "*Environmental Sensitive Habitat Areas.*"
3. Expedite demolition of Halaco plant.
4. Expedite removal of slag heap and waste settlement ponds.
5. Removal of non-native species.
6. Restoration to natural state.
  - Convert Ormond Beach Wetlands area into a Protected Habitat State or National Park
7. Ownership or management by a conservancy.
8. Protection of habitat and wildlife.
9. Remove one block of Perkins road and parking lot so riparian up land can be continued from Hueneme Road through the Halaco site.
10. US EPA Region 9 place into action the 1994 Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations."  
<http://www.epa.gov/oswer/ei/html-doc/execordr.htm>
11. Establish a: "Jean Harris, Cynthia Leake, Roma Armbrust Memorial Ormond Wetlands Visitors Center"

LULAC and other organizations are currently pursuing plans to expedite "quick start" the EPA Super Fund Cleanup of the Halaco Smelter, slag pile and old waste ponds. It would be a sad tragedy to have the area restored only to have commercial buildings constructed on this valuable public resource.

Please take our issues into account and modify the Oxnard City 2030 Plan. Anything we can do to assistance you, do not hesitate to call us.

Cordially,

Dave Rodriguez,  
California LULAC Deputy Director

cc:  
LULAC State Director - Argentina Davila-Luevano  
Senator Barbara Boxer  
Senator Diane Feinstein  
Congresswoman Lois Capps  
California Lt. Governor John Garamendi  
California Attorney General Jerry Brown  
State Lands Commissioner John Chiang  
State Senator Fran Pavley  
California Speaker of the House Karin Bass  
Assemblywoman Julia Brownley 41st AD  
Assemblyman Pedro Nava

Mexican American Bar Association "MABA"  
Coastal Conservancy –  
Environmental Defense Center  
Sierra Club  
Coastal Alliance United for a Sustainable Economy  
"CAUSE"  
Coastal Advocates – Susan Jordan  
Pacific Environment – Rory Cox  
Beacon Foundation – Jean Rountree  
Saviors Road Design Team – Larry & Shirley Godwin  
Earth Alert – Janet Bridgers  
Oxnard College Marine Center – Dee Anderson  
Rebecca Carlson - Marine Biology teacher-  
Saint Bonaventure High School  
CINMS - Channel Islands National Park & Channel  
Islands National Marine Sanctuary - Chris Mobley -  
Superintendent

June 17, 2009

California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street  
Los Angeles, CA 90013  
ATTN: Man Voong

*Transmitted via e-mail to mvoong@waterboards.ca.gov*

**Subject: Comments on Proposed 2008 303(d) list**

Dear Mr. Voong:

The participating members of the MOA Management Committee, the parties implementing TMDLs in the Calleguas Creek watershed, appreciate the opportunity to comment on the proposed 2008 303(d) list. In addition to a few general comments we feel there are a number of constituents that should be re-categorized on the 303(d) list. This letter provides a summary of the group's comments on the proposed 2008 303(d) list and additional comments previously submitted during the 2006 review detailing incorrect initial listing processes and the inappropriate application of objectives found in the Water Quality Control Plan for the Los Angeles Region (Basin Plan).

In general we are supportive of the list and the changes made to the 2008 list. However we have three specific comments for the Regional Water Board staff's consideration:

1. A number of waterbody/pollutant combinations are listed as still requiring TMDLs (category A) when they are covered by a USEPA approved TMDL.
2. The information provided to support the trash listing in Arroyo Simi is being resubmitted by the Ventura Coastkeepers to correct errors identified during the data review. We request your consideration of the revised data to ensure consistency with the Listing Policy.
3. Comments on the 2006 list that were not addressed during that listing cycle, but remain as issues on the 2008 proposed list.

#### **INCORRECT CATEGORIZATION OF WATERBODY/POLLUTANT COMBINATIONS**

In 2006, a number of listings were placed on the 303(d) list for Organochlorine Pesticides. These listings were based on information developed during the preparation of the Calleguas Creek Watershed Organochlorine Pesticides and PCB TMDL that demonstrated that some additional reaches had data that supported additional impairments. In 2006, the State Board included these additional impairments on the 303(d) list because an USEPA approved TMDL was in effect. The Fact Sheets for the constituents listed in Table 1 for the 2006 list from the

SWRCB included the following language as the rationale for including the constituents on the list:

*"After review of the available information for this recommendation, SWRCB staff conclude that the water body pollutant combination should be placed in the Water Quality Limited Segments Being Addressed category of the 303(d) list because a TMDL has been approved."*

Based on this rationale, we request that the following listings be changed from category A to category B in the 2008 list. Table 1 summarizes the listings.

**Table 1. 2008 OC and PCB TMDL Constituents to be moved to Fact Sheet Category B**

Reach	Water Body	Constituent 2008 List	Current Category	Correct Category
1	Calleguas Creek	Endosulfan (tissue)	A	B
2	Calleguas Creek	ChemA (tissue)	A	B
2	Calleguas Creek	Endosulfan (tissue)	A	B
4	Calleguas Creek	ChemA (tissue)	A	B
4	Calleguas Creek	Endosulfan (tissue & sediment)	A	B
5	Calleguas Creek	ChemA (tissue)	A	B
5	Calleguas Creek	Dacthal (sediment)	A	B
5	Calleguas Creek	Endosulfan (tissue & sediment)	A	B
9A	Calleguas Creek	ChemA (tissue)	A	B
9A	Calleguas Creek	Endosulfan (tissue)	A	B
9A	Calleguas Creek	Lindane/gamma-HCH (tissue)	A	B
9B	Calleguas Creek	ChemA (tissue)	A	B
9B	Calleguas Creek	Endosulfan (tissue)	A	B
10	Calleguas Creek	ChemA (tissue)	A	B
10	Calleguas Creek	Endosulfan (tissue)	A	B
11	Calleguas Creek	ChemA (tissue)	A	B
11	Calleguas Creek	Endosulfan (tissue)	A	B
13	Calleguas Creek	ChemA (tissue)	A	B
13	Calleguas Creek	Endosulfan (tissue)	A	B

Additionally, the USEPA approved TMDL for salts (effective December 2, 2008) addresses the boron, sulfate and TDS listings in Fox Barranca, a tributary to the Calleguas Creek watershed. We request that the following listings be moved from Category A to Category B based on the same rationale as expressed in the fact sheets for the other reaches of the Calleguas Creek watershed which will be addressing the salts issue on a watershed scale approach. Table 2 summarizes the listings.

**Table 2. 2008 Salts TMDL Constituents to be moved to Fact Sheet Category B**

Water Body	Constituent List	Current Category	Correct Category
Fox Barranca	Boron	A	B
Fox Barranca	Sulfates	A	B
Fox Barranca	TDS	A	B

### TRASH LISTING IN ARROYO SIMI

We would like to support the recent Ventura Coastkeepers (VCK) re-submittal of data used as the basis for the trash listing in the Arroyo Simi. Members of the MOA group identified a discrepancy in the data available on the fact sheet (Decision ID 10423). VCK staff have since identified the errors and revised the data sheet to accurately reflect the conditions observed in Reach 7 (Arroyo Simi) during the 2006 sampling period. We are supportive of this data submission and appreciate VCK staff working in a cooperative effort to help identify and revise the data. We appreciate the VCK taking a proactive approach to ensure that data is accurate and correct, and support Regional Water Board staff accepting this revised data.

We request, in light of the re-submittal of the data, that the Regional Board staff consider the information in the context of the State's Listing Policy. The FED for the Listing Policy (page 90) discusses the need to use both numeric and non-numeric data for determining a trash listing. We request that the decision to list trash be based on consideration of both numeric and non-numeric data as discussed in the FED. Although not available for review, we would request that the listing in Arroyo Simi only be listed if the resubmitted data includes one or both of the following non-numeric types of information that can be used to verify the numeric values for trash. Additionally, we request that the following information be a requirement of any data submittal used as the basis for a new trash listing, and that the information be available for review during the review process:

1. **Photographic or Other Documentation Providing Evidence of the Impairment** - By utilizing photographic information in the listing, the Regional Board will be better able to identify specific locations of the impairment and possibly better identify sources of impairment. Beyond the TMDL development stage, by having more detailed information contained in photos, this would assist in the development of implementation plans. If photographs are not available, field logs, survey forms, or other information should be provided to ensure the submitted results are verifiable by the SWRCB or RWQCB as required by the Listing Policy.
2. **Specific Trash Details** - Having more specific data beyond the general trash category will further assist in the development of the TMDL and the subsequent TMDL implementation effort. This information would greatly assist in both phases of the TMDL process.

The following comment was submitted during the 2006 review:

***"Calleguas Creek Reaches 4 (Revolon Slough) – Trash***

*In 1996, trash was listed based on the 1996 WQA. The 1996 trash listing in Reach 4 in the WQA reads as follows: "Trash". However, there is no reference to where or when the data were collected or who collected the data...The categories used for assessing field observations of trash included "none, trash observed, and significant amount of trash observed" (Table 9 of 1996 WQA). However, no objectives are*

*expressly stated and it is unclear whether the "trash observed" and/or "significant amount of trash observed" categories represented an exceedance of an objective."*

During our last review, the group had extensive issues in trying to obtain the original data submitted for the Revolon Slough/Beardsley Wash Trash listing. We appreciate the new approach utilized for the 2008 listing procedure with associated fact sheets that include the listing data available for review. However, we feel that data used to justify listings for impairments like trash require supporting documentation to ensure the observations are verifiable. The Regional Board needs to ensure the re-submitted data meets these requirements prior to listing trash in the Arroyo Simi.

Should Regional Board staff decide that the information is sufficient for listing per the Listing Policy requirements, we request that the listing be placed on the list with a characterization of Category C-Being addressed by action(s) other than a TMDL. As stated in the FED (page 90), the recommended alternative for addressing trash is:

"Identify trash as a problem using numerical data and non-numeric information (as described in Alternative 2) but allow existing programs to address any identified water-related trash problem."

To allow the trash problem to be addressed by an existing program, the FED provides the following guidelines for making the determination:

- A regulatory program has been adopted and is being implemented by another state, regional, local, or federal agency, and the program will correct the impairment.
- Sufficient mechanisms exist to provide reasonable assurances that the program will address the impairment in a reasonable period of time.
- Sufficient mechanisms to enforce the program exist or the RWQCB otherwise has sufficient confidence that the program will be implemented.
- Water quality standards attainment can be demonstrated through an existing monitoring program or a future monitoring program with reasonable assurance of implementation.
- The program contains conditions that require trackable progress, and such progress is tracked.
- For alternative programs intended to control non-point source contributions to an impairment, such programs comport with the requirements of the Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program, including, but not limited to, the Key Elements of an NPS Pollution Control Implementation Program (SWRCB, 2004a).

The FED specifically acknowledges that storm water permits and associated Storm Water Management Plans (SWMP) are an existing program that can be utilized for justifying this categorization.

"If trash is a nuisance in water bodies of the State and storm drains are the major source, then existing storm water permits could be used to reduce the trash discharged via storm drains."

The recently adopted Ventura County Municipal Storm Water NPDES Permit contains a number of provisions to address trash that can be utilized to address the trash impairment.

- Catch basin prioritization, inspection, and cleaning based on the amount of trash generated.
- Trash management at public events.
- Trash can installation and maintenance in high trash generation areas.
- Trash excluder installation on catch basins or conduct alternative BMPs to reduce trash discharges to receiving waters within two years.

These provisions are sufficient to categorize the trash listing in Category C on the 303(d) list. The permit is an adopted regulatory program that is enforceable by the RWQCB, contains a monitoring program, and reporting programs that demonstrate progress and the provisions will address discharges of trash to the Arroyo Simi within a reasonable amount of time.

### **2006 COMMENTS**

During the 2006 303(d) list review, stakeholders from the Calleguas submitted comments concerning specific listings in the watershed, some of which have been addressed since that review. We feel the following comments were not adequately addressed and would like Regional Water Board staff to consider the following comments during the review process for the 2008 list. These comments pertain to waterbody/pollutant combinations that were listed prior to 2002 and for which the original listings were not reviewed for consistency with the Listing Policy.

In the 2006 303(d) listing process, the State Board had appropriately taken the approach of reevaluating existing listings based on the newly established Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy) to identify faulty listings. We strongly supported this approach and the majority of the comments in the letter sent in 2006 and this letter are based on the examination of readily available information in the administrative record for the 303(d) lists developed in 1996, 1998, and 2002. We believe this information was available to the State Board during the development of the 2006 list and should have been considered during the listing cycle for identifying faulty listings as was done for other waterbodies throughout the state.

The listings developed for Region 4 in 1996, 1998, and 2002 are based on the following documents generally referred to throughout this letter as Water Quality Assessments (WQA):

- LARWQCB 1996 Water Quality Assessment and Documentation (WQA)
- LARWQCB 1998 Biennial Listing of Impaired Surface Waters Pursuant to the Clean Water Act, Section 303(d)
- LARWQCB 2002 Update: Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters – Los Angeles Region

Table 3 presents a summary of the comments outlined in the 2006 letter, excluding the comments we feel were addressed. The remaining portion of this letter provides the detailed discussion supporting the reasons for delisting pollutant reach combinations in Table 3.

**Table 3. Summary of Comments**

Reach	Constituent	Reasoning for delisting
4	Chlorpyrifos in Fish Tissue	The original listing was based solely on an EDL. The Listing Policy does not allow the use of EDLs in listing or delisting decisions. Additionally, the data do not exceed the chlorpyrifos screening value of 10,000 ug/kg set for the protection of human health from the consumption of fish/shellfish.
5	Chlorpyrifos in Fish Tissue	The listing in Reach 5 was based on the data collected in Reach 4 and should be considered for delisting for the same reasons.
5	Dacthal in Sediment	In 2002 dacthal was delisted in sediment and fish tissue for all reaches of the CCW except for Reach 5. The Regional and State Boards recommended delisting dacthal in sediment because there are no approved valid approved guidelines for Dacthal.

**CCW Reach 4 (Revolon Slough) – Chlorpyrifos in Fish Tissue**

In 1996, chlorpyrifos in fish tissue was listed based information presented in the 1996 WQA. The 1996 listing of chlorpyrifos in fish tissue in Reach 4 in the WQA reads as follows: "Tissue ('93): chlorpyrifos (EDL95)<sup>3</sup>". The "3" references that the data were collected through the California State Water Resources Board's Toxic Substances Monitoring Program (TSMP). The EDL95 (Elevated Data Level 95%) represents the "standard" that was exceeded. Table presents fish tissue data collected by the TSMP in 1993 that are the basis for the 1996 listing. These data were collected on Revolon Slough at Wood Road from a combined sample of 22 *Pimephales promelas*. Additional data, presented in Table 4 were collected on Revolon Slough at Wood Road in 1994 and 1997.

The chlorpyrifos in fish tissue listing should be removed from the 303(d) list based on section 4 of the Listing Policy. The Listing Policy calls for the delisting of waters if the decision is found to be faulty and it is demonstrated that the listing would not have occurred in the absence of such faulty data. The original listing was based solely on an EDL. The Listing Policy does not allow the use of EDLs in listing or delisting decisions.

Additionally, the data used for the listing are well below the chlorpyrifos screening value of 10,000 ug/kg for the protection of human health from the consumption of fish and shellfish presented on page 8 of the Draft Staff Report Supporting the Recommended Revisions to the Clean Water Act Section 303(d) List Volume 1.



Based on the readily available data and information presented in the 1996 and 1998 WQAs, the weight of evidence indicates that there is insufficient justification for maintaining the chlorpyrifos listing in fish tissue. As such, the Reach 4 chlorpyrifos listing in fish tissue should be removed from the 2006 303(d) list.

**Table 4. Summary of Chlorpyrifos Fish Tissue Data Collected by the TSMP in Revolon Slough at Wood Road**

Sample Date	Wet Chemical Tissue Concentrations	Lipid Weight Organic Chemical Tissue Concentrations
6/20/1993	<b>100 ug/kg</b>	1900 ug/kg
6/23/1994	10 ug/kg	166 ug/kg
7/16/1997	18 ug/kg	250 ug/kg

**Bolded** indicates results believed to be the basis for the listing

**Note:** *Pimephales promelas* (fathead minnow) was the test species.

#### **CCW Reach 5 (Beardsley Channel) – Chlorpyrifos in Fish Tissue**

The listing of chlorpyrifos in fish tissue in Reach 5 is based on data collected in a different reach and an incorrect initial listing process. Tissue samples were never collected in what is now Reach 5. In 1996, the final 303(d) List considered Reaches 4 and 5 as only one reach. In 1998, that one reach was split into two. It appears that when the reach was split, the 1996 listings were applied to both of the new reaches without considering that the data were collected in Reach 4. The listing is based on data collected downstream from this segment and is not representative. Additionally, as discussed in the previous section, the Reach 4 listing of chlorpyrifos in fish is faulty as it based on an EDL.

The Listing Policy calls for the delisting of waters if the decision is found to be based on faulty data and it is demonstrated that the listing would not have occurred in the absence of such faulty data. The data that was used for the original listing was collected in the downstream reach (Reach 4) and EDLs, which are considered to be faulty, formed the basis of the listing. As such, the Reach 5 chlorpyrifos listing in fish tissue should be removed from the 2006 303(d) list. In a similar case State Board staff recommended delisting cadmium in Ballona Creek because data collected in a downstream reach were applied inappropriately.

#### **Calleguas Creek Reach 5 (Beardsley Channel) – Dacthal in Sediment**

Based on Regional Board recommendations for the 2002 303(d) List, dacthal was delisted in sediment and fish tissue for all of the relevant listed reaches of the CCW except for Reach 5. The Regional and State Boards' recommendations for delisting dacthal in sediment in Reach 4, which is directly down stream of Reach 5, were as follows:

**Regional Board:** "Delist because there are no valid approved guidelines for Dacthal."

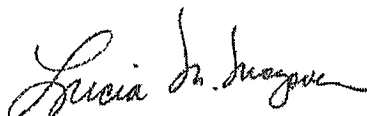
**State Board:** "After reviewing the available data and information and the RWQCB documentation for this recommendation, SWRCB staff conclude that the water body should

be removed from the section 303(d) list because approved valid guideline for Dacthal in sediment do not exist.”

Similar delisting recommendations were made for the removal of dacthal in fish tissue listings in the remainder of the Watershed: Reaches 4, 9A, 9B, 10, 11, and 13. As there are no sediment quality guidelines published in the peer-reviewed literature or developed by state or federal agencies for dacthal, the sediment listing for dacthal in Reach 5 should be removed from the 303(d) list.

Thank you for your consideration of these comments. If you have any questions, please feel free to contact Ashli Desai, Larry Walker Associates, at 310-394-1036 or via e-mail at [ashlid@lwa.com](mailto:ashlid@lwa.com).

Sincerely,



Lucia McGovern  
Chair, TMDL MOA Management Committee  
Parties Implementing TMDLs on the Calleguas Creek Watershed

c. Dr. Eric Wu, Los Angeles Regional Water Quality Control Board,  
[ewu@waterboards.ca.gov](mailto:ewu@waterboards.ca.gov)



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June 16, 2009

Attn: Man Voon  
Los Angeles Regional Water Quality Control Board  
320 Est 4<sup>th</sup> Street  
Los Angeles, California 90013

**Re: Proposed Revisions to the 303(d) List of Impaired Water Bodies for the Los Angeles Region**

Dear Mr. Voon,

Channelkeeper appreciates this opportunity to comment on the Los Angeles Regional Board's efforts to update the 303(d) List of Impaired Water Bodies. Channelkeeper has compiled a brief list of comments and recommendations, provided below, regarding a subset of water bodies and proposed listings throughout the Los Angeles Region. These comments are primarily limited to water bodies and proposed listings within the Ventura River Watershed where Channelkeeper can offer informed input based on our monitoring programs and experiential knowledge of this region. Please note, that a lack of mention of any proposed listings in the following pages does not constitute a lack of support for such listings. Generally Channelkeeper supports the Regional Board's efforts to document water quality impairments on the 303(d) list that are based on credible water quality monitoring data and sound evaluation criteria.

*San Antonio Creek*

Channelkeeper strongly supports the Regional Board's decision to list San Antonio Creek for indicator bacteria and total dissolved solids water quality impairments as well as the existing listing for nitrogen. These listings are supported by Channelkeeper's Stream Team citizen monitoring program data, which has been submitted to the Regional Board and cited as a line of evidence in making these determinations. San Antonio creek provides multiple benefits to the communities of Ojai and Ventura County. This creek flows through multiple residential neighborhoods and ranches. It is easily accessed by the public at multiple locations and frequently used for multiple forms of recreation including swimming. A deep pool exists immediately downstream of the confluence of San Antonio Creek and the Ventura River. Local community members regularly use this pool for swimming. San Antonio Creek also supports diverse riparian plant and animal communities. San Antonio Creek provides critical habitat for endangered steelhead trout, which have been observed there by biologists in recent years. In the summer of 2008 biologists counted over 200 steelhead smolts in this pool. It is imperative that these

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Susan Jordan ♦ Sherry Madsen ♦ Cindy Moore ♦ James Munro ♦ Tim Robinson ♦ Rafia Rork ♦ Holly Sherwin ♦ Robert Warner ♦ Paul Junger Witt



existing beneficial uses are protected and that impairments identified through water quality monitoring activities are included on the revised 303(d) list.

*Canada Larga Creek*

Channelkeeper strongly supports the Regional Board's decision to list Canada Larga Creek for total dissolved solids as well as the existing listings for fecal coliform. These listings are supported by Channelkeeper's Stream Team citizen monitoring program data, which has been submitted to the Regional Board and cited as a line of evidence in making these determinations. We note that for the purposes of consistency and clarity, the Regional Board should consider modifying the listing for 'fecal coliform' to 'E. coli' or 'indicator bacteria' since the data collected by Channelkeeper that supports this listing is in fact E. coli data. The Canada Larga Watershed has been extensively used for cattle ranching. Ranching activities have contributed significantly to water quality impairments. In-stream cattle enclosures regularly result in the transport of animal waste and sediment to Canada Larga Creek and the Ventura River. The ongoing removal of vegetation from hillsides and stream banks due to grazing activities results in increased sheet flow runoff during storms, which carries vast quantities of manure to the creek and causes significant erosion to stream banks. These impairments impact both the ecology of Canada Larga Creek itself as well as the beneficial uses of the lower reaches of the Ventura River. It is imperative that existing beneficial uses of Canada Larga Creek and the Ventura River are protected and that impairments identified through water quality monitoring activities are included on the revised 303(d) list

*Interpreting Narrative Objectives for Biostimulatory Substances*

Channelkeeper strongly supports the Regional Board's decision to develop a numeric evaluation criterion to interpret the Basin Plan Water Quality Objective for biostimulatory substances. The existing Basin Plan nitrate objective to protect domestic and municipal water supplies is not protective of aquatic ecosystems, and the lack of such numeric criteria has been one of the most critical limitations of the existing Plan. Channelkeeper looks forward to future opportunities to comment on the methodology and criteria proposed for development of future 303(d) listing guidelines.

~ ~ ~

Thank you for your careful consideration of these comments.

Respectfully,

Ben Pitterle  
Watershed Programs Director  
Santa Barbara Channelkeeper

3152 Shad Court  
Simi Valley, CA 93063  
May 18, 2009

CA Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street  
Los Angeles, CA 90013  
ATTN: Man Voong

Re: LOS ANGELES REGION INTEGRATED REPORT CLEAN WATER ACT  
SECTION 305(b) REPORT AND SECTION 303(d) LIST OF  
IMPAIRED WATER AVAILABILITY OF DOCUMENTS AND PUBLIC  
COMMENT PERIOD.

Dear Man Voong:

The following are my comments from a lay person's  
perspective for the Regional Water Board's consideration.

#1 - Page 2, it is stated in the legal NOTICE, under  
Background of the 2008 Integrated Report, in the  
first paragraph that "The Regional Water Board is  
proposing to revise the surface water quality  
assessment under Clean Water Act section 305(b)  
and the list of impaired water under Clean Water  
Act section 303(d) in a 2008 Integrated Report."

By revising the surface water quality assessment  
in 2009 for the 2008 Integrated Report, the  
Regional Water Board is in essence changing the  
dynamics of NPDES permits' requirements and other  
Orders approved for pollutants in discharges that  
are impairing waterbodies throughout the region.  
It would be a different picture if the Integrated  
Report stated something to the effect that  
beginning in XX XX, XXXX the proposed criteria  
(Table 3-2 Lakes: Nutrient Concentration and  
Biological Response Indicators Criteria Limits  
(Rivers and Streams), and Table 3-3 Rivers and  
Streams: Nutrient Concentration and Biological  
Response Indicators Criteria Limits(Lakes)) will  
be used after the Board public hearing.

- #2 - Since the Tables (Draft Integrated Report, Pages 13 and 14) information is inaccurate--Table 3-2 states "Lakes" yet the information is for "Rivers and Streams", and Table 3-3 states "Rivers and Streams" yet the information is for "Lakes"--even if I had the mathematical and technical knowledge to decide which of the mg/Ls and mg/m2s better protects the health of the: 1. public, 2. aquatic life, 3. wildlife, and 4. environment, I cannot comment because my support or opposition would be flawed.
- #3 - Even if I commented on the corrected criteria Tables, and even though it is stated on Page 2 of the Tentative Resolution, top of page, that "Regional Board staff responded to oral and written comments received from the public", there is no guarantee that my comments will be responded to by Regional Board staff. Example: I submitted 5 letters on the Ventura Countywide MS4 NPDES permit (3 by the deadline, and 2 within days of the deadline). Not one of my letters' comments were responded to by Regional Board staff. Many of my comments involved inaccuracies in the documents. It is stated also on Page 2 of the Tentative Resolution, last paragraph before the Executive Officer's statement, that "If during State Board's approval process the State Board determines that minor, non-substantiative corrections to the language of the report are needed for clarity or consistency, the Executive Officer may make such changes, and shall inform the Board of any such changes." The revised documents still contained the inaccuracies that my letters pointed out. The State Water Board is going to be considering corrections to the Calleguas Creek Watershed area's Nitrogen TMDLs. Thus, the Regional Board staff must revise the "Response to Comments" section of the April 30, 2009 Ventura Countywide MS4 NPDES permit.

The Regional Board staff's "Response to Comments" for the Boeing Company's Santa Susana Field Laboratory NPDES permit must also be revised to correct the misspelled name of commenter Ginn Doose--listed as "Moose" on Page 102 of 103.

- #4 - That there are 66 proposed new 303(d) listings in 35 waterbodies (Draft Integrated Report, Page 1, fourth paragraph) does not bode well for the Regional Board's responsibilities and actions. This means that enforcement continues to be a major problem in this region since according to the information on Page 19 (Draft Integrated Report) points to a number of "limitations". It is shameful that so many years have passed and just now the required Integrated Report is providing "the most complete 305(b) report for the Los Angeles Region" (last sentence, Page 19).
- #5 - I am opposed to delisting the Calleguas Creek Reach 4 (Revolon Slough Main Branch: Mugu Lagoon to Central Avenue) for Boron, Sulfates, and Total Dissolved Solids from the 303(d) list.
- #6 - I would have done a better job of addressing this extremely important subject, but already I have delayed commenting on the Department of Water Resources' Draft 2009 Water Plan Update's Volume 3 (Regional Report, specifically the South Coast) since the many draft tentative NPDES permits orders at the Regional Water Board level, and many State Water Board policies and plans that I have addressed have taken up a lot of time cross-referencing other documentation, though the information has all been priceless. Also, the Ex Parte Communications entanglement ate up a lot of my time as well. I have yet to hear from the Staff Senior Counsel from the State Water Board as to whether or not I violated the law. As long as this situation remains in limbo, I am being punished for participating in the public review and comment period because I have pointed out documents' incompleteness and inaccuracies, and in speaking out about defrauding of taxpayers.

Sincerely,

*Mrs. Teresa Jordan*

Mrs. Teresa Jordan



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

June 17, 2009

Man Voong  
Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> St, Suite 200  
Los Angeles, CA 90013

Dear Man Voong:

Thank you for the opportunity to comment on the Los Angeles Regional Water Board's draft 2008 Clean Water Act Section 303d list. We carefully reviewed the draft listing decisions and factsheets and we have concluded the vast majority of the assessment determinations are consistent with federal listing requirements. We write to support Regional Board staff recommendations to identify certain impairments as being addressed by a TMDL alternative. We also recommend several additional changes to the draft 303(d) list including: delisting impairments on Wilmington Drain, Los Angeles River Reach 6 and Malibu Lagoon; and corrections regarding prior TMDLs completed for Robert H Meyer Memorial Beach, Fox Barranca and various reaches of Calleguas Creek.

**Delistings from the 303(d) list**

EPA supports staff recommendations to delist Wilmington Drain ammonia and requests that Regional Board staff consider delisting this waterbody for copper and lead. The City of Los Angeles has collected thirty-three samples from 2007 to 2009 in this waterbody and two additional samples were collected by the Regional Board in that timeframe. The overall record indicates only two excursions above the standard for copper and zero excursions above the standard for lead. We urge staff to evaluate these monitoring results and review the assessment decisions for either of these metals in Wilmington Drain. Additionally, EPA requests that Regional Board staff consider delisting three volatile organic compounds (TCE, PCE and 1,1-DCE) on Los Angeles River Reach 6. The City of Los Angeles has collected forty samples from 2006 to 2007 in this reach. Monitoring results for trichloroethene (TCE), tetrachloroethene (PCE) and 1,1-dichloroethene (DCE) show no excursions above the applicable standard for all non-drinking water purposes. A potential municipal use is associated with this segment of the Los Angeles River. However, both TMDLs and assessments are based on designated and existing uses, not potential uses. This segment is therefore not impaired by volatile organic compounds. For both of these waterbodies EPA has provided the raw data in prior communications.



Additionally, EPA urges Regional Board staff to consider delisting the shellfish harvesting advisory from Malibu Lagoon. The Malibu Creek Watershed Bacteria TMDLs (EPA approval on 1/10/06) addressed impairments for coliform, swimming restrictions and enteric viruses and pointed out that shellfish harvesting was not a designated beneficial use in Malibu Lagoon. This waterbody is therefore not impaired by the shellfish harvesting advisory as indicated on the draft 303(d) list.

### **TMDL Alternatives**

EPA supports the Regional Board staff recommendation to identify Malibu Lagoon benthic community effects listing as being addressed by an alternative to a TMDL. An upcoming Malibu Lagoon restoration project will address this impairment. The Malibu Lagoon Restoration Feasibility Study lists structural and non-structural best management practices that will be implemented during restoration. These measures are expected to improve sediment delivery and increase scour to some areas, increase grain size, and allow more oxygen rich water to bed sediment. This restoration project will commence in 2009 and will be effective at restoring the beneficial uses.

EPA also supports the Regional Board staff recommendation to identify Port Hueneme DDT (dichlorodiphenyltrichloroethane) and PCBs (polychlorinated biphenyls) as being addressed by an alternative to a TMDL. A Port Hueneme Harbor dredging project was initiated in 2008 and is designed to remove contaminated sediments from the harbor, and as a result eliminate the bioaccumulation potential of the DDT and PCBs contaminated sediment and ongoing impacts to the aquatic biota thereby addressing these impairments.

### **Waterbody pollutant combinations with existing TMDLs, misidentified as requiring TMDLs**

Two waterbodies are listed incorrectly in the draft list as requiring a TMDL for impairments that have had TMDLs completed already. EPA requests that Regional Board staff correct the listing for beach closures at Robert H. Meyer Memorial Beach to indicate that a TMDL has already been approved. It was included in the Santa Monica Bay bacteria TMDLs (EPA approval on 6/19/03) which included all of the waterbody pollutant combinations identified in Assessment Unit 48 of the *Heal the Bay v. Browner* consent decree. Additionally, EPA would like Regional Board staff to correct the listings for boron, sulfates and total dissolved solids at Fox Barranca and indicate that a TMDL has already been approved. Many waterbody segments in this watershed were resegmented and renamed. EPA believes these TMDLs were included in one of the reaches in the Calleguas Creek Salts TMDLs (approval on 12/2/08) that covered the waterbody pollutant combinations identified in Assessment Units 3 and 4 of the *Heal the Bay v. Browner* consent decree.

In addition, various reaches of Calleguas Creek are shown in the draft 303(d) list as requiring a TMDL for endosulfan, dacthal, and ChemA. These were identified in the Calleguas Creek Watershed Organochlorine Pesticides and PCBs TMDL (EPA approval on 3/14/06) as "category 2" because they were found to not be causing impairment. They were, however, given load and wasteload allocations set equal to numeric targets for all listed reaches. EPA requests

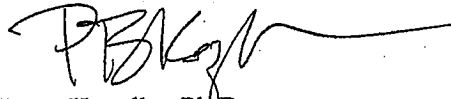
that Regional Board staff correct the draft 303(d) list to identify these waterbody pollutant combinations as either delisted or having an approved TMDL for the contaminants in question. The Calleguas Creek Organochlorine Pesticides and PCBs TMDLs and the Calleguas Creek Toxicity TMDLs (EPA approval on 3/14/06) addressed all waterbody pollutant combinations identified in Assessment Units 2 and 5 of the *Heal the Bay v. Browner* consent decree and none of those waterbody pollutant combinations should be identified as requiring TMDLs on the State's 303(d) list.

**Waterbody pollutant combinations on the 303(d) list that are not impaired**

Several waterbody pollutant combinations remain on the draft 303(d) list even though existing TMDL documents contain information supporting findings of non-impairment for these contaminants. For example, during the development of the Marina del Rey Harbor Toxics TMDLs (EPA approval on 3/16/06), Regional Board staff concluded non-impairment due to DDT and dieldrin in these waters. Similarly Ballona Creek was found to be non-impaired due to cadmium as part of the Ballona Creek Metals TMDLs (EPA approval on 12/22/05). Apparently, Regional Board staff have not elected to remove these waterbody pollutant combinations from the 303(d) list because, although the data available show a lack of impairment, sufficient data do not exist to meet the State's binomial statistical methodology requirements for delisting. EPA considers these contaminants appropriate for delisting since federal guidelines do not contain minimum sample size requirements for making assessment decisions (EPA 2006 Integrated Reporting Guidance, pp.36-37)

In conclusion, Regional Board staff have produced a sound framework for assessing the condition of its waters. We urge the Regional Board to adopt staff recommendations at the July 2009 board meeting and submit the 303(d) list to State Board shortly thereafter. If you have any questions concerning our comments, please call me at (415) 972-3448.

Sincerely yours,



Peter Kozelka, Ph.D.  
303(d)/TMDL Coordinator  
Water Division

CC: LB Nye; Deborah Smith

References:

Guidance for 2006 Assessment, Listing and Reporting Requirements Pursuant to Sections 303(d), 305(b) and 314 of the Clean Water Act, Diane Regas, EPA Office of Wetlands, Oceans and Watersheds, July 29, 2005

*Heal the Bay V. Browner*, C. 98-48 25 SBA, March 22, 1999

Moffatt & Nichol. 2005. Malibu Lagoon Restoration Feasibility Study, Final Alternatives Analysis

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June 17, 2009

Man Voogn  
Los Angeles Regional Water Quality Control Board  
320 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Subject: Comments on Draft 303(d) List; Additional Trash Additions

Dear Ms. Egoscue, Mr. Voogn, and Members of the Board:

Thank you for the opportunity to comment on the proposed 303(d) list. The Ventura Coastkeeper (VCK) is a program of the Wishtoyo Foundation, a community based 501(c)(3) non profit with over 700 members consisting of Ventura County residents, Chumash Native Americans, and the general public that enjoys, depends on, and visits Ventura County's inland and coastal waterbodies. Wishtoyo uses traditional Native American Chumash beliefs, practices, songs, stories and dances to increase awareness of our connection with the environment and to preserve the maritime culture and resources of coastal communities. Core values of the Chumash include sustainable living and respect for the environment. In 2000, the Wishtoyo Foundation launched VCK to protect, preserve, and restore the ecological integrity and water quality of Ventura County's inland waterbodies, coastal waters, and watersheds. In pursuit of its mission, VCK investigates polluters and, when necessary, takes legal action to stop them. In commenting on the proposed basin planning projects, VCK draws upon the Wishtoyo Foundation's unique perspective, our involvement with the local community, and our experience protecting, preserving, monitoring, sampling, and restoring Ventura County's waterways and waterbodies.

Of particular importance to VCK is that waterbody segments whose water quality, aquatic life, aesthetic conditions, recreational opportunities, and ecological integrity are impaired by trash, are listed on the 303(d) list as impaired by trash. As Stated in the Revised Draft: July 27, 2007 16 Los Angeles River Watershed Trash TMDL:

“Trash in waterways causes significant water quality problems. Small and large floatables can inhibit the growth of aquatic vegetation, decreasing spawning areas and habitats for fish and other living organisms. Wildlife living in rivers and in riparian areas can be harmed by ingesting or becoming entangled in floating trash.

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Except for large items such as shopping carts, settleables are not always obvious to the eye. They include glass, cigarette butts, rubber, construction debris and more. Settleables can be a problem for bottom feeders and can contribute to sediment contamination. Some debris (e.g. diapers, medical and household waste, and chemicals) are a source of bacteria and toxic substances. Floating debris that is not trapped and removed will eventually end up on the beaches or in the open ocean, repelling visitors away from our beaches and degrading coastal waters.”

VCK supports in full Decision ID 10423 listing Calleguas Creek Reach 7, Water Body ID CAR4036200020000228103510, on the 303(d) list for trash as a pollutant and nuisance.

However, based on VCK’s Stream Team’s 2006 and 2007 Monitoring Data (see attached), gathered pursuant to VCK’s QAPP that is certified and approved by the Regional Board, the weight of evidence indicates that additional water segment-pollutant combinations in the Calleguas Creek Watershed should be placed on the section 303(d) list for trash as a pollutant and nuisance in the Water Quality Limited Segments category because applicable water quality standards<sup>1</sup> are exceeded in these additional waterbody segments impairing their beneficial uses, and the trash in these waterbody segments contributes to or causes the exceedences.

The additional waterbody segments that should be listed on the 303(d) list for trash as a pollutant and nuisance include the water body segments that include these VCK monitoring stations in Table 1 below (see attached “VCK 2006-2007 Calleguas Creek Watershed Monitoring Stations”) where the following trash data was observed and counted as part of the sampling efforts of Ventura Coastkeeper’s Stream Team from February 2006 through June 2007:

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<sup>1</sup> The Los Angeles Basin Plan states that “waters shall not contain floating materials, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses.” (Water Quality Control Plan (“Basin Plan”), p. 3-9), and that for solid, suspended, or settleable materials: “Waters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses”(Ibid., pp. 3-16).



Table 1:

VCK Monitoring Stations (note: see attached VCK 2006-2007 Calleguas Creek Monitoring Locations)	Site #	Trash Data Used to Assess Water Quality and to Justify the 303(d) Listing for Trash of the Waterbody Segment Containing the VCK Monitoring Station:
Arroyo Simi	AS1	From February - December 2006, 10 of 11 samples exceeded the numeric target for trash at AS1, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 5 of 6 samples exceeded the numeric target for trash at AS1, as derived in the Los Angeles River Trash TMDL
Conejo Creek Lower	CJ1	From February - December 2006, 7 of 11 samples exceeded the numeric target for trash at CJ1, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 6 of 6 samples exceeded the numeric target for trash at CJ1, as derived in the Los Angeles River Trash TMDL
Conejo Creek Mid	CJ2	From February - December 2006, 7 of 11 samples exceeded the numeric target for trash at CJ2, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 4 of 6 samples exceeded the numeric target for trash at CJ2, as derived in the Los Angeles River Trash TMDL
Conejo Creek Upper	CJ3	From February - December 2006, 7 of 11 samples exceeded the numeric target for trash at CJ3, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 4 of 6 samples exceeded the numeric target for trash at CJ3, as derived in the Los Angeles River Trash TMDL
Calleguas Creek Lower	CL1	From February - December 2006, 3 of 11 samples exceeded the numeric target for trash at CL1, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 4 of 6 samples exceeded the numeric target for trash at CL1, as derived in the Los Angeles River Trash TMDL
Calleguas Creek Upper	CL2	From February - December 2006, 5 of 11 samples exceeded the numeric target for trash at CL2, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 4 of 6 samples exceeded the numeric target for trash at CL2, as derived in the Los Angeles River Trash TMDL
Revolon Slough	RS1	From February - December 2006, 5 of 11 samples exceeded the numeric target for trash at RS1, as derived in the Los Angeles River Trash TMDL. From January - June 2007, 5 of 6 samples exceeded the numeric target for trash at RS1, as derived in the Los Angeles River Trash TMDL

Even if the evaluation guidelines use a numeric target of 0 trash in the waterbody to fully support beneficial uses and to provide for an adequate margin of safety, as used by the Los Angeles River

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Trash TMDL, is not strictly adhered to, the presence of trash at all of these monitoring stations is of the frequency, consistency, and magnitude to warrant that the waterbody segments that contain each of these monitoring stations (AS1, CJ1, CJ2, CJ3, CL1, CL2, and RS1) are listed on the 303(d) list as impaired for trash.

Thank you for considering our comments. Please feel free to contact us with any questions.

Sincerely,



Jason Weiner, M.E.M  
Associate Director & Staff Attorney  
Ventura Coastkeeper

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**Item 13**

**Table of Contents for Item 13 on the Agenda of  
the 528<sup>th</sup>**

**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**RESPONSE TO COMMENTS  
(to be provided in supplemental board package)**



**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

1. Center for Biological Diversity
2. City of Calabasas
3. City of Los Angeles
4. City of Oxnard
5. City of Santa Clarita
6. City of Simi Valley
7. City of Ventura
8. County of Los Angeles Public Works (LACDPW)
9. County Sanitation Districts of Los Angeles (LA County Sans)
10. Coalition for Practical Regulation (CPR)
11. Heal the Bay
12. Lake Sherwood Joint Advisory Committee (JAC)
13. Las Virgenes Municipal Water District (MWD)
14. Los Padres Chapter of the Sierra Club
15. Nature Conservancy
16. Newhall Land and Farming Company
17. Ormond Beach Wetlands Environmental Coalition
18. Parties Implementing TMDLs in Calleguas Creek
19. Santa Barbara Channel Keeper
20. Teresa Jordan
21. United States Environmental Protection Agency, Region 9 (USEPA)
22. Ventura Coastkeeper

No.	Author	Date	Comment	Response
1.1	Centers for Biological Diversity	Jun 17	<p>The Center for Biological Diversity requests that Los Angeles region's ocean water segments be added to the Clean Water Act § 303(d) list of impaired water bodies due to impairment resulting from ocean acidification.</p> <p>On February 27, 2007, the Center for Biological Diversity submitted scientific information supporting the inclusion of ocean waters on California's 303(d) List to each of the coastal</p>	<p>Given that the Pacific Ocean overlaps jurisdictional boundaries for multiple Regional Boards, this comment letter, its attachments and all previous data submittals received at the Los Angeles Regional Board from the Center for Biological Diversity requesting staff to list the Pacific Ocean for acidification</p>

**Response to Comments on the Draft 2008 303(d) List  
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No.	Author	Date	Comment	Response
			<p>regional water boards. Since then, it has only become more apparent that ocean acidification poses a serious threat to seawater quality with adverse effects on marine life. On February 4, 2009, the Center for Biological Diversity submitted additional scientific information concerning the latest findings on ocean acidification to the Regional Board and State Water Resources Control Board. Nonetheless, the Los Angeles draft Integrated Report failed to list ocean waters as impaired from ocean acidification or even discuss how this serious water quality problem will be addressed by the Board.</p> <p>Section 303(d) of the Clean Water Act requires states to establish a list of impaired water bodies within their boundaries for which existing pollution controls "are not stringent enough to implement any water quality standard applicable to such waters." 33 U.S.C. § 1313(d). EPA regulations mandate that a state's list shall be approved only if it meets the requirements that existing pollution control requirements are stringent enough to ensure waters meet all water quality standards. 40 C.F.R. § 130.7(b)(1) &amp; (d)(2).</p>	<p>have been forwarded to State Board. Staff at State Board intends to respond to these comments and address the listing on a statewide basis. Regions are not addressing this issue individually.</p>
2.1	City of Calabasas	Jun 16	<p>This letter serves as written notice that the City of Calabasas opposes the inclusion of the New Zealand Mudsnail, <i>Potamopyrges antipoderm</i> on the proposed 303(d) listing for Las Virgenes Creek, as stated in the Decision ID 15821.</p> <p>Since the discovery of the New Zealand Mudsnail in the Malibu Creek Watershed, the City of Calabasas has engaged in rigorous Best Management Practices to limit the spread of this non-native snail. These "BMPs" included suspending water quality monitoring programs while locating and researching the New Zealand Mudsnail in each tributary of Malibu Creek.</p> <p>To prevent the unintentional spread of mudsnails during the subsequent water quality monitoring, separate waders were used at each survey location. Additionally, waders were placed in a</p>	<p>The Regional Board appreciates the efforts of the City of Calabasas in preventing the spread of the New Zealand mudsnail, including use of appropriate BMPs for the City's actions and efforts to increase public awareness about the mudsnail and its impacts. In the data assessed from the Santa Monica Bay Restoration Commission, 3 of 5 sites in Las Virgenes Creek showed an increase in density of mudsnails over the three years of sampling and 6 out of 10 sites sampled showed medium or high densities of mudsnails in Las Virgenes Creek. When additional data</p>

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2.2	City of Calabasas	Jun 16	<p>freezer for a minimum of 48 hours after each use and all equipment was washed and inspected. City of Calabasas participated in the mudsnail "summit" meeting hosted by the Santa Monica Bay Restoration Commission in June of 2006. To promote awareness of this issue the City also posted information signage at various locations along Las Virgenes Creek.</p> <p>In recent survey conducted by Heal the Bay and the Santa Monica Bay Restoration Commission, it was stated that numbers mudsnails found in Las Virgenes Creek stations was substantially lower than those of surrounding areas of Malibu Creek. This study also observed native snails within the watershed; Lymnaeidae, <i>Fossaria</i> sp. that are nearly identical in size and color to the New Zealand snail, the only difference was fewer number of shell whirls. Additionally, the survey describes that the New Zealand Mudsnail has been established in three streams within the Malibu Creek Watershed and shows no evidence of spreading into other streams.</p> <p>The New Zealand Mudsnail is a non native species found in many watersheds throughout the United States. Currently there is no form or procedure known for eradication of this species. In its native range populations are controlled by a parasitic trematode. There is not any known biological control. Some have suggested introducing the trematode into infested waters. There is still not enough known about the effects of the trematode on native snail species to be confident enough to introduce it.</p> <p>In addition given the existing science and technology, establishing and complying with a new TMDL for the New Zealand Mudsnail would sidetrack efforts and financing better spent on other obtainable TMDLs.</p>	<p>are collected, those data can be considered in the next listing cycle.</p> <p>The quality assurance procedures of the Santa Monica Bay Restoration Commission were adequate and included identification and training for field staff by experts and, in some cases, genetic identification of collected mudsnails.</p>
3.1	City of Los Angeles	Jun 17	<p>We believe in general that RWQCB staff has improved the transparency of the listing process. Where sufficient information has been provided in fact sheets, this transparency has helped</p>	<p>The Regional Board agrees, the challenge of controlling the mudsnail is significant.</p> <p>The impairment by mudsnails of several creeks in the Malibu Watershed is well documented and therefore it is appropriate to include them on the State's list of impaired waters, the 303(d) list. Any TMDL or other program which might be developed in the future will acknowledge the state of the science and any control or eradication methods that may or may not be available at that time.</p> <p>Comment noted.</p>

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
3.2	City of Los Angeles	Jun 17	<p>stakeholders to assess the proposed listing in a more informed manner. In particular, the Bureau commends the effort that RWQCB staff has undertaken to make available more fact sheets for proposed listings, as well as to collect and review readily available data and information in conformance with the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Developing California's Clean Water Act § 303(d) List (Listing Policy). The Bureau generally supports the Region's 2008 CWA§303(d) List.</p> <p>The Bureau requests that the RWQCB re-evaluate the "legacy" listings shown in Table 1 (attached) utilizing the procedures in the 2004 State Listing Policy. This request reiterates Comment No. 5 on the Bureau's October 18, 2006 letter, which was submitted during the comment period for the 2006 303(d) list proposed by the State Water Resources Control Board (SWRCB) and is enclosed for reference. While we are re-submitting that comment, the following additional thoughts are added regarding these listings. The "legacy" listings were placed on the 303(d) List prior to 2002 and appear on the previous 1998 303(d) List available on the RWQCB's website. While we recognize that the SWRCB declined to re-evaluate many of these listings as indicated in its Responses to Comments staff report for the 2006 303(d) listing, we do not agree with the rationale and logic for not re-evaluating the listings utilizing the Listing Policy. We note the objective of the Listing Policy is to "establish a standardized approach for developing California's section 303(d) list" and the "methodology to be used to develop the section 303(d) list [40 CFR 130.7(b)(6)(i)] is established by this Policy."</p> <p>Our principle concern with the RWQCB staff's decision not to retroactively apply the Listing Policy to the legacy listings is the potential substantial resources that the State will incur for developing TMDLs and the resources the Bureau and other stakeholders will expend to comply with a TMDL approved based on each and every one of the listings. The most effective</p>	<p>Staff has evaluated all readily available data as defined in section 6.1 of the Listing Policy. However, staff resources are limited. As such, priorities were established, and fact sheets were developed accordingly, based on those priorities (see section 3.4 of the staff report). All high priority fact sheets were completed. Listing cycles previous to the 2006 list did not use the State Listing Policy but were based on scientific rationale and the lists were approved by the Regional Board and/or State Board and the US EPA.</p> <p>Staff may be able to assist the Bureau in information requests regarding specific waterbody/pollutant combinations.</p> <p>Staff also notes that during the process of developing a TMDL, all available data is examined including the original listing data, as well as newer data. Data gaps are identified and addressed prior to development of the TMDL. If the</p>

**Response to Comments on the Draft 2008 303(d) List**  
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No.	Author	Date	Comment	Response
3.3	City of Los Angeles	Jun 17	<p>way to ensure such resources are not wasted due to a flawed listing rationale is to ensure that the same procedures, criteria, and transparency are applied uniformly to all pollutant/waterbodies combinations. This can be achieved by providing the data used to justify these listings and evaluating the data based on the applicable listing factors in the Listing Policy. We note that this concern would be partly addressed if the Bureau could examine the data and information that formed the basis of the original listings for these waterbody/pollutant combinations in the first place. After due diligence, however, we cannot locate this data or any information to substantiate the basis for the listings. We note that the 1996 List available on the RWQCB's website link does not provide any data or data reference for the list as no fact sheets were prepared for the listings to our knowledge (with the exception of two listings), and no information is contained in the "comment" column for the 1998 List.</p> <p>The Bureau requests that fact sheets be prepared for all Impaired Waters on the 303(d) List and included in the staff report. The Bureau appreciates the development of fact sheets for listings that change the 303(d) list and agrees with the purpose of fact sheets in relation to the role they serve in providing tangible evidentiary support for each listing decision. Fact sheets meeting the Listing Policy's implementation requirements for all water bodies, in particular the legacy listings in Table 1, would facilitate review and validation of the listings. If the fact sheets are not present for a listing the State cannot: 1) validate the previous impairment decision, 2) adjust for changes in the development of new water quality criteria, 3) adjust to changes in environmental and receiving water conditions, and 4) adjust to the application of the use attainability analysis or site specific objective. The data presented in fact sheets are typically utilized as part of the TMDL development and implementation process and a component of scientific studies conducted to determine impairment.</p>	<p>analysis of the data demonstrates non-impairment and if the data satisfies the data quality (section 6.1.4) and quantity requirements (section 6.1.5) of the Listing Policy, the specific waterbody pollutant combinations attaining standards will be identified in the TMDL and removed from the subsequent 303(d) list.</p> <p>Further reviews of listings made prior to the listing policy will also occur in future listing cycles, especially as new data become available.</p>
				<p>See response to comment 3.2.</p> <p>Previous impairment decisions prior to the 2006 list did not use the State Listing Policy but were based on scientific rationale and the lists were approved by the Regional Board and/or State Board and the US EPA.</p> <p>Ultimately, the goal is to have fact sheets for every waterbody/pollutant combination. The staff resources to undertake this task were limited and so priorities for developing fact sheets were used (see staff report).</p> <p>Further reviews will occur in future listing cycles or as TMDLs are developed.</p>

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No.	Author	Date	Comment	Response
3.4	City of Los Angeles	Jun 17	<p>During the 2006 listing cycle, the SWRCB deleted a number of waterbody listings for "conditions" from the 303(d) list. Waters listed for conditions such as algae, odor, debris, enteric virus, scum/foam, or beach closures are inappropriate because these are waterbody conditions and not pollutants as required by 40 CFR §130.7(b)(4) or the 2004 Listing Policy. The Bureau also requests that the RWQCB move away from listings based on a Category of Pollutants. Pollutants should be identified as stated in 40 CFR §130.7(b)(4): "The list required under § 130.7(b)(1) and 130.7(b)(2) of this section...shall identify the pollutants causing or expected to cause violations of the applicable water quality standards..." For the 2008 List, the Bureau requests that listings shown in Table 2 for conditions without water quality criteria be evaluated for removal from the 2008 303(d) list.</p>	<p>Staff disagrees. The Basin Plan contains narrative objectives for nuisance conditions, which can be used as the basis for listings. The Listing Policy specifically allows, as described in Section 3.7, listing for nuisance when associated with numerical water quality data.</p> <p>In some situations, "conditions" may be removed from the list according to Section 4.7 of the listing policy. Further reviews will occur in future listing cycles or as TMDLs are developed.</p> <p>Removing "conditions" from the list without any evaluation, however, may have the unintended consequence of not recognizing a water quality problem which has been demonstrated and which does, in fact, exist.</p>
3.5	City of Los Angeles	Jun 17	<p>Additionally, although the Bureau agrees with the desire of RWQCB staff to identify "a clear approach for determinations of impairment under the biostimulatory substances standard in the Basin Plan" as described in Section 3.3.3 (pp. 10-12) of the Staff Report, the Bureau is concerned with the proposed use of numeric guidelines for listing for biostimulatory substances that are not based on established water quality criteria. Should the RWQCB staff decide to pursue the development of numeric values for biostimulatory substances for listing decisions, the RWQCB should develop numeric criteria through a Water Quality Standards setting process in which all required factors under the State Water Code are considered and the required public process is followed. It is not appropriate to set de facto</p>	<p>The presence of biostimulatory substances in our waterways and the associated adverse impacts on beneficial uses are a significant problem. It is important that these impairments be included on the Region's list of impaired waters.</p> <p>Under the State Listing Policy, waterbodies can be included on the 303(d) list where standards or guidelines are exceeded. In the case of biostimulatory substances, the Los</p>

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 Comment due date: June 17, 2009

No.	Author	Date	Comment	Response
			biostimulatory substances objectives that will be used for the development of listing decisions and TMDLs through the 303(d) development process. Objectives for biostimulatory substances are generally site-specific and dependent on local conditions as demonstrated from the range of values presented in the tables (Tables 3.2, 3.3). To effectively determine impairments, site-specific criteria need to be developed through a standard setting process and utilized for listing decisions.	Angeles Region Basin Plan contains a narrative objective for biostimulatory substances, which may be used in assessments by relying upon numerical guidelines.
3.6	City of Los Angeles	Jun 17	It should also be noted that to date, no Region 4 TMDL to address biostimulatory substances has used targets as low as the numbers proposed in Table 3-2 of the Staff Report for listing considerations. As a result, the potential criteria would result in listings for waterbodies that are meeting TMDL targets.	Comment noted. Guidelines used to address biostimulatory substances specifically (vice nitrogen standards in the Basin Plan) could potentially require new TMDLs.
3.7	City of Los Angeles	Jun 17	<i>Due to confusing language, the Bureau requests that the current wording in Section 3.3.1 of the Integrated Report regarding the exceedance days for indicator bacteria, be revised as shown below.</i>  "To calculate the number of exceedance days, the number of days during a period equals the sum of individual days during which one or more indicator bacteria exceeds the standard <del>is an</del> exceedance day."	Comment noted. Staff agrees that the revision establishes essentially the same definition.
3.8	City of Los Angeles	Jun 17	<i>The Bureau requests that the listings for dieldrin and DDT for Marina Del Rey Harbor Back Basins be delisted. During development of the Toxic Pollutants TMDL for this water body, the RWQCB reviewed the available data and determined that dieldrin and DDT no longer cause impairment of the marina's back basins. (See Table 7-18.1 to Attachment A to LARWQCB Resolution No. 2005-012 amending Section 7 of the Basin Plan).</i>	During the development of the Marina del Rey Harbor Toxics TMDLs (EPA approval on 3/16/06), Regional Board staff concluded that there was not an impairment due to DDT and dieldrin in these waters. However, there is not sufficient data to de-list under the Listing Policy. A comment will be included in the 303(d) list to document the finding of non-impairment.
3.9	City of Los Angeles	Jun 17	<i>The Bureau requests that the listing for trash for Compton Creek be re-categorized from requiring a TMDL to "being addressed by USEPA approved TMDL (B). "A Trash TMDL for</i>	Though a sub-watershed of the trash-impaired Los Angeles River Watershed, Compton Creek is separately listed as

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
3.10	City of Los Angeles	Jun 17	<p><i>The Los Angeles River and its tributaries has been incorporated in the Los Angeles Region Basin Plan by LARWQCB Resolution No. 2007-012. Compton Creek is identified as a tributary of the Los Angeles River in the TMDL Staff Report. Thus, the trash impairment in Compton Creek is already being addressed by a TMDL.</i></p>	<p>impaired for trash. However, the trash TMDL for the Los Angeles River watershed assigns waste load allocations for trash discharges to all cities within the watershed, which includes all cities within the Compton Creek sub-watershed. Therefore, while Compton Creek will remain listed as impaired for trash, it will be placed on the list of impaired water bodies being addressed by a TMDL.</p>
3.11	City of Los Angeles	Jun 17	<p><i>The Bureau requests that the decision to "Do Not Delist" sediment toxicity for the San Pedro Bay be placed on hold until the data used to justify the listing is made readily available in a more transparent fashion for review by stakeholders. The language used in the reference section of the fact sheet for this listing provides insufficient information to locate the data used to justify that listing. Specifically, "Eleven of 33 samples were toxic (BPTCP). Two of 14 samples were toxic (Bight, 1998). None of three samples were toxic (W-EMAP) (LARWQCB &amp; CCC, 2004)." These references do not provide a data year for the BPTCP data and nor describe which specific stations were monitored by each study. The weblinks provided by RWQCB staff (Jeffrey Shu) were not useful in discovering the specific data described in the fact sheet. This may have occurred because the location description was vague ("Los Angeles and Long Beach harbors," never specifying San Pedro Bay) or because the data retrieved by the web link did not contain sediment toxicity data.</i></p>	<p>Staff disagrees. The line of evidence in question was developed for the 2006 303(d) list. The 2006 303(d) list was adopted by the State Board and subsequently approved by USEPA. Staff concurs with their original decision supporting the listing. Staff recognizes that the development of the 303(d) list is a dynamic process. Further review of the listing will occur in future listing cycles or as a TMDL is developed.</p>
3.11	City of Los Angeles	Jun 17	<p><i>The Bureau requests listings based on sediment toxicity including those for specific pollutants in sediment should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB</i></p>	<p>The SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries has been adopted by the SWRCB but has yet to be approved by USEPA. Staff will consider application of the</p>



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3.12	City of Los Angeles	Jun 17	<p><i>Resolution 2008-0070. We note that this plan "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments" (SWRCB Resolution 2008-0070). The SWRCB recognizes the need to ensure that the listing policy and the SQO Plan are consistent. Therefore, SWRCB staff has been directed to revise the Listing Policy to achieve consistency with the sediment quality objectives in said plan. The Bureau has listed in Table 3 those waterbodies that should be evaluated based on the SQOs.</i></p> <p><i>The Bureau requests that the PAH listing for Ballona Creek Estuary, be removed based on the Fact Sheets Decision ID 7584 which state "Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against placing this water segment/pollutant combination on the section 303(d) list in the Water Quality Limited Segments category."</i></p>	<p>plan upon USEPA approval, or when revision to the Listing Policy has been made, which may not occur until the next listing cycle.</p> <p>Staff disagrees. Decision 7584 concludes that benzo(a)pyrene, chrysene, phenanthrene, and pyrene, along with other pollutants, should not be listed on the 303(d) list. These four pollutants are components of total PAHs and insufficient data is available to determine the delisting potential of total PAH based on just the data described in Decision 7584.</p>
3.13	City of Los Angeles	Jun 17	<p><i>The Bureau requests that RWQCB staff should ensure the available data and fact sheets are consistent. Although the data available for review for the proposed new listings generally support the listings, the fact sheets are not always consistent with the data available for review.</i></p>	<p>Comment noted.</p>
3.14	City of Los Angeles	Jun 17	<p><i>A primary line of evidence used in conjunction with a TMDL will satisfy Section 2.2 or Section 3.11 of the Listing Policy. Referencing a TMDL does not provide information to evaluate the original listing or subsequent listing decision. Without including the supporting data in the Staff Report, stakeholders can not verify if the conditions for placement in the water quality limited segments category have been met or if water quality</i></p>	<p>Creation of fact sheets to summarize analyses developed in TMDLs was not identified as a priority, given limited staff resources. See response to comment 3.2 in regards to prioritizing fact sheets.</p> <p>Data and analyses are available in the</p>

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No.	Author	Date	Comment	Response									
3.15	City of Los Angeles City of Los Angeles City of Los Angeles	Jun 17	<p><i>standards have been attained. This includes listings placed in the 'Being Addressed' category.</i></p> <p>Table 3. Detailed Comments on Specific Listings</p> <table border="1" data-bbox="354 1136 597 1879"> <thead> <tr> <th data-bbox="354 1136 402 1283">Water Body</th> <th data-bbox="354 1283 402 1879">Pollutant/ Stressor</th> <th data-bbox="354 1879 402 1890">2008 Revised Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="402 1136 597 1283">Marina del Rey Harbor - Back Basins</td> <td data-bbox="402 1283 597 1430">DDT (tissue)</td> <td data-bbox="402 1430 597 1879">This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that DDT is no longer a cause of impairment.</td> </tr> <tr> <td data-bbox="597 1136 760 1283">Marina del Rey Harbor - Back Basins</td> <td data-bbox="597 1283 760 1430">Dieldrin (tissue)</td> <td data-bbox="597 1430 760 1879">This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that Dieldrin is no longer a cause of impairment.</td> </tr> </tbody> </table>	Water Body	Pollutant/ Stressor	2008 Revised Comments	Marina del Rey Harbor - Back Basins	DDT (tissue)	This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that DDT is no longer a cause of impairment.	Marina del Rey Harbor - Back Basins	Dieldrin (tissue)	This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that Dieldrin is no longer a cause of impairment.	supporting documentation for TMDLs.  See response to comment 3.8.
Water Body	Pollutant/ Stressor	2008 Revised Comments											
Marina del Rey Harbor - Back Basins	DDT (tissue)	This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that DDT is no longer a cause of impairment.											
Marina del Rey Harbor - Back Basins	Dieldrin (tissue)	This listing should be removed as identified in the Marina Del Rey Toxics TMDL, which states that Dieldrin is no longer a cause of impairment.											
3.16	City of Los Angeles	Jun 17		See response to comment 3.8.									
3.17	City of Los Angeles	Jun 17	Trash	See response to comment 3.9.									
3.18	City of Los Angeles	Jun 17	DDT	A review indicates that the OEHHA fish consumption advisories in Los Angeles County are still in effect and have yet to be rescinded. The 2006 303(d) list was adopted by the State Board and subsequently approved by USEPA. Staff concurs with their original decision supporting the listing. Staff will continue to evaluate data as it becomes available and delist waterbody/pollutant combinations if the data suggest that standards are being attained.  Also see response to comment 3.2 regarding legacy listings.									

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No.	Author	Date	Comment	Response
3.19	City of Los Angeles	Jun 17	<p>are no Fact Sheets available indicating the reason the listing appears as based on water column instead of fish tissue pollutant levels. The basis for the, advisory should be investigated and upheld prior to maintaining the pollutant-waterbody on the list.</p> <p>The RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. The original fish consumption advisory, which was based on fish tissue and formed the basis for the listing, appears to have been conducted in the mid-1990's. There are no Fact Sheets available indicating the reason the listing appears as based on water column instead of fish tissue pollutant levels. The basis for the advisory should be investigated and upheld prior to maintaining the pollutant-waterbody on the list.</p>	See response to comment 3.18.
3.20	City of Los Angeles	Jun 17	<p>Los Angeles River Reach 6 (Above)</p> <p>Dichloro ethylene / 1,1-DCE</p>	<p>There is no line of evidence to support the original listing. Using the 2004 State Listing Policy listing criteria, the existing data provided by the State do not support a listing for this</p> <p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p>

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No.	Author	Date	Location	Pollutant	Comment	Response
3.21	City of Los Angeles	Jun 17	Los Angeles Harbor - Cabrillo Marina	DDT (tissue)	<p>Sepulveda Flood Control Basin)</p> <p>constituent. There are 0 exceedances out of 16 samples. There are 16 non-detects that are above the CTR objective for human health and organisms of 0.057 ppb. We believe any monitoring required due to groundwater contamination should be addressed under an alternative enforcement program. Additional data needs to be collected in order to support a listing or delisting of this constituent in this waterbody. The Los Angeles River and most of its tributaries have a conditional beneficial use designation for MUN. Conditional designations are not subject to federal law and therefore are not subject to TMDLs.</p> <p>The OEHHA fish consumption advisory should be re-evaluated as most of the original advisories were conducted in the mid-1990's. In addition, the RWQCB should provide in the record the supporting data and required information to list or not list using the listing criteria. According to Section 3.4 of the Listing Policy a OEHHA health advisory must be posted, a beneficial use for consumption identified, and the supporting data must be available indicating the evaluation guideline for tissue has been exceeded.</p>	See response to comment 3.18.
3.22	City of Los Angeles	Jun 17	Los Angeles Harbor - Cabrillo Marina	DDT	This pollutant-water body listing for	See response to comment 3.18

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No.	Author	Date	Angeles Harbor Consolidated Slip	(tissue & sediment	Comment	Response
	Angeles				<p>sediment should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part 1: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that this plan "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments." (SWRCB Resolution 2008-0070). The SWRCB recognizes the need to ensure that the listing policy and the SQO Plan are consistent. Therefore, SWRCB staff has been directed to revise the Listing Policy to achieve consistency with the sediment quality objectives in said plan. (Ibid.). For the tissue based listing, there is no fact sheet available or tissue data available for review. Therefore the listing could not be validated using the Listing Policy.</p>	<p>regarding the tissue listing.  See response to comment 3.11 regarding SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries.</p>
3.23	City of Los Angeles	Jun 17	Los Angeles Fish Harbor	DDT	<p>This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has</p>	<p>See response to comment 3.18.</p>

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No.	Author	Date	Comment	Response
3.24	City of Los Angeles	Jun 17	<p>been exceeded. There are no 2006 and 2008 Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory that formed the basis for the listing appears to have been conducted in the mid-1990's. The basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.</p> <p>This Listing does not meet the requirements of Section 2 or 3.7 of the Listing Policy. There are no data in the record to evaluate as no fact sheets were found substantiating the listing decision. The Basin Plan describes the objective as "Waters shall not contain oils...in concentrations that result in a visible film or coating on the surface of the water or on objects in the water that cause nuisance or that otherwise adversely affect beneficial uses. No observational data is available that substantiates any of the conditions necessary to violate this standard.</p>	<p>Staff will continue to evaluate data as it becomes readily available and delist waterbody/pollutant combinations if the data indicate that standards are being attained. Also see response to comment 3.2.</p>
3.25	City of Los Angeles	Jun 17	<p>Oil</p> <p>Los Angeles River Reach 2 (Carson to Figueroa Street)</p> <p>PCBs</p> <p>Point Fermin Park Beach</p>	<p>The current listing is based on water column exceedances. This original listing appeared to have been based on Section 3.4 of the Listing Policy, which allows for a listing where a OEHHA health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating</p> <p>See response to comment 3.18.</p>

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No.	Author	Date	Comment	Response	
3.26	City of Los Angeles	Jun 17	<p>the evaluation guideline for tissue has been exceeded. OEHHA's fish advisories are based on fish tissue concentrations. Thus, listing should reflect this. This and similarly-based listings were conducted in the mid-1990's and were apparently founded on fish tissue pollutant concentrations. Therefore, (1) the RWQCB has not substantiated the water based pollutant listing and (2) the basis for the current fish advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.</p>	See response to comment 3.18.	
3.27	City of Los Angeles	Jun 17	<p>Point Fermin Park Beach</p> <p>Royal Palms Beach</p>	<p>DDT</p> <p>DDT</p> <p>This waterbody/pollutant combination should be listed according to Section 3.4 of the Listing Policy which states that a health advisory must be posted, a beneficial use for consumption identified, and the supporting data must be available indicating the evaluation guideline for tissue has been exceeded. A fact sheet is not available for this listing; therefore, it is assumed that this listing was based on OEHHA's fish consumption advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.</p> <p>This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the</p>	See response to comment 3.18.

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No.	Author	Date	Comment	Response
3.28	City of Los Angeles	Jun 17	<p>Royal Palms Beach</p> <p>PCBs</p>	<p>supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no 2006 and 2008 Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory that formed the basis for the listing appears to have been conducted in the mid-1990's. Therefore, the basis for the advisory should be investigated and upheld prior to re-listing the pollutant waterbody.</p> <p>This listing is based on Section 3.4 of the Listing Policy, which allows for a listing where a health advisory has been posted, a beneficial use for consumption identified, and the supporting data is available indicating the evaluation guideline for tissue has been exceeded. There are no Fact Sheets available indicating the basis for this listing has changed. The original fish consumption advisory, which should be based on fish tissue and form the basis for the listing, appears to have been conducted in the mid-1990's. The basis for the advisory should be investigated and upheld prior to re-listing the pollutant-waterbody.</p> <p>See response to comment 3.18.</p>
3.29	City of Los Angeles	Jun 17	<p>Santa Monica Bay Offshore/Nearshore</p> <p>Fish Consumption Advisory</p>	<p>Please correct the "pollutant" basis for the listing. The existence of a fish consumption advisory is a listing factor, but is neither a "pollutant" nor a water quality objective delineated in</p> <p>See response to comment 3.18. Currently there are OEHHA fish advisories for PCBs and DDT, so the listing documents an actual impairment.</p>



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No.	Author	Date	Location	Subject	Comment	Response
3.30	City of Los Angeles	Jun 17	Santa Monica Bay Offshore/ Nearshore	Sediment Toxicity	<p>any applicable plan or regulation. The fact that supporting data based on organism tissue must be available to support the listing under Section 3.4 of the Listing Policy which indicates specific pollutant concentrations in the organisms must be the reason OEHHA has issued the advisory. Currently there are OEHHA fish advisories for PCBs and DDT.</p> <p>During the SWRCB's 2006 listing process, the State provided no toxicity data in their line of evidence to support the listing decision. The RWQCB has provided no fact sheet for this listing. Therefore, stakeholders cannot validate the listing. Nonetheless, this pollutant-water body listing should be evaluated in accordance with the SWRCB's Water Quality Control Plan for Enclosed Bays and Estuaries Plan (Part I: Sediment Quality), which the SWRCB approved in 2008 (SWRCB Resolution 2008-0070). We note that Part 1 "supersedes all applicable narrative water quality objectives and related implementation provisions in water quality control plans (basin plans) to the extent that the objectives and provisions are applied to protect bay or estuarine benthic communities from toxic pollutants in sediments." (SWRCB Resolution 2008-0070):</p>	See response to comment 3.11.
3.31	City of Los Angeles	Jun 17	Los	DDT	This listing has been updated from	See response to comment 3.2 regarding

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No.	Author	Date	Angeles / Long Beach Inner Harbor	Comment	Response
3.32	City of Los Angeles	Jun 17	Los Angeles / Long Beach Inner Harbor	DDT (sediment & tissues) to DDT, i.e., a water column listing on the 2006 303(d) list. However, a fact sheet is not available for this pollutant/waterbody combination. A fact sheet would allow the Bureau to review the data and appropriately comment on this pollutant/waterbody listing. The only information available for this listing is the SWRCB's 2006 comments stating that this listing was based on OEHHA fish advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.	the fact sheet. Also see response to comment 3.18 regarding the OEHHA fish advisories.  This waterbody pollutant was listed prior to 2006. The listing was updated in 2006 but no fact sheet was prepared at that time.
4.1	City of Oxnard	Jun 15	PCBs	This listing has been updated from PCB (sediment & tissue) to PCB, i.e., a water column listing in the 2006 303 (d) list. However, a fact sheet is not available for this pollutant/waterbody combination. A fact sheet would allow the Bureau to review the data and appropriately comment on this pollutant/waterbody listing. The only information available for this listing is the State Board's 2006 comments stating that this listing was based on OEHHA fish advisory. The fish consumption advisory should be reevaluated as most of the original advisories were conducted in the mid-1990's.	See response to comment 3.31.
			We have received the Notice of Availability of the referenced documents and the solicitation of public comments. We have		Comment noted.

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No.	Author	Date	Comment	Response
5.1	City of Santa Clarita	Jun 17	<p>reviewed the documents, and concur with Regional Board staff's recommendation to de-list Channel Islands Harbor, listed for lead and zinc in sediment from non-point sources. We understand that this listing was based on a single Bay Protection and Toxic Cleanup Program (BPTCP) sample 13 years ago. At that time, the BPTCP document said that since Channel Islands Harbor "had relatively undegraded benthos and few chemicals at elevated concentration it might also serve as a potential reference site". We'd go even further than that, and state that Channel Islands Harbor is probably one of the cleanest harbors in the nation.</p> <p>Newly proposed listings for the Santa Clara River are erroneously based on application of the conditional Municipal and Domestic Supply (MUN) Beneficial Use. A Federal Court, the State Water Resources Control Board (State Board), and the Federal Environmental Protection Agency (EPA) have all determined that the P*MUN use is not a properly designated use available for any regulatory purpose, such as the proposed 2008 Section 303(d) List. The application of the conditional P*MUN Beneficial Use resulted in the incorrect application of maximum contaminant levels (MCL) and California Toxics Rule (CTR) human health criteria using "water plus organisms" standards.</p> <p>In 1994, the California Regional Water Quality Control Board, Los Angeles (Regional Board) sought to designate a Municipal and Domestic Supply (P*MUN) Beneficial Use to all water bodies identified in the Basin Plan. This was a response to the State Board's issuance of Resolution No. 88-63 (the "Sources of Drinking Water Policy") and the Regional Boards companion resolution, Resolution No. 89-03. However, the Regional Board only conditionally designated the Beneficial Use by forming the P*MUN and cannot establish effluent limitations based on conditional designations.</p> <p>In addition, during the previous Section 303(d) List update in</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p>

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No.	Author	Date	Comment	Response
5.2	City of Santa Clarita	Jun 17	<p>2006, the Regional Board included water body segments based on the P*MUN Beneficial Use. After receiving comments objecting to this action, the State Board removed all of the proposed 303(d) listings based on this beneficial use. The State Board indicated the P*MUN Beneficial Use should not be used for listing purposes, and is not a designated beneficial use for the identified water bodies. No change to the status of the P*MUN Beneficial Use has occurred since. Therefore, the City of Santa Clarita requests that the Regional Board act in accordance with the State Board's previous determination on this issue and asks for the following waterbody/pollutant listings to be removed from the Regional Board's proposed 2008 Section 303(d) List:</p> <ul style="list-style-type: none"> <li>• Santa Clara River, Reach 5 - Iron, Specific Conductivity (based on secondary MCLs); Chlorodibromomethane, and Dichlorobromomethane (based on application of CTR human health criteria using water plus organisms)</li> <li>• Santa Clara River, Reach 6 - Iron, Specific Conductivity (based on secondary MCLs); Chlorodibromomethane, Dichlorobromomethane, Bis (2-ethylhexyl) phthalate (based on application of CTR human health criteria using water plus organisms)</li> </ul>	
			<p>The Regional Board included Diazinon for Reach 6 of the Santa Clara River during the 2008 listing cycle. This was based on the evaluation of available data indicating that the California Department of Fish and Game (CDFG) four-day Criterion Continuous Concentration (CCC) threshold of 0.10 µg/L Diazinon was exceeded in samples collected from Bouquet Canyon Creek. All of the utilized monitoring data was collected as part of the Surface Water Ambient Monitoring Program (SWAMP).</p> <p>On December 31, 2004, the EPA banned sales of all nonagricultural products containing Diazinon. The EPA's action</p>	<p>Staff disagrees with the recommendation to restrict the data evaluated. Furthermore, when evaluating data collected through the end of the solicitation period, exceedances of the diazinon threshold were still observed after EPA's ban. In addition, it would be premature to state that the impairment is being addressed by other actions, especially given that there are enough exceedances to warrant not</p>

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No.	Author	Date	Comment	Response
5.3	City of Santa Clarita	Jun 17	<p>should be considered implementation of a significant management practice in Reach 6 of the Santa Clara River. Therefore, the City believes only data collected since January 1, 2005, should be used for listing reevaluation.</p> <p>As stated in previous comments submitted by the City regarding this listing, upon receipt of notification of a 13267 letter from the Regional Water Quality Control Board in September 2002, the City and County of Los Angeles embarked on a very aggressive Public Outreach and Abatement program. Inspections, enforcement, and cooperation from local retailers and the public led to a drastic reduction of Diazinon levels recorded in the original samples. Though this information was provided to the Regional Board, no response to the final report has been given to date.</p> <p>It is the City's understanding that data taken by the Los Angeles County Sanitation Districts shows no exceedances were found in nine samples collected between April 2007 and July 2008. This listing should be moved to the "Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL" category since the EPA Residential Use phaseout of Diazinon is a regulatory action other than a TMDL. Therefore, Diazinon in Reach 6 of the Santa Clara River should be removed from the 303(d) list.</p>	<p>delisting (as per the Listing Policy). The 2004 USEPA diazinon ban restricted the sale of products containing diazinon, <i>not the use of such products already in circulation</i>. The continued use of products purchased prior to the ban may occur for some time and the ban did not include specific dates for water quality attainment.</p> <p>Staff disagrees with the recommendation to move the listing to "Being Addressed by Other Actions." Looking at data collected through the end of the solicitation period, exceedances were still observed post-ban. In addition, it would be premature to state that the impairment is being addressed by other actions, especially given that there are enough exceedances to warrant not delisting (as per the Listing Policy). The 2004 USEPA diazinon and chlorpyrifos phase-out restricted the sale of products containing diazinon and chlorpyrifos, <i>not the use of such products currently in circulation</i>. The continued use of products purchased prior to the ban may occur for some time and the ban did not include specific dates of water quality attainment.</p> <p>Data collected after the solicitation period will be evaluated during the next listing cycle.</p>

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No.	Author	Date	Comment	Response
5.4	City of Santa Clarita	Jun 17	<p>The Regional Board included Chlorpyrifos for Reach 6 of the Santa Clara River during the 2008 Section 303(d) listing cycle. Similar to Diazinon, the EPA has been phasing out all monagricultural uses of Chlorpyrifos with the cessation of sales of all residential use products by December 31, 2004.</p> <p>It is the City's opinion that data collected from January 1, 2005, forward should only be considered for the 2008 Section 303(d) listing. The City understands that monitoring by the Los Angeles County Sanitation Districts resulted in 18 four-day average Chlorpyrifos monitoring results with no exceedences of the 0.05 µg/L threshold. Therefore, this listing should be moved to the "Water Quality Limited Segments Being Addressed by Actions Other Than a TMDL" category since the Residential Use phaseout of Chlorpyrifos is a regulatory action other than a TMDL and appears to be resulting in attainment of standards.</p>	See response to comment 5.3.
6.1	City of Simi Valley	Jun 17	<p>The City of Simi Valley appreciates the opportunity to comment on the Draft 2008 303(d) List and respectfully opposes the listing of trash in the Arroyo Simi (Reach 7) on the Draft List. The City understands the fiscal challenges facing the State agencies, as the City is facing very similar fiscal challenges. The response for us must be to collectively and jointly find cost-effective, efficient solutions to issues we encounter.</p> <p>First, on a technical level, there may be inadequate data to support the listing. Members of the Parties Implementing TMDLs on the Calleguas Creek Watershed identified a discrepancy in the data available on the fact sheet (Decision ID 10423). The Ventura Coastkeepers staff revised the data sheet to correct the inaccuracy. The State's Listing Policy indicates the need to use both numeric and non-numeric data for determining a trash listing. The City requests that the 303 (d) listing follow the policy for submittal of non-numeric data. Such data could be photographic evidence allowing locations to be determined and/or detailed data on trash, including location, to facilitate an</p>	<p>Staff disagrees. The Listing Policy suggests the use of both qualitative assessments and numeric data to list for trash impairment in a waterbody. Such qualitative assessment should not be limited to photographic format only. Data submitted by the Ventura Coastkeeper also included qualitative assessments.</p> <p>The data satisfies the data quality and quantity requirements of section 6.1.4 and 6.1.5 of the Listing Policy. Based on data received by Staff, monitoring was conducted on a monthly basis for approximately 11 months. The data sufficiently documented the number of pieces of trash that were observed. Thus, the waterbody was correctly</p>

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6.2	City of Simi Valley	Jun 17	<p>effective TMDL development. Data used to justify listings for impairments like trash require supporting documentation to ensure that the observations are verifiable.</p> <p>A 303(d) listing of trash in the Arroyo Simi is not a cost effective means to address this issue. Importantly, the Waste Discharge Requirements for Ventura County Municipal Separate Storm Sewer System includes significant new requirements to reduce trash in the storm sewer system, and should provide more tangible progress towards reducing such pollution. This is a more effective means to remove the impact than subjecting the issue to further study under a TMDL. Actions planned already by the City include:</p> <ul style="list-style-type: none"> <li>• Prioritizing, inspecting, and cleaning catch basins based trash at the location;</li> <li>• Managing trash at public events;</li> <li>• Installing and maintaining trash cans in high trash generation areas; and</li> <li>• Installing excluders on catch basins or conducting alternative BMPs to reduce trash discharges to receiving waters in the next two years.</li> </ul>	<p>assessed as impaired for trash.</p> <p>Staff disagrees. If a waterbody is impaired, it needs to be included on the 303(d) list. Staff acknowledges that the MS4 permit contains provisions for the management of trash, however, the MS4 permit currently does not include numeric targets and allocations to meet the narrative objectives in the Basin Plan, nor does it establish specific dates for water quality attainment.</p>
6.3	City of Simi Valley	Jun 17	<p>Should your agency decide that a 303 (d) listing meets the Listing Policy requirements, the City requests a Category C, "addressed by action(s) other than a TMDL," listing. This would follow the City's understanding of the State's Listing Policy to allow existing programs to address water-related trash. A significant effort by your agency and all of the Ventura County Cities and the County of Ventura recently resulted in the adopted Waste Discharge Requirements for Ventura County Municipal Separate Storm Sewer System. The State's Listing Policy specifically acknowledges that storm water permits and associated Storm Water Management Plans (SWMP) are existing programs that justify Category C categorization. The Waste Discharge Requirements for Ventura County Municipal Separate Storm Sewer System is an adopted regulatory program that is enforceable by the RWQCB, contains a monitoring program and</p>	<p>See response to comment 6.2.</p> <p>The State Listing Policy specifically requires that a waterbody be included with the "water quality segments being addressed" if "...an existing regulatory program is reasonably expected to result in attainment... within a reasonable, specified time frame." The recently-adopted Waste Discharge Requirements for Ventura County MS4 does not include specified dates for water quality attainment.</p>

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7.1	City of Ventura	Jun 17	<p>reporting programs that demonstrate progress, and provisions to address discharges of trash to the. Arroyo Simi within a reasonable amount of time. This meets all the State's Listing Policy for the Category C categorization.</p> <p>For the Promenade Park Beach bacterial indicators listing, the fact sheet shows comparison of exceedances at individual stations to the Listing Policy. Therefore, individual stations, rather than the whole beach, should be listed on the 2008 303(d) list. Only one (1) of the four (4) stations monitored at Promenade Park Beach has bacterial exceedances that meet the Listing Policy criteria for addition to the 2008 303(d) list. There may be specific activities occurring in this part of the beach or attributes of these sampling locations that are resulting in the bacterial exceedances. The City requests that only the station where the exceedances meet the Listing Policy be listed. This would allow us to focus City resources on addressing problematic areas rather than the entire beach.</p>	<p>Comment noted. On the 303(d) list, waterbodies are listed - not specific sampling sites within a waterbody. In this case the relevant reach is the Promenade Park Beach.</p> <p>Staff notes that Appendix E (Impaired Waterbodies, TMDLs still required) and Appendix G (New or Revised factsheets) of the Staff Report indicate impairment of only one of the sampling stations at Promenade Park Beach. A comment in the 303(d) list will be revised to address this comment.</p>
7.2	City of Ventura	Jun 17	<p>For the San Buenaventura Beach bacterial indicators listing, the fact sheet associated with this listing shows comparison of exceedances at individual stations to the Listing Policy. Therefore, individual stations, rather than the whole beach, should not be delisted from the 303(d) list. Only one (1) of the three (3) stations monitored has bacterial exceedances that do not meet the Listing Policy requirements for delisting. There may be specific activities occurring in this part of the beach or attributes of these sampling locations that are resulting in the bacterial exceedances. The City requests that all stations, except the station where the exceedances do not meet the Listing Policy for delisting, be delisted to allow City resources to be focused on addressing problematic areas rather than the entire beach.</p>	<p>Comment noted. On the 303(d) list, waterbodies are listed - not specific sampling sites within a waterbody. In this case the relevant reach is San Buenaventura Beach.</p> <p>Staff notes that Appendix E (Impaired Waterbodies, TMDLs still required) and Appendix G (New or Revised factsheets) of the Staff Report indicate impairment of only one of the sampling stations at San Buenaventura Beach. A comment in the 303(d) list will be revised to address this comment.</p>



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7.3	City of Ventura	Jun 17	<p>The 2008 303(d) list proposes listing arsenic in the Santa Clara River Estuary based on nine (9) exceedances out of 63 samples, which meets the Listing Policy criteria for addition to the 303(d) list of impaired waters. However, upon review of the provided data used to assess water quality, the City found only two (2) exceedances of the CTR saltwater criterion maximum concentration of 69 µg/L (0.069 mg/L) out of 63 samples. This does not meet the Listing Policy criteria for addition to the 303(d) list of impaired waters, therefore, the City requests that the Santa Clara River Estuary arsenic listing be removed from the 2008 303(d) list.</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p>
7.4	City of Ventura	Jun 17	<p>The proposed 2008 303(d) list includes a listing for toxicity in the Santa Clara River Estuary. The City requests an examination of the appropriateness of the dataset, as well as clarification and procedural changes regarding this listing.</p> <p>Firstly the City would like to comment that all available toxicity data for the estuary was conducted using freshwater species. An examination of available salinity and hardness data indicate that even in samples with relatively low salinity, significant seawater mixing was occurring resulting in hardness values typically exceeding 1000 mg/L CaCO<sub>3</sub>. Therefore, it is most likely that any "toxicity" observed was due to ion imbalance associated with elevated sea water concentrations and not due to toxic compounds. Only toxicity test results conducted using species tolerant of euryhaline conditions or tests conducted with marine species with salinity levels appropriately adjusted would be suitable for evaluating this listing. In the absence of such data, there is not enough suitable data to make a determination whether toxicity is present and should be listed.</p> <p>Secondly, the fact sheet for this listing describes the toxicity evaluation guideline as follows:</p> <p><i>Toxicity was defined as a reduction of the NOEC below 100% and was considered significant if the effect on the sample</i></p>	<p>Staff disagrees. Commenter fails to provide the salinity data as evidence that the toxicity was due to ion imbalance associated with elevated sea water concentrations and not due to toxic compounds.</p> <p>This data is from the Ventura Waste Water Treatment Plant. If the plant modifies its testing procedures for toxicity and new data demonstrate a different level of toxicity, that data can be considered in the next listing cycle.</p>
7.5	City of Ventura	Jun 17	<p><i>Toxicity was defined as a reduction of the NOEC below 100% and was considered significant if the effect on the sample</i></p>	<p>The Basin Plan states that "There shall be no chronic toxicity in ambient waters outside of mixing zones." The use of TUc is an appropriate evaluating value for translating the Basin Plan narrative</p>

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			<p><i>exposure was greater than 25%. Chronic toxicity is further expressed as toxic units (TUC), where TUC = 100/NOEC. The No Observable Effect Concentration (NOEC) is expressed as the maximum percent of receiving water that causes no observable effect on a test organism, as determined by the result of a critical life stage toxicity test. The NOEC is defined, in (USEPA, 2002) as the lowest concentration of toxicant to which organisms are exposed in a life-cycle or partial life-cycle (short-term) test, which causes adverse effects on the test organisms (i.e., where the values for the observed responses are statistically significantly different from the controls).</i></p> <p>This definition of the listing criteria is not sufficiently straightforward and clear given that the data provided is in the form of TUCs, and the numeric TUC value to which the data were compared was not provided. A more clear presentation of the above criteria would be that significant toxicity is considered a 75% effect or greater on the test organisms as a percentage of the control.</p>	<p>water quality objectives for chronic toxicity.</p>
7.6	City of Ventura	Jun 17	<p>Additionally, the toxicity listing is based on toxicity tests to multiple test species. The purpose of testing toxicity to multiple species of test organisms is that these different organisms are indicators of different types of toxicity problems. Therefore, it would be more appropriate and useful to list toxicity to each individual species independently, rather than one general toxicity listing that does not differentiate the different toxicity tests.</p>	<p>Staff disagrees. Multiple species are tested to ensure that the most sensitive species is protected, given the fact that certain species are more sensitive than others toward certain toxicants. Listing for toxicity rather than toxicity to a certain species is the more conservative approach because toxicity to any aquatic species impairs beneficial uses.</p>
7.7	City of Ventura	Jun 17	<p>Additionally, if there is significant toxicity to a test species by a survival endpoint, then toxicity by a reproduction or growth endpoint should not additionally be counted. Toxicity measured by a survival endpoint is greater than toxicity measured by a reproduction or growth endpoint, and is therefore already</p>	<p>Toxicity testing based on survival endpoint (i.e., acute toxicity) and toxicity testing based on a reproduction or growth endpoint (i.e., chronic toxicity) are counted and summed</p>

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8.1	LACDPW	June 17	<p>accounted for and need not be tested separately.</p> <p>In evaluating the sediment impairment in Bays and Estuaries for 303(d) listing purposes, the Regional Water Quality Control Board (Regional Board) - Los Angeles Region (Los Angeles Regional Board) utilized sediment quality guidelines and numeric objectives established by the National Oceanic and Atmospheric Administration (NOAA). These NOAA guidelines and objectives were established based on the single-line-of-evidence approach and were never intended to be used for 303(d) listing purposes.</p> <p>As you are aware, the State Water Resources Control Board (State Water Board) has developed Sediment Quality Objectives (SQO) for Enclosed Bays and Estuaries, adopted on September 16, 2008, in the State of California. For the purposes of assessing sediment impairment, the State SQO utilizes the multiple-line-of-evidence approach. Further, the State SQO was established based on the most recent scientific information available to date and is hence more robust and scientifically sound.</p> <p>The State SQO plan recommends that Regional Boards utilize the plan to evaluate sediment impairments in Bays and Estuaries to develop a new or revise the existing 303(d) list. Given that the State SQO supersedes the NOAA criteria, the State SQO must be used for appropriate evaluation of 303(d) listings of sediment impairments in Bays and Estuaries in the Los Angeles Region.</p>	<p>separately during evaluation and subsequently listed separately in the appendices.</p> <p>See response to comment 3.11.</p>
8.2	LACDPW	June 17	<p>The use of calendar-month approach for calculating the geometric mean for bacteria indicators is more reasonable than the 30-day rolling approach that has been used in the past.</p>	<p>Comment noted.</p>
8.3	LACDPW	June 17	<p>Bacteria standards established by the Los Angeles Regional Board (e.g., Basin Plan), the State Water Board (e.g., Ocean Plan), and the United States Environmental Protection Agency</p>	<p>Staff disagrees. The Basin Plan states that, "[t]he geometric means values should be calculated based on a</p>

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8.4	LACDPW	June 17	<p>(EPA) all require a minimum of five data points for the calculation of geometric mean to satisfy the needed statistical significance. The use of data points less than five for the calculation of geometric mean for 303(d) listing purposes does not follow the Federal and State standard guidelines. Given that the Los Angeles Regional Board indicated in its report that two or more samples were used in the calculation of the geometric mean, this does not meet the established guidelines for the calculation of geometric mean.</p> <p>It is clear that sufficient data points (&gt; 5) may not be available in each month. To avoid the insufficiency of data points, it is more appropriate to calculate the geometric mean based on calendar seasons (instead of calendar months), consistent with the EPA's recommendation. In this approach, a year can be divided into two to four seasons based on recreational uses and one geometric mean would be calculated for each season.</p>	<p>statistically sufficient number of samples (<i>generally</i> not less than 5 samples equally spaced over a 30-day period)". The Basin Plan does not explicitly stipulate the usage of five or greater samples for purpose of calculating geometric means.</p> <p>Staff disagrees. Bacteria densities are highly dynamic. Given the fact that beaches are more frequently visited some months than others, the calculation of a calendar month geometric mean is more protective of public health compared to a seasonal geometric mean.</p>
8.5	LACDPW	June 17	<p>Moreover, it is not appropriate to use geometric mean for 303(d) listing purposes. Geometric mean can be used to assess the condition of a water body over a longer time period for impaired water bodies, but not as a parameter for developing a new or revising the current 303(d) list. Thus, listing a water body for bacterial impairment shall be made exclusively based on the evaluation of the single-sample exceedances only</p>	<p>Staff disagrees. The Basin Plan includes geometric mean and single sample numeric objectives, consistent with USEPA's recommended 1986 Ambient Water Quality Criteria. Also, epidemiological studies have correlated increased illness to both geometric mean and single sample bacteria density. As such, the continued application of both single sample and geometric mean indicator bacteria objectives is consistent with existing US EPA criteria and is more protective of human health than just applying either the single sample or geometric mean objectives for listing purposes.</p>

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8.6	LACDPW	June 17	<p>Further, the Basin Plan lists four bacteria indicators (total coliform, fecal coliform, Enterococcus, and fecal-to-total coliform ratio) for marine waters and two bacteria indicators (E. coli and fecal coliform) for fresh water. With the exceedance-day approach used by the Los Angeles Regional Board to assess bacteria impairment, an exceedance day is defined as a day during which any of the bacteria indicators exceeds the standard. In the case of marine waters having four bacteria indicators, a day with exceedance in only one bacteria indicator can still be considered as an exceedance day, even if the other three remaining indicators do not show an exceedance. This approach is not logical and could potentially result in an unimpaired water body being listed as impaired. Instead, the appropriate approach should be to list a water body when two or more of the bacteria indicators have exceeded the standard.</p>	<p>Staff disagrees. Epidemiological studies, including the Santa Monica Bay Epidemiological Study, have found an increased incidence of illness when any of the four indicator bacteria densities is elevated. Based the findings of the epidemiological studies, staff finds that an exceedance of one indicator bacteria objective is sufficient to increase the incidence of illness and jeopardize public health.</p>
8.7	LACDPW	June 17	<p>We agree that actions need to be taken to curtail the impact of invasive species on the aquatic environment and human health. However, we have reservations on listing invasive species as pollutants requiring Total Maximum Daily Loads (TMDL). Invasive species should not be interpreted as pollutants. Invasive species are alien species of which the sources are mostly unknown, and even when known, they cannot be attributed to local discharges. Further, there is no water quality standards set for invasive species in the Basin Plan. Additionally, the State listing policy, which the current listing is based on, does not include guidelines for listing invasive species. Thus, the invasive species listing should be removed from the TMDL-required list.</p>	<p>Federal courts have found that, under the Clean Water Act, the term "pollutant" includes "biological materials" and can be regulated under the Clean Water Act (see <i>Northwest Environmental Advocates v. EPA</i>, No. C 03-05760 SI (N.D.Cal. September 18, 2006)).</p> <p>The State Listing Policy does not have specific guidelines for invasive species. However, under Section 3.10 of the Listing Policy, a listing can be made for declining trends in water quality including invasive species as was done by the State Board for several waterbodies in 2006 (e.g. Bodega Harbor, North Coast Region, invasive species 2006 listing).</p>

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8.8	LACDPW	June 17	<p>Invasive species should be treated as a cause of harm to the aquatic environment, but not as pollutants that require development of TMDL allocations. The impact of invasive species on the aquatic ecosystem should then be addressed through programs other than TMDLs.</p>	<p>See response to 8.7. If another program is developed to control or eradicate the mudsnail, that program can be the implementation action for a possible future TMDL. Otherwise, if another program is developed with specific water quality attainment dates, then a TMDL may not need to be developed. In all cases, if a waterbody is impaired and the impairment to the waterbody is documented, it needs to be included on the 303(d) list.</p>
8.9	LACDPW	June 17	<p>In the current evaluations for metals listing, it is unclear whether total or dissolved metals criteria are applied and appropriate hardness values are used. However, in reviewing some of the exceedances observed in the applicable datasets in comparison with the exceedances listed in the Los Angeles Regional Board's fact sheet for the proposed listings, it appears that most of the listings are made based on observed total metals fraction. The California Toxics Rule mandates that the dissolved, and not the total, metals fraction be used, as dissolved metals concentrations more closely approximate the bioavailable fraction of a metal than total recoverable concentrations do.</p> <p>Although the California Toxics Rule includes conversion factors for total metals, only dissolved metals were intended to be used as criteria for assessing water body impairment for 303(d) listing purposes. In the absence of dissolved metals data, listing a water body for metals impairment lacks the necessary scientific and regulatory basis. Therefore, all currently proposed metals listings that are generated based on observed total recoverable metals data must be removed. The assessment of water body impairment for metals must be made only based on observed dissolved metals data</p>	<p>Regional Board staff applied dissolved criteria when dissolved data were available. When only total metals data were available, staff used CTR conversion factors to express the dissolved criteria as total metals in order to assess the total metals data.</p> <p>Appropriate hardness values were used when analyzing metals data. When concurrent hardness values were available, they were used to adjust the criteria. When concurrent hardness values were not available, staff either omitted the sample from the data set or used the average hardness value for the previous and following data point. Both of these approaches are valid.</p> <p>CTR does not mandate the use of the dissolved data for water quality assessments. Although State Board did not use translators in developing the</p>

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8.10	LACDPW	June 17	For several water bodies in the Los Angeles Region, site-specific objectives (SSOs) for ammonia were developed, amended into the Basin Plan, and became effective on April 23, 2009. As	<p>2006 303(d) list, the language in CTR does not preclude the use of translators to compare total metals data to dissolved criteria in order to make water quality assessments. In fact, US EPA supports the use of translators (see US EPA's January 27, 2006 comment letter on the 2006 303(d) list) and added waters to the list based on the use of translators (see US EPA's June 28, 2007 final decision on waters added to the 2006 303(d) list).</p> <p>Staff believes that the use of translators to compare total metals data to dissolved criteria is appropriate because the CTR criteria are calculated based on total metals data. The criteria are calculated by multiplying the total metals criteria values (from the US EPA national section 304(a) criteria guidance) by conversion factors to obtain dissolved criteria (FR Vol. 65, No. 97, page 31690). The use of translators to compare total metals data to the dissolved criteria is, in essence, the same as reversing the last step in the CTR criteria calculations, which results in comparing like data to like criteria. Therefore, translators can and should be used to assess data when only total metals data are available.</p> <p>The ammonia Site Specific Objectives (SSOs) referred to were not in effect during the period of the 2008 303(d)</p>

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8.11	LACDPW	June 17	<p>indicated in the associated Basin Plan Amendment, the SSO adopted for ammonia applies to water bodies in the Los Angeles River, San Gabriel River, and Santa Clara River Watersheds.</p> <p>With the Los Angeles Regional Board having adopted the ammonia SSO, the criteria proposed in the SSO must be utilized for evaluating the current listing. Therefore, the assessments for ammonia impairment in all of the applicable watersheds need to be re-evaluated to reflect the appropriate ammonia water quality standards in the Basin Plan.</p> <p>Several of the new proposed 303(d) listings are generated based on the conditional beneficial use designations, which are denoted with an asterisk (*) in the Basin Plan. In the past, both the State Water Board and the EPA have taken the position that conditional beneficial uses are not final designations and should not be used for 303(d) listing purposes. As such, the State Water Board removed all of the proposed 303(d) listings generated for the conditional beneficial use designations during the 2006 303(d) listing update.</p> <p>Since the 2006 action, we are not aware of any status change on conditional beneficial use designations. Thus, the Regional Board must abide to the Federal and State policies and remove all water bodies that are proposed for the 2008 303(d) listings where a listing was done based on an evaluation of criteria for beneficial uses designated as conditional (i.e., asterisked) in the Basin Plan.</p>	<p>assessment. The effective date of the ammonia SSOs is April 23, 2009. Therefore, the modified objectives were not used in the determination of impairment, but will be used in the next listing cycle.</p> <p>See response to comment 5.1.</p>
8.12	LACDPW	June 17	<p>In its evaluation, the Los Angeles Regional Board used recommended maximum contaminant level criteria of 250 micrograms per liter as specified in the California Code of Regulations' Table 64449-B and concluded that five out of seven data points were exceeded. However, an exceedance for sulfate was observed for only one of the seven data points per the data collected by the LACFCID and reported to the Los Angeles</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p>



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8.13	LACDPW	June 17	<p>Regional Board. Given the State's 303(d) listing policy requires a minimum of two exceedances for a water body to be listed as impaired, Puente Creek is erroneously listed for sulfate and must be removed from the proposed listing.</p> <p>Bis(2-ethylhexyl)phthalates (DEHPs) are commonly found in plastic materials used for sampling and laboratory analysis, including gloves, tubings, and buckets that are made of plastics. A review of the LACFCD's sampling data from 2001 to 2007 indicates that a significant exceedance of DEHP was observed during the 2003-04 sampling season, but not detected in any of the remaining sampling years. In 2004 our records indicate that a change was made in the equipment used to analyze the samples. During the same period, it was noted that analytical laboratories across the State were making changes to address DEHP sample contamination. Given that the major sources of DEHP are plasticizers, the DEHP detections observed during the 2003-04 sampling season could potentially be a result of sample handling and laboratory analysis. Therefore, until further evidence is found that links the DEHP to sources other than the field and laboratory equipments used, this pollutant must not be included in the 303(d) list.</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p>
9.1	LA County Sans	June 17	<p>First, the Sanitation Districts would like to take this opportunity to commend Regional Board staff for their diligent implementation of the State Water Resources Control Board's ("State Board's") Quality Control Policy for Developing California's Clean Water Act Section 303(d) List ("Listing Policy") to produce, for the most part, a well-documented and scientifically valid 303(d) List. In addition, the Sanitation Districts greatly appreciate the efforts of the Regional Board to make the listing process more transparent, particularly through making the data used to assess listings available on the Regional Board's website and through production of clear fact sheets on each water body/pollutant combination.</p>	<p>Comment noted.</p>
9.2	LA County Sans	June 17	<p>Section 3.3.3 of the 2008 Update of the Los Angeles Region Integrated Report Clean Water Act Section 305(b) Report and</p>	<p>The presence of biostimulatory substances in our waterways and the</p>

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			<p>Section 303(d) List of Impaired Waters ("303(d) List Staff Report") states that in the current 303(d) List update, nitrogen impairment decisions continue to be based on the current Basin Plan objectives for nitrogen compounds. However, in the 303(d) List Staff Report the Regional Board proposes to use a new methodology for assessing nutrient-related impairments in the future. This methodology would rely on an assessment of both nutrient concentrations and one or more biological response indicators such as pH and dissolved oxygen.</p> <p>While we commend the Regional Board for recognizing the significant issues associated with eutrophication and nutrient-related impairments, the 303(d) List Staff Report is an inappropriate vehicle to introduce proposed nutrient criteria and objectives. Promulgation of new nutrient criteria and/or implementation policies related thereto constitutes an amendment to the Basin Plan, and should therefore be handled exclusively through appropriate Basin Plan amendment procedures. Adoption of Basin Plan amendments requires fulfilling the requirements of California Environmental Quality Act ("CEQA") as well as conducting an analysis in accordance with California Water Code 13241/13000 factors.</p>	<p>associated adverse impacts on beneficial uses are a significant problem. It is important that these impairments be included on the Region's list of impaired waters.</p> <p>The staff report does not propose nutrient criteria or objectives but listing guidelines to use when evaluating data relative to the narrative water quality objective for biostimulatory substances contained in the Basin Plan. Under the State Listing Policy, waterbodies can be included on the 303(d) list when standards or guidelines are exceeded. If a TMDL is developed for a waterbody listed using guidelines, the targets developed in that TMDL may be site specific having used those guidelines or other appropriate scientific approaches.</p> <p>The 303(d) list already includes listings for known biostimulatory substance-related problems such as algae, eutrophication and organic enrichment impairments. Developing a consistent approach to including waterbodies on the 303(d) list for biostimulatory substances and the associated effects is a goal.</p> <p>Staff looks forward to working with the Los Angeles County Sanitation Districts and other stakeholders as we determine the best way to proceed to address</p>

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9.3	LA County Sans	June 17	<p>The appropriate time to consider whether numeric nutrient criteria should be pursued is during the triennial review of the Basin Plan. During this and subsequent basin plan amendment review, the costs and benefits of adopting such criteria can be assessed and the priority for pursuing the criteria can be weighed against other basin planning priorities.</p> <p>To avoid duplication of effort, the Regional Board should wait until the State Board releases its NNE tools before considering whether it should develop its own independent nutrient objectives. The approach to nutrient criteria developed by the State Board and USEPA Region 9 is described in the report, "Technical Approach to Develop Nutrient Numeric Endpoints for California" ("CA NNE"), released in 2006. The CA NNE report calls for using multiple lines of biological responses to make an assessment of impairment. Based on this assessment, if an impairment exists, then nutrient concentrations can be examined to determine if they are causing or contributing to the impairment, and nutrient standards can then be developed as appropriate. In preparing this report, the State Board and other experts correctly recognized that ambient nutrient concentrations typically do not correlate with algal/nutrient related impairments, and thus nutrient concentrations should not be used to assess whether an impairment exists.</p>	<p>See response to comment 9.2. In addition, the Regional Board has identified the development of numeric nutrient objectives as a possible priority in the current triennial review cycle. Regional Board staff will continue to evaluate this along with other basin planning priorities.</p>
9.5	LA County Sans	June 17	<p>In conflict with the Statewide approach, the Regional Board approach includes nutrient concentrations (i.e., total nitrogen and phosphorous) as a line of evidence to use when assessing whether an impairment exists. Beneficial use impairment only occurs when, independent of nutrient loading, the biological response is of sufficient magnitude to adversely impact the use.</p>	<p>The Regional Board has proposed possible guidelines for including a waterbody on the 303(d) list. We propose including a numeric line of evidence with the biostimulatory substances impairment as the Listing Policy Section 3.7 requires for impairments due to "...odor, water taste, excessive algae growth..." etc.</p>

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9.6	LA County Sans	June 17	<p>Examples of the proposed Regional Board approach to nutrient criteria are presented in Tables 3-2 and 3-3 of the 303(d) List Staff Report. In this table, the Regional Board lists criteria from a number of different sources, including the 2000 USEPA National Nutrient Criteria Technical Guidance ("National Guidance") and the subsequent 2001 USEPA Ecoregion III Nutrient Criteria Recommendations for Rivers and Streams ("Ecoregion III Guidance"). The purpose of the National Guidance was not to recommend specific nutrient criteria, but rather to describe an approach to be used by the states to develop such criteria. The numbers cited by the Regional Board in Tables 3-2 and 3-3 of the 303(d) List Staff Report from the National Guidance were taken from a table listing a number of examples of numeric thresholds drawn from various studies. No justification was provided by the Regional Board as to why these particular values were chosen, or why these particular values would be applicable to waterbodies in the Los Angeles Region. Furthermore, the approach described in the National Guidance and in the Ecoregion III Guidance, which covers the Xeric West ecoregion that includes most of the Los Angeles Basin, has been widely criticized for its technical shortcomings. Under this approach, criteria for nutrients are set at the 25th percentile of nutrient concentrations for all waterbodies within an ecoregion. This arbitrarily delineates 75% of the waterbodies in a region as impaired.</p> <p>Additionally, no attempt was made in the guidance documents to show a relationship between the nutrient criteria and eutrophic conditions that would affect beneficial uses. In response to these and other flaws, the guidance was never adopted in California, and the State Board and USEPA Region 9 continued to pursue efforts to develop guidance specific to California, as described above.</p>	See comment 9.2.
9.7	LA County Sans	June 17	<p>Another criteria source listed by the Regional Board was a New Zealand guidance document. The Sanitation Districts believe that criteria for another continent should not be used without a</p>	The New Zealand guidance was used in the development of the Malibu Creek Nutrient TMDL and found to be useful.

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9.8	LA County Sans	June 17	<p>high degree of scrutiny to ensure that it is appropriate for the Los Angeles Region.</p> <p>A site-specific study for Malibu Creek was also referenced; however, criteria for one specific water body should not be applied region-wide unless a technical review indicates that it is appropriate region-wide.</p>	<p>and appropriate.</p> <p>The Malibu Creek study is just one of several guidance documents referenced including national guidance and southern California guidance.</p>
9.9	LA County Sans	June 17	<p>The last source mentioned is the State Board NNE screening tools for 303(d) listing. While the Sanitation Districts concur that the State Board's NNE guidance, as presented in the CA NNE report, is the most appropriate guidance currently available, the Regional Board's tables do not accurately portray the guidance in the report. In particular, the pH, dissolved oxygen, total nitrogen, and total phosphorus criteria listed in Table 3-2 for the State Board NNE screening tools for 303(d) listing are not consistent with the CA NNE report.</p>	<p>The tables in the Staff Report do not reference the CA NNE set of reports and studies, but the <i>Nutrient Screening Tools for Use in the Clean Water Act Section 303(d) Listing Process</i> as developed by State Board in 2007.</p>
9.10	LA County Sans	June 17	<p>Additionally, the criteria listed for benthic algal biomass are misrepresented; the criteria listed are not meant to be used to determine impairments, but rather, to distinguish between waterbodies that are definitely not impaired versus those that are potentially impaired, but for which further study is needed to assess an impairment.</p>	<p>Comment noted.</p>
9.11	LA County Sans	June 17	<p>The Sanitation Districts believe that the following water body/pollutant combinations should not be added to the 303(d) List:</p> <p>Coyote Creek - sulfate and TDS (based on application of secondary MCLs) San Gabriel River Reach 1 - TDS (based on application of secondary MCLs) San Jose Creek Reach 1 - sulfate (based on application of secondary MCLs)</p> <p>Santa Clara River Reach 5 - iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane (based on application of California Toxics Rule</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting. Also see response to comment 5.1 for the Santa Clara River Watershed.</p>

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9.12	LA County Sans	June 17	<p>(CTR) human health criteria using water plus organisms)            Santa Clara River Reach 6 - iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, bis(2-dichlorobromomethane, bis(2-ethylhexyl)phthalate (based on application of CTR human health criteria using water plus organisms)</p> <p>These new proposed listings are erroneously based on application of the conditional Municipal and Domestic Supply (P* MUN) beneficial use. A federal court, the State Board, and the USEPA have all determined that the P*MUN beneficial use is not a properly designated use available for any regulatory purpose, including assessment of water bodies for inclusion on the Regional Board's proposed 2008 303(d) List. The application of the conditional P* MUN beneficial use resulted in the incorrect application of maximum contaminant levels (MCLs) and CTR human health criteria using "water plus organisms" standards.</p> <p>In addition to addressing application of the P*MUN use when it evaluated the 2006 303(d) List, the State Board provided direction on several additional issues, to ensure statewide consistency in assessment of water body impairments.<sup>2</sup> These issues include the use of dissolved and total fraction metals data, the use of wet and dry weather data, and the use of concurrent or average hardness values for hardness-dependent metals. The Regional Board failed to adhere to this direction when making several listing decisions. The Sanitation Districts believe that consistent application of the guidance provided by the State Board will result in a cohesive, well-documented, and scientifically valid 303(d) List, and urge the Regional Board to follow this guidance.</p>	
				<p>Regarding the use of dissolved and total fraction metals data, Regional Board staff has been consistent with US EPA guidance on the use of translators to compare data reported as the total metals fraction to criteria expressed as the dissolved metals fraction. US EPA supports the use of translators (see US EPA's January 27, 2006 comment letter on the 2006 303(d) list) and added waters to the list based on the use of translators (June 28, 2007 final decision on waters added to the 2006 303(d) list).</p>

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				<p>Staff believes that the use of translators to compare total metals data to dissolved criteria is appropriate because the CTR criteria are calculated based on total metals data. The criteria are calculated by multiplying the total metals criteria values (from the US EPA national section 304(a) criteria guidance) by conversion factors to obtain dissolved criteria (FR Vol. 65, No. 97, page 31690). The use of translators to compare total metals data to the dissolved criteria is, in essence, the same as reversing the last step in the CTR criteria calculations, which results in comparing like data to like criteria. Therefore, translators can and should be used to assess data when only total metals data are available.</p> <p>Regarding the use of wet and dry weather data, staff is consistent with State Board and US EPA guidance. Staff has not separated dry and wet weather data for listing decisions.</p> <p>Regarding the use of concurrent or average hardness values for hardness-dependent metals criteria, staff has used concurrent hardness values to calculate criteria when available. When concurrent hardness values were not available, staff either omitted the sample from the data set or used the average hardness value for the previous</p>

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9.13	LA County Sans	June 17	<p>In several instances the Sanitation Districts' analyses of listing decisions reached different conclusions than the Regional Board analyses because the Sanitation Districts were able to identify additional data that, when considered together with the data considered by the Regional Board, demonstrate attainment. In all instances, the Sanitation Districts believe that these data meet the definition of "existing and readily available data," and therefore must be considered by the Regional Board.<sup>3</sup> In most cases, these data were collected as part of NPDES permit monitoring requirements and were submitted to the Regional Board in discharge monitoring reports. The data were, therefore, in the possession of the Regional Board. In some cases, the data were collected after the initial data solicitation for the 2008 303 (d) List, and a large enough dataset is now available to meet the minimum number of samples required for listing/delisting. In all of these instances, re-examination of the proposed decisions with respect to listing is warranted to ensure that sound listings decisions are made in accordance with the Listing Policy.</p>	<p>and following data point. Both of these approaches are valid. Using the average hardness value for the entire data set to estimate the hardness values instead of these two approaches would not change the listing decisions.</p> <p>Data collected after the solicitation period will be evaluated during the next listing cycle.</p>
9.14	LA County Sans	June 17	<p>In addition to these general comments, the Sanitation Districts have specific comments on the listing decisions for a number of water body/pollutant combinations. Detailed specific comments are provided in the appendices to this letter, and Attachment 1 includes a tabular summary of the specific comments. Based on review of the data and fact sheets released for public comment, the Sanitation Districts have identified a number of water body/pollutant combinations proposed for inclusion on the 2008 303(d) List that are attaining water quality standards and therefore qualify for delisting (or, alternatively, when they are not already on the 303(d) List do not qualify for listing). The</p>	<p>See responses to the specific comments below.</p>



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9.15	LA County Sans	June 17	<p>Sanitation Districts believe it is very important for the Regional Board to follow-up on this information and make changes to the proposed 2008 303(d) List where appropriate, since the implications of erroneous listings are substantial.</p> <p>The Sanitation Districts have reviewed the Regional Board's 303(d) listing analyses for the water body/pollutant combinations listed below. The Sanitation Districts believe the analyses are technically sound, and support the Regional Board's decisions to remove these water body/pollutant combinations from the 303(d) list:</p> <ul style="list-style-type: none"> <li>• Ballona Creek – silver</li> <li>• Coyote Creek - zinc</li> <li>• Los Angeles River Estuary - lead (sediment) and zinc (sediment)</li> <li>• Rio Hondo Reach 2 - ammonia</li> <li>• San Jose Creek - selenium</li> <li>• Wilmington Drain - ammonia</li> <li>• Walnut Creek Wash - toxicity</li> </ul>						Comment noted.
9.16	LA County Sans	June 17	Water Body	Constituent	Regional Board Proposed Decision	Sanitation Districts Recommendation	Reason	<p>Regional Board staff believes it is appropriate to use translators to compare data reported as the total metals fraction to criteria expressed as the dissolved metals fraction for both listing and delisting evaluations (see response to comment No. 9.13).</p> <p>The additional dissolved copper data provided by the commenter was collected after the solicitation period will be evaluated during the next listing cycle.</p> <p>See response to comment 8.10</p>	
			San Gabriel River Estuary	Copper	Do Not Delist	Delist	Water quality objective being achieved		
9.17	LA County Sans	June 17	<p>*See Attachment I Fact sheet A of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.</p>						

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						being achieved	
9.18	LA County Sans	June 17	Santa Clara River Reach 6	Copper	List	Do not list	Water quality objective being achieved
			*See Attachment 1 Fact sheet B of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.				
9.19	LA County Sans	June 17	San Gabriel River Reach 2	Cyanide	List	Do not list	Water quality- objective being achieved
			*See Attachment 1 Fact sheet D of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.				

Staff disagrees. All dry weather and wet weather data were used. The criterion was recalculated for each individual sample using the corresponding hardness value for the sample and the hardness dependant criterion formula listed in CTR. Analysis of the readily available data indicates San Clara River Reach 6 is not meeting the copper water quality objective and shall remain on the list.

Wet and dry weather data were not separated for the analyses.

While the commenter provided an additional 108 data points, 101 of these were for sampling locations not within Reach 2 but were included in the analyses for Reach 3. In keeping with the precedent set by the 2002 and 2006 303(d) evaluations, the San Gabriel River Reach 2 is considered to extend from Firestone Blvd to the Whittier Narrows Dam. The rest of the data was generated after the solicitation period and the result of a special LACSD study not available to Staff during the assessment. Data collected after the solicitation period will be evaluated during the next listing cycle. Analysis of the available data indicates San Gabriel River Reach 2 is not meeting

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9.20	LA County Sans	June 17	Santa Clara River Reach 6	Chlorpyrifos	Do Not Delist	Delist	Water quality objective being achieved	<p>the cyanide water quality objective and shall remain on the list.</p> <p>Staff disagrees that only two of the SWAMP were valid. Based on section 4.1 and table 4.1 of the Listing Policy, a minimum of 28 samples is needed to support delisting of a toxicant. An analysis of the data up to February 2007 indicates that there are an insufficient number of samples to support the delisting of chlorpyrifos based on section 4.1 of the Listing Policy.</p> <p>See response to comment 5.3 regarding the USEPA phase-out of chlorpyrifos.</p> <p>Data collected after the solicitation period will be evaluated during the next listing cycle.</p>
9.21	LA County Sans	June 17	San Gabriel River Estuary	Nickel	List	Do not list	Insufficient Basis to List	<p>Regional Board staff believes it is appropriate to use translators to compare data reported as the total metals fraction to criteria expressed as the dissolved metals fraction for both listing and delisting evaluations. Also see response to comment 9.13.</p> <p>Staff disagrees with rejecting data due to "holding time violation". Concentrations of chlorpyrifos in samples can only decrease with time. These data should still be considered for listing since chlorpyrifos was detected in most of the samples even if the holding time passed.</p>
9.22	LA County Sans	June 17	Santa Clara River Reach 6	Diazinon	Do Not Delist	Delist	Water quality objective being achieved	<p>*See Attachment I Fact sheet F of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.</p> <p>*See Attachment I Fact sheet G of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.</p>

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9.23	LA County Sans	June 17	San Gabriel River Reach 1	Total Dissolved Solids	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply	Based on section 4.1 and table 4.1 of the Listing Policy, a minimum of 28 samples is needed to support delisting of a toxicant. An analysis of the data up to February 2007 indicates that there are an insufficient number of samples to support the delisting of diazinon based on section 4.1 of the Listing Policy.  See response to comment 5.3 regarding the USEPA phase-out of diazinon.  Data collected after the solicitation period will be evaluated during the next listing cycle.
9.24	LA County Sans	June 17	Coyote Creek	Total Dissolved Solids & Sulfate	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply.	See response to comment 9.12.  See response to comment 9.12.
9.25	LA County Sans	June 17	Santa Clara River Reaches 5 and 6	Iron & Conductivity	List	Do not list	Beneficial Use is wrong for water Body; MCLs do not apply.	See response to Comment 5.1.
9.26	LA County	June 17	Coyote	Diazinon	List	Do not list	Water	See response to comment 5.3.

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			Creek			quality objective being achieved	
9.27	LA County Sans	June 17	*See Attachment I Fact sheet I of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.				All dry weather and wet weather data were used in the assessment for this reach. Dry and wet weather data within the same line of evidence were combined. However, staff did not combine lines of evidences due to the fact different fractions were collected and analyzed.
			Coyote Creek	Copper	Do Not Delist	Delist	
			*See Attachment I Fact sheet J of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.				Total and dissolved fraction data was evaluated, but in separate lines of evidence.  Staff has used concurrent hardness values to calculate criteria when available. When concurrent hardness values were not available, staff used the average hardness of the previous and following data point. In response to this comment, staff recalculated the criteria using the average hardness value of the entire data set and it did not change the number of exceedances.  However, in reviewing the data for this comment, a copy error was detected for the criteria formula. Staff has corrected the error.
							An assessment of the available data

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9.28	LA County Sans	June 17	Coyote Creek	Lead	Do Not Delist	Delist	Water quality objective being achieved	<p>indicates that Coyote Creek is still not meeting the copper water quality objective and shall remain on the list.</p> <p>Revised appendices (decision language only).</p> <p>The error in the formula for the CCC has been corrected.</p> <p>See comment 9.27 for discussion of hardness data.</p> <p>Both the LACSD data and the MS4 data were evaluated for this analysis. All dry weather and wet weather data were used in the assessment for this reach. Dry and wet weather data within the same line of evidence were combined. However, the data sets were kept as separate lines of evidence and not combined due to the different fraction analyzed.</p> <p>An assessment of the available data indicates that Coyote Creek is still not meeting the copper water quality objective and shall remain on the list.</p> <p>The data evaluation was revised to include four-day average dissolved lead concentrations compared to the four-day average criteria, where available.</p> <p>The error in the formula for the CCC has been corrected. The correction</p>
9.29	LA County Sans	June 17	San Gabriel River Reach 2	Lead	List	Delist	Water quality objective being achieved	<p>*See Attachment 1 Fact sheet K of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.</p> <p>*See Attachment 1 Fact sheet L of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.</p>

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9.30	LA County Sans	June 17	<p>Chlorodibro momethane</p> <p>Santa Clara River Reaches 5 and 6</p>	<p>resulted in slight differences in the calculated CCC, but did not change the number of exceedances.</p> <p>See comment 9.27 for discussion of wet and dry weather and hardness data.</p> <p>No total fraction data was available for this waterbody-pollutant analysis from the original data solicitation. While the commenter did provide an additional 135 data points of total fraction data, 126 of these were for sampling locations not within Reach 2. Analyses of these data were included in the analyses for Reach 3. In keeping with the precedent set by the 2002 and 2006 303(d) evaluations, the San Gabriel River Reach 2 is considered to extend from Firestone Blvd to the Whitier Narrows Dam. The rest of the data was generated after the solicitation period and the result of a special LACSD study not readily available to Staff. Data collected after the solicitation period will be evaluated during the next listing cycle. Analysis of the readily available data indicates San Gabriel River Reach 2 is not meeting the lead water quality objective and shall remain on the list.</p>
			<p>Beneficial Use is wrong for water Body; MCLs do not apply.</p> <p>Do not list</p> <p>List</p>	<p>Staff agrees. See response to comment 5.1. Beneficial use will change to REC1 on the fact sheet. Exceedances of CTR</p>

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9.31	LA County Sans	June 17	Santa Clara River Reaches 5 and 6	Dichloro methane	List	Do not list	Human Health Criteria for Water & Organisms impact the REC1 beneficial use.  See response to comment 5.1.  Exceedances of CTR Human Health Criteria for Water & Organisms impact the REC1 beneficial use. <u>Revise factsheet</u>
9.32	LA County Sans	June 17	San Jose Creek Reach 1	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
9.33	LA County Sans	June 17	Santa Clara River Reach 5	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
9.34	LA County Sans	June 17	Santa Clara River Reach 5	Nitrate and Nitrite	Do Not Delist	Delist	Water quality objective being achieved
9.35	LA County Sans	June 17	Santa Clara River Reach 6	Ammonia	Do Not Delist	Delist	Water quality objective being achieved
9.36	LA County	June 17	Santa Clara River	Polychlorinat ed biphenyls	List	Do not list	Insufficient- Basis to List



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			Reach 5 (PCBs)					
	Sans		Reach 5				<p>The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p> <p>Staff reevaluated data for Castaic Creek and SCR Reach 5 separately and found that there are not enough data for Castaic Creek and only 1 of the 2 samples exceeded CTR human health criteria. The proposed listing of DDT for SCR Reach 5 will be deleted.</p> <p>Excluding data from Castaic Lake, SCR Reach 5 data show that 1 of 2 samples exceeded the water quality standard. So PCB for SCR Reach 5 will not be added to the 303(d) list.</p>	
9.37	LA County Sans	June 17	Santa Clara River Reach 5	DDT	List	Do not list	Insufficient Basis to List	<p>Staff agrees and has proposed not listing. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.</p> <p>Excluding data from Castaic Lake, SCR Reach 5 data show that 1 of 2 samples exceeded the water quality standard. So DDT for SCR Reach 5 will not be added to the 303(d) list.</p> <p>Staff reevaluated data for Castaic Creek and SCR Reach 5 separately and found that there are not enough data for Castaic Creek and only 1 of the 2 samples exceeded CTR human health criteria. The proposed listing of DDT</p>

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9.38	L.A County Sans	June 17	Santa Clara River Reach 6	Bis(2ethylhexyl)phthalate (DEHP)	List	Do not list	Water quality objective being achieved	for SCR Reach 5 will be deleted.
			*See Attachment 1 Fact sheet U of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.					Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.  Listing of Bis(2ethylhexyl)phthalate in the Santa Clara River Reach 6 will be deleted because the comment letter verified that exceedances were due to sample contamination.
9.39	L.A County Sans	June 17	Walnut Creek .	Copper	List	Do not list	Water quality objective being achieved	Staff agrees. However, in reviewing the data for this comment, a copy error was detected for the hardness and criteria formula. Staff has corrected both errors. The data evaluation was revised to include four-day average dissolved copper concentrations compared to the four-day average criteria, where available. Corrected analysis of the data indicates Walnut Creek is meeting the water quality objective for copper and shall be removed from the list.
			*See Attachment 1 Fact sheet V of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.					Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.
9.40	L.A County Sans	June 17	Santa Clara River Estuary	Arsenic	List	Do not list	Water quality objective being achieved	Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting.
			*See Attachment 1 Fact sheet W of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.					Staff agrees. However, in reviewing the data for this comment, a copy error was
9.41	L.A County Sans	June 17	Walnut Creek	Lead	List	Do not list	Water quality objective	Staff agrees. However, in reviewing the data for this comment, a copy error was

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				being achieved	
			*See Attachment 1 Fact sheet X of the County Sanitation Districts of Los Angeles County comment letter for the detailed specific comments.		detected for the hardness. The data evaluation was revised to include four-day average dissolved lead concentrations compared to the four-day average criteria, where available.
10.1	CPR	Jun 17	<p>First, CPR commends the Water Boards for updating the 303(d) list within the context of the Integrated Report. This approach presents a more comprehensive assessment of water quality within the region. In addition, we would like to thank the Regional Water Board for following the Listing/Delisting Policy established by the State Water Board. The establishment and use of this policy facilitates the continued improvement of the 303(d) list. One of the areas in which CPR would like to acknowledge improvement is in delisting, due to Regional Board staff's application of the Delisting Policy.</p>		<p>Corrected analysis of the data indicates Walnut Creek not meeting the water quality objective for lead and shall be removed from the list.</p> <p>Comment noted.</p>
10.2	CPR	Jun 17	<p>State Board staff previously recommended correcting past mistakes by delisting erroneously listed water segment-pollution combinations. These proposed corrections included listings for which data used to list a pollutant was actually from a different water body, listings for which an insufficient number of samples exceeded the CTR criteria, listings for which biological impacts documented were not associated with toxicity or pollutant concentrations, listings for which the listing was based on faulty data, and listings for which data used to list a waterbody could not be found. CPR is pleased to note that Regional Board staff recognizes the validity of those State Board suggestions. Many of the proposed delistings are the result of recognizing that there were flaws in the original listings. The delisting of waterbody-segment combinations that do not need to be addressed allows</p>		<p>Comment noted.</p>

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10.3	CPR	Jun 17	<p>permittees to better focus water quality resources on real issues. However, CPR continues to be concerned that additional work is required to ensure that the 303(d) list becomes a focused and technically defensible instrument. The proposed 2008 revision continues to include listings for conditions where actual pollutants have not been identified. Requiring permittees to treat for a condition rather than a listing is problematic at best; if the Regional Board staff and permittees do not have an understanding of what we should be controlling, and, by extension, how we should be controlling it, any attempts at source control or treatment will be unfocused and are unlikely to be successful.</p>	See response to comment 3.4.
10.4	CPR	Jun 17	<p>Further, the 303(d) list still contains listings that are based on potential future uses rather than probable future uses. As CPR has stated in the past, potentiality is an unreasonably broad concept on which to base listings. Erroneous listings such as these could trigger TMDLs for uses that do not exist and are not likely to exist and would be an extremely costly mistake that could potentially waste millions of dollars.</p> <p>CPR requests that the Board direct staff to search out and remove any additional erroneous historic listings that were based on potential rather than probable future uses, and to remove all historic listings of conditions for which causative pollutants have not been identified. Given the absence of rules for listing before the Listing/Delisting Policy was adopted in September 2004, earlier listings were sometimes inconsistent, poorly documented, and ratified by the State Board without careful review. Additional work remains to ensure that all of the past listings are valid, supported by appropriate documentation, and based upon the application of a consistent set of standards.</p>	<p>The commenter has submitted no evidence that the uses in question which are identified as "potential" are "unreasonably broad", "not likely to exist", or a mistake of any sort, "extremely costly" or otherwise. Whether it is appropriate to identify designated uses as "potential" is the subject of the commenter's collateral litigation in the matter of Cities of Arcadia v. SWRCB. That matter is currently on appeal. Whatever the ultimate outcome of that litigation may be, the commenter's comment and argument must be directed to the standards setting process, not to the 303(d) listing process. Presently, the potential uses generally referenced by the commenter are components of the federally approved water quality standards under CWA section 303(c). The section 303(d) list requires an assessment of where the federally</p>

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				<p>approved 303(c) standards are not being attained. The state is required to identify as impaired all waters not attaining the federally approved water quality standards. The state lacks legal authority to omit waters not meeting designated uses identified as "potential" uses, as requested by the commenter. If the commenter presents evidence in the standards setting process, demonstrating that a particular designated use is not reasonably attainable, and the Regional Board has legal authority to modify the particular use, the Regional Board will consider whether such modifications are appropriate. Assuming such modifications are made, the 303(d) list would thereafter be modified to reflect the impaired or attainment status of the water body as compared to the modified standards. The commenter's objection to designating potential uses does not provide a legal or evidentiary basis to fail to identify waters not attaining potential uses on the 303(d) list. Historic listings will not be reconsidered without evidence demonstrating that a particular listing is presently incorrect. The fact that a listing determination was made prior to the policy's adoption is not itself a basis to reconsider the otherwise proper listing. Earlier decisions made prior to adoption of a policy are not rendered invalid by the subsequent adoption of a</p>

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10.5	CPR	Jun 17	Further, because the determination of impairments is based on core beneficial uses associated with each waterbody segment, the beneficial uses defined in the Basin Plan should be thoroughly reviewed and revised as necessary before the next update to the 303(d) list.	<p>policy. In fact, the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (September 30, 2004) expressly states: "The most recently completed section 303(d) list shall form the basis for any subsequent lists." (P. 17, section 6. Policy Implementation.)</p> <p>The waste of resources associated with reconsidering prior decisions without evidence that suggests the listing is not currently correct is magnified in view of the state budget deficit and the associated resulting lack of resources.</p> <p>Staff disagrees. The core beneficial uses as identified in the category lists are categories of beneficial uses devised by USEPA so, ultimately, data from all Regions and States could be combined even though they may have different designated beneficial uses.</p> <p>Impairments are determined as an impairment of a beneficial uses as listed and defined in the Basin Plan.</p> <p>Beneficial uses in the Basin Plan are reevaluated and revised, where deemed necessary, within the triennial review process.</p>
10.6	CPR	Jun 17	CPR notes that the largest group of new listings in the 2008 303(d) list is for indicator bacteria. As acknowledged in the staff report, the "indicator bacteria" impairment category includes a range of bacterial indicators to protect water contact recreation and non-contact water recreation beneficial uses. Both the beneficial uses and the indicators of impairment require refinement to focus on existing and probable future beneficial	<p>See response to comment 10.4 regarding existing and probable future uses and response to comment 10.5 for reevaluating beneficial uses.</p> <p>As bacterial standards are updated or refined, determinations of impairment due to bacterial indicators will also be</p>

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10.7	CPR	Jun 17	<p>uses and on human pathogens.</p> <p>CPR is pleased to see that the subcategories of Water Quality Limited Segments Being Addressed by USEPA-Approved TMDL and Water Quality Limited Segments Being Addressed by Action Other than TMDL are being utilized in the 2008 list. Use of these subcategories implements suggestions made in the <i>State Guidance for Addressing Impaired Waters</i> and provides encouragement to municipalities attempting to make improvements and comply with regulations.</p>	<p>reviewed.</p> <p>Comment noted.</p>
10.8	CPR	Jun 17	<p>CPR has a specific question about Los Cerritos Channel. In a meeting with stakeholders in the Los Cerritos Channel Watershed and Regional Board staff, Peter Kozelka from USEPA Region IX indicated that he thought that ammonia would be delisted for the channel during the current update to the 303(d) list. However, we do not see evidence that it was even considered for delisting. We would appreciate an explanation of the status of this listing and why there is no fact sheet for this waterbody/pollutant combination.</p>	<p>Staff has reviewed the Los Cerritos data and finds that, at this time, there is not enough data to justify delisting under the State Listing Policy.</p>
10.9	CPR	Jun 17	<p>Further, CPR appreciates staffs recommendation to solicit stakeholder comments on proposed criteria for the development of guidelines for listing waterbodies as impaired for biostimulative substances to be used in future updates of the 303(d) List. Developing a sound scientific basis for listing decisions is essential in order to focus resources on solving real water quality problems.</p>	<p>Comment noted.</p>
11.1	Heal the Bay	June 17	<p>Heal the Bay supports the proposed addition of 66 waterbody-pollutant segments in the Los Angeles Region (Region 4) to the 2008 List. Specifically, we strongly support the addition of invasive species listings for numerous waterbodies in the Malibu Creek Watershed and indicator bacteria listings at several impacted beaches. Regional Board staff correctly identified a negative trend in water quality in association with the proliferation of invasive species (specifically New Zealand Mudsnails) and the associated degradation of the Aquatic Life Support core beneficial use. In the case of the proposed indicator</p>	<p>Comment noted.</p>

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11.2	Heal the Bay	June 17	<p>bacteria listings, these listings are critical as beach bacteria water quality standards are clearly not being met and public health is at risk.</p> <p>During the public solicitation of water quality data and information for the 2008 public comment period, Heal the Bay submitted seven Index of Biological Integrity ("IBI") data sets from multiple sources.<sup>1</sup> As described below, these data sets provided sufficient information to necessitate listings for "biological community impairment." However, there is no mention of any evaluation of these data in the Staff Report and no proposed new listings were made for biological community impairment in the Region.</p>	<p>Staff has reviewed the submitted data sets, reviewed the available reports which originally reported that data and have proposed for inclusion on this 303(d) list, 11 new listings for "Benthic Macroinvertebrate Bioassessment."</p>
11.3	Heal the Bay	June 17	<p>Specifically, water segments with IBI data in the poor and very poor ranges meet the listing factors in sections 3.9 and 3.11 of the Listing Policy. Inherently, the IBI scoring system compares monitoring site conditions to reference sites. Thus, in accordance with Section 3.9, the IBI data indicate significant degradation in biological populations and/or communities as compared to reference sites. In addition, one sample is sufficient for considering IBI scores due to the extensive sampling protocol used in the IBI process, which takes into account site variability and is designed to combat sampling errors.<sup>5</sup> In essence, one IBI score is really multiple samples within a creek run. In other words, the Board does not need to use the Listing Policy's binomial distribution table to correct for these issues because the sampling methods are so rigorous.</p>	<p>Comment noted.</p>
11.4	Heal the Bay	June 17	<p>Also, IBI scores can and should be evaluated using the situation-specific weight of evidence approach. Section 3.11 of the Listing Policy states that "if the weight of evidence indicates non-attainment [of water quality standards], the water segment shall be placed on the section 303(d) list." Listing Policy at 8. The IBI scores should be weighed heavily in conducting such an analysis. Water quality standards and beneficial uses are not being attained in waterbodies with an IBI score less than 39.</p>	<p>Comment noted.</p>
11.5	Heal the Bay	June 17	<p>As acknowledged in the Staff Report, the Basin Plan's "nitrogen</p>	<p>Comment noted.</p>



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11.6	Heal the Bay	June 17	<p>water quality objective does not protect waterbodies from impairments related to biostimulatory substances and eutrophication." Staff Report at 10. Thus, staff proposes to include waterbodies on the 303(d) List for biostimulatory substances "when both nutrient concentrations and one or more biological response indicators are at levels which characterize eutrophic conditions and/or beneficial uses of the waterbody are impaired." Staff Report at 11. We strongly support this approach and Tables 3.1 and 3.2 of the Staff Report which present various nutrient concentrations and associated biological response indicator criteria limits. Specifically, the Tables present thresholds that are representative of the concentrations at which one sees biostimulatory impacts in the Region. Criteria such as these are long overdue, as eutrophication and nutrient enrichment is one of the biggest water quality issues facing California and the Nation, and should be utilized in current 303(d) listing decisions.</p> <p>Although the Staff Report outlines these recommendations for biostimulatory substances listings, the Regional Board fails to take any action on these pollutants during the current 2008 listing cycle. "In future updates, Regional Board staff is considering categorizing these impairments all as 'biostimulatory substances' using a Los Angeles Region specific, nutrient concentration/biological response method as described below. In this 2008 list update, however, no "biostimulatory substances" impairments have been included." Staff Report at 10. It is inappropriate for the Regional Board to delay these critical listings to the next listing cycle. Thus, we urge the Regional Board to evaluate the current data sets using the criteria outlined in Tables 3.1 and 3.2.</p>	<p>Staff looks forward to working with Heal the Bay and other stakeholders as we determine the best way to proceed to address impairments due to biostimulatory substances in our Region's waterbodies.</p>
11.7	Heal the Bay	June 17	<p>The Staff Report states that when evaluating exceedances of bacteria limits, "... a calendar month approach as opposed to a rolling 30 day sample approach was used to assess geometric mean to maintain sample independence." Staff Report at 8. In other words, only one geometric mean was calculated per month as</p>	<p>Due to the importance of the issue, the several efforts that are underway to develop criteria and guidelines, and the potential consequences of listing decisions, Staff believe additional involvement and feedback from stakeholders is prudent before making new listing decisions using the new criteria and/or guidelines.</p>
	Heal the Bay	June 17		<p>Staff is compelled to follow the provisions of the Listing Policy. As such bacteria impairments are determined through the usage of Table 3.2 which relies on binomial</p>

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11.8	Heal the Bay	June 17	<p>opposed to the four or five results one would produce when using a rolling calculation. Using a static time-frame like a calendar month to assess a very dynamic system is completely inappropriate, statistically unsound, and is not protective of public health. In fact, the state's Ocean Plan requires all indicator bacteria monitoring programs to meet beach water quality standards based on the 30 day rolling geometric mean. The Regional Board fails to provide any sound justification for taking a different approach and does not discuss how this could possibly be statistically superior to and more protective of public health than a rolling average when dealing with indicator bacteria. The end result of this approach will be far fewer beaches listed, far fewer TMDL violations, and far more beachgoer illness. Thus, we urge the Regional Board to evaluate indicator bacteria data using the rolling 30 day geometric mean.</p> <p>The Staff Report states that "if [beach] water quality monitoring was conducted April 1 through October 31 only, a four percent exceedance percentage shall be used." The Staff Report continues to say that for delisting purposes, "A 19% exceedance percentage was used for water quality monitoring conducted April 1 through October 31..." Staff Report at 7. After talking to staff, it became clear that the provided exceedance percentages are used as the null hypothesis for the binomial distribution in the Listing Policy. This should be clarified within the Staff Report as it is not obvious as currently written.</p>	<p>distribution. The application of binomial distribution requires sample independence, which a rolling geometric mean would not provide.</p> <p>Additionally, the use of a calendar month for calculation of the geometric mean is one of the alternatives identified by the US EPA in its BEACH Act Rule.</p> <p>Finally, the State Ocean Plan does not require a <i>rolling</i> geometric mean calculation.</p>
11.9	Heal the Bay	June 17	<p>The Staff Report states that "if [beach] water quality monitoring was conducted April 1 through October 31 only, a four percent exceedance percentage shall be used." The Staff Report continues to say that for delisting purposes, "A 19% exceedance percentage was used for water quality monitoring conducted April 1 through October 31..." Staff Report at 7. After talking to staff, it became clear that the provided exceedance percentages are used as the null hypothesis for the binomial distribution in the Listing Policy. This should be clarified within the Staff Report as it is not obvious as currently written.</p> <p>In January 2009, Heal the Bay released a report entitled License to Kill. During the eight and a half year study time period (2000-2008), among the 42 dischargers, there were there were 408 chronic and 64 acute toxicity exceedances among all receiving water testing stations.<sup>6</sup> Clearly beneficial uses are not being maintained in many of these waterbodies. Although this report was completed and submitted to Regional Board after the Regional Board's data submission deadline, these toxicity data are readily available to the Regional Board in discharger monitoring report submittals. However, there are only a few new</p>	<p>Comment noted. The staff report will be revised to address this comment.</p> <p>See response to comment 3.2. Staff reviewed all available NPDES receiving water data including POTW data and other sources of data on a reach by reach basis as with other pollutants. Currently approximately 35 waterbodies in this Region are listed for toxicity.</p>

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11.10	Heal the Bay	June 17	<p>proposed toxicity listings, and only one listing appears to use POTW monitoring data. It is unclear from the Staff Report if any other POTW toxicity data were assessed. We urge the Regional Board to review these data for 2008 listing decisions.</p> <p>The Staff Report states that “[t]wo of 16 samples exceed the effects range median for copper for surface sediment samples and this exceeds the allowable frequency... However, current conditions have changed due to the new shallow water habitat created in Cabrillo Beach area and <i>may no longer</i> be negatively impacted due to copper.” Emphasis added. This reasoning for a delisting decision is inappropriate for several reasons.</p> <p>First, the shallow water habitat did not cap the entire Cabrillo area, so some sediments may still be contaminated with high copper concentrations. Also there are still large sources of copper (namely boat paint) to the waterbody that have not been adequately addressed. Finally, burying a pollutant does not necessarily indicate that the pollutant will stop impacting beneficial uses. For example, species such as ghost shrimp and spoon worms go down a meter or more into the sediments. Thus, buried contaminated sediments can impact the benthic community. Also sediments can be dynamic and can move and be buried due to a single storm event. By stating that the waterbody “<i>may</i> no longer be negatively impacted due to copper”, the Regional Board appears to concur that the impacts are unknown. Delisting cannot occur without extensive data supporting the waterbody-pollutant removal. Thus, copper should remain on the 303(d) list for Los Angeles Harbor – Inner Cabrillo Beach Area until such a time new data is provided to justify delisting.</p>	<p>Two observed exceedences occurred in 1992 within the Inner Cabrillo Beach waters; whereas, since then, zero of 14 exceedences of the copper sediment guideline exist, including two recent samples collected in 2006. The shallow water habitat has created improved sediment conditions within the Cabrillo Beach waters. The habitat was built in three phases, ranging from the mid-90s to 2005, placing approximately 25 feet of clean sediment material on top of previous sediment. (By design, the water depth changed from 40 ft. to 15 ft.) Also, there are no boats moored within the Inner Beach waters and thus no boat paint contributors. Given this evidence, there is sufficient rationale to support delisting copper from this waterbody.</p>
11.11	Heal the Bay	June 17	<p>Staff asserts that silver sediment data were incorrectly applied to Ballona Creek, and the samples were actually collected in the Ballona Estuary. If this is actually true, it is unclear why staff did not propose that the Ballona Estuary be listed as impaired for silver due to the alleged mix-up. The samples came from either</p>	<p>The Ballona Estuary TMDL does transfer the impairment for silver in sediment from the Creek to the Estuary and assigns a waste load allocation to address this impairment. The silver</p>

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11.12	Heal the Bay	June 17	<p>The Creek or the Estuary. So one or both are impaired. The State Board cannot delist this pollutant in the Creek on the basis of mis-location without then adding silver to the list for the Estuary if that is where the data was taken. Thus we urge the Regional Board to make this correction.</p> <p>That Staff Report states that for zinc in Coyote Creek "The USEPA final decision was to not delist this water body-pollutant combination from the section 303(d) list for 2006, based on the information contained in the lines of evidence." However, it is unclear from the information provided by the Regional Board in the Staff Report why their proposal for the 2008 303(d) List differs from the previous USEPA decision. Are there new data available? The Regional Board should clarify the reasoning for this decision.</p>	<p>impairment in Ballona Estuary is therefore already being addressed through a TMDL. As such, silver in the Ballona Creek Estuary was listed by USEPA as being addressed by a TMDL during the 2006 303(d) listing process and included in the final approved 2006 303(d) list and proposed 2008 303(d) list.</p> <p>Staff agrees. The fact sheets and appendices will be revised to clarify Regional Boards rationale.</p>
11.13	Heal the Bay	June 17	<p>Staff proposes to delist the current lead and zinc sediment impairments listings for the Los Angeles River Estuary (Queensway Bay) because the available data includes surface and core sediment samples. How extensive were the sediment data spatially and temporally? How deep were the core samples? It is often important to examine the top layer and deeper layers of sediment in order to get sufficient insight on the ecological health of the water body and to determine if beneficial uses are maintained. Species such as ghost shrimp and spoon worms go down a meter or more into the sediments. Thus, buried sediments can impact the benthic community. Also sediments can be dynamic and can move and be buried due to a single storm event. Clearly, the Regional Board should consider deeper sediments and larger spatial areas in its listing and delisting decisions.</p> <p>Further the Staff Report states that "[b]ased on the readily</p>	<p>The current assessment is based on review of surface sediment results for chemistry, and either toxicity or benthic community effect. Chemical results were from the top of the core sediment samples. This assessment methodology is consistent with the State Listing Policy.</p> <p>As summarized in the fact sheet, available data show sediment toxicity is evident in the Los Angeles River Estuary, yet there are no exceedences of sediment quality guidelines for lead or zinc; thus there is sufficient justification for removing these two pollutants for this waterbody from the 303(d) list.</p>

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11.14	Heal the Bay	June 17	<p>available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list in the Water Quality Limited Segments category.” This statement appears to be in conflict with the fact sheet header that proposes to delist this waterbody-pollutant combination. We agree with staff’s statement and they should clarify this inconsistency.</p> <p>The Staff Report indicates that the Malibu Lagoon Benthic Community Effects listing should be moved to the 303(d) list’s “being addressed by action other than TMDL” category. The reasoning provided is that “[t]he Malibu Lagoon Restoration Feasibility Study Final Alternatives Analysis describes restoration measures for Malibu Lagoon. These proposed restoration efforts, if fully implemented, is anticipated to correct the conditions which allow the negative indicator species to thrive.” We are hopeful that the restoration efforts will improve benthic communities; however, it is premature to make this conclusion and move this listing. The Malibu Lagoon Restoration efforts have not started and the start date is uncertain because of the budget crisis. In addition, this listing change presumes that the benthic community problems are only a result of the lagoon’s configuration and poor tidal flushing, and not any pollutant contribution. While this may be the case, it is simply premature to state this conclusively. Thus, the benthic community effects listing should remain on the main 303(d) List.</p>	<p>The typographical error in the fact sheet has been corrected.</p> <p>The Malibu Lagoon Benthic Community Effects listing has not been removed from the 303(d) list but categorized as “being addressed by action other than TMDL.” Similar to when a listing has been addressed by a TMDL, it gets categorized as such, but remains on the list until it is demonstrated that the impairment has been removed.</p> <p>This listing reassignment is in compliance with Section 2.2 of the State Listing Policy, which states that a waterbody shall be placed in this category if a program “... is reasonably expected to result in the attainment of the water quality standard within a reasonable, specified time frame.”</p>
11.15	Heal the Bay	June 17	<p>The Staff Report appears to base the Walnut Creek Wash Toxicity delisting decision on the fact that the majority of exceedances were observed in older samples. Staff concludes that “[f]ive out of 42 samples exhibit toxicity to Ceriodaphnia. However, four toxic results occurred in samples from 1992-93. In between 2003 and 2007, only one of 38 samples exhibited toxicity, thus significant improvements in survival and reproduction endpoints have been observed in the most recent timeframe...Based on the improving trend in water quality</p>	<p>This listing decision is a fairly strict interpretation of the Listing Policy. The recent data were collected as part of a joint effort between USEPA and dischargers to further evaluate the toxicity impairment in Walnut Creek. The data were collected over a longer time period and at more frequent intervals than the older data and clearly</p>

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11.16	Heal the Bay	June 17	<p>conditions and only one toxic result in the past four years, it is evident that beneficial uses are being supported.” While we understand staff’s reasoning, it appears that this is not a strict interpretation of the Listing Policy and opens the door to future misinterpretations of the Policy. The Staff Report indicates that section 4.6 of the Listing Policy is used for this delisting decision. This section of the Listing Policy states:            “Water/Sediment Toxicity or associated water or sediment quality guidelines are not exceeded using the binomial distribution as described in section 4.1.” However by comparing the data to the binomial distribution, it is clear that the delisting should not occur. By only looking at the more recent data, staff is basically saying that the old data does not matter. This could be problematic, especially as tight monitoring budgets in the coming years reduce the amount of available newer data. We discourage the Regional Board from using this line of reasoning for listing/delisting decisions.</p>	<p>demonstrate a change in the water body segment. This is likely the result of the implementation of management practices throughout the subwatershed. Staff therefore believes it is appropriate to exclude the older line of evidence based on section 6.1.5.3 of the Listing Policy.</p>
12.1	Lake Sherwood JAC	June 16	<p>Staff proposes to delist PAHs in San Pedro Bay. However, there appears to still be some uncertainty about this decision, as the Staff Report appears to ask a question of staff: “zero of 27 surface sediment samples exceeded the <i>CONFIRM WITH PK</i> in marine sediment and this meets the allowable frequency...” Emphasis added. Please clarify what staff intends for this listing. We are concerned with the State Water Resources Control Board and Los Angeles Regional Board’s inadequate communication with the small stakeholder. This has been confirmed by the absence of the State and/or Regional Board’s to notify Lake Sherwood lake management of the inclusion of Lake Sherwood in the following listings:             The 1998 California 303(d) List and TMDL Priority Schedule            The 2002 CWA Section 303(d) List of Water Quality Limited Segment            The 2006 CWA Section 303(d) List of Water Quality Limited Segment Requiring TMDLS</p>	<p>Comment noted. The fact sheet and appendices will be revised to address this comment.</p>
				<p>The Regional Board recognizes the importance of working with all stakeholders and is committed to continued improvement in stakeholder outreach.            Each revision of the 303(d) list has been announced by newspaper notice and communication with all known interested parties. This availability of the proposed 2008 303(d) list for public comment was announced in the newspaper on April 30, 2009, and has</p>

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12.2	Lake Sherwood JAC	June 16	<p>The 2008 CWA Section 303(d) List of Water Quality Limited Sections</p> <p>The State and Regional Board's have failed to provide Sherwood lake management any current evidence for listing Lake Sherwood as an impaired body of water.</p>	<p>been available on our website since that time. Email notification of the availability of the proposed list and the July 16 hearing was made to all self-identified interested parties for all watersheds in the Region.</p> <p>These previous listings were made through a public process and approved by this Regional Board and/or State Board and the USEPA.</p> <p>While data from previous listing cycles has not been posted with the data from this listing cycle, we can assist Lake Sherwood management with any request to provide original listing information available from Regional Board files. In addition, the USEPA TMDL (Total Maximum Daily Load for Nutrients Malibu Creek Watershed US Environmental Protection Agency Region 9 established March 21, 2003) discusses the Lake Sherwood impairments in some detail:  <a href="http://www.epa.gov/region09/water/tmdl/final.html">http://www.epa.gov/region09/water/tmdl/final.html</a></p> <p>Additionally, with each listing cycle, staff will continue to update listings as new data are assessed.</p>
12.3	Lake Sherwood JAC	June 16	<p>Additionally, the State and Regional Board's have repeatedly failed to notify Sherwood lake management of the request for solicitation of data and information. This lack of communication has effectively denied the owners, SVHOA, the opportunity to respond to and/or comply with the suggested impairments</p>	<p>The data solicitation was sent on December 4, 2006. Notification included all parties who had identified themselves as interested parties in the Malibu watershed and individuals</p>

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12.4	Lake Sherwood JAC	June 16	<p>indicated in the California 303(d) List.</p> <p>We do not believe that adequate efforts have been displayed by the Regional Board to communicate with the Lake Sherwood lake management in order to update the Regional Boards information of current Lake Sherwood lake management policies or actions. This is evidenced by the outdated generic listing of the sources for pollution in the Supporting Information section of the current draft 303(d) List that has been applied to all suggested impairments.</p> <p><b>Source (303(d) listing)</b></p> <ul style="list-style-type: none"> <li>• Agriculture-animal</li> <li>• Atmospheric Deposition</li> <li>• Golf Course Activities</li> <li>• Groundwater Loadings</li> <li>• Irrigated Crop Production</li> <li>• Major Municipal Point Source</li> <li>• Onsite Wastewater Systems (Septic Tanks)</li> <li>• Urban Runoff/Storm Sewers</li> </ul> <p><b>Present Status</b></p> <ul style="list-style-type: none"> <li>• Significant reduction upstream, ongoing monitoring by SVHOA</li> <li>• No data available (exception: Mercury)</li> <li>• Ongoing monitoring by SVHOA</li> <li>• No data to confirm as source pollutant</li> <li>• Discontinued, no data to confirm as source pollutant</li> <li>• Does not exist, no data to confirm as source pollutant dry and/or wet weather discharge</li> <li>• Removed, septic tanks do not exist</li> <li>• Does not exist, no data to confirm as source pollutant</li> </ul>	<p>including the Malibu Watershed Council.</p> <p>Furthermore, the nutrient TMDL for the Malibu watershed, which was developed to ameliorate the nutrient related impairments in Lake Sherwood and other waterbodies within the watershed, has been in place since 2003.</p> <p>Comment noted. The appendices will be revised to address this comment.</p>
12.5	Lake	June 16	<p>It has become apparent that all communication originating from</p>	<p>Staff disagrees. This revision to the</p>



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	Sherwood JAC		<p>the Regional Board is aimed specifically towards industry, counties, municipalities and/or water districts. We believe communication focused solely towards the large stakeholder unfairly isolates the smaller stakeholder from participating in the process to contribute and partner with the Regional Board in establishing water quality standards that are reasonable, realistic and relate specifically to that water body. The small stakeholder, such as Lake Sherwood, requires ongoing communication with the Regional Board to provide timely, appropriate and accurate information in order to stay current in the important processes of water quality management.</p>	<p>303(d) list was notified to all individual interested parties including the larger entities and municipalities and also smaller organizations and individuals. However, we recognize the challenges of the smaller municipalities and organizations with small staffs to fully interact with our processes and we remain committed to improving communication with these stakeholders and Lake Sherwood, specifically. Many smaller stakeholders also interact with their local municipalities such as their County as they may have similar interests in the process. The Malibu Creek watershed has an active watershed group, the Malibu Creek Watershed Council. This sort of group will also have stakeholders with similar interests and can be of assistance when navigating the complexities these processes.</p>
12.6	Lake Sherwood JAC	June 16	<p>Lake Sherwood is listed as having the following designations and examples of how they apply:</p> <p>Municipal and Domestic Supply (MUN) (potential)  <i>This water body is not used as a municipal or domestic water supply.</i></p>	<p>Comment noted. Note however that the Regional Board is required by the federal Clean Water Act to protect all existing and designated beneficial uses of a waterbody. Potential uses are designated beneficial uses, which have been established by the Regional Board for a number of reasons, identified in Basin Plan.</p>
12.7	Lake Sherwood JAC	June 16	<p><b>Proactive Measures for Water Quality Improvement:</b>                  [Lake Sherwood JAC letter lists 13 measures taken between</p>	<p>Regional Board staff recognizes and commends the efforts of the Lake Sherwood management to improve and</p>

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12.8	Lake Sherwood JAC	June 16	<p>1984 and 2008 to protect water quality in lake Sherwood. - See Lake Sherwood JAC letter for full list]</p> <p><b>Ongoing maintenance program:</b></p> <p>[Lake Sherwood JAC letter lists all beneficial uses of Lake Sherwood with comments on current usage. - See Lake Sherwood JAC letter for full list]</p>	<p>maintain the quality of the waters of Lake Sherwood. Information on the beneficial uses of Lake Sherwood can be considered during the Regional Board during a future review of its water quality standards, which include the beneficial uses designated for a waterbody. This process is known as the triennial review, and occurs in three-year cycles.</p>
			<p>The development of Best Management Practices in a continuous review and update process by lake management has provided the ability to introduce new techniques and positive actions towards this maintenance effort. This effort includes a water quality testing program that has yielded long-term data to support de-listing from the 303(d) list. Unfortunately, due to a lack of notification by the Regional Board, Lake Sherwood lake management was not given the opportunity to present this data within the solicitation window for the 2008 de-listing. Lake management is now faced with an unacceptable and costly delay that requires continued testing until the solicitation period for 2010 is decided. This unnecessarily extends the period in which Lake Sherwood remains on the 303(d) list for an additional 2 to 4 years.</p>	<p>Regional Board staff recognizes and commends the efforts of the Lake Sherwood management to improve and maintain the quality of the waters of Lake Sherwood.</p> <p>Regional Board staff would be glad to discuss with your staff the utility of continued testing in terms of the type of data being collected (e.g. will this data demonstrate whether or not the targets of the TMDL are being met?) and the amount of data being collected.</p> <p>Lake Sherwood is impaired for algae, ammonia, eutrophic conditions and organic enrichment/low dissolved oxygen. The USEPA established a TMDL for the Malibu Creek watershed for nutrients to address these listings on March 21, 2003. These impairments are on the proposed 2008 303(d) list as "being addressed by a USEPA approved TMDL." The assessment of whether or not it is appropriate for the Lake to be removed from the 303(d) list must consider how those conditions interact</p>

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12.9	Lake Sherwood JAC	June 16	Accept and analyze data from the small stakeholder for de-listing when the data is available. Waiting for a solicitation period is financially impractical. This burden limits the ability of the small stakeholder to contribute and participate with the Regional Board.	with nitrogen and phosphorus levels, as discussed in the TMDL, and whether the TMDL targets are being met. The State of California does not use a continuous updating method to update the 303(d) list.
12.10	Lake Sherwood JAC	June 16	We believe that the water quality testing program at Lake Sherwood has developed sufficient data and information to justify removal from the 303(d) List for Ammonia and Total Nitrogen. We request the Regional Board accept this data outside the solicitation period and remove Lake Sherwood from the 303(d) List for these items.	See response 12.7. Regardless of whether the list is continuously or periodically updated, all changes to the 303(d) list (whether to newly list or delist) must also be approved by the State Board and USEPA to be considered final.
12.11	Lake Sherwood JAC	June 16	We believe that there is insufficient data to list Lake Sherwood for Eutrophic and Organic Enrichment as no criteria appears to exist for these pollutants in the documents provided on the LARWQCB website or elsewhere. We request the Regional Board remove Lake Sherwood from the 303(d) List for these items.	Staff disagrees. The listings were made through a public process and approved by this Regional Board and/or State Board and USEPA. Additionally, the TMDL established by USEPA in 2003 discusses the lake Sherwood impairments and the nutrient targets in detail. The Regional Board will continue to review and update listings through the periodic listing process, especially as new data become available and as staff resources allow.
12.12	Lake Sherwood JAC	June 16	Establish one department with consistent staff to communicate with the small stakeholder on the 303(d) and TMDL process.	The 303(d) list and TMDL department at the Regional Board is the Regional Programs Section, Renee Purdy, Acting Section Chief. We have verified that the Lake Sherwood JAC is on the Regional Board's interested parties list for the Malibu watershed, including TMDLs and Basin Planning. Regional

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12.13	Lake Sherwood JAC	June 16	Develop an ongoing, proactive communication effort specifically geared towards the small stakeholder to provide timely, appropriate and accurate information.	Board staff also encourages the Lake Sherwood management to subscribe to other e-mail subscription lists, if convenient, regarding other topics of interest to lake management. Available subscriptions are listed on the Regional Board website.
12.14	Lake Sherwood JAC	June 16	Simplify and streamline the processes of the Regional Board when communicating with the small stakeholder. Agencies employing full-time staff that specializes in water related issues and standards have a distinct advantage in comprehending formulas and communicating with Regional staff. The small stakeholder does not possess the full-time staff to track the actions and decipher policies of the Regional Board. Our participation, and I am sure many other small stakeholders, has been hampered by confusing rhetoric and complicated processes.	The Regional Board remains committed to continue to improve stakeholder outreach. Many smaller stakeholders also interact with their local municipalities such as their County as they may have similar interests in the process. The Malibu Creek watershed has an active watershed group, the Malibu Creek Watershed Council. This sort of group will also have stakeholders with similar interests and can be of assistance when navigating the complexities of these processes. (The Malibu Creek watershed includes three other urban lakes, Lindero, Westlake, and Malibou, which are also included in the Malibu nutrient TMDL and which may have other interests in common.) The Regional Board recognizes the challenges of the smaller municipalities and organizations with small staffs to fully interact with our processes and remains committed to improving communication with these stakeholders and Lake Sherwood, specifically.
12.15	Lake Sherwood	June 16	Partner with small stakeholders to encourage the development of testing programs and standards. Communicate with the	The Malibu Creek Watershed Council has a monitoring subcommittee which

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12.16	Lake Sherwood JAC	June 16	<p>stakeholder in order to minimize duplicate or erroneous efforts to maximize the budget potential for both the stakeholder and Regional Board.</p> <p>Develop clear cut definitions and criteria. We have, as an example, found it difficult to receive specific definitions on something as basic as Dissolved Oxygen levels.</p>	<p>currently coordinates between stakeholders in order to monitor effectively throughout the watershed.</p> <p>Clear definitions and criteria, also referred to as water quality objectives, are contained in the Los Angeles Region's Water Quality Control Plan (Basin Plan). The Basin Plan is the primary document that establishes the water quality standards to be achieved in surface and ground waters throughout the region. The Basin Plan and amendments to the Plan are available on the Regional Board website.</p>
12.17	Lake Sherwood JAC	June 16	<p>Consider the impact that Lake Sherwood has on the watershed, given that the lake does not discharge water into Potrero Creek except during high flows in the winter season. During these times of high flow, Dissolved Oxygen, Ammonia as N, Total Nitrogen, Total Phosphorus and Chlorophyll-a do not exceed TMDL standards developed by the USEPA as waters are well mixed. These waters either fall within objectives or the objectives currently do not exist.</p>	<p>Comment noted. As stated earlier, the Regional Board will continue to review and update listings through the periodic listing process, especially as new data become available and as staff resources allow.</p>
12.18	Lake Sherwood JAC	June 16	<p>Maintain accurate data that is easily available to the small stakeholder. Update all information to a digital format for acquisition and viewing over the internet as Listing data cannot be located on the Regional Boards website. Adopted 2003 TMDL was not presented until 2008.</p>	<p>The link to the 303(d) Impaired Waterbodies list is on the Region's home page, both in the center of the page and listed under the "Announcements" section. This is the first listing cycle where data supporting new decisions was available on the website by hyperlink from the decision factsheet. The Regional Board was glad to offer this improvement in transparency over previous listing cycles. We are committed to continue to improve transparency and access to</p>

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13.1	Las Virgenes MWD	June 17	<p>Table 1 (attached) lists our recommended changes to the state's draft update for specific listings. The majority of our recommended changes to the state update are related to proposed listings that appear to be unsupported by the data in the state decision lines of evidence (LOE), or where data relevant to their decision may have been overlooked. The one exception is our recommendation to list Cold Creek for invasive species, which is based on our understanding of the invasive potential of the New Zealand mudsnail found in 2008 for the first time in the creek's headwaters.</p> <p>Note we are recommending that the Regional Board not list several water bodies currently listed or proposed for listings for metals (selenium), nutrients, organic enrichment, and specific conductivity. Our findings strongly suggest that natural sources are responsible for the observed exceedances of the water quality objectives and guidelines for these pollutants in the affected water bodies.</p>	<p>Specific responses to comments which are also included in your Table 1 are in response to comments 13.13 through 13.40, below.</p>
13.2	Las Virgenes MWD	June 17	<p>JPA staff also reviewed our comments on earlier 303(d) updates in 2002 and 2006 to determine which recommendations were addressed by the state and/or incorporated into the state's current draft update. Formal requests were submitted for both the 2002 and 2006 state updates to better document the 303(d) listing process, from source data to staff recommendation. <i>We are pleased to report substantial progress by the state in this regard for the current 303(d) list update, although the traceability of pre-2006 listings remains extremely difficult.</i></p>	<p>Comment noted. See response to comment 3.3 on the pre-2006 listings.</p>
13.3	Las Virgenes MWD	June 17	<p>A long-standing problem throughout the country is how to translate narrative Biostimulatory Substances objectives into numerical thresholds – so called “Numerical Nutrient Endpoints, or NNE’s - for quantifying the levels at which biostimulatory substances impair beneficial uses. Both the state and the US EPA have tried to provide national, regional and sub-regional guidance on this issue, as referenced in the 2008 Update Staff Report in Tables 3-2 and 3-3<sup>1</sup>. Some of this guidance is quite</p>	<p>Comment noted.</p>

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13.4	Las Virgenes MWD	June 17	<p>dated and/or unsupported by recent independent scientific peer review, and we therefore support the Regional Board's decision to defer adopting any of the potential criteria listed in Tables 3-2 and 3-3 in the current 303(d) listing cycle, pending further study by staff.</p> <p>Nonetheless, we remain concerned that these criteria may be used in NPDES permits outside of the 303(d) listing process, or otherwise used to regulate JPA facilities. Our concerns center on three issues:</p> <p>(1) Application of "guidance" criteria without adequate regard for site-specific, natural conditions at the watershed level.</p> <p>In the following section and in our previous comments for the Triennial Review, we provide evidence that the nutrient levels observed in the Malibu Creek watershed do not fall below levels determined by natural sources of marine sedimentary phosphatic shale (Monterey Formation).</p> <p>It is essential that the Regional Board acknowledge and address natural sources of nutrients, metals and salt <u>within the current 303(d) listing cycle</u>. Failure to do so may result in the subsequent promulgation of new regulations seeking to remedy water quality problems that are likely due to natural sources.</p> <p>(2) Overly-narrow focus on phosphorus and nitrogen biostimulatory substances</p> <p>For several decades regulators have focused almost exclusively on nitrogen and phosphorus compounds when applying and translating the biostimulatory narrative standard into water quality objectives. However, recent findings show that algal growth, particularly in those taxa responsible for the algal mats seen in local waters, is often better correlated with the specific conductivity of the waters in which they grow, with the highest</p>	<p>Staff intention is to appropriately identify waterbodies which are impaired by biostimulatory substances. Guidance developed to identify nutrient impaired waterbodies may consider natural conditions and any nutrient TMDL developed will consider natural sources as part of the load allocation.</p> <p>Staff appreciates the thorough approach Las Virgenes MWD has taken in the discussion of biostimulatory substances and looks forward to working with Las Virgenes MWD and other stakeholders as we address the issue of biostimulatory substances and the related negative effects on waters in our Region.</p>

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13.5	Las Virgenes MWD	June 17	<p>growth seen in high conductivity waters (See Fig. 5 from Biggs and Price, 1987 below)<sup>2</sup>.</p> <p>The precise mechanism behind this correlation is unknown<sup>3</sup>, although it appears to be independent of the particular ionic species that collectively contribute to overall water conductivity. Regardless, to date there have been five site-specific studies of algal growth in the Malibu Creek watershed; all five studies found better correlation of algal growth with specific conductivity. None of these studies were able to demonstrate a quantitative, causal relationship between “conventional” biostimulants – nitrogen and phosphorus – and algal growth, probably due to N and P levels in excess of that needed for algal growth in the sites studied. This includes sites located in open spaces upstream of urban development.</p> <p>(3) Recent scientific literature on saturation levels of biostimulatory substances in algae.</p>	
			<p>Most of the guidance-based biostimulatory NNE’s cited in Table 3-3 of the Staff Report are correlative in nature, meaning they are based on various statistical measures of ambient nutrient levels found in relatively unimpaired freshwater streams and lakes. As regulatory remedies for excessive algal growth, these NNE’s assume that nutrient levels in waters with low algal growth would also result in low algal growth if applied elsewhere<sup>4</sup>. The efficacy of this approach depends on two conditions; (1) that the NNE’s can be met by controlling human nutrient sources and (2) that the NNE’s, if met, are in fact capable of limiting algal growth. Our findings show that neither condition is met in the Malibu Creek watershed.</p> <p>In our review we searched the scientific literature for laboratory and field studies on the limiting concentrations of nutrients for the specific algal taxa responsible for floating algal mats (e.g. Cladophora and Rhizoclonium) and bottom-coating algal films (periphytic diatoms) in the Malibu Creek watershed.</p>	<p>Staff appreciates the thorough approach Las Virgenes MWD has taken in the discussion of biostimulatory substances and looks forward to working with Las Virgenes MWD and other stakeholders as we address the issue of biostimulatory substances and the related negative effects on waters in our Region.</p>



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			<p>Concentrations of phosphate of 0.714 mg/L and 0.12 – 0.47 mg/L were sufficient to sustain maximum growth in Cladophora glomerata and periphytic diatoms, respectively (Stevenson et al., 1996; Taylor et al., 2001)<sup>5</sup>.</p> <p>As for the NNE's proposed by Regional Board staff in the Staff Report (Tables 3-2 &amp; 3-3), these levels are consistently exceeded in the Malibu Creek watershed, including those locations upstream of all known point and non-point sources and presumably minimally impacted by human activities (see Fig. 1 and JPA LOEs 1-3). These levels are lower than all five of the NNE's proposed in the Staff Report.</p> <p>We are not suggesting that the proposed NNE's are inappropriate for the entire Los Angeles basin. They may prove effective in those water bodies where algal impairments are related to algal species whose limiting nutrient levels are higher than the proposed NNE's, and where natural nutrient sources do not exceed these levels. We do note, however, that the algal species responsible for most occurrences of floating algal mats (e.g. Cladophora glomerata and Rhizoclonium sp.) are fairly widespread in the region, and can support sustained growth on relatively low levels of nutrients.</p>	

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13.9	Las Virgenes MWD	June 17	<p>Native geological sources of nutrients, metals and salts are well-known in the scientific literature (e.g. Isaacs &amp; Rullkotter, 2001<sup>9</sup>), and their locations in the Los Angeles region are documented in US Geological Survey and Mineral Management Service maps (Fig. 2). Yet neither the current Basin Plan nor any of the completed nutrient TMDLs for the Los Angeles region mentions this known source of metals (e.g. Selenium), biostimulatory substances (e.g. phosphorus, high specific conductivity), and high levels of total organic carbon (TOC). It is also important to note that Stein and Yoon (2007) discussed potential geological effects in broad terms, noting that marine sedimentary rocks in general can contribute to high observed levels of TDS, nutrients and some metals. They did not specifically discuss Monterey Formation-fed streams, which show elevated levels of these pollutants significantly higher than the other marine sedimentary drainages in their study.</p>	<p>Comment noted. Regional Board staff has been exploring possible natural loadings of constituents such as nutrients, metals and salts via a scientific study done under contract with the Southern California Coastal Water Research Project (SCCWRP). Staff will continue to evaluate the findings from this study and others to determine whether modifications to water quality objectives, implementation provisions, or TMDLs are warranted to account for natural loadings of these constituents to waterbodies.</p>

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13.11	Las Virgenes MWD	June 17	<p>Several lines of evidence demonstrate that many of the proposed and existing 303(d) listings are due to this natural source. Historical water well logs often included basic water quality tests for total dissolved solids, conductivity and some metals. Well data from the Malibu Creek watershed show that Total Dissolved Solids (TDS) and chloride levels in excess of Basin Plan water quality objectives predate the importation of non-native State Water Project water the majority of the region's development (Fig. 4)<sup>7</sup>.</p> <p>Two additional lines of evidence come from two independent sets of recent surface water quality monitoring results from sites located in undeveloped areas upstream of urban areas and potable and recycled water systems (See Fig. 3). In the Malibu Creek watershed these include creeks that lie within the Monterey Formation and immediately downstream of it (e.g. sites HTB-6, HTB-9 and LV-1), and also in similar undeveloped headwaters lying outside of the Monterey Formation (e.g. upper Cold Creek). Both datasets show that specific conductivity and phosphorus levels in the undeveloped Monterey Formation sites are substantially higher than similar sites in equally undeveloped areas underlain by other geology (Figs. 5-7)<sup>8</sup>.</p> <p>Aside from salts and nutrients, the Monterey Formation is a known source of sulfate and heavy metals (e.g. selenium) currently listed or proposed for listing in several tributary streams within the Monterey Formation or immediately downstream of it (see Table 1). Our CTR test results (Fig. 8) were consistent with this association, showing detectable levels of selenium and other metals known to occur in the Monterey Formation<sup>9</sup>, but non-detects for other organic compounds common in runoff from more developed areas<sup>10</sup>.</p>	<p>There are several possible regulatory tools for addressing the issues related to natural sources of metals or minerals, which may be contributing to levels above water quality standards. These may include, but are not limited to, site specific objectives and implementation provisions similar to the natural sources exclusion approach established for bacteria objectives in the region's Basin Plan. These regulatory options would however need to be developed outside the 303(d) listing process.</p> <p>If site-specific objectives were to be defined in the future on the basis of natural background levels then the 303(d) list would be refined to reflect the new objectives.</p> <p>The natural sources exclusion approach is implemented within a TMDL by identifying and quantifying natural background loads and anthropogenic loads, and then eliminating anthropogenic loads. Once anthropogenic loads are eliminated the TMDL would allow a certain level of exceedance of the objective(s) based on the remaining load, attributable to natural background.</p>												
13.13	Las Virgenes	June 17	<table border="1"> <thead> <tr> <th data-bbox="1128 682 1161 808">Waterbody</th> <th data-bbox="1128 808 1161 934">Impairm/ Pollutant</th> <th data-bbox="1128 934 1161 1060">Impairm/ Pollutant</th> <th data-bbox="1128 1060 1161 1186">State Decision</th> <th data-bbox="1128 1186 1161 1312">Recomme nded Revision</th> <th data-bbox="1128 1312 1161 1438">Rationale</th> </tr> </thead> <tbody> <tr> <td data-bbox="1161 682 1193 808">Lake Lindero</td> <td data-bbox="1161 808 1193 934">Eutrophic</td> <td data-bbox="1161 934 1193 1060">Eutrophic</td> <td data-bbox="1161 1060 1193 1186">Listed on 303(d)</td> <td data-bbox="1161 1186 1193 1312">List if Supportin</td> <td data-bbox="1161 1312 1193 1438">See Table 1 of the</td> </tr> </tbody> </table>	Waterbody	Impairm/ Pollutant	Impairm/ Pollutant	State Decision	Recomme nded Revision	Rationale	Lake Lindero	Eutrophic	Eutrophic	Listed on 303(d)	List if Supportin	See Table 1 of the	<p>The waterbody/pollutant combination is being addressed by a USEPA approved TMDL. Re-assessment of sources from an approved TMDL is outside the scope</p>
Waterbody	Impairm/ Pollutant	Impairm/ Pollutant	State Decision	Recomme nded Revision	Rationale											
Lake Lindero	Eutrophic	Eutrophic	Listed on 303(d)	List if Supportin	See Table 1 of the											

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					(being addressed by USEPA approved TMDL)	Las Virgenes MWD comment letter.	
13.14	Las Virgenes MWD	June 17	Selenium	Selenium	Listed - TMDL required	Delist - Natural source	See Table 1 of the Las Virgenes MWD comment letter.  Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.15	Las Virgenes MWD	June 17	Chloride	Chloride	Listed	Delist - Natural source	See Table 1 of the Las Virgenes MWD comment letter.  Chloride exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.16	Las Virgenes MWD	June 17	Specific Conductivity	Specific Conductivity	Listed	Delist - Natural source	See Table 1 of the Las Virgenes MWD comment letter.  Specific conductivity exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.17	Las Virgenes MWD	June 17	Eutrophic	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	See Table 1 of the Las Virgenes MWD comment letter.  Eutrophic conditions have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.
13.18	Las Virgenes MWD	June 17	Organic Enrichment/Low Dissolved	Organic Enrichment/Low Dissolved	List on 303(d) list (being addressed)	Delist - unsupported by weight of	See Table 1 of the Las Virgenes MWD comment letter.  Organic enrichment and low DO have been demonstrated to exist and a USEPA approved TMDL has been

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No.	Author	Date	Comment			evidence, approved TMDL	MWD comment letter.	Response
			Oxygen	Oxygen	by USEPA approved TMDL)			
13.9	Las Virgenes MWD	June 17	Eutrophic	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	See Table 1 of the Las Virgenes MWD comment letter.	developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process. Eutrophic conditions have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.
13.20	Las Virgenes MWD	June 17	Nutrients (Algae)	Nutrients (Algae)	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	See Table 1 of the Las Virgenes MWD comment letter.	Nutrients and algae have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.
13.21	Las Virgenes MWD	June 17	Organic Enrichment /Low Dissolved Oxygen	Organic Enrichment /Low Dissolved Oxygen	List on 303(d) list (being addressed by USEPA approved TMDL)	Delist - unsupported by weight of evidence, approved TMDL	See Table 1 of the Las Virgenes MWD comment letter.	Organic enrichment and Low DO have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.

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13.22	Las Virgenes MWD	June 17	Las Virgenes Creek	Selenium	Selenium	Listed	Delist - Natural source See Table 1 of the Las Virgenes MWD comment letter.	TMDL is outside the scope of the 303(d) listing process. Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.23	Las Virgenes MWD	June 17	Lindero Creek Reach 1	Selenium	Selenium	Listed	Delist - Natural source See Table 1 of the Las Virgenes MWD comment letter.	Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.24	Las Virgenes MWD	June 17	Lindero Creek Reach 2	Selenium	Selenium	Listed	Delist - Natural source See Table 1 of the Las Virgenes MWD comment letter.	Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.25	Las Virgenes MWD	June 17	Malibu Lake	Eutrophic	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	Eutrophic conditions have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.
13.26	Las Virgenes MWD	June 17	Malibu Lake	Organic Enrichment/ Low Dissolved Oxygen	Organic Enrichment/ Low Dissolved Oxygen	List on 303(d) list (being addressed by USEPA approved)	List if Supporting Information revised (see right)	Organic enrichment and Low DO have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets

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					TMDL)				
13.27	Las Virgenes MWD	June 17	Malibu Creek	Copper (dissolved)	Copper (dissolved)	Delist - TMDL	Delist - TMDL unnecessary	See Table 1 of the Las Virgenes MWD comment letter.	the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process. Malibu Creek is not listed for copper.
13.28	Las Virgenes MWD	June 17	Malibu Creek	Selenium	Selenium	List - TMDL Required	Delist - Natural source	See Table 1 of the Las Virgenes MWD comment letter.	Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.29	Las Virgenes MWD	June 17	Malibu Creek	Sulfates	Sulfates	List - TMDL Required	Delist - TMDL unnecessary	See Table 1 of the Las Virgenes MWD comment letter.	Sulfates exceed standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.30	Las Virgenes MWD	June 17	Malibu Creek	Toxicity	Toxicity	Delist - TMDL	Delist - TMDL unnecessary	See Table 1 of the Las Virgenes MWD comment letter.	Malibu Creek is not listed for toxicity.
13.31	Las Virgenes MWD	June 17	Malibu Creek	Nutrients (algae)	Nutrients (algae)	Delist - approved TMDL	List if Supporting Information revised (see right)	See Table 1 of the Las Virgenes MWD comment letter.	Nutrients have been demonstrated exceed standards and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved

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13.32	Las Virgenes MWD	June 17	Malibu Lagoon	Antimony [Arsenic] PAHs] Dibenz[a, h]anthracene] Lead] Phenanthrene] Pyrene] Zinc	Antimony [Arsenic] PAHs] Dibenz[a, h]anthracene] Lead] Phenanthrene] Pyrene] Zinc	Delist - TMDL unnecessary	See Table 1 of the Las Virgenes MWD comment letter.	TMDL is outside the scope of the 303(d) listing process. Malibu Lagoon is not listed for Antimony, Arsenic, PAHs, Dibenz[a,h]anthracene, Lead, Phenanthrene, Pyrene, Zinc
13.33	Las Virgenes MWD	June 17	Malibu Lagoon	Sediment Toxicity	Sediment Toxicity	Delist - TMDL unnecessary	See Table 1 of the Las Virgenes MWD comment letter.	Malibu Lagoon is not listed for sediment toxicity.
13.34	Las Virgenes MWD	June 17	Malibu Lagoon	Eutrophic	Eutrophic	Delist - TMDL	See Table 1 of the Las Virgenes MWD comment letter.	Eutrophic conditions have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.
13.35	Las Virgenes MWD	June 17	Medea Creek Reach 1	Selenium	Selenium	Delist - Natural source	See Table 1 of the Las Virgenes MWD comment letter.	Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.36	Las Virgenes MWD	June 17	Medea Creek Reach 2	Selenium	Selenium	Listed - TMDL required	See Table 1 of the Las Virgenes MWD comment letter.	Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See



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					Information revised (see right)	Virgenes MWD comment			
13.37	Las Virgenes MWD	June 17	Triunfo Canyon Creek	Invasive Species	Invasive Species	Do not list	List for invasives	See Table 1 of the Las Virgenes MWD comment letter.	Invasive species may be listed under Section 3.10 of the Listing Policy, "Trends in Water Quality." This section requires that at least three years of data be considered and that a negative trend be demonstrated. In Triunfo Canyon Creek, while New Zealand mudsnails have been documented, in the data available, no site showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008).
13.38	Las Virgenes MWD	June 17	Westlake Lake	Eutrophic	Eutrophic	List on 303(d) list (being addressed by USEPA approved TMDL)	List if Supporting Information revised (see right)	See Table 1 of the Las Virgenes MWD comment letter.	Eutrophic conditions have been demonstrated to exist and a USEPA approved TMDL has been developed. The State Listing Policy requires inclusion on the 303(d) list until such time as the waterbody meets the requirements of the TMDL. Re-assessment of sources from an approved TMDL is outside the scope of the 303(d) listing process.
13.30	Las Virgenes MWD	June 17	Los Angeles River Reach 6	Selenium	Selenium	Listed	List if Supporting Information revised (see right)	See Table 1 of the Las Virgenes MWD comment letter.	Selenium exceeds standards such that the State Listing Policy requires inclusion on the 303(d) list. See response to comment 13.11.
13.40	Las Virgenes MWD	June 17	Cold Creek	Invasive Species	Invasive Species	Do not list	List for invasives	See Table 1 of the Las Virgenes MWD comment letter.	Invasive species may be listed under Section 3.10 of the Listing Policy, "Trends in Water Quality." This section requires that at least three years of data be considered and that a negative trend

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14.1	Los Padres Chapter Sierra Club	Jun 17			letter.	be demonstrated. In Cold Creek, while New Zealand mudsnails have been documented, in the data available, no site showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008). Comment noted.
			<p>It has come to our attention that the Oxnard Industrial Drain, J Street Drain and the Bubbling Springs water way are not included on the 303(d) list for monitoring purposes. Both the Oxnard Industrial Drain and the J street drain are manmade concrete lined water ways that drain a large area of Oxnard's residential, industrial and agriculture runoff into the Ormond Beach Lagoon which is at the south End of Perkins Rd., adjacent to the HALACO Superfund site. The bubbling Springs waterway is more natural in appearance but at it's terminus is pumped into the same lagoon. The apparent effect of the discharge of these waterways is to fill the lagoon to a maximum level that registers 7 feet on a depth gauge next to the foot bridge and is sometimes in contact with the bridge's structure.</p> <p>During a month of observations of the area the water level has never lowered but seems to gradually rise. There is no outlet to the ocean at this time. During heavy rains and high surf the lagoon does occasionally breach and drains into the ocean. We have been told by city officials that sometimes bulldozers are used to arbitrarily create a breach for drainage. However this practice has implications to wildlife that may have not been considered in the past.</p>			
14.2	Los Padres Chapter Sierra Club	Jun 17	<p>The Oxnard Industrial Drain appears to be constantly full of water that is within two feet of the bottom of the bridges on Hueneme Road. Today we followed this water way inland to Pleasant Valley Road, about one mile north of Saviors Road. The Edison high tension Power lines cross Hueneme road at this point. We observed standing water that appeared to be at least one foot in depth. There were thick algae, much trash and a foul</p>			<p>Comment noted.</p> <p>Staff recognizes the concerns of the Sierra Club and is waiting for finalized water quality reports and superfund site data so that we may make an appropriate assessment.</p>

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14.3	Los Padres Chapter Sierra Club	Jun 17	<p>odor at this location. It is obvious that the Lagoon is full and the water is backed up miles inland. The water appears to be stagnant and most likely bacteria laden and a potential breeding ground for mosquitoes.</p> <p>So far what we describe in layman's terms does not appear to pass the visual or smell test that are criteria of water quality permits. Apparently there is no professional testing of this waterway system. Sierra Club asks that the Waterboard makes the same visual observations and goes further to recommend testing and observation of this waterway system. We would be more than willing to act as your guides if you so desire.</p> <p>We have more concerns about the Lagoon which is the receiving water of these manmade drainage channels. In addition to what has been described, the Abandoned HALACO building, paved area and Slag heap are all draining into the lagoon. The Slag Heap is in contact with the lagoon and Oxnard drain for hundreds of feet along the toe of the manmade mountain. As you know the site has been designated as a Superfund site and has been managed by Wayne Praskins for at least three years. During this time limited testing of the slag heap has found an abundance of heavy metals and radioactive isotopes (thorium).</p> <p>When asked at a recent media event that we held that was publicized in newspapers and ABC TV, Mr. Praskins disclosed that no water samples or underwater sediment had been tested. Sierra Club asks that this testing be ordered as well as marine life tissue samples.</p>	<p>Consideration of inclusion on the 303(d) list will happen in the next listing cycle.</p> <p>We understand that USEPA has conducted groundwater testing at the superfund site and that surface water testing is scheduled for this year. We are also aware that there are draft water quality reports with data for these areas generated by the Coastal Conservancy. When these reports are finalized we will be able to assess the data for possible inclusion in the 303(d) list during the next listing cycle.</p>
15.1	Nature Conservancy	Jun 15	<p>I am requesting that the J - Street lagoon at Ormond Beach in South Oxnard be placed on the impaired waters list and receive a TMDL for trash. This area receives a tremendous amount of trash from both the Oxnard Industrial Drain and the J Street drain. I have attached photos of the lagoon.</p>	<p>Staff recognizes the concerns of stakeholders around the Oxnard Industrial Drain and J Street Drain and appreciates you sending the photos. However, the Listing Policy suggests the use of both qualitative assessments and numeric data to list for trash</p>

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16.1	Newhall Land and Farming Company	June 17	We commend the Regional Water Quality Control Board (RWQCB) for making continued progress toward improving the clarity and objectivity of the 303(d) listing process through the development and implementation of the Water Quality Control Policy for Developing California's Clean Water Act 303(d) List (Listing Policy) (September 2004). We understand that the goal of the Listing Policy is to "establish a standardized approach for developing California's 303(d) list" and we support those efforts.	impairment in a waterbody and staff will assemble the water quality data as it becomes available for assessment and possible inclusion in the 303(d) list in the next listing cycle. Comment noted.
16.2	Newhall Land and Farming Company	June 17	In September of 2007, the RWQCB issued an NPDES permit for the proposed NRWRP. In accordance with the permit, semi-annual samples have been collected in reach 5 of the SCR. In addition, the County Sanitation Districts of Los Angeles County (LACSD) also collects monthly receiving water samples throughout Reaches 5 and 6 as part of their NPDES permit monitoring program for their Valencia and Saugus WRPs. These data were previously submitted to the RWQCB through quarterly and annual monitoring reports and are currently publicly available through the NPDES permit reporting program. We request that these data be included in the RWQCB's administrative record and 303(d) database, and that the RWQCB consider these datasets in making listing determinations.	Data collected after the solicitation period will be evaluated during the next listing cycle.
16.3	Newhall Land and Farming Company	June 17	Currently, the conditional potential MUN (MUN*) designation is applied in the Basin Plan for SCR Reaches 5 and 6. The conditional potential MUN designation is not enforceable and cannot be used as the basis for regulatory actions. Recognition that the MUN use is not applicable to these receiving waters leads to the conclusion that the proposed listing for iron, specific conductivity (based on secondary MCLs); chlorodibromomethane, dichlorobromomethane; and bis(2-ethylhexyl)phthalate (based on application of California Toxics	Staff agrees. See responses to comment 5.1.

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16.4	Newhall Land and Farming Company	June 17	<p>Rule (CTR) human health criteria using water plus organisms) is not warranted. The objectives used to support the proposed impairments for iron and specific conductance are drinking water quality standards (in fact, the standards used were Secondary Maximum Contaminant Levels (SMCL) - which are aesthetic drinking water standards that are meant for control of taste and odor). Specifically regarding the proposed iron and specific conductivity listings, the SMCLs that were used as the basis for these listings are "non-enforceable guidelines that are intended to assist public water systems in managing their drinking water for aesthetic considerations, such as taste, color and odor. Contaminants are not considered to present a risk to human health at the SMCL."<sup>2</sup> Further, SMCLs are intended to be applied to drinking water at the point of delivery, and are an inappropriate standard for natural surface waters, particularly for waters without an MUN designation. Section 6.1.3 of the Listing Policy is instructive with respect to this point as it specifies the use of evaluation guidelines that are "applicable to the beneficial use." Thus the water quality standards used to evaluate data and determine the potential for impairment of beneficial uses must be applicable and appropriate, to assure an accurate determination of water quality impairment. Therefore, we respectfully request that iron and specific conductivity not be listed in Reaches 5 and 6 since the MUN use is not applicable to those receiving waters. Similarly chlorodibromomethane, dichlorobromomethane; and bis(2-ethylhexyl)phthalate should not be listed in Reaches 5 and 6 since the MUN is not applicable to those receiving waters.</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting. See response to comment 9.34 and 9.36.</p>
16.5	Newhall Land and Farming	June 17	<p>It is requested that ammonia plus nitrite be removed from the 303(d) list for Reach 5 of the Santa Clara River because existing water quality data demonstrate that the Basin Plan water quality objectives are being met. (See Fact Sheet No.1)</p>	<p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address</p>

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16.6	Newhall Land and Farming Company	June 17	<p>met (only nine exceedances out of 243 measurements). In light of the data being equal to the delisting criterion, and Section 6.1.5.3 of the Listing Policy's direction to consider the change (improvement) in a water body segment following the implementation of NDN management measures by the Sanitation Districts as a result of the TMDL implementation plan, nitrate plus nitrite should be delisted. (See Fact Sheet No.1)</p> <p>As discussed previously, the proposed listing of iron and specific conductivity in Reaches 5 and 6 of the Santa Clara River does not meet the listing standard since those reaches are designated potential conditional municipal (MUN). Therefore, iron and specific conductivity should not be listed because existing potential MUN beneficial use designation for these reaches has no legal effect and is inapplicable for listing purposes.</p>	<p>the delisting. See response to comment 9.35.</p> <p>Staff agrees and has proposed delisting. The appendices to the Staff Report and the 303(d) list will be revised to address the delisting. See response to comment 5.1.</p>
16.7	Newhall Land and Farming Company	June 17	<p>Chlorpyrifos was added to the 303(d) list in 2006. There have been only two exceedances of the 4-day Criterion Continuous Concentration (CCC) threshold from a combined LADPW and SWAMP set of samples; two or less exceedances is the delisting criteria in the listing policy. In addition, chlorpyrifos has been phased out by EPA for non-agricultural uses, including the cessation of sales of all indoor and outdoor residential use products. In light of the data being equal to the delisting criterion, and Section 6.1.5.3 of the Listing Policy's direction to consider the change (improvement) in a water body segment following the implementation management measures, chlorpyrifos should be delisted. (See Fact Sheet No.2)</p>	<p>Staff disagrees. See responses to comments 5.3 and 9.22.</p>
16.8	Newhall Land and Farming Company	June 17	<p>The proposed listing of copper for Reach 6 is based on Staff's analysis of MS4 data only. When considered with data provided by the Sanitation District and others, only three exceedances of the CCC and two exceedances of the CMC were observed from sample lots of 69 and 71, respectively. Copper does not meet the minimum of six exceedances of the CCC and CMC as required by the Listing Policy. Therefore, copper should not be listed for Reach 6 because water quality objectives are currently being achieved. (See Fact Sheet No.3)</p>	<p>See response to comment 9.18.</p>

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16.9	Newhall Land and Farming Company	June 17	<p>More recent data for diazinon should be considered preferentially consistent with EPA guidance and the Listing Policy regarding temporal representation of data. Two substantial source controls for diazinon have been imposed: USEPA's 2004 ban on residential use of the pesticide, and the provisions and conditions of the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region (Order No. R4-2005-0080) (the "Ag Waiver") adopted by the LARWCB in 2005. Post-ban data demonstrate that only two of 29 samples exceeded the applicable threshold, thus the listing of diazinon for this reach is not warranted per the listing policy and should be delisted. Should the RWQCB maintain this proposed listing despite EPA Guidance and the Listing Policy, diazinon in Reach 6 should be listed under the "Water Quality Limited Segments Being Addressed" category due to the existing USEPA ban on diazinon sales for residential use and monitoring and control of diazinon required pursuant to the Ag. Waiver. Nonetheless, the small number of diazinon exceedances since the ban warrants delisting. (See Fact Sheet No.4)</p>	<p>Staff disagrees. See response to comment 5.3.</p>
16.10	Newhall Land and Farming Company	June 17	<p>Pursuant to the draft 303(d) fact sheet for this proposed listing, SWAMP data for Castaic Creek was included in the primary data set supporting the proposed listing for SCR Reach 5. Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated uses that are independent of SCR Reach 5. Therefore DDT data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for SCR Reach 5.</p>	<p>See response to comment 9.37.</p>
16.11	Newhall Land and Farming Company	June 17	<p>SCR Reach 5 data shows that only 1 of 2 samples exceeded the water quality standard. Thus available SCR Reach 5 data do not meet the Listing Policy requirements for number of exceedances, and no new listing is warranted for DDT in SCR Reach 5. A similar listing deficiency was acknowledged by Staff in 2006 when DDT in Reach 6 were not placed on the 303(d) list due to comparable circumstances from samples in Bouquet Creek. Furthermore, the 2001 SWAMP data does not appear to be</p>	<p>See response to comment 9.37.</p>

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16.12	Newhall Land and Farming Company	June 17	<p>representative of typical or long-term conditions within the waterbody (Santa Clara River Reach 5), as well as being a collected from a separately-defined reach (Castaic Creek) by the Basin Plan. (See Fact Sheet No.5)</p> <p>Pursuant to the draft 303(d) fact sheet for this proposed listing, SWAMP data for Castaic Creek was included in the primary data set supporting the proposed listing for SCR Reach 5. Table 2-1 of the Basin Plan identifies Castaic Creek as a separate water body with designated uses that are independent of SCR Reach 5. Therefore PCB data for Castaic Creek should be evaluated separately and should not be included in the primary data set considered in determining a listing for SCR Reach 5.</p>	See response to comment 9.37.
16.13	Newhall Land and Farming Company	June 17	<p>SCR Reach 5 data shows that only 1 of 2 samples exceeded the water quality standard. Thus available SCR Reach 5 data do not meet the Listing Policy requirements for number of exceedances, and no new listing is warranted for PCBs in SCR Reach 5. Furthermore, the 2001 SWAMP data does not appear to be representative of typical or long-term conditions within the waterbody (Santa Clara River Reach 5), as well as being a collected from a separately-defined reach (Castaic Creek) by the Basin Plan. (See Fact Sheet No.6)</p>	See response to comment 9.37.
16.14	Newhall Land and Farming Company	June 17	<p>Section 3.6 of the Listing Policy states, "If the pollutant causing or contributing to the toxicity is identified, the pollutant shall be included on the section 303(d) list as soon as possible (i.e., during the next listing cycle)." Appendix B of the 2005 SWAMP report Water Quality in the Calleguas Creek and Santa Clara River Watersheds identifies diazinon as the probable cause of toxicity in the Reach 6 (Bouquet Creek) samples. Therefore, the proposed toxicity listing in Reach 6 should be replaced with diazinon, consistent with these scientific findings and the guidelines of the Listing Policy. However, due to the existing USEPA diazinon ban, diazinon should either not be listed (since by preferentially using post-ban data only, listing would not be warranted), or be listed under the "Water Quality Limited Segments Being Addressed" category (see above comments on</p>	See response to comment 5.3.



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16.15	Newhall Land and Farming Company	June 17	<p>Reach 6 proposed diazinon listing).</p> <p>Pursuant to the RWQCB staff report Section 3.3.3, comments were solicited on the possible use of biostimulatory substances in future impairment determinations. Any establishment of water quality objectives involving biostimulatory substances (nitrogen, phosphorus and other compounds that stimulate growth) or other physical parameters (dissolved oxygen, temperature, etc) should be subject to detailed analysis under the State Basin Plan amendment process, including compliance with the California Environmental Quality Act (CEQA) and other requirements under State law. In addition, the Newhall Ranch Sanitation District NDPEs discharge permit incorporates nutrient-related water quality objectives, including algal biomass. Furthermore, the RWQCB should wait until the SWRCB releases its Nutrient Numeric Endpoint guidance, which is currently under peer review. Nutrient criteria developed by the SWRCB and USEPA Region 9 is described in the report, "Technical Approach to Develop Nutrient Numeric Endpoints for California" ("CA NNE"), released in 2006.</p>	<p>The presence of biostimulatory substances in our waterways and the associated adverse impacts on beneficial uses are a significant problem. It is important that these impairments be included on the Region's list of impaired waters.</p> <p>Under the State Listing Policy, waterbodies can be included on the 303(d) list where standards or guidelines are exceeded. In the case of biostimulatory substances, the Los Angeles Region Basin Plan contains a narrative objective for biostimulatory substances, which may be used in assessments by relying upon numerical guidelines.</p>
17.1	Ormond Beach Wetlands Environmental Coalition	Jun 17	<p>We have been alerted that somehow the Southern California Regional Water Board has not been made aware of toxic cesspool problems that suffers one of our few remaining wetlands areas in California. Please place this issue in your upcoming agenda as an emergency action item.</p>	<p>The Los Angeles Regional Board has a long history with the site. In September of 2007 the site was added to the Federal Superfund list. Wayne Praskins is the EPA Project Manager.</p>
17.2	Ormond Beach Wetlands Environmental Coalition	Jun 17	<p>As you can see from the attached photos, the area is an amazing habitat for coastal wildlife and a very attractive area for families to enjoy a day at the beach. The lagoon visually offers a family what might appear to be a safe wading area for small children.</p> <p>However as far as we know, no agency has been testing the water quality at the Ormond Wetlands and there are no warning signs in Spanish and English foretelling of probably pollution.</p> <p>Trash from local throwaways, picnickers', homeless is adding to the continual flow of trash from two or three Oxnard farmland</p>	<p>The Regional Board is aware that there are draft water quality reports with data for these areas generated by the Coastal Conservancy. When these reports are finalized Board staff will be able to assess the data for possible inclusion in the 303(d) list during the next listing cycle.</p>

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17.3	Ormond Beach Wetlands Environmental Coalition	Jun 17	<p>and industrial drains that empty into the wetlands. As you can see by the attached photos this trash is a serious detriment to the water quality and has been a long term health hazard to those unaware who take their families to enjoy a day at the beach and lagoon.</p> <p>Likewise, the estimated 700 thousand tons of toxic heavy metal slag hill that creates a double sized football field approximately sixty feet high and it's large footprint expanding underwater and sinking into the wetlands has been reported leaking contamination. By one EPA report the abandoned smelter and slag hill may harbor radio-isotopic materials that are blending into the local aquifers as well as the tidal action that pulls the toxic substances into the ocean at reach tide.</p>	<p>The Regional Board understands that USEPA has conducted groundwater testing at the Superfund site and that surface water testing is scheduled for this year. When available, Board staff will be able to assess these data for possible inclusion in the 303(d) list during the next listing cycle.</p>
18.1	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>In 2006, a number of listings were placed on the 303(d) list for Organochlorine Pesticides. These listings were based on information developed during the preparation of the Calleguas Creek Watershed Organochlorine Pesticides and PCB TMDL that demonstrated that some additional reaches had data that supported additional impairments. In 2006, the State Board included these additional impairments on the 303(d) list because an USEPA approved TMDL was in effect. The Fact Sheets for the constituents listed in Table 1 for the 2006 list from the SWRCB included the following language as the rationale for including the constituents on the list:</p> <p>"After review of the available information for this recommendation, SWRCB staff conclude that the water body pollutant combination should be placed in the Water Quality Limited Segments Being Addressed category of the 303(d) list because a TMDL has been approved."</p> <p>Based on this rationale, we request that the following listings be changed from category A to category B in the 2008 list. Table 1 summarizes the listings.</p>	<p>Staff agrees. The fact sheets, appendices and 303(d) list will be revised to address this comment.</p>

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18.2	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>*Table 1 is located in the of the Parties Implementing TMDLs in Calleguas Creek Watershed comment letter.</p> <p>Additionally, the USEPA approved TMDL for salts (effective December 2, 2008) addresses the boron, sulfate and TDS listings in Fox Barranca, a tributary to the Calleguas Creek watershed. We request that the following listings be moved from Category A to Category B based on the same rationale as expressed in the fact sheets for the other reaches of the Calleguas Creek watershed which will be addressing the salts issue on a watershed scale approach. Table 2 summarizes the listings.</p>	Staff agrees. The factsheets, appendices and 303(d) list will be revised to address this comment.
18.3	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>We would like to support the recent Ventura Coastkeepers (VCK) re-submittal of data used as the basis for the trash listing in the Arroyo Simi. Members of the MOA group identified a discrepancy in the data available on the fact sheet (Decision ID 10423). VCK staff have since identified the errors and revised the data sheet to accurately reflect the conditions observed in Reach 7 (Arroyo Simi) during the 2006 sampling period. We are supportive of this data submission and appreciate VCK staff working in a cooperative effort to help identify and revise the data. We appreciate the VCK taking a proactive approach to ensure that data is accurate and correct, and support Regional Water Board staff accepting this revised data.</p>	Comment noted.
18.4	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>We request, in light of the re-submittal of the data, that the Regional Board staff consider the information in the context of the State's Listing Policy. The FED for the Listing Policy (page 90) discusses the need to use both numeric and non-numeric data for determining a trash listing. We request that the decision to list trash be based on consideration of both numeric and non-numeric data as discussed in the FED. Although not available for review, we would request that the listing in Arroyo Simi only be listed if the resubmitted data includes one or both of the following non-numeric types of information that can be used to verify the numeric values for trash.</p>	See response to comment 6.1.

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18.5	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>Additionally, we request that the following information be a requirement of any data submittal used as the basis for a new trash listing, and that the information be available for review during the review process:</p> <ol style="list-style-type: none"> <li>1. Photographic or Other Documentation Providing Evidence of the Impairment – By utilizing photographic information in the listing, the Regional Board will be better able to identify specific locations of the impairment and possibly better identify sources of impairment. Beyond the TMDL development stage, by having more detailed information contained in photos, this would assist in the development of implementation plans. If photographs are not available, field logs, survey forms, or other information should be provided to ensure the submitted results are verifiable by the SWRCB or RWQCB as required by the Listing Policy.</li> <li>2. Specific Trash Details - Having more specific data beyond the general trash category will further assist in the development of the TMDL and the subsequent TMDL implementation effort. This information would greatly assist in both phases of the TMDL process.</li> </ol>	See response to comment 6.1.
18.6	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>During our last review, the group had extensive issues in trying to obtain the original data submitted for the Revolon Slough/Beardsley Wash Trash listing. We appreciate the new approach utilized for the 2008 listing procedure with associated fact sheets that include the listing data available for review.</p>	Comment noted.
18.7	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>Should Regional Board staff decide that the information is sufficient for listing per the Listing Policy requirements, we request that the listing be placed on the list with a characterization of Category C-Being addressed by action(s) other than a TMDL.</p>	See response to comment 6.2.
18.8	Parties	Jun 17	<p>The FED specifically acknowledges that storm water permits and</p>	See response to comment 6.2.

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	Implementing TMDLs in Calleguas Creek Watershed		<p>associated Storm Water Management Plans (SWMP) are an existing program that can be utilized for justifying this categorization.</p> <p>“If trash is a nuisance in water bodies of the State and storm drains are the major source, then existing storm water permits could be used to reduce the trash discharged via storm drains.”</p> <p>The recently adopted Ventura County Municipal Storm Water NPDES Permit contains a number of provisions to address trash that can be utilized to address the trash impairment.</p> <ul style="list-style-type: none"> <li>• Catch basin prioritization, inspection, and cleaning based on the amount of trash generated.</li> <li>• Trash management at public events.</li> <li>• Trash can installation and maintenance in high trash generation areas.</li> <li>• Trash excluder installation on catch basins or conduct alternative BMPs to reduce trash discharges to receiving waters within two years.</li> </ul> <p>These provisions are sufficient to categorize the trash listing in Category C on the 303(d) list. The permit is an adopted regulatory program that is enforceable by the RWQCB, contains a monitoring program, and reporting programs that demonstrate progress and the provisions will address discharges of trash to the Arroyo Simi within a reasonable amount of time.</p>	
18.9	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	<p>The chlorpyrifos in fish tissue listing should be removed from the 303(d) list based on section 4 of the Listing Policy. The Listing Policy calls for the delisting of waters if the decision is found to be faulty and it is demonstrated that the listing would not have occurred in the absence of such faulty data. The original listing was based solely on an EDL. The Listing Policy does not allow the use of EDLs in listing or delisting decisions.</p>	<p>Staff disagrees. The listing is supported by chlorpyrifos exceedances in water. A comment will be added to the 303(d) list until the listing fraction (ie “tissue”) can be amended. As new listings are added or updated specific fractions are not included in the pollutant name.</p>

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18.10	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	The Listing Policy calls for the delisting of waters if the decision is found to be based on faulty data and it is demonstrated that the listing would not have occurred in the absence of such faulty data. The data that was used for the original listing was collected in the downstream reach (Reach 4) and EDLs, which are considered to be faulty, formed the basis of the listing. As such, the Reach 5 chlorpyrifos listing in fish tissue should be removed from the 2006 303(d) list. In a similar case State Board staff recommended delisting cadmium in Ballona Creek because data collected in a downstream reach were applied inappropriately.	See response to comment 18.9.
18.11	Parties Implementing TMDLs in Calleguas Creek Watershed	Jun 17	Similar delisting recommendations were made for the removal of dacthal in fish tissue listings in the remainder of the Watershed: Reaches 4, 9A, 9B, 10, 11, and 13. As there are no sediment quality guidelines published in the peer-reviewed literature or developed by state or federal agencies for dacthal, the sediment listing for dacthal in Reach 5 should be removed from the 303(d) list.	See response to comment 18.1.
19.1	Santa Barbara Channel Keeper	Jun 16	Channelkeeper strongly supports the Regional Board's decision to list San Antonio Creek for indicator bacteria and total dissolved solids water quality impairments as well as the existing listing for nitrogen. These listings are supported by Channelkeeper's Stream Team citizen monitoring program data, which has been submitted to the Regional Board and cited as a line of evidence in making these determinations. San Antonio creek provides multiple benefits to the communities of Ojai and Ventura County. This creek flows through multiple residential neighborhoods and ranches. It is easily accessed by the public at multiple locations and frequently used for multiple forms of recreation including swimming. A deep pool exists immediately downstream of the confluence of San Antonio Creek and the Ventura River. Local community members regularly use this pool for swimming. San Antonio Creek also supports diverse riparian plant and animal communities. San Antonio Creek provides critical habitat for endangered steelhead trout, which	Comment noted.

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19.2	Santa Barbara Channel Keeper	Jun 16	<p>have been observed there by biologists in recent years. In the summer of 2008 biologists counted over 200 steelhead smolts in this pool. It is imperative that these existing beneficial uses are protected and that impairments identified through water quality monitoring activities are included on the revised 303(d) list.</p> <p>Channelkeeper strongly supports the Regional Board's decision to list Canada Larga Creek for total dissolved solids as well as the existing listings for fecal coliform. These listings are supported by Channelkeeper's Stream Team citizen monitoring program data, which has been submitted to the Regional Board and cited as a line of evidence in making these determinations.</p>	Comment noted.
19.3	Santa Barbara Channel Keeper	Jun 16	<p>We note that for the purposes of consistency and clarity, the Regional Board should consider modifying the listing for 'fecal coliform' to 'E. coli' or 'indicator bacteria' since the data collected by Channelkeeper that supports this listing is in fact E. coli data.</p>	Canada Larga was listed in 2002 for fecal coliform. See response to comment 3.2.
19.4	Santa Barbara Channel Keeper	Jun 16	<p>Channelkeeper strongly supports the Regional Board's decision to develop a numeric evaluation criterion to interpret the Basin Plan Water Quality Objective for biostimulatory substances. The existing Basin Plan nitrate objective to protect domestic and municipal water supplies is not protective of aquatic ecosystems, and the lack of such numeric criteria has been one of the most critical limitations of the existing Plan.</p>	Comment noted.
20.1	Teresa Jordan	May 18	<p>Page 2, it is stated in the legal NOTICE, under Background of the 2008 Integrated Report, in the first paragraph that "The Regional Water Board is proposing to revise the surface water quality assessment under Clean Water Act section 305(b) and the list of impaired water under Clean Water Act section 303(d) in a 2008 Integrated Report."</p> <p>By revising the surface water quality assessment in 2009 for the 2008 Integrated Report, the Regional Water Board is in essence changing the dynamics of NPDES permits' requirements and other Orders approved for pollutants in discharges that are impairing waterbodies throughout the region. It would be a</p>	<p>Staff disagrees. Section 305(b) of the Clean Water Act requires states to biennially assess the conditions of surface waters to USEPA. The proposed biostimulatory guidelines are an assessment tool for determining impairments of surface waters from biostimulatory substances and eutrophication and is not anticipated to affect adopted NPDES permit requirements and other orders.</p>

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
20.2	Teresa Jordan	May 18	different picture if the Integrated Report stated something to the effect that beginning in XX XX, XXXX the proposed criteria (Table 3-2 Lakes: Nutrient Concentration and Biological Response Indicators Criteria Limits (Rivers and Streams), and Table 3-3 Rivers and Streams: Nutrient Concentration and Biological Response Indicators Criteria Limits(Lakes)) will be used after the Board public hearing.	Staff also notes that section 3.4 of the staff report states that, "[i]n this 2008 list update, however, no "biostimulatory substances" impairments have been included" and that "[t]he Regional Board intends to solicit stakeholder comments regarding the criteria presented below for development of the guidelines to be used for listing in future updates of the 303(d) list."
20.3	Teresa Jordan	May 18	Since the Tables (Draft Integrated Report, Pages 13 and 14) information is inaccurate--Table 3-2 states "Lakes" yet the information is for "Rivers and Stream", and Table 3-3 states Rivers and Streams" yet the information is for "Lakes"--even if I had the mathematical and technical knowledge to decide which of the mg/Ls and mg/m2s better protects the health of the: 1. public, 2. aquatic life, 3. wildlife, and 4. environment, I cannot comment because my support or opposition would be flawed. Even if I commented on the corrected criteria Tables, and even though it is stated on Page 2 of the Tentative Resolution, top of page, that "Regional Board staff responded to oral and written comments received from the public", there is no guarantee that my comments will be responded to by Regional Board staff. Example: I submitted 5 letters on the Ventura Countywide MS4 NPDES permit (3 by the deadline, and 2 within days of the deadline). Not one of my letters' comments were responded to by Regional Board staff. Many of my comments involved inaccuracies in the documents.	The titles for tables 3-2 and tables 3-3 in the staff report have been corrected.
20.4	Teresa Jordan	May 18	It is stated also on Page 2 of the Tentative Resolution, last paragraph before the Executive Officer's statement, that "If during State Board's approval process the State Board determines that minor, non-sustentative corrections to the language of the report are needed for clarity or consistency, the Executive Officer may make such changes, and shall inform the Board of any such	Staff intends to respond to all comments received from the public by the comment submittal deadline. While comments on the MS4 permit are out of the scope of this action, Storm Water Permitting Staff had responded to all the comments in question and integrated certain editorial changes, though specific comments may not have specifically call out the commenter or their comments. Storm Water Permitting staff has included their editorial changes and is submitting their revised documents to State Board. Further comments regarding revised documents may be addressed to State Board during their



**Response to Comments on the Draft 2008 303(d) List**  
**Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
20.5	Teresa Jordan	May 18	<p>The revised documents still contained the inaccuracies that my letters pointed out. The State Water Board is going to be considering corrections to the Calleguas Creek Watershed areas Nitrogen TMDLs. Thus, the Regional Board staff must revise the "Response to Comments" Notation of the April 30, 2009 Ventura Countywide MS4 NPDES permit.</p> <p>The Regional Board staffs "Response to Comments" for the Boeing Company's Santa Susana Field Laboratory NPDES permit must also be revised to correct the misspelled name of commenter Ginn Doose-listed as "Moose" on Page 102 of 103.</p>	<p>comment solicitation period.</p> <p>The notice, issued on April 30, 2009, was intended to solicit written comments for the 2008 Integrated Report and 303(d) list. Comments received and not pertaining to the 2008 Integrated Report or 303(d) list are beyond the scope of comments solicited. As such, these comments should be addressed to the relevant program.</p> <p>Comment noted.</p> <p>The notice, issued on April 30, 2009, was intended to solicit written comments for the 2008 Integrated Report and 303(d) list. Comments received and not pertaining to the 2008 Integrated Report or 303(d) list are beyond the scope of comments solicited. As such, these comments should be address to the relevant program.</p>
20.6	Teresa Jordan	May 18	<p>That there are 66 proposed new 303(d) listings in 35 waterbodies (Draft Integrated Report, Page 1, fourth paragraph) does not bode well for the Regional Board's responsibilities and actions. This means that enforcement continues to be a major problem in this region since according to the information on Page 19 (Draft Integrated Report) points to a number of "limitations". It is shameful that so many years have passed and just now the required Integrated Report is providing "the most complete 305(b) report for the Los Angeles Region" (last sentence, Page 19).</p>	<p>This Region continues to have significant water quality issues in many waterbodies. Staff is committed to continuing to improve the Integrated Report and 303(d) listing cycle in terms of standardization, accuracy and transparency with each listing cycle.</p>

**Response to Comments on the Draft 2008 303(d) List**  
**Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
20.7	Teresa Jordan	May 18	I am opposed to delisting the Calleguas Creek Reach 4 (Revolon Slough Main Branch: Mugu Lagoon to Central Avenue) for Boron, Sulfates, and Total Dissolved Solids from the 303(d) list.	Comment noted. Staff has determined that Calleguas Creek Reach 4 below Laguna Road is tidally influenced and had observed salinity levels in the brackish range. As such, the freshwater water quality objectives do not apply for boron, sulfate, and total dissolved solids (TDS). As no saltwater objectives are available for boron sulfate, and TDS, staff recommends delisting these waterbody pollutant combinations from the 303(d) list.
20.8	Teresa Jordan	May 18	I would have done a better job of addressing this extremely important subject, but already I have delayed commenting on the Department of Water Resources' Draft 2009 Water Plan Update's Volume 3 (Regional Report, specifically the South Coast) since the many draft tentative NPDES permits orders at the Regional Water Board level, and many State Water Board policies and plans that I have addressed have taken up a lot of time cross-referencing other documentation, though the information has all been priceless.	Comment noted.
20.9	Teresa Jordan	May 18	Also, the Ex Parte Communications entanglement ate up a lot of my time as well. I have yet to hear from the Staff Senior Counsel from the State Water Board as to whether or not I violated the law. As long as this situation remains in limbo, I am being punished for participating in the public review and comment period because I have pointed out documents' incompleteness and inaccuracies, and in speaking out about defrauding of taxpayers.	Comment noted. As a public agency, the integrated reporting process is open to all stakeholders.
21.1	USEPA	June 17	We carefully reviewed the draft listing decisions and factsheets and we have concluded the vast majority of the assessment determinations are consistent with federal listing requirements. We write to support Regional Board staff recommendations to identify certain impairments as being addressed by a TMDL alternative.	Comment noted.

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
21.2	USEPA	June 17	<p>EPA supports staff recommendations to delist Wilmington Drain ammonia and requests that Regional Board staff consider delisting this waterbody for copper and lead. The City of Los Angeles has collected thirty-three samples from 2007 to 2009 in this waterbody and two additional samples were collected by the Regional Board in that timeframe. The overall record indicates only two excursions above the standard for copper and zero excursions above the standard for lead. We urge staff to evaluate these monitoring results and review the assessment decisions for either of these metals in Wilmington Drain.</p>	<p>The data available (from the City of Los Angeles) which documents a non-impairment of Wilmington Drain for copper and lead and would support delisting for these metals was not evaluated as part of the 2008 listing cycle. The data was not evaluated because all of the data provided was collected after the data solicitation deadline for this listing cycle. Staff will consider the additional data in the next listing cycle.</p>
21.3	USEPA	June 17	<p>Additionally, EPA requests that Regional Board staff consider delisting three volatile organic compounds (TCE, PCE and 1,1-DCE) on Los Angeles River Reach 6. The City of Los Angeles has collected forty samples from 2006 to 2007 in this reach. Monitoring results for trichloroethene (TCE), tetrachloroethene (PCE) and 1,1-dichloroethene (DCE) show no excursions above the applicable standard for all non-drinking water purposes. A potential municipal use is associated with this segment of the Los Angeles River. However, both TMDLs and assessments are based on designated and existing uses, not potential uses. This segment is therefore not impaired by volatile organic compounds. For both of these waterbodies EPA has provided the raw data in prior communications.</p>	<p>Staff agrees. The factsheets, appendices and 303(d) list will be revised to address this comment. Also see response to comment 3.20 for 1,1-DCE.</p>
21.4	USEPA	June 17	<p>Additionally, EPA urges Regional Board staff to consider delisting the shellfish harvesting advisory from Malibu Lagoon. The Malibu Creek Watershed Bacteria TMDLs (EPA approval on 1/10/06) addressed impairments for coliform, swimming restrictions and enteric viruses and pointed out that shellfish harvesting was not a designated beneficial use in Malibu Lagoon. This waterbody is therefore not impaired by the shellfish harvesting advisory as indicated on the draft 303(d) list.</p>	<p>Staff agrees. The Basin Plan does not include a shellfish harvesting beneficial use for Malibu Lagoon and furthermore, there are no shellfish advisories for the lagoon. The appendices and 303(d) list will be revised to address this comment.</p>
21.5	USEPA	June 17	<p>EPA supports the Regional Board staff recommendation to identify Malibu Lagoon benthic community effects listing as</p>	<p>Comment noted.</p>

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
21.6	USEPA	June 17	<p>being addressed by an alternative to a TMDL. An upcoming Malibu Lagoon restoration project will address this impairment. The Malibu Lagoon Restoration Feasibility Study lists structural and non-structural best management practices that will be implemented during restoration. These measures are expected to improve sediment delivery and increase scour to some areas, increase grain size, and allow more oxygen rich water to bed sediment. This restoration project will commence in 2009 and will be effective at restoring the beneficial uses.</p> <p>EPA also supports the Regional Board staff recommendation to identify Port Hueneme DDT (dichlorodiphenyltrichloroethane) and PCBs (polychlorinated biphenyls) as being addressed by an alternative to a TMDL. A Port Hueneme Harbor dredging project was initiated in 2008 and is designed to remove contaminated sediments from the harbor, and as a result eliminate the bioaccumulation potential of the DDT and PCBs contaminated sediment and ongoing impacts to the aquatic biota thereby addressing these impairments.</p>	Comment noted.
21.7	USEPA	June 17	<p>Two waterbodies are listed incorrectly in the draft list as requiring a TMDL for impairments that have had TMDLs completed already. EPA requests that Regional Board staff correct the listing for beach closures at Robert H. Meyer Memorial Beach to indicate that a TMDL has already been approved. It was included in the Santa Monica Bay bacteria TMDLs (EPA approval on 6/19/03) which included all of the waterbody pollutant combinations identified in Assessment Unit 48 of the <i>Heal the Bay v. Browner</i> consent decree.</p>	Staff agrees. The fact sheets, appendices and 303(d) list will be revised to address this comment.
21.8	USEPA	June 17	<p>Additionally, EPA would like Regional Board staff to correct the listings for boron, sulfates and total dissolved solids at Fox Barranca and indicate that a TMDL has already been approved. Many waterbody segments in this watershed were resegmented and renamed. EPA believes these TMDLs were included in one of the reaches in the Calleguas Creek Salts TMDLs (approval on 12/2/08) that covered the waterbody pollutant combinations identified in Assessment Units 3 and 4 of the <i>Heal the Bay v.</i></p>	Staff agrees. The fact sheets, appendices and 303(d) list will be revised to address this comment. See response to comment 18.2.

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
21.9	USEPA	June 17	<p><i>Browner</i> consent decree.</p> <p>In addition, various reaches of Calleguas Creek are shown in the draft 303(d) list as requiring a TMDL for endosulfan, dacthal, and ChemA. These were identified in the Calleguas Creek Watershed Organochlorine Pesticides and PCBs TMDL (EPA approval on 3/14/06) as "category 2" because they were found to not be causing impairment. They were, however, given load and wasteload allocations set equal to numeric targets for all listed reaches. EPA requests that Regional Board staff correct the draft 303(d) list to identify these waterbody pollutant combinations as either delisted or having an approved TMDL for the contaminants in question. The Calleguas Creek Organochlorine Pesticides and PCBs TMDLs and the Calleguas Creek Toxicity TMDLs (EPA approval on 3/14/06) addressed all waterbody pollutant combinations identified in Assessment Units 2 and 5 of the <i>Heal the Bay v. Browner</i> consent decree and none of those waterbody pollutant combinations should be identified as requiring TMDLs on the State's 303(d) list.</p>	<p>Staff agrees. The fact sheets, appendices and 303(d) list will be revised to address this comment. See response to comment 18.1.</p>
21.10	USEPA	June 17	<p>Several waterbody pollutant combinations remain on the draft 303(d) list even though existing TMDL documents contain information supporting findings of non-impairment for these contaminants. For example, during the development of the Marina del Rey Harbor Toxics TMDLs (EPA approval on 3/16/06), Regional Board staff concluded non-impairment due to DDT and dieldrin in these waters. Similarly Ballona Creek was found to be non-impaired due to cadmium as part of the Ballona Creek Metals TMDLs (EPA approval on 12/22/05). Apparently, Regional Board staff have not elected to remove these waterbody pollutant combinations from the 303(d) list because, although the data available show a lack of impairment, sufficient data do not exist to meet the State's binomial statistical methodology requirements for delisting. EPA considers these contaminants appropriate for delisting since federal guidelines do not contain minimum sample size requirements for making assessment decisions (EPA 2006 Integrated Reporting Guidance, pp.36-37)</p>	<p>Staff agrees with the finding of non-impairment for these waterbodies. The State Listing Policy requires a certain number of samples to de-list a waterbody pollutant combination, however (Section 4.1), so staff is unable to de-list at this time. However a comment will be included in the 303(d) list next to the listing to identify the finding of non-impairment.</p> <p>Also see response to comment 3.8 for dieldrin and DDT in the Marina Del Rey Harbor.</p>

**Response to Comments on the Draft 2008 303(d) List  
Comment due date: June 17, 2009**

No.	Author	Date	Comment	Response
22.1	Ventura Coastkeeper	June 17	VCK supports in full Decision ID 10423 listing Calleguas Creek Reach 7, Water Body ID CAR403620002000228103510, on the 303(d) list for trash as a pollutant and nuisance.	Comment noted.
22.2	Ventura Coastkeeper	June 17	<p>However, based on VCK's Stream Team's 2006 and 2007 Monitoring Data (see attached), gathered pursuant to VCK's QAPP that is certified and approved by the Regional Board, the weight of evidence indicates that additional water segment-pollutant combinations in the Calleguas Creek Watershed should be placed on the section 303(d) list for trash as a pollutant and nuisance in the Water Quality Limited Segments category because applicable water quality standards are exceeded in these additional waterbody segments impairing their beneficial uses, and the trash in these waterbody segments contributes to or causes the exceedences.</p> <p>The additional waterbody segments that should be listed on the 303(d) list for trash as a pollutant and nuisance include the water body segments that include these VCK monitoring stations in Table 1 below (see attached "VCK 2006-2007 Calleguas Creek Watershed Monitoring Stations") where the following trash data was observed and counted as part of the sampling efforts of Ventura Coastkeeper's Stream Team from February 2006 through June 2007:</p> <p>Trash TMDL, is not strictly adhered to, the presence of trash at all of these monitoring stations is of the frequency, consistency, and magnitude to warrant that the waterbody segments that contain each of these monitoring stations (AS1, CJ1, CJ2, CJ3, CL1, CL2, and RS1) are listed on the 303(d) list as impaired for trash.</p>	<p>Comment noted. Staff will incorporate these trash impaired reaches into the 303(d) list and the factsheets, appendices and 303(d) list will be revised to address this comment.</p>

**Item 13**

**Table of Contents for Item 13 on the Agenda of  
the 528<sup>th</sup>**

**Regular Meeting of the California Regional  
Water Quality Control Board, Los Angeles Region**

**Los Angeles Region 2008 Integrated Clean Water  
Act Section 305(b) Report and Section 303(d) List  
of Impaired Waters**

**SELECTED FACTSHEETS FOR SELECTED  
LISTINGS BASED ON RESPONSE TO COMMENTS  
(to be provided in supplemental board package)**

## Selected Factsheets for selected listings based on Response to Comments

### Los Angeles Region 2008 Integrated Clean Water Act Section 305(b) Report and Section 303(d) List of Impaired Waters

1	Calleguas Creek Reach 7	Trash	13 - 506
2	Calleguas Creek Reach 10	Trash	13 - 508
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5	Inner Cabrillo Beach (Los Angeles Harbor)	Copper	13 - 518
6	Los Angeles River Estuary (Queensway)	Lead	13 - 524
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8	Los Cerritos Channel	Ammonia	13 - 535
9	Malibu Creek	Benthic MacroInvertebrate Bioassessment	13 - 538
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22	Triunfo Canyon	Invasive Species - Mud snail	13 - 580
23	Walnut Creek Wash	Toxicity	13 - 583



# Draft 2008 California 303(d)/305(b) Integrated Report

## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)  
Water Body ID: CAR4036200020000228103510  
Water Body Type: River & Stream

DECISION ID 10423

Pollutant: Trash  
Final Listing Decision: List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Sources: Source Unknown  
Expected TMDL: 2021  
Completion Date:  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.7 of the Listing Policy. Under section 3.7 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Seven of 11 samples exceeded the narrative objectives for trash listed in the Basin Plan, and evaluated using numeric targets derived in Los Angeles River Trash TMDL and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

### Lines of Evidence (LOEs) for Decision ID 10423

LOE ID: 21362

Pollutant: Trash  
LOE Subgroup: Pollutant-Nuisance  
Matrix: Water

Fraction:	None
Beneficial Use:	Warm Freshwater Habitat
Aquatic Life Use:	Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	11
Number of Exceedances:	7
Data and Information Type:	QUALITATIVE (EVALUATED) ASSESSMENT - UNSPECIFIED
Data Used to Assess Water Quality:	Seven of 11 samples exceeded the numeric target for trash, as derived in the Los Angeles River Trash TMDL. Trash was observed and counted as part of the sampling efforts of the Ventura Coastkeepers.
Data Reference:	<u>Calleguas Creek volunteer water quality monitoring data for 2006 conducted by Ventura Coastkeeper.</u>
Water Quality Objective/Criterion:	The Basin Plan states that "waters shall not contain floating materials, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses."
Objective/Criterion Reference:	<u>Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009</u>
Evaluation Guideline:	The Los Angeles River Trash TMDL derived a numeric target for trash to evaluate the narrative guidelines listed in the Basin Plan. This target was derived as 0 for trash to fully support beneficial uses and also includes a margin of safety.
Guideline Reference:	<u>Trash Total Maximum Daily Loads for the Los Angeles River Watershed Staff Report. California Regional Water Quality Control Board, Los Angeles Region. July 27, 2007.</u>
Spatial Representation:	The Ventura Coastkeepers conducted sampling at the monitoring station AS1 located in Arroyo Simi (Calleguas Creek Reach 7) at Madera Road.
Temporal Representation:	A total of 11 observations and trash counts were taken from February to December of 2006.
Environmental Conditions:	
QAPP Information:	Not Available.
QAPP Information Reference(s):	

# Draft 2008 California 303(d)/305(b) Integrated Report

## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Calleguas Creek Reach 10 (Conejo Creek (Hill Canyon)-was part of Conejo Crk Reaches 2 & 3, and lower Conejo Crk/Arroyo Conejo N Fk on 1998 303d list)  
Water Body ID: CAR4036400020020226083118  
Water Body Type: River & Stream

DECISION ID 17170

Pollutant: Trash  
Final Listing Decision: List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Sources: Source Unknown  
Expected TMDL: 2021  
Completion Date:  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.7 of the Listing Policy. Under section 3.7 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Seven of 11 samples exceeded the narrative objectives for trash listed in the Basin Plan, and evaluated using numeric targets derived in Los Angeles River Trash TMDL and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWRCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

Lines of Evidence (LOEs) for Decision ID 17170

LOE ID:	30189
Pollutant:	Trash
LOE Subgroup:	Pollutant-Water
Matrix:	Water
Fraction:	None
Beneficial Use:	Warm Freshwater Habitat
Aquatic Life Use:	Wildlife Habitat
Number of Samples:	11
Number of Exceedances:	7
Data and Information Type:	Not Specified
Data Used to Assess Water Quality:	Seven of 11 samples exceeded the numeric target of zero trash.
Data Reference:	Calleguas Creek Watershed Monitoring Report prepared by Wishtoyo Foundation, Ventura Coastkeeper, 2006
Water Quality Objective/Criterion:	From the Los Angeles RWQCB Basin Plan: Waters shall not contain floating materials, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses.
Objective/Criterion Reference:	<u>Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009</u>
Evaluation Guideline:	Narrative objective evaluated using numeric target of zero trash in Los Angeles River Trash TMDL and other regional trash TMDLs.
Guideline Reference:	<u>Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009</u>
Spatial Representation:	One monitoring station in Calleguas Creek, Reach 10 (CJ2).
Temporal Representation:	11 observations and trash counts were taken every month from February to December of 2006.
Environmental Conditions:	
QAPP Information:	QA information unavailable.
QAPP Information Reference(s):	

# Draft 2008 California 303(d)/305(b) Integrated Report

## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Coyote Creek  
 Water Body ID: CAR4051501019980917123914  
 Water Body Type: River & Stream

DECISION ID 5096

Pollutant: Diazinon  
 Final Listing Decision: Do Not Delist from 303(d) list (TMDL required list)  
 Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)  
 Revision Status: Revised  
 Sources: Source Unknown  
 Expected TMDL: 2019  
 Completion Date:  
 Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for removal from the section 303(d) list under section 4.1 of the Listing Policy. Under this section a single line of evidence is necessary to assess listing status.

Three lines of evidence are available in the administrative record to assess This pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Six of 69 samples exceeded the CDFG acute Hazard Assessment Criterion and seven of 47 samples exceed the CDFG chronic criterion for Diazinon and this exceeds the allowable frequency calculated from the equation in Table 4.1 of the Listing Policy.
4. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

### Lines of Evidence (LOEs) for Decision ID 5096

LOE ID: 2440  
 Pollutant: Diazinon  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water

Fraction:	Not Recorded
Beneficial Use:	Warm Freshwater Habitat
Number of Samples:	22
Number of Exceedances:	2
Data and Information Type:	PHYSICAL/CHEMICAL MONITORING
Data Used to Assess Water Quality:	Numeric data generated from 22 samples taken from 10/12/00 to 4/30/03 at one to two-week sampling interval. Two samples out 22 exceeded the acute DFG fresh water hazard assessment criteria for the protection of aquatic life (LACDPW, 2004c).
Data Reference:	<u>Placeholder reference 2006 303(d)</u>
Water Quality Objective/Criterion:	Basin Plan narrative WQO for Pesticides.
Objective/Criterion Reference:	<u>Placeholder reference 2006 303(d)</u>
Evaluation Guideline:	Numerical Diazinon guideline used to interpret Basin Plan narrative pesticide WQO. The numeric guidelines are 0.10 ug/l 4-day average and 0.16 ug/l 1-hour average generated by DFG as a fresh water hazard assessment criteria for the protection of aquatic life (Siepman & Finlayson, 2000; Finlayson, 2004).
Guideline Reference:	<u>Placeholder reference 2006 303(d)</u>
Spatial Representation:	One sample site sampled during the dry and wet season beginning from 10/12/00 through 4/30/03 at approximately one to two week intervals.
Temporal Representation:	Twenty-one samples were taken during the wet season and one sample was taken during the dry season from 10/12/00 to 4/30/03 at approximately one to two week intervals as part of the Los Angeles County Storm water monitoring program prepared by the Los Angeles County Department of Public Works.
Environmental Conditions:	The Coyote Creek Monitoring Station (S13) is located at the existing ACOE stream gage station (Stream Gage No. F354-R) below Spring Street in the lower San Gabriel River watershed. The site assists in determining mass loading for the San Gabriel River watershed. At this location, the upstream tributary area is 150 square miles (extending into Orange County). The sampling site was chosen to avoid backwater effects from the San Gabriel River. Coyote Creek, at the gauging station, is a concrete lined trapezoidal channel. The Coyote Creek sampling location has been an active stream gauging station since 1963.
QAPP Information:	Evaluation of Analytes and QA/QC Specifications for Monitoring Program (Woodward-Clyde, 1996) Los Angeles County Department of Public Works.
QAPP Information Reference(s):	
LOE ID:	25003
Pollutant:	Diazinon
LOE Subgroup:	Pollutant-Water
Matrix:	Water
Fraction:	None
Beneficial Use:	Warm Freshwater Habitat
Aquatic Life Use:	Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	24
Number of Exceedances:	3
Data and Information Type:	Fixed station physical/chemical (conventional plus toxic pollutants)
Data Used to Assess Water Quality:	Three of 24 samples exceeded the CDFG chronic Hazard Assessment Criterion for Diazinon and one of 24 samples exceeded the CDFG acute Hazard Assessment Criterion. Water quality samples were taken and analyzed for Diazinon in accordance with the Sanitation Districts of Los Angeles County permit monitoring and testing parameters.

Data Reference: [Monitoring Report \(MS4 Data\) - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach](#)

Water Quality Objective/Criterion: The Basin Plan states, "[n]o individual pesticide or combination of pesticides shall be present in concentrations that adversely affect beneficial uses."

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: The California Department of Fish and Game (CDFG) lists an acute and chronic Hazard Assessment Criterion of 0.16 ug/L and 0.10 ug/L for diazinon.

Guideline Reference: [Water quality criteria for diazinon and chlorpyrifos. Administrative Report 00-3. Rancho Cordova, CA: Pesticide Investigations Unit, Office of Spills and Response. CA Department of Fish and Game](#)  
[Water quality for diazinon. Memorandum to J. Karkoski, Central Valley RWQCB. Rancho Cordova, CA: Pesticide Investigation Unit, CA Department of Fish and Game](#)

Spatial Representation: The Los Angeles County Department of Public Works conducted sampling at the mass emission monitoring station S13 located below Spring Street in Coyote Creek (Lat: 33.8098610175, Long: -118.077061937).

Temporal Representation: Composite samples were taken approximately six per year, four wet-weather events and two dry-weather events, from October 2003 through April 2007.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in County of Los Angeles MS4 Permit (NPDES No. CAS004001) Monitoring and Reporting Program.

QAPP Information Reference(s): [Monitoring and Reporting Program - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach](#)

LOE ID: 21361

Pollutant: Diazinon  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 23  
Number of Exceedances: 4

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
Data Used to Assess Water Quality: Four of 23 samples exceeded the CDFG chronic Hazard Assessment Criterion and three of 23 samples exceeded the CDFG acute Hazard Assessment Criterion for Diazinon. Water quality samples were taken and analyzed for Diazinon in accordance with the Sanitation Districts of Los Angeles County permit monitoring and testing parameters.

Data Reference: [NPDES receiving water monitoring reports for Long Beach Water Reclamation Plant \(NPDES No. CA0054119\), Los Coyotes Water Reclamation Plant \(NPDES No. CA0053716\), Pomona Water Reclamation Plant \(NPDES No. CA0053911\), San Jose Creek Water Reclamation Plant \(NPDES No. CA0053619\), and Whittier Narrows Creek Water Reclamation Plant \(NPDES No. CA0054011\).](#)

Water Quality Objective/Criterion: The Basin Plan states, "[n]o individual pesticide or combination of pesticides shall be present in concentrations that adversely affect beneficial uses."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: The California Department of Fish and Game (CDFG) lists an acute and chronic Hazard Assessment Criterion of 0.16 ug/L and 0.10 ug/L for diazinon.

Guideline Reference: Water quality criteria for diazinon and chlorpyrifos. Administrative Report 00-3 Rancho Cordova, CA: Pesticide Investigations Unit, Office of Spills and Response. CA Department of Fish and Game  
Water quality for diazinon. Memorandum to J. Karkoski, Central Valley RWQCB, Rancho Cordova, CA: Pesticide Investigation Unit, CA Department of Fish and Game

Spatial Representation: The Sanitation Districts of Los Angeles County conducted sampling in Coyote Creek in the following receiving water monitoring stations: receiving water station RA1 located upstream of discharge from Long Beach Water Reclamation Plant and receiving water station RA located downstream of discharge from Long Beach Water Reclamation Plant.

Temporal Representation: Grab samples taken and analyzed on a bimonthly and monthly basis from June 2004 to February 2007.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Sanitation Districts of Los Angeles County Permit (No. CA0054119) Monitoring and Reporting Program.

QAPP Information Reference(s): Long Beach Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0054119 (County Sanitation Districts of Los Angeles County)



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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Coyote Creek  
Water Body ID: CAR4051501019980917123914  
Water Body Type: River & Stream

DECISION ID 4518

Pollutant: Lead  
Final Listing Decision: List on 303(d) list (being addressed by USEPA approved TMDL)  
Last Listing Cycle's Final Listing Decision: Do Not Delist from 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Sources: Major Municipal Point Source-wet weather discharge  
TMDL Name: San Gabriel River Metals (39)  
TMDL Project Code: 385  
Date TMDL Approved by USEPA: 03/27/2007  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for removal on the section 303(d) list under sections 2.2 and 4.1 of the Listing Policy. Under section 4.1 of the Policy, a minimum of one line of evidence is needed to assess listing status.

Three lines of evidence are available in the administrative record to assess this pollutant. Data from lines of evidence 2428 and 2438 will not be considered and will be disassociated in this decision due to lines of evidence 21346 and 21353 including all the data listed in lines of evidence 2428 and 2438 along with newer data.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list. There is sufficient justification to place it in the Being Addressed portion of the 303(d) list because a TMDL has been completed and established by USEPA, and is expected to result in attainment of the standard.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Seven of 51 samples exceeded the lead CTR Criterion Continuous Concentration for the dissolved fraction, zero out of 75 samples exceeded the lead CTR Criterion Continuous Concentration for the total fraction, and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy for the dissolved fraction.
4. The San Gabriel River Metals TMDL has been established by USEPA on 03/26/2007.
5. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the Water Quality Limited Segments Being Addressed category of the section 303(d) list because a TMDL has been established by USEPA, and applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

SWRCB Board Decision /  
Staff Recommendation:

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 4518

LOE ID:	21346
Pollutant:	Lead
LOE Subgroup:	Pollutant-Water
Matrix:	Water
Fraction:	Total
Beneficial Use:	Warm Freshwater Habitat
Aquatic Life Use:	Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	75
Number of Exceedances:	0
Data and Information Type:	Fixed station physical/chemical (conventional plus toxic pollutants)
Data Used to Assess Water Quality:	Zero of 75 samples exceeded the hardness dependent California Toxics Rule Criterion Maximum Concentration for Lead and zero of 75 samples exceeded the hardness dependent California Toxics Rule Criterion Continuous Concentration for Lead. Water quality samples were taken and analyzed for Lead in accordance with the Sanitation Districts of Los Angeles County permit monitoring and testing parameters.
Data Reference:	<u><a href="#">NPDES receiving water monitoring reports for Long Beach Water Reclamation Plant (NPDES No. CA0054119), Los Coyotes Water Reclamation Plant (NPDES No. CA0053716), Pomona Water Reclamation Plant (NPDES No. CA0053911), San Jose Creek Water Reclamation Plant (NPDES No. CA0053619), and Whittier Narrows Creek Water Reclamation Plant (NPDES No. CA0054011).</a></u> <u><a href="#">NPDES receiving water metals data for Long Beach Water Reclamation Plant (NPDES No. CA0054119), Los Coyotes Water Reclamation Plant (NPDES No. CA0053716), Pomona Water Reclamation Plant (NPDES No. CA0053911), San Jose Creek Water Reclamation Plant (NPDES No. CA0053619), and Whittier Narrows Creek Water Reclamation Plant (NPDES No. CA0054011).</a></u>
Water Quality Objective/Criterion:	The California Toxics Rule lists Criterion Continuous Concentrations for Lead to protect aquatic life in freshwater. The Lead criterion in freshwater is hardness dependent for each sample and varies based on the on the ambient hardness during sampling. Section (b)(1) in CTR contains the hardness dependent formula for metals criteria.
Objective/Criterion Reference:	<u><a href="#">Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97, Washington, D.C.: Environmental Protection Agency</a></u>
Evaluation Guideline: Guideline Reference:	
Spatial Representation:	The Sanitation Districts of Los Angeles County conducted sampling in Coyote Creek in the following receiving water monitoring stations: station RA1 located upstream of discharge from Long Beach Water Reclamation Plant; station RA located downstream of discharge from Long Beach Water Reclamation Plant; and station R9 East located at the downstream end of the pavement lining (near Atherton Street) in the eastern low flow channel of San Gabriel River.
Temporal Representation:	Grab samples were taken and analyzed on a yearly basis from August 1995 to July 2001 and on a bimonthly and monthly basis from July 2001 to February 2007
Environmental Conditions:	

QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Sanitation Districts of Los Angeles County Permit (No. CA0054119) Monitoring and Reporting Program.

QAPP Information Reference(s): Long Beach Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0054119 (County Sanitation Districts of Los Angeles County)

LOE ID: 28716

Pollutant: Lead  
 LOE Subgroup: Narrative Description Data  
 Matrix: Not Specified  
 Fraction: None

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 0  
 Number of Exceedances: 0

Data and Information Type: Not Specified  
 Data Used to Assess Water Quality: A TMDL has been established for this water segment-pollutant combination. The San Gabriel River Metals TMDL was established by USEPA on March 26, 2007. Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Metals in the San Gabriel River Watershed.

Data Reference: Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Metals in the San Gabriel River Watershed.

Water Quality Objective/Criterion:  
 Objective/Criterion Reference:

Evaluation Guideline:  
 Guideline Reference:

Spatial Representation:  
 Temporal Representation:  
 Environmental Conditions:  
 QAPP Information: QA information unavailable.  
 QAPP Information Reference(s):

LOE ID: 21353

Pollutant: Lead  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: Dissolved

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 51  
 Number of Exceedances: 7

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
 Data Used to Assess Water Quality: Seven of 51 samples exceeded the hardness dependent California Toxics Rule Criterion Continuous Concentration for lead and zero of 100 samples exceeded the hardness dependent Criterion Maximum Concentration. Water quality samples were taken and analyzed for lead in accordance with the Municipal Separate Storm Sewer System (MS4) permit monitoring and testing parameters.

Data Reference: Lead Monitoring Data (MS4 Data) for Coyote Creek, Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated Cities therein, Except the City of Long Beach.

Water Quality Objective/Criterion: The California Toxics Rule lists Criterion Continuous Concentrations for Lead to protect aquatic life in freshwater. The Lead criterion in freshwater is hardness dependent for each sample and varies based on the on the ambient hardness during sampling. Section (b)(1) in CTR contains the hardness dependent formula for metals criteria.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: The Los Angeles County Department of Public Works conducted sampling at the mass emission monitoring station S13 located below Spring Street in Coyote Creek (Lat: 33.8098610175, Long: -118.077061937).

Temporal Representation: Composite samples, sampled periodically throughout the year from June 1995 through April 2007.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in County of Los Angeles MS4 Permit (NPDES No. CAS004001) Monitoring and Reporting Program.

QAPP Information Reference(s): Monitoring and Reporting Program - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Los Angeles Harbor - Inner Cabrillo Beach Area  
Water Body ID: CAB4051200020050201175100  
Water Body Type: Bay & Harbor

DECISION ID 5382

Pollutant: Copper  
Final Listing Decision: Delist from 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Reason for Delisting: State determines water quality standard is being met  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for removal from the section 303(d) list under section 4.1 and 4.11 of the Listing Policy. Under this section a single line of evidence is necessary to assess listing status.

Six lines of evidence are available in the administrative record to assess this pollutant. Lines of Evidence 137 and 141 will not be considered in this decision because that data has been incorporated into the re-evaluated data which combines old and newer data and eliminates some previous exceedances due to remediation operations that have changed surface sediment conditions.

The Port of Los Angeles has created some shallow water habitat in Cabrillo Beach area which has added clean sediment on top of sample sites with elevated copper, thus conditions have improved and beneficial uses are no longer negatively impacted due to copper. Newer data, listed in LOE 28224, shows no copper exceedances.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Zero of four water column samples exceeded the California Toxics Rule Criterion Continuous Concentration for copper.
4. Two of 16 samples exceeded the effects range median for copper for surface sediment samples and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy. However, current conditions have changed due to the new shallow water habitat created in Cabrillo Beach area and may no longer be negatively impacted due to copper.
5. Zero of two of the samples listed in newer data, LOE 28224, shows no copper exceedances this does not exceed the allowable frequency listed in Table 4.1
6. One of 14 samples were either moderately or highly toxic; however this sample result was historic (1992) and more recent sediment results (1993-1997) did not show elevated copper levels.
7. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be removed from the section 303(d) list because applicable water quality standards for the pollutant are not being exceeded.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

**Lines of Evidence (LOEs) for Decision ID 5382**

LOE ID: 137

Pollutant: Copper  
LOE Subgroup: Pollutant-Sediment  
Matrix: Sediment  
Fraction: None

Beneficial Use: Marine Habitat

Number of Samples: 16  
Number of Exceedances: 14

Data and Information Type: Chemical monitoring of sediments  
Data Used to Assess Water Quality: Of the 16 sediment grab samples, 14 exceeded the sediment quality guideline (LARWQCB and CCC, 2004).  
Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Basin Plan: Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use (LARWQCB, 1995)  
Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: An Effects Range-Median of 270 ug/g was used (Long et al., 1995).  
Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: The samples were spread throughout the Inner Cabrillo Beach area.  
Temporal Representation: Samples were collected between 1992 and 1994.  
Environmental Conditions:  
QAPP Information: Bay Protection and Toxic Cleanup Program QAPP (Stephenson et al., 1994).  
QAPP Information Reference(s):

LOE ID: 141

Pollutant: Sediment Toxicity  
LOE Subgroup: Toxicity  
Matrix: Sediment  
Fraction: None

Beneficial Use: Marine Habitat

Number of Samples: 52  
Number of Exceedances: 7

Data and Information Type: Toxicity testing of sediments  
Data Used to Assess Water Quality: Seven of 52 sediment samples were toxic as compared to toxicity test controls (Anderson et al., 1998).  
Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Basin Plan: Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use (LARWQCB, 1995)

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: Toxicity was assessed by statistical comparison to test control.

Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: The 52 samples were spread throughout the Inner Cabrillo Beach area.

Temporal Representation: The samples were collected between 1992 and 1997.

Environmental Conditions:

QAPP Information: Bay Protection and Toxic Cleanup Program QAPP (Stephenson et al., 1994).

QAPP Information Reference(s):

LOE ID: 28239

Pollutant: Copper

LOE Subgroup: Pollutant-Sediment

Matrix: Sediment

Fraction: Total

Beneficial Use: Marine Habitat

Aquatic Life Use: Preservation of Rare & Endangered Species

Number of Samples: 16

Number of Exceedances: 2

Data and Information Type: Chemical monitoring of sediments

Data Used to Assess Water Quality: Two out of 16 samples exceeded the effects range median for copper for surface sediment samples.

Data Reference: Contaminated Sediments Task Force Sediment Chemistry data for San Pedro Bay, 1992-1997.  
Los Angeles Harbor Inner Cabrillo Beach are shallow water habitat map.

Water Quality Objective/Criterion: The Basin Plan states that, "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan  
Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Long et. al. lists a sediment effects range median of 270 ug/g dry weight for copper.

Guideline Reference: Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuary sediments. Environmental Management. 19. (1): 81-97

Spatial Representation: A total of 14 stations were monitored in the Inner Cabrillo Beach area of the Port of Los Angeles which include the following stations: 28, 30, 136, 1006, 1008, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, and 1076.

Temporal Representation: Composite surface sediment samples were taken and analyzed during spring/summer of 1992 to 1997.

Environmental Conditions:

QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in State Water Resources Control Board's Bay Protection and Toxic Cleanup Program Quality Assurance Project Plan.

QAPP Information Reference(s): Bay Protection and Toxic Cleanup Program QAPP. (BPTCP). Sacramento, CA: State Water Resources Control Board

LOE ID: 28237

Pollutant:	Copper
LOE Subgroup:	Pollutant-Water
Matrix:	Water
Fraction:	Dissolved
Beneficial Use:	Marine Habitat
Aquatic Life Use:	Preservation of Rare & Endangered Species
Number of Samples:	4
Number of Exceedances:	0
Data and Information Type:	Fixed station physical/chemical (conventional plus toxic pollutants)
Data Used to Assess Water Quality:	Zero of four samples exceeded the California Toxics Rule Criterion Continuous Concentration for copper. Water quality samples were taken and analyzed for copper in accordance with the Port of Los Angeles monitoring and testing parameters.
Data Reference:	<u>Port of Los Angeles Enhanced Water Quality Monitoring Data 2005-2006.</u>
Water Quality Objective/Criterion:	The California Toxics Rule lists a Criterion Continuous Concentrations of 3.1 ug/L for Copper to protect aquatic life in saltwater.
Objective/Criterion Reference:	<u>Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency</u>
Evaluation Guideline:	
Guideline Reference:	
Spatial Representation:	The Port of Los Angeles conducted water quality surveys in the Inner Cabrillo Beach area at station LA-05 (Lat: 33.7139, Long: -118.27823).
Temporal Representation:	Grab samples were taken and analyzed on a semi-annual basis in 2005 and 2006.
Environmental Conditions:	
QAPP Information:	QA information unavailable.
QAPP Information Reference(s):	
LOE ID:	28238
Pollutant:	Sediment Toxicity
LOE Subgroup:	Toxicity
Matrix:	Sediment
Fraction:	None
Beneficial Use:	Marine Habitat
Aquatic Life Use:	Preservation of Rare & Endangered Species
Number of Samples:	14
Number of Exceedances:	1
Data and Information Type:	Toxicity testing of sediments
Data Used to Assess Water Quality:	One of 14 samples were either moderately or highly toxic; however this sample result was historic (1992) and more recent sediment results (1993-1997) did not show elevated copper levels.
Data Reference:	<u>Contaminated Sediments Task Force Sediment Toxicity data for Los Angeles/Long Beach Inner Harbor, Outer Harbor, Fish Harbor, Inner Cabrillo Beach area, the San Pedro Bay, and the Los Angeles River Estuary. 1999-2003.</u>
Water Quality Objective/Criterion:	All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life.
Objective/Criterion Reference:	<u>Water Quality Control Plan Los Angeles Region R4 Basin Plan</u>



Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region  
R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Bay et. al. classifies sediment toxicity based on the following survival percentages: Non toxic if greater than or equal to 80% survival; moderately toxic if between 50 to 80% survival; and highly toxic if less than 50% survival.

Guideline Reference: Southern California Bight 1998 Regional Monitoring Program, Volume IV.

Spatial Representation: A total of 14 stations were monitored in the Inner Cabrillo Beach area of the Los Angeles Harbor.

Temporal Representation: Composite surface sediment samples were taken and analyzed during spring/summer of 1992 to 1997.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Bay Protection Toxic Clean up Program Quality Assurance Project Plan.

QAPP Information Reference(s): Bay Protection and Toxic Cleanup Program QAPP, (BPTCP), Sacramento, CA: State Water Resources Control Board .

LOE ID: 28224

Pollutant: Copper  
LOE Subgroup: Pollutant-Sediment  
Matrix: Sediment  
Fraction: Total

Beneficial Use: Marine Habitat  
Aquatic Life Use: Preservation of Rare & Endangered Species

Number of Samples: 2  
Number of Exceedances: 0

Data and Information Type: Chemical monitoring of sediments  
Data Used to Assess Water Quality: Zero of two samples exceeded the effects range median for copper. Sediment samples were taken and analyzed for copper in accordance with the monitoring and testing parameters listed Los Angeles and Long Beach Harbors Sediment Contaminant Flux study.

Data Reference: Los Angeles Harbor Inner Cabrillo Beach Area sediment data.

Water Quality Objective/Criterion: The Basin Plan states that, "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan  
Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region  
R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Long et. al. lists a sediment effects range median of 270 ug/g dry weight for copper.

Guideline Reference: Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuary sediments. Environmental Management, 19, (1): 81-97

Spatial Representation: Sediment sampling was conducted in the Inner Cabrillo Beach area at sediment monitoring stations LA O-1 (Lat: 33.71185, Long: -118.2804) and LA O-2 (Lat: 33.71025, Long: -118.2818).

Temporal Representation: Composite samples were taken for both sediment monitoring stations on 10/09/2006.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Draft Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation.

QAPP Information Reference(s):

Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation. Prepared for the Port of Los Angeles and Port of Long Beach.

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Los Angeles River Estuary (Queensway Bay)  
Water Body ID: CAE4051200020020226101749  
Water Body Type: Estuary

DECISION ID 5387

Pollutant: Lead (sediment)  
Final Listing Decision: Delist from 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: Do Not Delist from 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Reason for Delisting: Flaws in original listing  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for delisting under sections 4.6 of the Listing Policy. Under section 4.6 two lines of evidence are necessary to assess listing status.

Seven lines of evidence are available in the administrative record to assess this pollutant.

Line of Evidence (LOE) 525, will not be considered in this decision because the LOE included sediment samples from deeper cores, along with the samples taken from the surface. Deeper core samples do not impact beneficial uses. LOE 526 will not be considered in this decision because the data was already incorporated into the LOE 534.

In 2002 this water segment-pollutant combination was listed based 8 of 18 samples listed in the Bay Protection Toxics Cleanup Program (BPTCP) which included data for deeper cores. In 2006 this water segment-pollutant combination was not delisted based on five of 27 exceedances in, BPTCP, LOE 526 and five of nine toxicity exceedances in LOE 534.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for removing this water segment-pollutant combination from the section 303(d) list.

This conclusion is based on the staff findings that:

1. The sediment quality guideline used complies, with the requirements of section 6.1.3 of the Policy.
2. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
3. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
4. Zero of 14 surface estuarine sediment samples exceeded the probable effects level for lead and this does not exceed the allowable frequency listed in Table 4.1 of the Listing Policy.
5. Seven of 14 surface sediment samples showed toxicity; however none were associated with elevated lead levels and this meets the allowable frequency listed in Table 4.1 of the Listing Policy.
6. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be removed from the section 303(d) list because applicable water quality standards for the pollutant are not being exceeded and the original listing was faulty due to the use of data from deeper cores.

SWRCB Board Decision /  
Staff Recommendation:

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 5387

LOE ID:	525
Pollutant:	Lead
LOE Subgroup:	Pollutant-Sediment
Matrix:	Sediment
Fraction:	Total
Beneficial Use:	Estuarine Habitat
Number of Samples:	27
Number of Exceedances:	5
Data and Information Type:	Chemical monitoring of sediments
Data Used to Assess Water Quality:	Twenty-seven samples, 5 samples exceeding (Anderson et al., 1998).
Data Reference:	<u>Placeholder reference 2006 303(d)</u>
Water Quality Objective/Criterion:	Basin Plan: Existing habitats and associated populations of wetlands fauna and flora shall be maintained by:  -Maintaining substrate characteristics necessary to support flora and fauna which would be present naturally, -Protecting food supplies for fish and wildlife, -Protecting reproductive and nursery areas, and -Protecting wildlife corridors.  Basin Plan: Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.
Objective/Criterion Reference:	<u>Placeholder reference 2006 303(d)</u>
Evaluation Guideline:	PEL: 112.18 ug/g (McDonald et al., 1996).
Guideline Reference:	<u>Placeholder reference 2006 303(d)</u>
Spatial Representation:	Samples were collected synoptically with toxicity samples.
Temporal Representation:	Samples taken in three different years.
Environmental Conditions:	
QAPP Information:	BPTCP Quality Assurance Project Plan.
QAPP Information Reference(s):	
LOE ID:	526
Pollutant:	Lead
LOE Subgroup:	Toxicity
Matrix:	Sediment
Fraction:	None
Beneficial Use:	Estuarine Habitat
Number of Samples:	6
Number of Exceedances:	4
Data and Information Type:	Toxicity testing of sediments

Data Used to Assess Water Quality: Four of six sediment samples were found to be significantly toxic to amphipod (Anderson et al., 1998).

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Basin Plan: Existing habitats and associated populations of wetlands fauna and flora shall be maintained by:

- Maintaining substrate characteristics necessary to support flora and fauna which would be present naturally,
- Protecting food supplies for fish and wildlife,
- Protecting reproductive and nursery areas, and
- Protecting wildlife corridors.

Basin Plan: Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use. (LARWQCB, 1995)

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: BPTCP reference envelope approach used.

Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: Samples were collected synoptically with sediment samples.

Temporal Representation: Samples taken in 2 different years.

Environmental Conditions:

QAPP Information: BPTCP Quality Assurance Project Plan (Stephenson et al., 1994).

QAPP Information Reference(s):

LOE ID: 527

Pollutant: Lead

LOE Subgroup: Population/Community Degradation

Matrix: Sediment

Fraction: None

Beneficial Use: Estuarine Habitat

Number of Samples: 0

Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys

Data Used to Assess Water Quality: The benthic community was classified as transitional (Anderson et al., 1998).

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Basin Plan (LARWQCB, 1995): Existing habitats and associated populations of wetlands fauna and flora shall be maintained by:

- Maintaining substrate characteristics necessary to support flora and fauna which would be present naturally,
- Protecting food supplies for fish and wildlife,
- Protecting reproductive and nursery areas, and
- Protecting wildlife corridors.

Basin Plan (LARWQCB, 1995): Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: Evaluation of the benthic data were completed using the approaches developed by scientists associated with the BPTCP. The relative benthic index used is a calculated value considering the total fauna, total mollusk species, crustacean species and indicator species at a site. The index ranges from 0 to 1.0. An index

value of less than or equal to 0.3 is an indication that pollutants or other factors are negatively impacting the benthic community.  
 Placeholder reference 2006 303(d)

Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: Samples were collected synoptically with sediment and toxicity samples.  
 Temporal Representation: Samples taken in 2 different years.  
 Environmental Conditions:  
 QAPP Information: BPTCP Quality Assurance Project Plan (Stephenson et al., 1994).  
 QAPP Information Reference(s):

LOE ID: 28534

Pollutant: Sediment Toxicity  
 LOE Subgroup: Toxicity  
 Matrix: Sediment  
 Fraction: None

Beneficial Use: Estuarine Habitat  
 Aquatic Life Use: Fish Migration | Fish Spawning | Marine Habitat | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 5  
 Number of Exceedances: 2

Data and Information Type: Toxicity testing of sediments  
 Data Used to Assess Water Quality: Two of five sediment samples were deemed either moderately or highly toxic however none of these were associated with elevated lead or zinc concentrations.  
 Data Reference: Southern California Bight 2003 Regional Marine Monitoring Survey Data

Water Quality Objective/Criterion: The Basin Plan states that, "[a]ll waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life."  
 Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Bay et. al. classifies sediment toxicity based on the following survival percentages: Non toxic if greater than or equal to 80% survival; moderately toxic if between 50 to 80% survival; and highly toxic if less than 50% survival.  
 Guideline Reference: Southern California Bight 1998 Regional Monitoring Program. Volume IV.

Spatial Representation: A total of five stations were monitored in the Los Angeles River Estuary: 4142, 4440, 4600, 4788, 4856.  
 Temporal Representation: Composite surface sediment samples were collected in the estuary in fall 2006.  
 Environmental Conditions:  
 QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Southern California Bight 2003 Regional Marine Monitoring Survey Quality Assurance Manual.  
 QAPP Information Reference(s): Southern California Bight 2003 Regional Marine Monitoring Survey (Bight 03) Quality Assurance Manual

LOE ID: 28532

Pollutant: Lead  
 LOE Subgroup: Pollutant-Sediment  
 Matrix: Sediment  
 Fraction: Total

Beneficial Use: Estuarine Habitat

Aquatic Life Use: Fish Migration | Fish Spawning | Marine Habitat | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 12  
 Number of Exceedances: 0

Data and Information Type: Chemical monitoring of sediments  
 Data Used to Assess Water Quality: Zero of 12 samples exceeded the effects range median for lead in estuarine sediment.

Data Reference: Contaminated Sediments Task Force Sediment Metals data for the Los Angeles River Estuary, 1999-2003.

Water Quality Objective/Criterion: The Basin Plan states that, "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: MacDonald et. al. lists a sediment probable effects level of 112.18 ug/g dry weight for lead.

Guideline Reference: Development and evaluation of sediment quality guidelines for Florida coastal waters. Ecotoxicology 5: 253-278

Spatial Representation: Several state sponsored studies were collecting sediment samples in the Los Angeles River Estuary, including BPTCP 1992-94, BPTCP 1996-97; Bight 1998; Bight 2003.

Temporal Representation: Composite surface sediment samples were taken and analyzed during spring/summer/fall.

Environmental Conditions:  
 QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Bay Protection Toxics Clean Program, Bight 1998, and Bight 2003 Quality Assurance Manual.

QAPP Information Reference(s): Bay Protection and Toxic Cleanup Program QAPP. (BPTCP). Sacramento, CA: State Water Resources Control Board Southern California Bight 2003 Regional Marine Monitoring Survey (Bight 03) Quality Assurance Manual Southern California Bight 1998 Regional Marine Monitoring Survey (Bight 98) Quality Assurance Manual

LOE ID: 28533

Pollutant: Lead  
 LOE Subgroup: Pollutant-Sediment  
 Matrix: Sediment  
 Fraction: Total

Beneficial Use: Estuarine Habitat  
 Aquatic Life Use: Fish Migration | Fish Spawning | Marine Habitat | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 2  
 Number of Exceedances: 0

Data and Information Type: Chemical monitoring of sediments  
 Data Used to Assess Water Quality: Zero out of two samples exceeded the effects range median for lead in estuarine sediment. Sediment samples were taken and analyzed for lead in accordance with the monitoring and testing parameters listed Los Angeles and Long Beach Harbors Sediment Contaminant Flux study.

Data Reference: Port of Los Angeles and Port of Long Beach sediment and overlaying and pore water data.

Water Quality Objective/Criterion: The Basin Plan states that, "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: MacDonald et. al. lists a sediment probable effects level of 112.18 ug/g dry weight for lead.

Guideline Reference: Development and evaluation of sediment quality guidelines for Florida coastal waters. Ecotoxicology 5: 253-278

Spatial Representation: Sediment sampling was conducted in the two sites in the Los Angeles River Estuary.

Temporal Representation: Composite surface sediment samples were collected in the estuary in fall 2006.

Environmental Conditions:

QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Draft Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation.

QAPP Information Reference(s): Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation. Prepared for the Port of Los Angeles and Port of Long Beach.

LOE ID: 534

Pollutant: Sediment Toxicity

LOE Subgroup: Toxicity

Matrix: Sediment

Fraction: Total

Beneficial Use: Estuarine Habitat

Number of Samples: 9

Number of Exceedances: 5

Data and Information Type: Toxicity testing of sediments

Data Used to Assess Water Quality: Overall, five of nine samples were toxic. This total was created from two different sediment studies within Los Angeles River Estuary. Three of 7 samples were toxic (BPTCP). Two of two samples were toxic (Bight, 1998). No samples were collected in 1999 (W-EMAP) (LARWQCB & CCC, 2004).

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Los Angeles RWQCB Basin Plan: All waters should be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological response in, human, plant, animal, or aquatic life.

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: Samples were considered toxic if; (1) there was a significant difference in mean organism response between the sample and the control, and (2) the mean organism response in the test, as a percent of the control, was less than the threshold based on the 90th percentile minimum significant difference value.

Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: Nine sites were sampled throughout Los Angeles River Estuary.

Temporal Representation: Samples were collected in 1992 thru 1994 and 1998.

Environmental Conditions:

QAPP Information: Contaminated Sediment Task Force (2005) and references therein (BPTCP QAPP, Bight 1998 QAPP).

QAPP Information Reference(s):



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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Los Angeles River Estuary (Queensway Bay)  
Water Body ID: CAE4051200020020226101749  
Water Body Type: Estuary

DECISION ID 7363

Pollutant: Zinc (sediment)  
Final Listing Decision: Delist from 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Reason for Delisting: Flaws in original listing  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for delisting under sections 4.6 of the Listing Policy. Under section 4.6 two lines of evidence are necessary to assess listing status.

Five lines of evidence are available in the administrative record to assess this pollutant.

Line-of-Evidence (LOE) 3910, will not be considered in this decision because the LOE is a placeholder LOE and other data is available to assess the water-segment pollutant combination.

In 2002 this water segment-pollutant combination was listed based five of 27 samples listed in the Bay Protection Toxics Cleanup Program (BPTCP) which included data for deeper cores. Deeper core samples do not impact beneficial uses.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for removing this water segment-pollutant combination from the section 303(d) list.

This conclusion is based on the staff findings that:

1. The sediment quality guideline used complies, with the requirements of section 6.1.3 of the Policy.
2. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
3. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
4. Zero of 14 surface sediment samples exceed the effects range median for zinc in estuarine sediment and this does not exceed the allowable frequency listed in Table 4.1 of the Listing Policy.
5. Seven of 14 surface sediment samples were deemed either moderately or highly toxic; however none were associated with elevated zinc levels and this meets the allowable frequency listed in Table 4.1 of the Listing Policy.
6. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be removed from the section 303(d) list because applicable water quality standards for the pollutant are not being exceeded and the original listing was faulty due to the use of data from deeper cores.

**SWRCB Board Decision / Staff Recommendation:**

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 7363

LOE ID:	534
Pollutant:	Sediment Toxicity
LOE Subgroup:	Toxicity
Matrix:	Sediment
Fraction:	Total
Beneficial Use:	Estuarine Habitat
Number of Samples:	9
Number of Exceedances:	5
Data and Information Type:	Toxicity testing of sediments
Data Used to Assess Water Quality:	Overall, five of nine samples were toxic. This total was created from two different sediment studies within Los Angeles River Estuary. Three of 7 samples were toxic (BPTCP). Two of two samples were toxic (Bight, 1998). No samples were collected in 1999 (W-EMAP) (LARWQCB & CCC, 2004).
Data Reference:	<u>Placeholder reference 2006 303(d)</u>
Water Quality Objective/Criterion:	Los Angeles RWQCB Basin Plan: All waters should be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological response in, human, plant, animal, or aquatic life.
Objective/Criterion Reference:	<u>Placeholder reference 2006 303(d)</u>
Evaluation Guideline:	Samples were considered toxic if; (1) there was a significant difference in mean organism response between the sample and the control, and (2) the mean organism response in the test, as a percent of the control, was less than the threshold based on the 90th percentile minimum significant difference value.
Guideline Reference:	<u>Placeholder reference 2006 303(d)</u>
Spatial Representation:	Nine sites were sampled throughout Los Angeles River Estuary.
Temporal Representation:	Samples were collected in 1992 thru 1994 and 1998.
Environmental Conditions:	
QAPP Information:	Contaminated Sediment Task Force (2005) and references therein (BPTCP QAPP, Bight 1998 QAPP).
QAPP Information Reference(s):	
LOE ID:	3910
Pollutant:	Zinc (sediment)
LOE Subgroup:	Pollutant-Sediment
Matrix:	Sediment
Fraction:	Not Recorded
Beneficial Use:	Estuarine Habitat
Number of Samples:	0
Number of Exceedances:	0
Data and Information Type:	Not Specified
Data Used to Assess Water Quality:	Unspecified--This LOE is a placeholder to support a 303(d) listing decision made prior to 2006.
Data Reference:	<u>Placeholder reference pre-2006 303(d)</u>

Water Quality Objective/Criterion: Unspecified  
Objective/Criterion Reference: Placeholder reference pre-2006 303(d)

Evaluation Guideline: Unspecified  
Guideline Reference: Placeholder reference pre-2006 303(d)

Spatial Representation: Unspecified  
Temporal Representation: Unspecified  
Environmental Conditions: Unspecified  
QAPP Information: Unspecified  
QAPP Information Reference(s):

LOE ID: 28536

Pollutant: Zinc  
LOE Subgroup: Pollutant-Sediment  
Matrix: Sediment  
Fraction: Total

Beneficial Use: Estuarine Habitat  
Aquatic Life Use: Fish Migration | Fish Spawning | Marine Habitat | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 2  
Number of Exceedances: 0

Data and Information Type: Chemical monitoring of sediments  
Data Used to Assess Water Quality: Zero out of two samples exceeded the effects range median for zinc in estuarine sediment. Sediment samples were taken and analyzed for lead in accordance with the monitoring and testing parameters listed Los Angeles and Long Beach Harbors Sediment Contaminant Flux study.

Data Reference: Port of Los Angeles and Port of Long Beach sediment and overlaying and pore water data.

Water Quality Objective/Criterion: The Basin Plan states that, "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Long et. al. lists a effects range median of 410 ug/g dry weight for zinc.  
Guideline Reference: Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuary sediments. Environmental Management. 19. (1): 81-97

Spatial Representation: Sediment sampling was conducted in the Los Angeles River Estuary at two sediment monitoring stations.  
Temporal Representation: Composite surface sediment samples were collected in the estuary in fall 2006.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Draft Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation.

QAPP Information Reference(s): Sampling and Analysis Plan for Characterization of Sediment Contaminant Flux for the Inner Harbor and Outer Harbor Waterbodies to Support Sediment TMDL Implementation. Prepared for the Port of Los Angeles and Port of Long Beach.

LOE ID: 28535

Pollutant: Zinc

LOE Subgroup:	Pollutant-Sediment
Matrix:	Sediment
Fraction:	Total
Beneficial Use:	Estuarine Habitat
Aquatic Life Use:	Fish Migration   Fish Spawning   Marine Habitat   Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	12
Number of Exceedances:	0
Data and Information Type:	Toxicity testing of sediments
Data Used to Assess Water Quality:	Zero of 12 samples exceeded the effects range median for zinc in estuarine sediment.
Data Reference:	<u>Contaminated Sediments Task Force Sediment Metals data for the Los Angeles River Estuary, 1999-2003.</u>
Water Quality Objective/Criterion:	The Basin Plan states that, "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use."
Objective/Criterion Reference:	<u>Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009</u>
Evaluation Guideline:	Long et. al. lists a effects range median of 410 ug/g dry weight for zinc.
Guideline Reference:	<u>Incidence of adverse biological effects within ranges of chemical concentrations in marine and estuary sediments. Environmental Management. 19, (1): 81-97</u>
Spatial Representation:	Several state sponsored studies were collecting sediment samples in the Los Angeles River Estuary, including BPTCP 1992-94, BPTCP 1996-97; Bight 1998; Bight 2003.
Temporal Representation:	Composite surface sediment samples were taken and analyzed during spring/summer/fall.
Environmental Conditions:	
QAPP Information:	Data was collected in compliance with the sampling and monitoring procedures detailed in Bay Protection Toxics Clean Program, Bight 1998, and Bight 2003 Quality Assurance Manual.
QAPP Information Reference(s):	<u>Bay Protection and Toxic Cleanup Program QAPP. (BPTCP). Sacramento, CA: State Water Resources Control Board</u> <u>Southern California Bight 2003 Regional Marine Monitoring Survey (Bight 03) Quality Assurance Manual</u> <u>Southern California Bight 1998 Regional Marine Monitoring Survey (Bight 98) Quality Assurance Manual</u>
LOE ID:	28534
Pollutant:	Sediment Toxicity
LOE Subgroup:	Toxicity
Matrix:	Sediment
Fraction:	None
Beneficial Use:	Estuarine Habitat
Aquatic Life Use:	Fish Migration   Fish Spawning   Marine Habitat   Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	5
Number of Exceedances:	2
Data and Information Type:	Toxicity testing of sediments

Data Used to Assess Water Quality: Two of five sediment samples were deemed either moderately or highly toxic however none of these were associated with elevated lead or zinc concentrations.

Data Reference: Southern California Bight 2003 Regional Marine Monitoring Survey Data

Water Quality Objective/Criterion: The Basin Plan states that, "[a]ll waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Bay et. al. classifies sediment toxicity based on the following survival percentages: Non toxic if greater than or equal to 80% survival; moderately toxic if between 50 to 80% survival; and highly toxic if less than 50% survival.

Guideline Reference: Southern California Bight 1998 Regional Monitoring Program, Volume IV.

Spatial Representation: A total of five stations were monitored in the Los Angeles River Estuary: 4142, 4440, 4600, 4788, 4856.

Temporal Representation: Composite surface sediment samples were collected in the estuary in fall 2006.

Environmental Conditions:

QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Southern California Bight 2003 Regional Marine Monitoring Survey Quality Assurance Manual.

QAPP Information Reference(s): Southern California Bight 2003 Regional Marine Monitoring Survey (Bight 03) Quality Assurance Manual

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Los Cerritos Channel  
Water Body ID: CAT4051501020000229140756  
Water Body Type: Wetland, Tidal

DECISION ID 7450

Pollutant: Ammonia  
Final Listing Decision: Do Not Delist from 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Sources: Nonpoint Source | Point Source  
Expected TMDL Completion Date: 2015  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for removal from the section 303(d) list under section 4.1 of the Listing Policy. Under section 4.1 a one line of evidence is necessary to assess listing status.

Two lines of evidence are available in the administrative record to assess this pollutant. Line of evidence 3922 is a placeholder line of evidence and the information contained in the line of evidence will not be considered in this decision. Zero of the samples exceed the water quality objective.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination in the Water Quality Limited Segments Being Addressed portion of the section 303(d) list.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Zero of 22 samples exceeded the one-hour objective for ammonia and this sample size is insufficient to determine with the power and confidence of the Listing Policy if standards are not met. A minimum of 28 samples is needed for application of table 4.1.
4. Pursuant to Section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should not be removed from the section 303(d) list because it cannot be determined if applicable water quality standards are not being exceeded.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

Lines of Evidence (LOEs) for Decision ID 7450

LOE ID: 30235

Pollutant: Ammonia  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: None

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Wildlife Habitat

Number of Samples: 22  
 Number of Exceedances: 0

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
 Data Used to Assess Water Quality: Zero of 22 samples exceeded the one-hour objective for ammonia and zero out of 11 samples exceeded the 30-day average objective. Water quality samples were taken and analyzed for ammonia in accordance with the City Long Beach MS4 Permit monitoring and testing parameters.

Data Reference: (MS4 Data) for Los Cerritos Channel - CI 8052 for order no. 99-060 NPDES No. CAS004003 Municipal Storm Water and Urban Runoff Discharges within the City of Long Beach

Water Quality Objective/Criterion: The Basin Plan states, "In order to protect aquatic life, ammonia concentrations in inland surface waters characteristic of freshwater shall not exceed the values calculated for the appropriate instream conditions shown in Tables 3-1 to 3-3." The one-hour average objective is dependent on pH and the presence or absence of early life stages of fish (ELS) but not temperature. The 30-day average objective is dependent on pH, temperature and ELS in Tables 3-1 to 3-3. The ammonia objectives and the pH and temperature dependent formula are found in Attachment A of Regional Board Resolution No. 2002-011.

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline:  
 Guideline Reference:

Spatial Representation: The City of Long Beach Long Beach conducted sampling at the mass emission monitoring station located at Los Cerritos Channel.

Temporal Representation: Composite samples were taken approximately six per year (four wet-weather events and two dry-weather events), from February 2003 through February 2007.

Environmental Conditions:  
 QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in City Long Beach MS4 Permit (NPDES No. CAS004003).

QAPP Information Reference(s): MS4 Permit - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach

LOE ID: 3922

Pollutant: Ammonia  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: Not Recorded

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 0  
 Number of Exceedances: 0

Data and Information Type: Not Specified  
 Data Used to Assess Water Quality: Unspecified--This LOE is a placeholder to support a 303(d) listing decision made prior to 2006.

Data Reference:	<u>Placeholder reference pre-2006 303(d)</u>
Water Quality Objective/Criterion: Objective/Criterion Reference:	Unspecified <u>Placeholder reference pre-2006 303(d)</u>
Evaluation Guideline: Guideline Reference:	Unspecified <u>Placeholder reference pre-2006 303(d)</u>
Spatial Representation:	Unspecified
Temporal Representation:	Unspecified
Environmental Conditions:	Unspecified
QAPP Information:	Unspecified
QAPP Information Reference(s):	



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## Supporting Information

### Regional Board 4 - Los Angeles Region

**Water Body Name:** Malibu Creek  
**Water Body ID:** CAR4042100019990201132825  
**Water Body Type:** River & Stream

**DECISION ID** 17209

**Pollutant:** Benthic-Macroinvertebrate Bioassessments  
**Final Listing Decision:** List on 303(d) list (TMDL required list)  
**Last Listing Cycle's Final Listing Decision:** New Decision  
**Revision Status:** Revised  
**Sources:** Nonpoint Source | Point Source  
**Expected TMDL Completion Date:** 2021  
**Impairment from Pollutant or Pollution:** Pollutant

**Weight of Evidence:** This pollutant is being considered for the section 303(d) list under section 3.9 of the Listing Policy. Under section 3.9, waters are listed when a bioassessment shows diminished numbers of species or other metrics (compared to a reference site) and it is associated with another pollutant.

Ten lines of evidence are available in the administrative record to assess this pollutant. Benthic macroinvertebrates as measured by Southern California IBI (index of biological integrity) in Malibu Creek were poor at one site in winter of 2005 and poor at two sites in spring and fall of 2005 indicating impairment of benthic community structure. This impairment is associated with impairment for Invasive Species, Nutrients(algae), Sedimentation/Siltation, Selenium, Sulfates and Trash.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification to place the water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. There is at least one bioassessment sample (Index of Biological Integrity score) to satisfy Section 3.9
4. The impairment is associated with another pollutant in the waterbody to satisfy Section 3.9.
5. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be added to the section 303(d) list because applicable water quality standards are not being attained.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

Lines of Evidence (LOEs) for Decision ID 17209

LOE ID: 2245

Pollutant: Sulfates  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Not Recorded

Beneficial Use: Municipal & Domestic Supply

Number of Samples: 20  
Number of Exceedances: 7

Data and Information Type: PHYSICAL/CHEMICAL MONITORING  
Data Used to Assess Water Quality: Numeric data generated from 20 samples taken from 10/28/00 to 4/30/03 at one to two-week sampling interval. Seven (7) samples exceeded the Basin Plan Objective for Sulfate (LACDPW, 2004c).  
Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Basin Plan Water Quality Objective of 500 mg/l is linked and applicable for the protection of MUN.  
Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: One sample site sampled during the dry and wet season beginning from 10/28/00 through 4/30/03 at approximately one to two week intervals.  
Temporal Representation: Twenty samples were taken during the wet and dry season from 10/28/00 to 4/30/03 at approximately one to two week intervals as part of the Los Angeles County Storm water monitoring program prepared by the Los Angeles County Department of Public Works.  
Environmental Conditions: The Malibu Creek monitoring station is located at the existing stream gage station (Stream Gage No. F130-9-R) near Malibu Canyon Road, south of Piuma Road. At this location, the tributary watershed to Malibu Creek is 104.9 square miles. The entire Malibu Creek Watershed is 109.9 square miles.  
QAPP Information: Evaluation of Analytes and QA/QC Specifications for Monitoring Program (Woodward-Clyde, 1996) Los Angeles County Department of Public Works.  
QAPP Information Reference(s):

LOE ID: 2246

Pollutant: Sulfates  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Not Recorded

Beneficial Use: Municipal & Domestic Supply

Number of Samples: 2  
Number of Exceedances: 2

Data and Information Type: PHYSICAL/CHEMICAL MONITORING  
Data Used to Assess Water Quality: Two samples with two exceeding (SWAMP, 2004).  
Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: CCR- Title 22 Table 64449-B Secondary Maximum Contaminant Levels of 250 mg/L for sulfate.  
Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: One station at Malibu Creek: 34.0429 -118.6842.  
Temporal Representation: Samples were collected March 2003 through March 2004.  
Environmental Conditions: Malibu Creek Watershed: 404.21.  
QAPP Information: SWAMR Quality Assurance Plan.  
QAPP Information Reference(s):

LOE ID: 2253

Pollutant: Selenium  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Total

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 20  
Number of Exceedances: 5

Data and Information Type: PHYSICAL/CHEMICAL MONITORING  
Data Used to Assess Water Quality: Numeric data generated from 20 samples taken from 10/28/00 to 4/30/03 at one to two-week sampling interval. Five (5) samples exceeded the CTR continuous total selenium concentration criterion (LACDPW, 2004c).

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: CTR total selenium criterion for continuous concentration in water for the protection of aquatic life is 5.0 ug/L. The criterion is linked and applicable for the protection of aquatic life Beneficial Uses.

Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: One sample site sampled during the dry and wet season beginning from 10/28/00 through 4/30/03 at approximately one to two week intervals.  
Temporal Representation: Twenty samples were taken during the wet and dry season from 10/12/00 to 4/30/03 at approximately one to two week intervals as part of the Los Angeles County Storm water monitoring program prepared by the Los Angeles County Department of Public Works.

Environmental Conditions: The Malibu Creek monitoring station is located at the existing stream gage station (Stream Gage No. F130-9-R) near Malibu Canyon Road, south of Pioma Road. At this location, the tributary watershed to Malibu Creek is 104.9 square miles. The entire Malibu Creek Watershed is 109.9 square miles.

QAPP Information: Evaluation of Analytes and QA/QC Specifications for Monitoring Program. (Woodward-Clyde, 1996) Los Angeles County Department of Public Works.

QAPP Information Reference(s):

LOE ID: 4325

Pollutant: Nutrients (Algae)  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Not Recorded

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 0

Number of Exceedances: 0

Data and Information Type: Not Specified  
 Data Used to Assess Water Quality: Unspecified--This LOE is a placeholder to support a 303(d) listing decision made prior to 2006.  
 Data Reference: [Placeholder reference pre-2006 303\(d\)](#)

Water Quality Objective/Criterion: Unspecified  
 Objective/Criterion Reference: [Placeholder reference pre-2006 303\(d\)](#)

Evaluation Guideline: Unspecified  
 Guideline Reference: [Placeholder reference pre-2006 303\(d\)](#)

Spatial Representation: Unspecified  
 Temporal Representation: Unspecified  
 Environmental Conditions: Unspecified  
 QAPP Information: Unspecified  
 QAPP Information Reference(s):

LOE ID: 30179

Pollutant: Invasive Species  
 LOE Subgroup: Population/Community Degradation  
 Matrix: Water  
 Fraction: None

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Fish Spawning | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 0  
 Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys  
 Data Used to Assess Water Quality: The IBI scores at this site ranked in the "fair" range (33) in the spring and "poor" (17) in the fall.  
 Data Reference: [Malibu Watershed 2005 Bioassessment Monitoring Report. \(2005\) The Malibu Creek Watershed Monitoring Program City of Calabasas. Environmental Services Division. Submitted by: Aquatic Bioassay and Consulting Laboratories.](#)

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: The IBI is a multi-metric assessment that employs biological metrics that respond to a habitat or water quality impairment. Each of the biological metrics measured at a site are converted to an IBI score then summed. These cumulative scores are then ranked as very good (80-100), good (60-79), fair (40-49), poor (20-39) and very poor (0-19) habitat conditions. Sites with scores below 39 are considered to have impaired conditions.

Guideline Reference: [A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams. Environmental Management Vol. 35, No. 4, pp. 493-504.](#)

Spatial Representation: One site in Malibu Creek was sampled, above the Lagoon at 34° 02.761' N 118° 41.270' W

Temporal Representation: Sites were sampled in Spring and Fall of 2005

Environmental Conditions: Benthic macroinvertebrate populations and IBI scores may also be affected by a wide range of anthropogenic stressors.

QAPP Information: Data was collected in compliance with California Stream Bioassessment Procedure.

QAPP Information Reference(s): California Stream Bioassessment Procedure (Protocol Brief for Biological and Physical/Habitat Assessment in Wadeable Streams) California Department of Fish and Game Water Pollution Control Laboratory Aquatic Bioassessment Laboratory Revision Date - December, 2003

LOE ID: 4328

Pollutant: Trash

LOE Subgroup: Visual

Matrix: Not Specified

Fraction: Not Recorded

Beneficial Use: Non-Contact Recreation

Number of Samples: 0

Number of Exceedances: 0

Data and Information Type: Not Specified

Data Used to Assess Water Quality: Unspecified--This LOE is a placeholder to support a 303(d) listing decision made prior to 2006.

Data Reference: Placeholder reference pre-2006 303(d)

Water Quality Objective/Criterion: Unspecified

Objective/Criterion Reference: Placeholder reference pre-2006 303(d)

Evaluation Guideline: Unspecified

Guideline Reference: Placeholder reference pre-2006 303(d)

Spatial Representation: Unspecified

Temporal Representation: Unspecified

Environmental Conditions: Unspecified

QAPP Information: Unspecified

QAPP Information Reference(s):

LOE ID: 28617

Pollutant: Nutrients (Algae)

LOE Subgroup: Narrative Description Data

Matrix: Not Specified

Fraction: None

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 0

Number of Exceedances: 0

Data and Information Type: Not Specified

Data Used to Assess Water Quality: A TMDL has been established for this water segment-pollutant combination. The Malibu Creek Watershed Nutrient TMDL was established by USEPA on March 21, 2003.

Data Reference: Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Nutrients in the Malibu Creek Watershed.

Water Quality Objective/Criterion:  
Objective/Criterion Reference:

Evaluation Guideline:  
Guideline Reference:

Spatial Representation:  
Temporal Representation:  
Environmental Conditions:

QAPP Information: QA information unavailable.  
QAPP Information Reference(s):

LOE ID: 28702

Pollutant: Invasive Species  
LOE Subgroup: Population/Community Degradation  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Fish Spawning | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 7  
Number of Exceedances: 5

Data and Information Type: Benthic macroinvertebrate surveys  
Data Used to Assess Water Quality: A total of five of seven sites showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008) and eight of eight sites sampled showed medium or high densities of mud snail in 2008

Data Reference: [New Zealand Mudsnaill Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains, Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.](#)

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: Presence of high densities and increasing densities. While quantitative and predictive research continues, due to its ability to attain extremely high densities, the impacts of the mudsnails on aquatic ecosystems where it occurs in the western U.S. are large and include: decreased densities of native macroinvertebrates and reduced food resources; decreased whole-stream algal production; poor food source in that mudsnails are much more difficult to digest, with their hard shells and operculum than are the thin-shelled, native pulmonate snails that do not have opercula or than soft-bodied, aquatic insect larvae.  
Guideline Reference: [The New Zealand Mudsnaill Invades the Western United States. Aquatic Nuisance Species Digest Volume 4 No. 4.](#)

Spatial Representation: Eight sites were sampled in the following locations in Malibu Creek: Lookout Trail, Logan's Run culvert U.S. Century Lake; MCSP D.S. of Rock Pool; Texas Crossing MCSP; Salvation Army Camp Bridge; the grated drain of Tapia Park U.S.; Malibu Canyon Rd. U.S. LA County Stream Gauge; the trail at end of Palm Cyn Rd in Serra Retreat; and Cross Creek Rd. U.S. in the middle of Arizona

Temporal Representation: Crossing.  
Salvation Army Camp Bridge was sampled in July of 2007 and October of 2008. The other seven sites were sampled in July of 2006, July of 2007, and October of 2008.

Environmental Conditions:  
QAPP Information: Data was collected as detailed in the Santa Monica Bay Restoration Commission and Santa Monica Baykeeper New Zealand Mudsnaill Surveys.

QAPP Information Reference(s): [New Zealand Mudsnaill Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains, Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.](#)

LOE ID: 30178

Pollutant: Invasive Species  
LOE Subgroup: Population/Community Degradation  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Fish Spawning | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys  
Data Used to Assess Water Quality: Two sites sampled in 2005 IBI scores were calculated at 26 and 20, both category "poor"

Data Reference: [Malibu Bioassessment Winter 2005](#)

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: The IBI is a multi-metric assessment that employs biological metrics that respond to a habitat or water quality impairment. Each of the biological metrics measured at a site are converted to an IBI score then summed. These cumulative scores are then ranked as very good (80-100), good (60-79), fair (40-49), poor (20-39) and very poor (0-19) habitat conditions. Sites with scores below 39 are considered to have impaired conditions.

Guideline Reference: [A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams, Environmental Management Vol. 35, No. 4, pp. 493-504.](#)

Spatial Representation: Two sites in Malibu Creek were sampled, MC1 and MC12  
Temporal Representation: Sites were sampled in winter of 2005.  
Environmental Conditions: Benthic macroinvertebrate populations and IBI scores may also be affected by a wide range of anthropogenic stressors.

QAPP Information: Data was collected in compliance with California Stream Bioassessment Procedure. Collection procedures were audited by California Department of Fish and Game in 2006.

QAPP Information Reference(s): [California Stream Bioassessment Procedure \(Protocol Brief for Biological and Physical/Habitat Assessment in Wadeable Streams\) California Department of Fish and Game Water Pollution Control Laboratory Aquatic Bioassessment Laboratory Revision Date - December, 2003](#)

California Stream Bioassessment Procedure Biological and Physical Habitat  
Field Audit

LOE ID: 4327

Pollutant: Sedimentation/Siltation  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Not Recorded

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: Not Specified  
Data Used to Assess Water Quality: Unspecified--This LOE is a placeholder to support a 303(d) listing decision made prior to 2006.

Data Reference: Placeholder reference pre-2006 303(d)

Water Quality Objective/Criterion: Unspecified  
Objective/Criterion Reference: Placeholder reference pre-2006 303(d)

Evaluation Guideline: Unspecified  
Guideline Reference: Placeholder reference pre-2006 303(d)

Spatial Representation: Unspecified  
Temporal Representation: Unspecified  
Environmental Conditions: Unspecified  
QAPP Information: Unspecified  
QAPP Information Reference(s):



# Draft 2008 California 303(d)/305(b) Integrated Report

## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Malibu Creek  
Water Body ID: CAR4042100019990201132825  
Water Body Type: River & Stream

DECISION ID 16618

Pollutant: Invasive Species  
Final Listing Decision: List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Sources: Nonpoint Source  
Expected TMDL: 2021  
Completion Date:  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.10 of the Listing Policy. Under section 3.10, waters are listed when a declining trend in water quality is substantiated.

Three lines of evidence are available in the administrative record to assess this pollutant. Five of 7 sites showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008) and 8 out of 8 sites sampled showed medium or high densities of mud snail in 2008.

At high numbers, mud snails can completely cover a stream bed and damage local stream ecosystems. The colonies outcompete native aquatic invertebrates that the watershed's fish and amphibians rely on for food, disrupting the entire food web.

Benthic macroinvertebrates as measured by Southern California IBI (index of biological integrity) in Malibu Creek were poor or fair in 2005 indicating impairment of benthic community structure.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Data was collected over a three years time frame and a baseline condition of zero abundance of the invasive species was used.
3. Five of seven sites showed an increase in density of mud snails over a three years of sampling and eight of eight sites sampled showed medium or high densities of mud snail in 2008.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

SWRCB Board Decision /  
Staff Recommendation:

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 16618

LOE ID: 28702

Pollutant: Invasive Species  
LOE Subgroup: Population/Community Degradation  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Fish Spawning | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 7  
Number of Exceedances: 5

Data and Information Type: Benthic macroinvertebrate surveys  
Data Used to Assess Water Quality: A total of five of seven sites showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008) and eight of eight sites sampled showed medium or high densities of mud snail in 2008

Data Reference: [New Zealand Mudsnaill Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains, Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.](#)

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."Â

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: Presence of high densities and increasing densities. While quantitative and predictive research continues, due to its ability to attain extremely high densities, the impacts of the mudsnails on aquatic ecosystems where it occurs in the western U.S. are large and include: decreased densities of native macroinvertebrates and reduced food resources; decreased whole-stream algal production; poor food source in that mudsnails are much more difficult to digest, with their hard shells and operculum than are the thin-shelled, native pulmonate snails that do not have opercula or than soft-bodied, aquatic insect larvæ.

Guideline Reference: [The New Zealand Mudsnaill Invades the Western United States. Aquatic Nuisance Species Digest Volume 4 No. 4.](#)

Spatial Representation: Eight sites were sampled in the following locations in Malibu Creek: Lookout Trail, Logan's Run culvert U.S. Century Lake; MCSP D.S. of Rock Pool; Texas Crossing MCSP; Salvation Army Camp Bridge; the grated drain of Tapia Park U.S.; Malibu Canyon Rd. U.S. LA County Stream Gauge; the trail at end of Palm Cyn Rd in Serra Retreat; and Cross Creek Rd. U.S. in the middle of Arizona Crossing.

Temporal Representation: Salvation Army Camp Bridge was sampled in July of 2007 and October of 2008. The other seven sites were sampled in July of 2006, July of 2007, and October of 2008.

Environmental Conditions:  
 QAPP Information: Data was collected as detailed in the Santa Monica Bay Restoration Commission and Santa Monica Baykeeper New Zealand Mudsnaill Surveys.

QAPP Information Reference(s): New Zealand Mudsnaill Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains, Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.

LOE ID: 30179

Pollutant: Invasive Species  
 LOE Subgroup: Population/Community Degradation  
 Matrix: Water  
 Fraction: None

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Fish Spawning | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 0  
 Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys  
 Data Used to Assess Water Quality: The IBI scores at this site ranked in the "fair" range (33) in the spring and "poor" (17) in the fall.

Data Reference: Malibu Watershed 2005 Bioassessment Monitoring Report. (2005) The Malibu Creek Watershed Monitoring Program City of Calabasas, Environmental Services Division. Submitted by: Aquatic Bioassay and Consulting Laboratories.

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: The IBI is a multi-metric assessment that employs biological metrics that respond to a habitat or water quality impairment. Each of the biological metrics measured at a site are converted to an IBI score then summed. These cumulative scores are then ranked as very good (80-100), good (60-79), fair (40-49), poor (20-39) and very poor (0-19) habitat conditions. Sites with scores below 39 are considered to have impaired conditions.

Guideline Reference: A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams. Environmental Management Vol. 35, No. 4, pp. 493-504.

Spatial Representation: One site in Malibu Creek was sampled, above the Lagoon at 34° 02.761' N 118° 41.270' W

Temporal Representation: Sites were sampled in Spring and Fall of 2005

Environmental Conditions: Benthic macroinvertebrate populations and IBI scores may also be affected by a wide range of anthropogenic stressors.

QAPP Information: Data was collected in compliance with California Stream Bioassessment Procedure.

QAPP Information Reference(s): California Stream Bioassessment Procedure (Protocol Brief for Biological and Physical/Habitat Assessment in Wadeable Streams) California Department of Fish and Game Water Pollution Control Laboratory Aquatic Bioassessment Laboratory Revision Date - December, 2003

LOE ID: 30178

Pollutant: Invasive Species  
 LOE Subgroup: Population/Community Degradation  
 Matrix: Water  
 Fraction: None

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Fish Spawning | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 0  
 Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys  
 Data Used to Assess Water Quality: Two sites sampled in 2005 IBI scores were calculated at 26 and 20, both category "poor"

Data Reference: Malibu Bioassessment Winter 2005

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: The IBI is a multi-metric assessment that employs biological metrics that respond to a habitat or water quality impairment. Each of the biological metrics measured at a site are converted to an IBI score then summed. These cumulative scores are then ranked as very good (80-100), good (60-79), fair (40-49), poor (20-39) and very poor (0-19) habitat conditions. Sites with scores below 39 are considered to have impaired conditions.

Guideline Reference: A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams. Environmental Management Vol. 35, No. 4, pp. 493-504.

Spatial Representation: Two sites in Malibu Creek were sampled, MC1 and MC12  
 Temporal Representation: Sites were sampled in winter of 2005.  
 Environmental Conditions: Benthic macroinvertebrate populations and IBI scores may also be affected by a wide range of anthropogenic stressors.

QAPP Information: Data was collected in compliance with California Stream Bioassessment Procedure. Collection procedures were audited by California Department of Fish and Game in 2006.

QAPP Information Reference(s): California Stream Bioassessment Procedure (Protocol Brief for Biological and Physical/Habitat Assessment in Wadeable Streams) California Department of Fish and Game Water Pollution Control Laboratory Aquatic Bioassessment Laboratory Revision Date - December, 2003  
California Stream Bioassessment Procedure Biological and Physical Habitat Field Audit

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Malibu Lagoon  
Water Body ID: CAE4042100019990201160355  
Water Body Type: Estuary

DECISION ID 7251

Pollutant: Benthic Community Effects  
Final Listing Decision: List on 303(d) list (being addressed by action other than TMDL)  
Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)

Revision Status Revised

Sources: Hydromodification

Expected Attainment Date: 2011

Date TMDL Approved by USEPA: The Malibu Lagoon experiences; a lack of surface water movement and ineffective tidal movement in open conditions; excessive sedimentation of fine grain particles and gradual sedimentation throughout the western lagoon; excessive buildup of nitrogen and phosphorus and limited denitrification; eutrophication during dry-weather and depressed oxygen levels; and habitat disturbance and modification and contains invasive species.

The Restoration Feasibility Study proposes to address these deficiencies through various alternatives with differing degrees of success. These alternatives propose utilizing existing wind and hydraulic gradients mechanism; lowering the channel beds and reconfiguring the hydraulic system; reducing direct exposure to creek flows, increase flushing and expulsion of sediment under open hydraulic conditions, and managing the overall sedimentation rate; modifying the lagoon's three dimensional geometry, lowering the lagoon surface water area to bed sediment area ratio; increasing scour of fines and summer organic matter and increased mixing of lagoon waters to create conditions with higher oxygen levels in the water and sediment; and altering the lagoon topography to enhance drainage and modifying habitat to attractive for increase avian usage.

Impairment from Pollutant or Pollution: Pollutant

Weight of Evidence: This pollutant is being considered for removal from the section 303(d) list under section 4.9 of the Listing Policy. Under this section a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for placing this water segment-pollutant combination on the section 303(d) list (being addressed by actions other than TMDL section).

This conclusion is based on the staff findings that:

The Malibu Lagoon Restoration Feasibility Study Final Alternatives Analysis describes restoration measure for Malibu Lagoon. These proposed restoration efforts, if fully implemented, is anticipated to correct the conditions which allow the negative indicator species to thrive.

RWQCB Board Decision / Staff Recommendation: After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the 303(d) list (being addressed by actions other than TMDL) because the proposed restoration measures are expected to affect existing conditions such that negative indicator species will cease to thrive.

SWRCB Board Decision /  
Staff Recommendation:

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 7251

LOE ID: 26966

Pollutant: Benthic Community Effects  
LOE Subgroup: Narrative Description Data  
Matrix: -N/A  
Fraction: None

Beneficial Use: Estuarine Habitat  
Aquatic Life Use: Cold Freshwater Habitat | Marine Habitat | Preservation of Rare & Endangered Species | Warm Freshwater Habitat | Wildlife Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: QUALITATIVE (EVALUATED) ASSESSMENT - UNSPECIFIED  
Data Used to Assess Water Quality: The Malibu Lagoon Restoration Feasibility Study lists structural and non-structural BMPs for the restoration of Malibu Lagoon. These measures are expected to improve sediment delivery and increase scour to some areas, increasing grain size, and allowing more oxygen rich water to bed sediment.

Data Reference: Malibu Lagoon Restoration Feasibility Study Final Alternatives Analysis, 2005. Prepared by: Moffatt & Nichol In Association With Heal the Bay. Prepared for California State Coastal Conservancy & California State Parks, March 2005. Lower Malibu Creek and Lagoon Resource Enhancement and Management Final Report to the California State Coastal Conservancy, Ambrose, Richard F. and Antony, R. Orme. University of California, Los Angeles, May 2000. Chapter 3.

Water Quality Objective/Criterion:  
Objective/Criterion Reference:

Evaluation Guideline:  
Guideline Reference:

Spatial Representation:  
Temporal Representation:  
Environmental Conditions:  
QAPP Information: None  
QAPP Information Reference(s):

LOE ID: 4329

Pollutant: Benthic Community Effects  
LOE Subgroup: Population/Community Degradation  
Matrix: Sediment  
Fraction: Not Recorded

Beneficial Use: Estuarine Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: Not Specified

Data Used to Assess Water Quality: Unspecified--This LOE is a placeholder to support a 303(d) listing decision made prior to 2006.

Data Reference: Placeholder reference pre-2006 303(d)

Water Quality Objective/Criterion:  
Objective/Criterion Reference:

Evaluation Guideline:  
Guideline Reference:

Spatial Representation:	Unspecified
Temporal Representation:	Unspecified
Environmental Conditions:	Unspecified
QAPP Information:	Unspecified
QAPP Information Reference(s):	

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: San Gabriel River Estuary  
Water Body ID: CAR4051600020000229163853  
Water Body Type: River & Stream

DECISION ID 6065

Pollutant: Copper  
Final Listing Decision: List on 303(d) list (being addressed by USEPA approved TMDL)  
Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Sources: Source Unknown  
TMDL Name: San Gabriel River Metals (39)  
TMDL Project Code: 385  
Date TMDL Approved by USEPA: 03/27/2007  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for removal from the section 303(d) list under section 2.2 and 4.1 of the Listing Policy. Under this section a single line of evidence is necessary to assess listing status.

Five lines of evidence are available in the administrative record to assess pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list. There is sufficient justification to place it in the Being Addressed portion of the 303(d) list because a TMDL has been completed and established by USEPA, and is expected to result in attainment of the standard.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. 17 of 61 samples exceeded the California Toxics Rule Criterion Continuous Concentration for copper and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy.
4. The San Gabriel River Metals TMDL has been established by USEPA on 03/26/2007.
5. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the Water Quality Limited Segments Being Addressed category of the section 303(d) list because a TMDL has been established by USEPA, and applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**



Lines of Evidence (LOEs) for Decision ID 6065

LOE ID: 2496

Pollutant: Copper  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: Dissolved

Beneficial Use: Estuarine Habitat

Number of Samples: 40  
 Number of Exceedances: 5

Data and Information Type: PHYSICAL/CHEMICAL MONITORING  
 Data Used to Assess Water Quality: Available data indicate numeric CTR standards are violated for copper 5 out of 40 results (USEPA, 2007).  
 Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: Basin Plan: Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.  
 Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: CTR values for copper in saltwater: 4.8 ppb (CMC, acute) 3.1 ppb (CCC, chronic).  
 Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: Four sampling locations: receiving water stations RA2, R6, R7, and R8.  
 Temporal Representation: Samples collected from June 2003 to November 2005.  
 Environmental Conditions:  
 QAPP Information: Data record: 2003-2006, LA RWQCB comment letter, 2006  
 QAPP Information Reference(s):

LOE ID: 25290

Pollutant: Copper  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: Total

Beneficial Use: Estuarine Habitat  
 Aquatic Life Use: Fish Migration | Fish Spawning | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 9  
 Number of Exceedances: 7

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
 Data Used to Assess Water Quality: Seven of nine samples exceeded the California Toxics Rule Criterion Continuous Concentration for Copper and 1 out of 9 samples exceeded the Criterion Maximum Concentration. Water quality samples were taken and analyzed for Copper in accordance with the Long Beach Waste Water Reclamation Plant Permit monitoring and testing parameters.  
 Data Reference: NPDES receiving water monitoring reports for Long Beach Water Reclamation Plant (NPDES No. CA0054119), Los Coyotes Water Reclamation Plant (NPDES No. CA0053716), Pomona Water Reclamation Plant (NPDES No. CA0053911), San Jose Creek Water Reclamation Plant (NPDES No. CA0053619), and Whittier Narrows Creek Water Reclamation Plant (NPDES No. CA0054011).

Water Quality Objective/Criterion: The California Toxics Rule lists a Criterion Maximum Concentration of 4.8 ug/L and a Criterion Continuous Concentration of 3.1 ug/L for Copper to protect aquatic life in saltwater.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: The Sanitation Districts of Los Angeles County conducted sampling in Coyote Creek in the following receiving water monitoring stations: station RA2 located downstream of the confluence of the eastern and western low flow channel; station R6 located at College Park bridge; station R7 located at Westminster Avenue (Second Street); and station R8 located at Marina Avenue.

Temporal Representation: Grab samples were taken and analyzed on quarterly basis from December 2005 to January 2007.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Sanitation Districts of Los Angeles County (NPDES No. CA0054119) Monitoring and Reporting Program.

QAPP Information Reference(s): Long Beach Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0054119 (County Sanitation Districts of Los Angeles County)

LOE ID: 28717

Pollutant: Copper  
LOE Subgroup: Narrative Description Data  
Matrix: Not Specified  
Fraction: None

Beneficial Use: Estuarine Habitat  
Aquatic Life Use: Fish Migration | Fish Spawning | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: Not Specified  
Data Used to Assess Water Quality: A TMDL has been established for this water segment-pollutant combination. The San Gabriel River Metals TMDL was established by USEPA on March 26, 2007. Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Metals in the San Gabriel River Watershed.

Data Reference:

Water Quality Objective/Criterion:  
Objective/Criterion Reference:

Evaluation Guideline:  
Guideline Reference:

Spatial Representation:  
Temporal Representation:  
Environmental Conditions:  
QAPP Information: QA information unavailable.  
QAPP Information Reference(s):

LOE ID: 25292

Pollutant: Copper  
LOE Subgroup: Pollutant-Water

Matrix:	Water
Fraction:	Total
Beneficial Use:	Estuarine Habitat
Aquatic Life Use:	Fish Migration   Fish Spawning   Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	6
Number of Exceedances:	5
Data and Information Type:	Fixed station physical/chemical (conventional plus toxic pollutants)
Data Used to Assess Water Quality:	Five of six samples exceeded the California Toxics Rule Criterion Continuous Concentration for Copper and five of six samples exceeded the Criterion Maximum Concentration. Water quality samples were taken and analyzed for Copper in accordance with the Haynes Generating Station Permit monitoring and testing parameters.
Data Reference:	<u>Reasonable Potential Analysis for Haynes Generating Station (NPDES No. CA0000353).</u>
Water Quality Objective/Criterion:	The California Toxics Rule lists a Criterion Maximum Concentration of 5.78 ug/L and a Criterion Continuous Concentration of 3.73 ug/L for Copper to protect aquatic life in saltwater for the total fraction.
Objective/Criterion Reference:	<u>Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California; Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.; Environmental Protection Agency</u>
Evaluation Guideline:	
Guideline Reference:	
Spatial Representation:	The City of Los Angeles Department of Water and Power conducted sampling in the San Gabriel River Estuary at the receiving water monitoring station RW10 located at the Pacific Coast Highway Bridge, at a point midway between the banks of the river.
Temporal Representation:	Grab samples were taken and analyzed between June 2003 and June 2004
Environmental Conditions:	
QAPP Information:	Data was collected in compliance with the sampling and monitoring procedures detailed in Haynes Generating Station NPDES Permit (NPDES No. CA0000353) Monitoring and Reporting Program.
QAPP Information Reference(s):	<u>Waste Discharge Requirements for City of Los Angeles Department of Water and Power (Haynes Generating Station) NPDES No. CA0000353.</u>
LOE ID:	25291
Pollutant:	Copper
LOE Subgroup:	Pollutant-Water
Matrix:	Water
Fraction:	Total
Beneficial Use:	Estuarine Habitat
Aquatic Life Use:	Fish Migration   Fish Spawning   Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	6
Number of Exceedances:	0
Data and Information Type:	Fixed station physical/chemical (conventional plus toxic pollutants)
Data Used to Assess Water Quality:	Zero of 6 samples exceeded the California Toxics Rule Criterion Continuous Concentration for Copper. Water quality samples were taken and analyzed for Copper in accordance with the Alamitos Generating Station Permit monitoring and testing parameters.

Data Reference: Reasonable Potential Analysis for Haynes Generating Station (NPDES No. CA0000353)

Water Quality Objective/Criterion: The California Toxics Rule lists a Criterion Maximum Concentration of 5.78 ug/L and a Criterion Continuous Concentration of 3.73 ug/L for Copper to protect aquatic life in saltwater for the total fraction.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: AES Alamos L.L.C. conducted sampling in the San Gabriel River Estuary at the receiving water monitoring station RW12 located at the Pacific Coast Highway Bridge, at a point midway between the banks of the river.

Temporal Representation: Grab samples were taken and analyzed between June 2003 and August 2004

Environmental Conditions:

QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Alamos Generating Station NPDES Permit (NPDES No. CA0001139) Monitoring and Reporting Program.

QAPP Information Reference(s): Waste Discharge Requirements for AES Alamos, L.L.C. (Alamos Generating Station) NPDES No. CA0001139

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: San Gabriel River Estuary  
Water Body ID: CAR4051600020000229163853  
Water Body Type: River & Stream

DECISION ID 11984

Pollutant: Nickel  
Final Listing Decision: List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Sources: Source Unknown  
Expected TMDL: 2021  
Completion Date:  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

Three lines of evidence are available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. 13 of 47 samples exceed the California Toxics Rule Criterion Continuous Concentration for nickel and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

#### Lines of Evidence (LOEs) for Decision ID 11984

LOE ID: 25285  
Pollutant: Nickel  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Total

Beneficial Use: Estuarine Habitat  
Aquatic Life Use: Fish Migration | Fish Spawning | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 35  
Number of Exceedances: 7

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
Data Used to Assess Water Quality: Seven of 35 samples exceeded the California Toxics Rule Criterion Continuous Concentration for Nickel and 1 out of 35 samples exceeded the Criterion Maximum Concentration. Water quality samples were taken and analyzed for Nickel in accordance with the Long Beach Waste Water Reclamation Plant Permit monitoring and testing parameters.

Data Reference: NPDES receiving water monitoring reports for Long Beach Water Reclamation Plant (NPDES No. CA0054119), Los Coyotes Water Reclamation Plant (NPDES No. CA0053716), Pomona Water Reclamation Plant (NPDES No. CA0053911), San Jose Creek Water Reclamation Plant (NPDES No. CA0053619), and Whittier Narrows Creek Water Reclamation Plant (NPDES No. CA0054011).

Water Quality Objective/Criterion: The California Toxics Rule lists a Criterion Continuous Concentration of 8.2 ug/L and a Criterion Maximum Concentration of 74 ug/L for Nickel to protect aquatic life in saltwater for the total fraction.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: The Sanitation Districts of Los Angeles County conducted sampling in Coyote Creek in the following receiving water monitoring stations: station RA2 located downstream of the confluence of the eastern and western low flow channel; station R6 located at College Park bridge; station R7 located at Westminster Avenue (Second Street); and station R8 located at Marina Avenue.

Temporal Representation: Grab samples were taken and analyzed on quarterly basis from July 2004 to January 2007

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Sanitation Districts of Los Angeles County (NPDES No. CA0054119) Monitoring and Reporting Program.

QAPP Information Reference(s): Long Beach Water Reclamation Plant Monitoring and Reporting Program for NPDES No. CA0054119 (County Sanitation Districts of Los Angeles County)

LOE ID: 25287

Pollutant: Nickel  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Total

Beneficial Use: Estuarine Habitat  
Aquatic Life Use: Fish Migration | Fish Spawning | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 6  
Number of Exceedances: 6

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)

Data Used to Assess Water Quality: Six of six samples exceeded the California Toxics Rule Criterion Continuous Concentration for Nickel. Water quality samples were taken and analyzed for Nickel in accordance with the Haynes Generating Station Permit monitoring and testing parameters.

Data Reference: [Reasonable Potential Analysis for Haynes Generating Station \(NPDES No. CA0000353\)](#).

Water Quality Objective/Criterion: The California Toxics Rule lists a Criterion Continuous Concentrations of 8.2 ug/L for Nickel to protect aquatic life in saltwater.

Objective/Criterion Reference: [Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency](#)

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: The City of Los Angeles Department of Water and Power conducted sampling in the San Gabriel River Estuary at the receiving water monitoring station RW10 located at the Pacific Coast Highway Bridge, at a point midway between the banks of the river.

Temporal Representation: Grab samples were taken and analyzed between June 2003 and June 2004

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Haynes Generating Station NPDES Permit (NPDES No. CA0000353) Monitoring and Reporting Program.

QAPP Information Reference(s): [Waste Discharge Requirements for City of Los Angeles Department of Water and Power \(Haynes Generating Station\) NPDES No. CA0000353.](#)

LOE ID: 25286

Pollutant: Nickel  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Total

Beneficial Use: Estuarine Habitat  
Aquatic Life Use: Fish Migration | Fish Spawning | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 6  
Number of Exceedances: 0

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
Data Used to Assess Water Quality: Zero of six samples exceeded the California Toxics Rule Criterion Continuous Concentration for Nickel. Water quality samples were taken and analyzed for Nickel in accordance with the Alamos Generating Station Permit monitoring and testing parameters.

Data Reference: [Reasonable Potential Analysis for Haynes Generating Station \(NPDES No. CA0000353\)](#).

Water Quality Objective/Criterion: The California Toxics Rule lists a Criterion Continuous Concentration of 8.2 ug/L for Nickel to protect aquatic life in saltwater.

Objective/Criterion Reference: [Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency](#)

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: AES Alamitos L.L.C. conducted sampling in the San Gabriel River Estuary at the receiving water monitoring station RW12 located at the Pacific Coast Highway Bridge, at a point midway between the banks of the river.

Temporal Representation: Grab samples were taken and analyzed between June 2003 and August 2004

Environmental Conditions:

QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in Alamitos Generating Station NPDES Permit (NPDES No. CA0001139) Monitoring and Reporting Program.

QAPP Information Reference(s): Waste Discharge Requirements for AES Alamitos, L.L.C.(Alamitos Generating Station) NPDES No. CA0001139



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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)  
Water Body ID: CAR4051501019980917150749  
Water Body Type: River & Stream

DECISION ID 12107

Pollutant: Cyanide  
Final Listing Decision: List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Sources: Source Unknown  
Expected TMDL: 2021  
Completion Date:  
Impairment from Pollutant or Pollution: Pollutant

Weight of Evidence: This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is not sufficient justification for placing the water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. There are eight of 20 samples that exceed the CTR CCC and one of 20 samples that exceed the CTR CMC; this exceeds the allowable frequency listed in Table 3.2 of the Listing Policy.
4. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

RWQCB Board Decision / Staff Recommendation: After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

SWRCB Board Decision / Staff Recommendation:

USEPA Decision:

### Lines of Evidence (LOEs) for Decision ID 12107

LOE ID: 4805

Pollutant: Cyanide  
LOE Subgroup: Pollutant-Water  
Matrix: Water

Fraction:	None
Beneficial Use:	Warm Freshwater Habitat
Aquatic Life Use:	Preservation of Rare & Endangered Species   Wildlife Habitat
Number of Samples:	20
Number of Exceedances:	8
Data and Information Type:	Fixed station physical/chemical (conventional plus toxic pollutants)
Data Used to Assess Water Quality:	Eight of 20 samples exceeded the California Toxics Rule Criterion Continuous Concentration for Cyanide and one of 20 samples exceeded the Criterion Maximum Concentration. Water quality samples were taken and analyzed for Cyanide in accordance with the Municipal Separate Storm Sewer System (MS4) permit monitoring and testing parameters.
Data Reference:	<u>Monitoring Report (MS4 Data) - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach</u>
Water Quality Objective/Criterion:	The California Toxics Rule lists a Criterion Continuous Concentration of 5.2 ug/L and a Criterion Maximum Concentration of 22 ug/L for Cyanide to protect aquatic life in freshwater.
Objective/Criterion Reference:	<u>Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency</u>
Evaluation Guideline:	
Guideline Reference:	
Spatial Representation:	The Los Angeles County Department of Public Works conducted sampling at the mass emission monitoring station S14 located downstream of the San Gabriel River Parkway (Lat: 34.0133815996, Long: -118.063082152).
Temporal Representation:	Grab samples were taken approximately six per year (four wet-weather events and two dry-weather events), from October 2003 through April 2007.
Environmental Conditions:	
QAPP Information:	Data was collected in compliance with the sampling and monitoring procedures detailed in County of Los Angeles MS4 Permit (NPDES No. CAS004001) Monitoring and Reporting Program.
QAPP Information Reference(s):	<u>Monitoring and Reporting Program - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach</u>

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam)  
Water Body ID: CAR4051501019980917150749  
Water Body Type: River & Stream

DECISION ID 4721

Pollutant: Lead  
Final Listing Decision: List on 303(d) list (being addressed by USEPA approved TMDL)  
Last Listing Cycle's Final Listing Decision: Do Not Delist from 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Sources: Nonpoint Source | Point Source  
TMDL Name: San Gabriel River Metals (39)  
TMDL Project Code: 385  
Date TMDL Approved by USEPA: 03/27/2007  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for removal from the section 303(d) list under section 2.2 and 4.1 of the Listing Policy. Under section 2.2 and 4.1 a single line of evidence is necessary to assess listing status.

Two line of evidence is available in the administrative record to assess this pollutant.

Data from line of evidence 2459 will not be considered and will be disassociated in this decision due to line of evidence 28296 including all the data listed in line of evidence 2459 along with newer data.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against removing this water segment-pollutant combination from the section 303(d) list. There is sufficient justification to place it in the Being Addressed portion of the 303(d) list because a TMDL has been completed and established by USEPA, and is expected to result in attainment of the standard.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Seven of 66 samples exceeded the hardness dependent California Toxics Rule Criterion Continuous Concentration for lead and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy.
4. The San Gabriel River Metals TMDL has been established by USEPA on 03/26/2007.
5. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the Water Quality Limited Segments Being Addressed category of the section 303(d) list because a TMDL has been established by USEPA, and applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 4721

LOE ID: 28719

Pollutant: Lead  
LOE Subgroup: Narrative Description Data  
Matrix: Not Specified  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: Not Specified  
Data Used to Assess Water Quality: A TMDL has been established for this water segment-pollutant combination. The San Gabriel River Metals TMDL was established by USEPA on March 26, 2007. Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Metals in the San Gabriel River Watershed.

Data Reference: Staff report, appendix, and letter to SWRCB and Los Angeles RWQCB establishing a TMDL for Metals in the San Gabriel River Watershed.

Water Quality Objective/Criterion:  
Objective/Criterion Reference:

Evaluation Guideline:  
Guideline Reference:

Spatial Representation:  
Temporal Representation:  
Environmental Conditions:  
QAPP Information: QA information unavailable.  
QAPP Information Reference(s):

LOE ID: 28296

Pollutant: Lead  
LOE Subgroup: Pollutant-Water  
Matrix: Water  
Fraction: Dissolved

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 66  
Number of Exceedances: 7

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
Data Used to Assess Water Quality: Seven of 66 samples exceeded the hardness dependent California Toxics Rule Criterion Continuous Concentration for lead and zero out 100 samples exceeded the hardness dependent Criterion Maximum Concentration. Water quality samples were taken and analyzed for lead in accordance with the Municipal Separate Storm Sewer System (MS4) permit monitoring and testing parameters.

Data Reference: Lead Monitoring Data (MS4 Data) for San Gabriel River Reach 2, Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities therein, Except the City of Long Beach.

Water Quality Objective/Criterion:

The California Toxics Rule lists Criterion Continuous Concentrations for lead to protect aquatic life in freshwater. The lead criterion in freshwater is hardness dependent for each sample and varies based on the on the ambient hardness during sampling. Section (b)(1) in CTR contains the hardness dependent formula for metals criteria.

Objective/Criterion Reference:

Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:

Guideline Reference:

Spatial Representation:

The Los Angeles County Department of Public Works conducted sampling at the mass emission monitoring station S14 located downstream of the San Gabriel River Parkway (Lat: 34.0133815996, Long: -118.063082152).

Temporal Representation:

Composite samples taken in wet- and dry-weather from October 1995 to April 2007.

Environmental Conditions:

QAPP Information:

Data was collected in compliance with the sampling and monitoring procedures detailed in County of Los Angeles MS4 Permit (NPDES No. CAS004001) Monitoring and Reporting Program.

QAPP Information Reference(s):

Monitoring and Reporting Program - CI 6948 for order no. 01-182 NPDES No. CAS004001 Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the incorporated cities, except the City of Long Beach

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Santa Clara River Estuary  
Water Body ID: CAE4031100020000229171211  
Water Body Type: Estuary

DECISION ID 8872

Pollutant: Toxicity  
Final Listing Decision: List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Sources: Source Unknown  
Expected TMDL Completion Date: 2019  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.6 of the Listing Policy. Under section 3.6 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.3 of the
2. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
3. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
4. 67 of 150 samples exceed the water quality objective from the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
5. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

### Lines of Evidence (LOEs) for Decision ID 8872

LOE ID: 7834  
Pollutant: Toxicity  
LOE Subgroup: Toxicity

Matrix: Water  
 Fraction: Total

Beneficial Use: Estuarine Habitat  
 Aquatic Life Use: Fish Migration | Fish Spawning | Preservation of Rare & Endangered Species | Wildlife Habitat

Number of Samples: 150  
 Number of Exceedances: 67

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
 Data Used to Assess Water Quality: 67 of 150 samples exceeded the water quality objective from the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties.

Data Reference: NPDES receiving water monitoring reports for the City of San Buenaventura Ventura Water Reclamation Facility (NPDES No. CA0053651).

Water Quality Objective/Criterion: The Basin Plan states at there shall be no acute or chronic toxicity in ambient waters outside mixing zones.

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Toxicity was defined as a reduction of the NOEC below 100% and was considered significant if the effect on the sample exposure was greater than 25%. Chronic toxicity is further expressed as toxic units (TU), where  $TU = 100/NOEC$   
 The No Observable Effect Concentration (NOEC) is expressed as the maximum percent of receiving water that causes no observable effect on a test organism, as determined by the result of a critical life stage toxicity test. The NOEC is defined, in (USEPA, 2002) as the The lowest concentration of toxicant to which organisms are exposed in a life-cycle or partial life-cycle (short-term) test, which causes adverse effects on the test organisms (i.e., where the values for the observed responses are statistically significantly different from the controls).

Guideline Reference: Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition, Office of Water, U.S. Environmental Protection Agency, Washington, D.C. EPA-821-R-02-013 FINAL Calleguas Creek Watershed Toxicity, Chlorpyrifos and Diazinon TMDL Technical Report, 2005. Submitted to Los Angeles Regional Water Quality Control Board. Prepared by Larry Walker Associates on behalf of the Calleguas Creek Watershed Management Plan, June 21, 2005.

Spatial Representation: The listed monitoring stations for this water body pollutant combination include: R1 located at the south shoreline, R3 located at the west shoreline, and L5 located at the northwest shoreline.

Temporal Representation: Grab samples were taken and analyzed on semi-annual basis from January 2002 to February 2007.

Environmental Conditions:  
 QAPP Information: Data collected for compliance with Ventura Water Reclamation Facility Monitoring and Reporting Program.

QAPP Information Reference(s): Ventura Water Reclamation Facility Monitoring and reporting program for NPDES No. CA0053651

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## Supporting Information

Regional Board 4 - Los Angeles Region

**Water Body Name:** Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)  
**Water Body ID:** CAR4035100019990204123459  
**Water Body Type:** River & Stream

**DECISION ID** 5393

**Pollutant:** Chlorpyrifos  
**Final Listing Decision:** List on 303(d) list (TMDL required list)  
**Last Listing Cycle's Final Listing Decision:** List on 303(d) list (TMDL required list)(2006)  
**Revision Status:** Original  
**Sources:** Source Unknown  
**Expected TMDL Completion Date:** 2019  
**Impairment from Pollutant or Pollution:** Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant. A sufficient number of samples exceed the CDFG Chlorpyrifos 0.05 mg/L four day average aquatic life toxicity guideline.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Ten of 39 samples exceeded the CDFG guideline and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

**RWQCB Board Decision / Staff Recommendation:** The decision has not changed.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

Lines of Evidence (LOEs) for Decision ID 5393

**LOE ID:** 2134  
**Pollutant:** Chlorpyrifos  
**LOE Subgroup:** Pollutant-Water



Matrix: Water  
Fraction: Not Recorded

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 39  
Number of Exceedances: 10

Data and Information Type: PHYSICAL/CHEMICAL MONITORING  
Data Used to Assess Water Quality: Thirty-nine water samples, 10 samples exceeding the 4 day average. All exceedances were from Station STCBQT (SWAMP, 2004; LACDPW, 2003a; Newhall Land and Farming Co., 2006).

Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: No individual pesticide or combination of pesticides shall be present in concentrations that adversely affect beneficial uses.  
Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: CDFG Aquatic life toxicity one hour average: 0.08 mg/l and 4 day average: 0.05 mg/L.  
Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: The Santa Clara River Reach 6 monitoring stations are located between Bouquet Canyon Road Bridge and West Point Highway 99.

Temporal Representation: Samples were collected from August 2002 through April 2003.

Environmental Conditions:  
QAPP Information: SWAMP Quality Assurance Plan.  
QAPP Information Reference(s):

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## Supporting Information

Regional Board 4 - Los Angeles Region

**Water Body Name:** Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)  
**Water Body ID:** CAR4035100019990204123459  
**Water Body Type:** River & Stream

**DECISION ID** 5366

**Pollutant:** Diazinon  
**Final Listing Decision:** List on 303(d) list (TMDL required list)  
**Last Listing Cycle's Final Listing Decision:** List on 303(d) list (TMDL required list)(2006)  
**Revision Status** Original  
**Sources:** Source Unknown  
**Expected TMDL** 2019  
**Completion Date:**  
**Impairment from Pollutant or Pollution:** Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant. A sufficient number of samples exceed the CDFG Diazinon Aquatic life toxicity guidelines of 0.08 mg/L one hour average and the 0.05 mg/L 4 day average.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Twenty-eight of 29 samples exceeded the CDFG guidelines and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

**RWQCB Board Decision / Staff Recommendation:** The decision has not changed.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

Lines of Evidence (LOEs) for Decision ID 5366

**LOE ID:** 2135  
**Pollutant:** Diazinon  
**LOE Subgroup:** Pollutant-Water

Matrix: Water  
Fraction: Not Recorded

Beneficial Use: Warm Freshwater Habitat

Number of Samples: 29  
Number of Exceedances: 28

Data and Information Type: PHYSICAL/CHEMICAL MONITORING  
Data Used to Assess Water Quality: Twenty-eight of 29 samples exceed the guideline (SWAMP, 2004).  
Data Reference: Placeholder reference 2006 303(d)

Water Quality Objective/Criterion: No individual pesticide or combination of pesticides shall be present in concentrations that adversely affect beneficial uses.  
Objective/Criterion Reference: Placeholder reference 2006 303(d)

Evaluation Guideline: CDFG Hazard Assessment Criteria 0.16 ug/L 1-hour average (acute), 0.10 ug/L 4-day (chronic) average (Siepman & Finlayson, 2000; Finlayson, 2004).  
Guideline Reference: Placeholder reference 2006 303(d)

Spatial Representation: Six stations.  
Temporal Representation: Samples were collected from August 2002 through April 2003.  
Environmental Conditions: The Santa Clara River Reach 6 monitoring stations are located between Bouquet Canyon Road Bridge and West Point Highway 99.

QAPP Information: SWAMP Quality Assurance Plan.  
QAPP Information Reference(s):

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## Supporting Information

### Regional Board 4 - Los Angeles Region

**Water Body Name:** Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)  
**Water Body ID:** CAR4035100019990204123459  
**Water Body Type:** River & Stream

**DECISION ID** 9431

**Pollutant:** Copper  
**Final Listing Decision:** List on 303(d) list (TMDL required list)  
**Last Listing Cycle's Final Listing Decision:** New Decision  
**Revision Status** Revised  
**Sources:** Nonpoint Source | Point Source  
**Expected TMDL** 2021  
**Completion Date:**  
**Impairment from Pollutant or Pollution:** Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

Two lines of evidence are available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Two of 20 samples exceeded the California Toxics Rule Criterion Continuous Concentration for copper in the dissolved fraction and this exceeds the allowable frequency listed in Table 3.1 of the Listing Policy.
4. One of 39 samples exceeded the California Toxics Rule Criterion Continuous Concentration for copper in the total fraction and this does not exceed the allowable frequency listed in Table 3.1 of the Listing Policy.
5. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded for copper in the dissolved fraction.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

Lines of Evidence (LOEs) for Decision ID 9431

**LOE ID:** 30234

Pollutant: Copper  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: Total

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Freshwater Replenishment | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 39  
 Number of Exceedances: 1

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
 Data Used to Assess Water Quality: One of 39 samples for dissolved copper exceeded the CTR Freshwater chronic criteria.

Data Reference: NPDES receiving water monitoring reports for Saugus Water Reclamation Plant (NPDES No. CA0054313) and Valencia Water Reclamation Plant (NPDES No. CA0054216).

Water Quality Objective/Criterion: The California Toxics Rule lists Criterion Continuous Concentrations for copper to protect aquatic life in freshwater. The copper criterion in freshwater is hardness dependent for each sample and varies based on the on the ambient hardness during sampling. Section (b)(1) in CTR contains the hardness dependent formula for metals criterion.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
 Guideline Reference:

Spatial Representation: Samples were taken at two stations:  
 R-A Santa Clara River approximately 300 feet upstream of point of discharge 001 to River  
 R-B Santa Clara River approximately 100 feet downstream of point of discharge 001 to River

Temporal Representation: Grab samples taken and analyzed from June 2004 to February 2007.  
 Environmental Conditions:  
 QAPP Information: Data collected for compliance with Saugus WWRP MRP.  
 QAPP Information Reference(s): Monitoring and Reporting Program No. CI-2960 for County Sanitation Districts of Los Angeles County (Saugus Water Reclamation Plant) (NPDES NO. CA0054313)

LOE ID: 7838

Pollutant: Copper  
 LOE Subgroup: Pollutant-Water  
 Matrix: Water  
 Fraction: Dissolved

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Freshwater Replenishment | Preservation of Rare & Endangered Species | Wetland Habitat | Wildlife Habitat

Number of Samples: 20  
 Number of Exceedances: 2

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)

Data Used to Assess Water Quality: Two of 20 samples exceeded the California Toxics Rule Criterion Continuous Concentration for copper. Water quality samples were taken and analyzed for copper in accordance with the Municipal Separate Storm Sewer System (MS4) permit monitoring and testing parameters.

Data Reference: Monitoring Reports for the Storm Water Management/Urban Runoff Discharges for Ventura County Flood Control District, County of Ventura, and the cities of Ventura County NPDES Permit No. CAS004002

Water Quality Objective/Criterion: The California Toxics Rule lists Criterion Maximum Concentrations and Criterion Continuous Concentrations for copper to protect aquatic life in freshwater. The copper criteria in freshwater is hardness dependent for each sample and varies based on the on the ambient hardness during sampling. Section (b)(1) in CTR contains the hardness dependent formula for metals criteria.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: Samples were taken at the Mass Emission Santa Clara River Monitoring Station (S29). Station S29 is located near Interstate 5 about 1.5 miles west of the confluence with San Francisquito Creek (Lat 34.42660, Long -118.58649).

Temporal Representation: Grab samples were taken and analyzed from October 31, 2003 to April 2, 2007.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in County of Ventura MS4 Permit (NPDES No. CAS004002) Monitoring and Reporting Program.

QAPP Information Reference(s): Monitoring and reporting program No. CI 7388 for Storm Water Management/Urban Runoff Discharges for Ventura County Flood Control District, County of Ventura, and the cities of Ventura County NPDES Permit No. CAS004002

## Draft 2008 California 303(d)/305(b) Integrated Report

### Supporting Information

#### Regional Board 4 - Los Angeles Region

**Water Body Name:** Santa Clara River Reach 5 (Blue Cut gaging station to West Pier Hwy 99 Bridge)  
(was named Santa Clara River Reach 7 on 2002 303(d) list)  
**Water Body ID:** CAR4035100019990203102901  
**Water Body Type:** River & Stream

**DECISION ID** 9068

**Pollutant:** Dichlorobromomethane  
**Final Listing Decision:** Do Not List on 303(d) list (TMDL required list)  
**Last Listing Cycle's Final Listing Decision:** New Decision  
**Revision Status** Revised  
**Impairment from Pollutant or Pollution:** Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Zero of 33 samples exceeded the California Toxics Rule Human Health Organism Consumption Criteria for Dichlorobromomethane and this does not exceed the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should not be placed on the section 303(d) list because applicable water quality standards are not being exceeded.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

#### Lines of Evidence (LOEs) for Decision ID 9068

**LOE ID:** 8346  
**Pollutant:** Dichlorobromomethane  
**LOE Subgroup:** Pollutant-Water  
**Matrix:** Water  
**Fraction:** None

Beneficial Use: Water Contact Recreation

Number of Samples: 33  
Number of Exceedances: 0

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
Data Used to Assess Water Quality: Zero of 33 samples exceeded the California Toxics Rule Human Health Criteria Organism Consumption Criteria for Dichlorobromomethane. Water quality samples were taken for Dichlorobromomethane in accordance with County Sanitation Districts monitoring parameters.

Data Reference: NPDES receiving water monitoring reports for Saugus Water Reclamation Plant (NPDES No. CA0054313) and Valencia Water Reclamation Plant (NPDES No. CA0054216).

Water Quality Objective/Criterion: The California Toxics Rule lists a Human Health Organism Consumption Criteria of 46 ug/L for Dichlorobromomethane to protect human health.  
Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: The listed monitoring stations for this water body pollutant combination include: RC located approximately 300 feet upstream of point of discharge 001 to the river, RD located approximately 300 feet downstream of point of discharge 001 to the river, and RE located approximately 1.6 miles upstream of Chiquita Canyon Road.

Temporal Representation: Grab samples were taken and analyzed on quarterly basis from July 2004 to February 2007

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in NPDES Permit No. CA0054216 Monitoring and Reporting Program.  
QAPP Information Reference(s): Valencia Water Reclamation Plant Monitoring and reporting program for NPDES No. CA0054216 (County Sanitation Districts of Los Angeles County)



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### Supporting Information

#### Regional Board 4 - Los Angeles Region

**Water Body Name:** Santa Clara River Reach 6 (W Pier Hwy 99 to Bouquet Cyn Rd) (was named Santa Clara River Reach 8 on 2002 303(d) list)  
**Water Body ID:** CAR4035100019990204123459  
**Water Body Type:** River & Stream

**DECISION ID** 9450

**Pollutant:** Dichlorobromomethane  
**Final Listing Decision:** Do Not List on 303(d) list (TMDL required list)  
**Last Listing Cycle's Final Listing Decision:** New Decision  
**Revision Status** Revised  
**Impairment from Pollutant or Pollution:** Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.1 of the Listing Policy. Under section 3.1 a single line of evidence is necessary to assess listing status.

One line of evidence is available in the administrative record to assess this pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification against placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Zero of eight samples exceeded the California Toxics Rule Human Health Organism Consumption Criteria for dichlorobromomethane and this does not exceed the allowable frequency listed in Table 3.1 of the Listing Policy.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should not be placed on the section 303(d) list because applicable water quality standards are not being exceeded.

**SWRCB Board Decision / Staff Recommendation:**

**USEPA Decision:**

#### Lines of Evidence (LOEs) for Decision ID 9450

**LOE ID:** 8754  
**Pollutant:** Dichlorobromomethane  
**LOE Subgroup:** Pollutant-Water  
**Matrix:** Water  
**Fraction:** Total

Beneficial Use: Water Contact Recreation

Number of Samples: 8  
Number of Exceedances: 0

Data and Information Type: Fixed station physical/chemical (conventional plus toxic pollutants)  
Data Used to Assess Water Quality: Zero of eight samples exceeded the California Toxics Rule Human Health Criteria Organism Consumption Criteria for dichlorobromomethane. Water quality samples were taken for dichlorobromomethane in accordance with County Sanitation Districts monitoring parameters.

Data Reference: NPDES receiving water monitoring reports for Saugus Water Reclamation Plant (NPDES No. CA0054313) and Valencia Water Reclamation Plant (NPDES No. CA0054216).

Water Quality Objective/Criterion: The California Toxics Rule lists a Human Health Organism Consumption Criteria of 46 ug/L for dichlorobromomethane to protect human health.

Objective/Criterion Reference: Water Quality Standards 2000. Establishment of numeric criteria for priority toxic pollutants for the State of California: Rules and regulations. Federal Register Vol. 65, No. 97. Washington, D.C.: Environmental Protection Agency

Evaluation Guideline:  
Guideline Reference:

Spatial Representation: Samples were taken at two stations:  
R-A Santa Clara River approximately 300 feet upstream of point of discharge 001 to River  
R-B Santa Clara River approximately 100 feet downstream of point of discharge 001 to River

Temporal Representation: Grab samples were taken and analyzed on quarterly basis from July 2004 to February 2007

Environmental Conditions:  
QAPP Information: Quality assurance information is described in the Monitoring and Reporting Program, No. CI-2960, for County Sanitation Districts of Los Angeles County, Saugus Water Reclamation Plant, (NPDES NO. CA0054313).

QAPP Information Reference(s): Monitoring and Reporting Program No. CI-2960 for County Sanitation Districts of Los Angeles County (Saugus Water Reclamation Plant) (NPDES NO. CA0054313)

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## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Triunfo Canyon Creek Reach 1  
Water Body ID: CAR4042400019990202081341  
Water Body Type: River & Stream

DECISION ID 16626

Pollutant: Invasive Species  
Final Listing Decision: Do Not List on 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: New Decision  
Revision Status: Revised  
Impairment from Pollutant or Pollution: Pollutant

**Weight of Evidence:** This pollutant is being considered for placement on the section 303(d) list under section 3.10 of the Listing Policy. Under section 3.10, waters are listed when a declining trend in water quality is substantiated.

Two lines of evidence are available in the administrative record to assess this pollutant. Zero of 2 sites showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008) and 0 out of 3 sites sampled showed medium or high densities of mud snail in 2008. One site exhibited a low density of mudsnails in 2008.

At high numbers, mud snails can completely cover a stream bed and damage local stream ecosystems. The colonies outcompete native aquatic invertebrates that the watershed's fish and amphibians rely on for food, disrupting the entire food web.

Benthic macroinvertebrates as measured by Southern California IBI (index of biological integrity) in Triunfo Creek were very poor in 2005 indicating impairment of benthic community structure.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Data was collected over a three years time frame and a baseline condition of zero abundance of the invasive species was used.
3. Zero of two sites showed an increase in density of mud snails over a three years of sampling and zero of three sites sampled showed medium or high densities of mud snail in 2008.
4. Pursuant to section 3.11 of the Listing Policy, no additional data and information are available indicating that standards are met.

**RWQCB Board Decision / Staff Recommendation:** After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**SWRCB Board Decision / Staff Recommendation:**

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 16626

LOE ID: 30183

Pollutant: Invasive Species  
LOE Subgroup: Population/Community Degradation  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Wildlife Habitat

Number of Samples: 0  
Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys  
Data Used to Assess Water Quality: The IBI scores at this site ranked in the "very poor" range (13) in the spring and "very poor" (3) in the fall.  
Data Reference: Malibu Watershed 2005 Bioassessment Monitoring Report. (2005) The Malibu Creek Watershed Monitoring Program City of Calabasas, Environmental Services Division. Submitted by: Aquatic Bioassay and Consulting Laboratories.

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: The IBI is a multi-metric assessment that employs biological metrics that respond to a habitat or water quality impairment. Each of the biological metrics measured at a site are converted to an IBI score then summed. These cumulative scores are then ranked as very good (80-100), good (60-79), fair (40-49), poor (20-39) and very poor (0-19) habitat conditions. Sites with scores below 39 are considered to have impaired conditions.

Guideline Reference: A Quantitative Tool for Assessing the Integrity of Southern Coastal California Streams. Environmental Management Vol. 35, No. 4, pp. 493-504.

Spatial Representation: One site in Triunfo Creek was sampled, below Westlake at 34° 07.927' N 118° 49.237' W

Temporal Representation: Sites were sampled in Spring and Fall of 2005

Environmental Conditions: Benthic macroinvertebrate populations and IBI scores may also be affected by a wide range of anthropogenic stressors.

QAPP Information: Data was collected in compliance with California Stream Bioassessment Procedure.

QAPP Information Reference(s): California Stream Bioassessment Procedure (Protocol Brief for Biological and Physical/Habitat Assessment in Wadeable Streams) California Department of Fish and Game Water Pollution Control Laboratory Aquatic Bioassessment Laboratory Revision Date - December, 2003

LOE ID: 28714

Pollutant: Invasive Species

LOE Subgroup: Population/Community Degradation  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Wildlife Habitat

Number of Samples: 2  
Number of Exceedances: 0

Data and Information Type: Benthic macroinvertebrate surveys  
Data Used to Assess Water Quality: A total of zero of two sites showed an increase in density of mud snails over the three years of sampling (2006, 2007, 2008) and zero of three sites sampled showed medium or high densities of mud snail in 2008.

Data Reference: [New Zealand Mudsnaill Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains. Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.](#)

Water Quality Objective/Criterion: The Basin Plan states that: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant or animal, or aquatic life. Compliance with this objective will be determined by use of indicator organisms, analysis of species diversity, population density, growth anomalies, bioassays of appropriate duration or other appropriate methods as specified by the State or Regional Board."A"

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: Presence of high densities and increasing densities. While quantitative and predictive research continues, due to its ability to attain extremely high densities, the impacts of the mudsnails on aquatic ecosystems where it occurs in the western U.S. are large and include: decreased densities of native macroinvertebrates and reduced food resources; decreased whole-stream algal production; poor food source in that mudsnails are much more difficult to digest, with their hard shells and operculum than are the thin-shelled, native pulmonate snails that do not have opercula or than soft-bodied, aquatic insect larvae.

Guideline Reference: [The New Zealand Mudsnaill Invades the Western United States. Aquatic Nuisance Species Digest Volume 4 No. 4.](#)

Spatial Representation: Three sites were sampled in the following locations in Triunfo Creek Reach 1: on the trailhead on right side of Ridgeford Dr.; at the corner of Kanan Rd. at Troutdale U.S. of bridge; at the outlet adjacent to Green Willow.

Temporal Representation: The Trailhead/Ridgeford Dr. and Kanan Rd. at Troutdale sites were sampled in July of 2006, July of 2007 and October of 2008. The Green Willow site was sampled in July of 2007 and October of 2008.

Environmental Conditions:  
QAPP Information: Data was collected as detailed in the Santa Monica Bay Restoration Commission and Santa Monica Baykeeper New Zealand Mudsnaill Surveys.

QAPP Information Reference(s): [New Zealand Mudsnaill Surveys July 2006, July 2007 and October 2008 Santa Monica Mountains. Santa Monica Bay Restoration Commission / Santa Monica Baykeeper.](#)

# Draft 2008 California 303(d)/305(b) Integrated Report

## Supporting Information

### Regional Board 4 - Los Angeles Region

Water Body Name: Walnut Creek Wash (Drains from Puddingstone Res)  
Water Body ID: CAR4053100019980918112433  
Water Body Type: River & Stream

DECISION ID 7325

Pollutant: Toxicity  
Final Listing Decision: Delist from 303(d) list (TMDL required list)  
Last Listing Cycle's Final Listing Decision: List on 303(d) list (TMDL required list)(2006)  
Revision Status: Revised  
Reason for Delisting: State determines water quality standard is being met  
Impairment from Pollutant or Pollution: Pollutant

Weight of Evidence: This pollutant is being considered for removal from the section 303(d) list under section 4.6 of the Listing Policy. Under this section a single line of evidence is necessary to assess listing status.

LOE 4270 is a placeholder LOE for a decision made prior to 2006. LOE 25394 contains the original listing data that is not listed in LOE 4270. As such, LOE 4270 has been disassociated from the decision.

Five lines of evidence are available in the administrative record to assess the pollutant.

Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification for removing this water segment-pollutant combination from the section 303(d) list.

This conclusion is based on the staff findings that:

1. The data used satisfies the data quality requirements of section 6.1.4 of the Policy.
2. The data used satisfies the data quantity requirements of section 6.1.5 of the Policy.
3. Five out of 42 samples exhibit toxicity to Ceriodaphnia. However, four toxic results occurred in samples from 1992-93. In between 2003 and 2007, only one of 38 samples exhibited toxicity, thus significant improvements in survival and reproduction endpoints have been observed in the most recent timeframe. All of these toxicity results were measured in water samples, which are more responsive to changing pollutant loads, and in this case reflect decreasing loads. Based on the improving trend in water quality conditions and only one toxic result in the past four years, it is evident that beneficial uses are being supported.
4. Based on more recent monitoring and available monitoring data, USEPA has determined that Walnut Creek is not impaired for toxicity and a TMDL is not required.
5. Pursuant to section 4.11 of the Listing Policy, no additional data and information are available indicating that standards are not met.

RWQCB Board Decision / Staff Recommendation: After review of the available data and information, RWQCB staff concludes that the water body-pollutant combination should be removed from the section 303(d) list because applicable water quality standards for the pollutant are not being exceeded.

SWRCB Board Decision / Staff Recommendation:

USEPA Decision:

Lines of Evidence (LOEs) for Decision ID 7325

LOE ID: 25394

Pollutant: Toxicity  
LOE Subgroup: Toxicity  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Wetland Habitat | Wildlife Habitat

Number of Samples: 4  
Number of Exceedances: 4

Data and Information Type: TOXICITY TESTING  
Data Used to Assess Water Quality: Four of four samples exhibited significant toxicity. Four samples from one site were used to test toxicity to three species: Fathead Minnow, Ceriodaphnia, and Selanastrum. The samples had no effect on Selanastrum, but had effects on the other species used in the testing. A toxicity identification evaluation (TIE) was conducted for one of the samples and data suggest that an organic constituent was responsible for toxicity.

Data Reference: Toxicity Study of the Santa Clara River, San Gabriel River, and Calleguas Creek, Final Report. Prepared by Aquatic Toxicology Laboratory, Department of Medicine, School of Veterinary Medicine, University of California Davis.

Water Quality Objective/Criterion: The Basin Plan states that there shall be no acute or chronic toxicity in ambient waters outside mixing zones.

Objective/Criterion Reference: Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009

Evaluation Guideline: Toxicity was defined as a statistically significant effect in the sample exposure compared to the control using EPA-recommended hypothesis testing (parametric Dunnett's Test or non-parametric Kruskal-Wallis or Wilcoxon Two-sample Test).

Guideline Reference: Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition, Office of Water, U.S. Environmental Protection Agency, Washington, D.C. EPA-821-R-02-013

Spatial Representation: Samples were taken at monitoring station, SG-8, in Walnut Creek at Baldwin Park Blvd.

Temporal Representation: Quarterly toxicity samples from were taken from June 1992 to March 1993.

Environmental Conditions:  
QAPP Information: Data was collected in compliance with the sampling and monitoring procedures detailed in University of California Davis' Work/QA Project Plan.

QAPP Information Reference(s): Toxicity Study of the Santa Clara River, San Gabriel River, and Calleguas Creek Toxicity Work/QA Project Plan

LOE ID: 25396

Pollutant: Toxicity  
LOE Subgroup: Toxicity  
Matrix: Water  
Fraction: None

Beneficial Use: Warm Freshwater Habitat  
Aquatic Life Use: Wetland Habitat | Wildlife Habitat

Number of Samples: 6

Number of Exceedances: 1

Data and Information Type: TOXICITY TESTING  
 Data Used to Assess Water Quality: One of six samples exhibited significant toxicity to Ceriodaphnia. Six grab samples from two sites were used to test toxicity to two species: Fathead Minnow and Ceriodaphnia.

Data Reference: [County Sanitation Districts of Los Angeles County 2003-2006 Toxicity Testing in Walnut Creek data.](#)

Water Quality Objective/Criterion: The Basin Plan states that there shall be no acute or chronic toxicity in ambient waters outside mixing zones.

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: Toxicity was defined as a statistically significant effect in the sample exposure compared to the control using EPA-recommended hypothesis testing (parametric Dunnett's Test or non-parametric Kruskal-Wallis or Wilcoxon Two-sample Test).

Guideline Reference: [Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition, Office of Water, U.S. Environmental Protection Agency, Washington, D.C. EPA-821-R-02-013](#)

Spatial Representation: Samples were taken at two monitoring stations, site Nos. 1 and 2, in Walnut Creek at Baldwin Park Blvd and Merced Ave.

Temporal Representation: Monthly toxicity samples from were taken from August 2003 to October 2003.

Environmental Conditions:

QAPP Information: Data was collected as detailed in Sanitation Districts of Los Angeles County QA/QC Memo.

QAPP Information Reference(s): [County Sanitation Districts of Los Angeles County QA/QC Memo for 2003 Toxicity testing in Walnut Creek.](#)

LOE ID: 28167

Pollutant: Toxicity  
 LOE Subgroup: Toxicity  
 Matrix: Water  
 Fraction: None

Beneficial Use: Warm Freshwater Habitat  
 Aquatic Life Use: Wetland Habitat | Wildlife Habitat

Number of Samples: 3  
 Number of Exceedances: 0

Data and Information Type: TOXICITY TESTING  
 Data Used to Assess Water Quality: Zero out of three samples exhibited significant toxicity. Samples were taken from two sites and tested for acute and chronic toxicity to Ceriodaphnia.

Data Reference: [Toxicity Monitoring in Walnut Creek 2005 to 2007.](#)

Water Quality Objective/Criterion: The Basin Plan states that there shall be no acute or chronic toxicity in ambient waters outside mixing zones.

Objective/Criterion Reference: [Water Quality Control Plan Los Angeles Region R4 Basin Plan Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009](#)

Evaluation Guideline: Toxicity was defined as a reduction of the NOEC below 100% and was considered significant if the effect on the sample exposure was greater than 25%. Chronic toxicity is further expressed as toxic units (TUc), where TUc = 100/NOEC.  
 The No Observable Effect Concentration (NOEC) is expressed as the maximum percent of receiving water that causes no observable effect on a test organism,



Guideline Reference:

as determined by the result of a critical life stage toxicity test. The NOEC is defined, in USEPA, 2002 as the the lowest concentration of toxicant to which organisms are exposed in a life-cycle or partial life-cycle (short-term) test, which causes adverse effects on the test organisms (i.e., where the values for the observed responses are statistically significantly different from the controls). Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms. Fourth Edition. Office of Water, U.S. Environmental Protection Agency. Washington, D.C. EPA-821-R-02-013 FINAL Calleguas Creek Watershed Toxicity, Chlorpyrifos and Diazinon TMDL Technical Report. 2005. Submitted to Los Angeles Regional Water Quality Control Board. Prepared by Larry Walker Associates on behalf of the Calleguas Creek Watershed Management Plan. June 21, 2005.

Spatial Representation:

Samples were taken from two monitoring stations, site SGLT506 and SGUT506, in Walnut Creek.

Temporal Representation:

Samples were taken on 07/25/2005, on 07/19/2006, and on 06/11/2007.

Environmental Conditions:

QAPP Information:

Data was collected in compliance with the sampling and monitoring procedures detailed in San Gabriel River Regional Monitoring Program Quality Assurance Project Plan.

QAPP Information Reference(s):

San Gabriel River Regional Monitoring Program Quality Assurance Project Plan. San Gabriel River Regional Monitoring Program.

LOE ID:

28004

Pollutant:

Toxicity

LOE Subgroup:

Narrative Description Data

Matrix:

Water

Fraction:

None

Beneficial Use:

Warm Freshwater Habitat

Aquatic Life Use:

Wetland Habitat | Wildlife Habitat

Number of Samples:

0

Number of Exceedances:

0

Data and Information Type:

Not Specified

Data Used to Assess Water Quality:

Based on additional monitoring and assessment of the available monitoring data, USEPA has determined that Walnut Creek is not impaired for toxicity.

Data Reference:

Letter to National Resources Defense Council, Heal the Bay, and Santa Monica Baykeeper determining no impairment for toxicity in Walnut Creek. USEPA.

Water Quality Objective/Criterion:

Objective/Criterion Reference:

Evaluation Guideline:

Guideline Reference:

Spatial Representation:

Temporal Representation:

Environmental Conditions:

QAPP Information:

QA info unavailable.

QAPP Information Reference(s):

LOE ID:

25399

Pollutant:

Toxicity

LOE Subgroup:

Toxicity

Matrix:

Water

Fraction:

None

Beneficial Use:	Warm Freshwater Habitat
Aquatic Life Use:	Wetland Habitat   Wildlife Habitat
Number of Samples:	29
Number of Exceedances:	0
Data and Information Type:	TOXICITY TESTING
Data Used to Assess Water Quality:	Zero out of 29 samples exhibited significant toxicity. Samples were taken from two sites and tested for toxicity to Ceriodaphnia.
Data Reference:	<u>Technical Report 493: Wet and Dry Weather Toxicity in the San Gabriel River.</u>
Water Quality Objective/Criterion:	The Basin Plan states that there shall be no acute or chronic toxicity in ambient waters outside mixing zones.
Objective/Criterion Reference:	<u>Water Quality Control Plan Los Angeles Region R4 Basin Plan</u> <u>Basin Plan Amendments to the Water Quality Control Plan Los Angeles Region R4 Basin Plan as of 02/02/2009</u>
Evaluation Guideline:	Toxicity was defined as a statistically significant effect in the sample exposure compared to the control using EPA recommended hypothesis testing (parametric Dunnett's Test or non-parametric Fisher's Exact Test).
Guideline Reference:	<u>Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to freshwater and Marine Organisms. Fourth Edition. EPA/600/4-90/027F. August 1993. Washington DC</u>
Spatial Representation:	Samples were taken from two monitoring stations, site Nos. 1 and 2, in Walnut Creek at Baldwin Park Blvd and Merced Ave.
Temporal Representation:	Monthly dry-weather samples were taken from March 2005 to August 2006 and three wet-weather samples were taken in December 2004, April 2005, and January 2006.
Environmental Conditions:	
QAPP Information:	Data was collected in compliance with the sampling and monitoring procedures detailed in Southern California Coastal Water Research Project and Nautilus Environmental Quality's Assurance Project Plan.
QAPP Information Reference(s):	<u>Evaluation of Toxicity in the San Gabriel River Watershed Quality Assurance Project Plan</u>