

**Comment Summary and Reponses**  
**2014-2016 Triennial Review Selection of Basin Planning Projects**  
**Comment Deadline: October 2, 2015**

**Commenters:**

1	Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed
2	County Sanitation Districts of Los Angeles County
3	Ventura County Stormwater Quality Management Program
4	Heal The Bay
5	Joyce Dillard

**Comment Summary and Responses:**

Comment No.	Comment	Response
1.1	<p>The Stakeholders Implementing Total Maximum Daily Loads (TMDLs) in the Calleguas Creek Watershed (Stakeholders) appreciate the opportunity to provide comments on the California Regional Water Quality Control Board, Los Angeles’s (Regional Board) 2014-2016 Triennial Review to consider and adopt a list of the highest priority issues regarding water quality standards for the Los Angeles Region (Triennial Review). In the Triennial Review the Regional Board determines and prioritizes potential revisions to the Water Quality Control Plan for the Los Angeles Region (Basin Plan).</p> <p>The Stakeholders consist of agricultural, wastewater, and MS4s that are responsible parties to six effective TMDLs in the Calleguas Creek Watershed (CCW). Five cities (Camarillo, Thousand Oaks, Simi Valley, Moorpark, and Oxnard), unincorporated Ventura County, and the Ventura County Watershed Protection District are all MS4 permittees within the CCW that must comply</p>	Comment noted.

	<p>with the TMDLs to comply with the NPDES MS4 permit for Ventura County (Ventura MS4 Order).</p> <p>In March 2015, the Stakeholders submitted a comment letter on the Request for Data and Information on Water Quality Standards for the Triennial Review. In that letter, and as noted in Table 5 of the staff report, the Stakeholders requested two issues be prioritized for consideration in the Triennial Review: 1) TMDL reconsideration for a number of local TMDLs, and 2) the further development and incorporation of natural source exclusions to improve the accuracy of water quality standards.</p> <p>Upon review of the Triennial Review Staff Report, the Stakeholders would like to provide further comments on the following issues:</p>	
1.2	<p><b>Comment #1:</b></p> <p>The Staff Report notes under Section 5, Potential Projects Identified by Staff, the update of ammonia objectives based on recommended criteria issued by the Environmental Protection Agency (EPA) in 2013. The Stakeholders encourage the Regional Board to focus the resources that would be allocated on this criteria review on other priorities. As the majority of wastewater treatment plants that discharge to inland surface waters in the Los Angeles Region have upgraded their treatment to remove ammonia, ammonia toxicity in most receiving waters has been reduced to such an extent that the Stakeholders do not feel that limited resources should be prioritized for the ammonia criteria review. Previously issued EPA criteria have not merited Basin Plan revisions. For example, the 2007 USEPA copper criteria has not been subject to the sort of assessment as is proposed for the ammonia criteria.</p> <p>If the Regional Board moves forward with consideration of the criteria, a careful examination of its application in the waters of Southern California will be required. The revised ammonia criteria was structured around designating</p>	<p>On August 5, 2015, USEPA signed a final rule revision indicating that states are required to consider new or revised criteria for parameters for which it has published or updated Clean Water Act (CWA) section 304(a) criteria recommendation since May 30, 2000 during their current or next Water Quality Standards triennial review.</p> <p>In light of this rule revision, and considering stakeholder's comments, the recommended project consisting of the update of the freshwater ammonia objectives has been modified to now include an evaluation of the Basin Plan water quality objectives, including freshwater ammonia objectives, based on new recommended water quality criteria published by USEPA. Work will include the identification of water quality</p>

	<p>standards that are protective of freshwater mussels, which have been identified as the most sensitive aquatic life receptor. However, scientific literature has noted that freshwater mussels are, and likely have been, extirpated from the waters of Southern California; Coney notes freshwater mussels are, "undoubtedly extirpated from all of Southern California". The USEPA criteria notes that "unionid mussel species are not prevalent in some waters, such as in the arid west." In the 2009 draft version of the USEPA criteria, EPA had proposed a mussels present and mussels absent criteria to acknowledge the lack of freshwater mussels in some waterbodies. While the 2013 criteria did not maintain this distinction, it will be critical for the Regional Board to consider deriving site-specific applications of the criteria. The 2013 USEPA criteria discusses the derivation of site-specific criteria and includes an appendix discussing the procedures for developing the criteria (Appendix N). Should the Regional Board pursue this evaluation, it should include consideration of developing site-specific criteria in accordance with Appendix N.</p> <p>Recommendation: Deprioritize the update of freshwater ammonia objectives based on the EPA's 2013 criteria and allocate those resources to other higher priority projects.</p>	<p>objectives that should be prioritized for updating, and preliminary work where appropriate.</p> <p>More specifically, staff will be conducting an assessment of the Basin Plan water quality objectives, including freshwater ammonia objectives, to determine which objective(s) need to be updated in consideration of USEPA's CWA section 304(a) criteria recommendation. Should a water quality objective need to be reconsidered, as a first step towards developing a Basin Plan amendment, the necessary modifications will be summarized. When an update is not deemed necessary, the reasons for this determination will be addressed. These considerations will be presented as part of the 2017-2019 Triennial Review staff report, which will be released for public comment prior to the Regional Water Board hearing adopting basin planning priority projects.</p> <p>Following these determinations, staff will proceed with any necessary water quality objective updates during the subsequent Triennial Reviews. Stakeholders will have the opportunity to comment on each of the revisions prior to its adoption by the Regional Water Board as part of the public notice and comment process for each individual Basin Plan amendment.</p> <p>These changes have been reflected in the</p>
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		Basin Plan resolution and the staff report.
1.3	<p><b>Comment #2:</b></p> <p>While Table 7 of the Staff Report states that work on a high flow suspension in Ventura County was not highlighted as a priority by commenters, the Stakeholders have in previous opportunities voiced support for this concept, and still are in strong support of this work and feel that it is a high priority for the Triennial Review. As the State Water Resources Control Board (State Board) is currently developing a Statewide Bacteria Policy which will include consideration of high flow suspension, we encourage the Regional Board to include the Bacteria Policy as a State Board program it will support during this Triennial Review. This support could include moving forward from work already done on high flow suspension in Ventura County, with a goal of incorporating high flow suspensions consistent with the statewide policy.</p> <p>Implementation of a high flow suspension will allow resources to be focused on protecting recreational beneficial uses where and when they actually occur as conditions during storm events are unsafe for recreation and compliance with objectives is temporarily unachievable.</p> <p>Recommendation: Prioritize support for the State Board's Statewide Bacteria Policy in this Triennial Review cycle, and conduct further work started on high flow suspension in Ventura County as part of that support.</p>	<p>The State Water Board is presently considering the development of high flow suspension implementation provisions for both natural and engineered channels as part of the ongoing development of statewide water quality objectives for bacteria to protect the REC-1 beneficial use. The Regional Water Board is following the State Water Board's consideration and development of these provisions. The Regional Water Board understands that this project is now nearing its final stages, as the State Water Board has scheduled adoption of the statewide bacteria objectives for May-June 2016. If and when the State Water Board adopts these provisions, the Regional Water Board will consider them in the context of waterbodies in the Los Angeles Region. The Regional Water Board intends to continue to work with, and provide input to, the State Water Board on this statewide effort, and will consider high flow suspension in Ventura County as a priority for the next Triennial Review, as reflected in the revised staff report.</p>
1.4	<p><b>Comment #3</b></p> <p>The Stakeholders would like to thank the Regional Board for including TMDL support as a priority project during this Triennial Review period. The</p>	<p>Comment noted. Support to the TMDL program is one of the recommended priority projects of this Triennial Review.</p>

	<p>Stakeholders have previously submitted comments outlining needed modifications to a number of local TMDLs to improve their effectiveness and better align their requirements with the most recent scientific knowledge gained during their implementation. We look forward to working with you on these TMDL modifications.</p> <p>Recommendation: As a Triennial Review priority, ensure that Regional Board staff provide support to the TMDL program as needed to improve its effectiveness, including efforts such as the requested TMDL reconsiderations.</p>	
2.1	<p>The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to submit comments to the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) on the selected priorities for the 2014-2016 Triennial Review of the Water Quality Control Plan – Los Angeles Region (Basin Plan), as proposed in the Tentative Resolution and Staff Report released September 2, 2015. The Sanitation Districts are pleased to support the continued development of Salt and Nutrient Management Plans (SNMPs) and the administrative update to Chapter 4 of the Basin Plan as Basin Planning priority projects. Furthermore, we have recommendations regarding the project to reconsider recreational beneficial use designations and the project to consider a high flow suspension of recreational beneficial uses in the Santa Clara River and other waterbodies. The comments relating to these projects are discussed in more detail below.</p>	Comment noted.
2.2	<p><i>Salt and Nutrient Management Plans</i> The State Water Resources Control Board’s (State Water Board’s) Recycled Water Policy requires that every groundwater basin and sub-basin in California have a SNMP. The Recycled Water Policy clarifies that the SNMP development process should be stakeholder-led with Regional Boards throughout the state providing oversight and regulatory guidance as necessary. As part of the 2008-2010 Triennial Review, the Regional Board directed staff to assist in the development of SNMPs in</p>	Comment noted. The Regional Water Board agrees that continued development of SNMPs is an important Basin Planning priority project.

	<p>the Los Angeles region. Since that time, the Regional Board has attended stakeholder meetings, held various stakeholder workshops, provided support and information, and developed the guidance document <i>“Regional Water Board Assistance in Guiding Salt and Nutrient Management Plan Development in the Los Angeles Region”</i>. Additionally, the Regional Board incorporated the Central Basin and West Coast Basin SNMP and the Lower Santa Clara River SNMP into the Basin Plan and created Basin Plan Chapter 8 <i>“Groundwater Quality Management – Sustainability and Basin-specific Protection of Groundwater”</i> to accommodate the SNMPS and future salt and nutrient management measures. The Sanitation Districts appreciate the Regional Board’s efforts thus far related to the SNMPS and support the inclusion of the continued support of the development of SNMPS as a Basin Planning priority. The Sanitation Districts believe this project is important, especially given that there are five groundwater basin groups still in the process of developing their plans.</p>	
2.3	<p><i>Basin Plan Administrative Update</i>  The Sanitation Districts’ are pleased that the Regional Board is proposing to continue work on the non-regulatory amendments to the Basin Plan. During the 2011-2013 Triennial Review period, the Regional Board adopted three resolutions updating Chapter 2 <i>“Beneficial Uses”</i>, Chapter 3 <i>“Water Quality Objectives”</i>, and Chapter 7 <i>“Total Maximum Daily Loads”</i> of the Basin Plan. In addition, on October 9, 2014 the Regional Board adopted a resolution updating Chapter 1 <i>“Introduction”</i>, Chapter 5 <i>“Plans and Policies”</i>, and Chapter 6 <i>“Monitoring and Assessment”</i> of the Basin Plan. The Sanitation Districts support the Regional Board’s proposal to include the administrative update of Chapter 4 <i>“Strategic Planning and Implementation”</i> as a priority project for the 2014-2016 Triennial Review, a chapter that has not been updated. There have been numerous Basin Plan amendments in the past and well as new information available and the Sanitation Districts appreciate the Regional Board’s effort to update the document in order to create an improved and complete plan. The Sanitation Districts also commend the Regional Board’s commitment to continue the administrative update until all chapters of the Basin Plan have been updated, and support administratively updating the Basin Plan on a more routine basis going forward.</p>	<p>Comment noted. Chapter 4 is the last of the Basin Plan chapters to be updated. Staff expects to have a draft update of this chapter available for public review by the end of 2015. The Regional Water Board intends to subsequently update the Basin Plan, as necessary, on a more regular basis.</p>
2.4		

*Application of REC-1 and REC-2 Beneficial Use Designations*  
The Regional Board identified reconsideration of the application of recreational (i.e. REC-1 and REC-2) beneficial use designations as a priority project for the 2008-2010 Triennial Review. The Sanitation Districts recognize that the Regional Board adopted Resolution R14-011 relating to the study results and findings for the engineered portions of the Los Angeles River watershed. However, the Sanitation Districts believe that assessing recreational uses region-wide is important; therefore, we recommend that this effort continue for other watersheds, including the San Gabriel and Santa Clara River watersheds, as well as non-engineered channels.

Resolution R14-011 reaffirmed the Regional Water Board's long-standing objective of achieving the fundamental "fishable/swimmable" goal of the Clean Water Act, wherever possible. The resolution was also fully supportive of the current momentum towards urban river revitalization, which is fueled by the efforts of federal agencies, including the U.S. EPA and U.S. Army Corps of Engineers, the City and County of Los Angeles, and other local agencies and non-profit organizations. Accordingly, in consideration of this objectives and the past, present, and potential uses documented in the Los Angeles River watershed, the Regional Water Board proceeded to affirm the current recreational beneficial use designations of the engineered channels of the Los Angeles River system.

Given these considerations, the amount of resources that was required to conduct the re-evaluation of recreational beneficial uses designations for the engineered portions of the Los Angeles River watershed, and the limited resources available, it is not a Board priority to conduct similar efforts in other watersheds, including the San Gabriel and Santa Clara River watersheds, as well as non-engineered channels.

In addition, a majority of stream reaches in the Santa Clara River watershed, as well as

		<p>selected reaches in the Santa Gabriel River watershed support existing recreational uses, which according to federal regulations cannot be reconsidered. Specifically, section 131.10(h)(1) of Title 40 of the Code of Federal Regulations (40 CFR) prohibits states from removing designated uses if they are existing uses, as defined in § 131.3, unless a use requiring more stringent criteria is added.</p>
<p>2.5</p>	<p><i>High Flow Suspension of Recreational Beneficial Use Designations</i>  The Regional Board adopted R03-010 in 2003, which created a new “High Flow Suspension” category that describes when recreational beneficial use designations and the associated bacteriological objectives are applicable during and following periods of high rainfall. However, this application has been limited to certain portions of the Ballona Creek, Dominguez Channel, Los Angeles River, and San Gabriel River Watersheds. As part of the 2014-2016 Triennial Review, the City of Santa Clarita requested that the Regional Board expand the evaluation of recreation beneficial use designations due to rainfall to the Santa Clara River. The Sanitation Districts see merit in this the project and support the City of Santa Clarita’s request to include this as a priority project for the 2014-2016 Triennial Review. Furthermore, the Sanitation Districts also support this assessment in general and recommend that the Regional Board continue the evaluation of high flow suspension of recreational beneficial uses in Ventura County after the Santa Clara River assessment. The Sanitation Districts recognize that the Staff Report states that the Regional Board is not pursuing this project due to resource constraints and the State Water Board’s intention to develop bacterial objectives; however, it is uncertain if the State Water Board will be considering high flow suspension implementation provisions and work has already been initiated on the Ventura County evaluation. For these reasons, we request that the continued evaluation of high flow exceptions is a priority project for the 2014-2016 Triennial Review.</p>	<p>See response to Comment No. 1.3.</p> <p>The high flow suspension resolution (R03-010), adopted in 2003, for the Ballona Creek, Dominguez Channel, Los Angeles River, and San Gabriel River Watersheds applied to engineered channels. Because the Santa Clara River presents a different setting, with a natural bed along the majority of its course, and only limited portions with engineered channels, a different set of criteria would be needed to be developed to support a high flow suspension. However, the State Water Board is presently considering the development of high flow suspension implementation provisions for natural as well as engineered channels as part of the ongoing development of water quality objectives for bacteria. The Regional Water Board is following State Water Board’s development of these provisions and will consider them in the context of waterbodies in the Los Angeles Region once</p>



		they have been finalized by the State Water Board.
2.6	In summary, the Sanitation Districts support the continued effort for development of the Salt and Nutrient Management Plans (SNMPs) and the administrative update to Chapter 4 of the Basin Plan as Basin Planning priority projects. Furthermore, we encourage the Regional Board to consider our recommendation to further continue the reconsideration of the application of recreational beneficial use designations and high flow suspension category.	See responses to comments 2.1 to 2.5.
3.1	<p>On behalf of Ventura Countywide Stormwater Quality Management Program (Program), which includes the Watershed Protection District, the County of Ventura and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks, thank you for the opportunity to provide stakeholder input on the 2014-2016 Triennial Review pursuant to Notice of Board Hearing dated November 5, 2015. Collectively, these agencies operate the municipal storm drain system in Ventura County and discharge stormwater and urban runoff pursuant to the Ventura Countywide 2010 NPDES Stormwater Permit. All 12 agencies are committed to working cooperatively to improve water quality in our local waterways and beaches.</p> <p>The Triennial Review determines and prioritizes issues regarding water quality standards to be addressed by revisions to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) in the coming years. The Program commends the significant work Regional Water Board staff has conducted in completing of a number of priority projects during the 2011-2013 triennial period. While the Program did not submit comments during the July triennial review workshop, the Program has reviewed the 2014-2016 Triennial Review Staff Report and would like to take this opportunity to submit the following comments on projects of particular importance to Ventura County Permittees.</p>	Comment noted.
3.2		

3.3	<p><b>1. Prioritize High Flow Suspension of Recreational Beneficial Uses for Engineered Channels in Ventura County</b></p> <p>In order to provide necessary levels of flood protection for Ventura residents and businesses, some of our rivers and streams in and around urban areas have been straightened, concrete-lined, or both. These channels are designed to support large volumes of water during wet weather events, consequently it is unsafe to swim or recreate in these channels during high-flow or high-velocity conditions. It is well accepted that high flows within highly modified channels can create life threatening conditions during and immediately following storm events; therefore, the unconditional application of REC uses 1 and 2 for these waterbody segments promotes unsafe conditions.</p> <p>As identified in the Triennial Review Staff Report, work on establishing high flow suspension of recreational use in engineered channels in Ventura County has already begun. Following Resolution No. 2003-10, which established high flow suspension of water contact recreational uses for various engineered channels in Los Angeles County, development of a similar high flow suspension for engineered channels in Ventura County was added to the list of basin planning priorities for the 2011-2013 Triennial Review. Subsequently, Regional Water Board staff conducted several surveys to identify engineered channel segments in Ventura County where similar unsafe conditions may exist during high flow conditions, and a high flow suspension may be applicable.</p> <p>The Program encourages the Regional Board move forward and complete this work as it remains a priority to Ventura County. Adoption of a high flow suspension Basin Plan Amendment would allow MS4 Permittees to focus resources on supporting and protecting recreational beneficial uses in appropriate conditions where water recreation is not considered to be inherently dangerous.</p> <p><b>Request:</b> Include High flow suspension on the list of projects to be prioritized in the time remaining for the 2014-2016 Triennial Review and change Table 7 in the 2014-2016 Triennial Review Staff Report to reflect that it remains a stakeholder issue.</p>	<p>See response to Comment No. 1.3</p> <p>Table 7 of the Staff report has been modified to reflect that the High Flow suspension in Ventura County project is still a stakeholder priority.</p>
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**2. Prioritize Developing Technical Guidance for Making Natural Source Determinations**

The Program supports prioritizing the development of a technical guidance document for making natural source determinations. The Program recommends that this project be placed on the list of priority projects for the remainder for the 2014-2016 Triennial Review period.

When exceedances of water quality objectives of pollutants are solely or predominantly the result of natural sources, an appropriate regulatory mechanism is warranted which takes into account such natural conditions. For example, the Program regularly observes exceedances of MUN beneficial use water quality objective for total aluminum in wet weather water quality samples. An investigation into the cause(s) of such exceedances found that 100% of wet weather samples collected upstream from anthropogenic activities exceeded the objective for total aluminum. High background concentrations of total aluminum detected in runoff from undeveloped areas suggests that wet weather aluminum may routinely exceed water quality objectives regardless of Permittees efforts. While data evaluation is ongoing and the Program continues to evaluate implementation actions to limit such exceedances where possible, a regulatory mechanism for addressing impairments due to naturally occurring pollutants needs to be explored. Therefore, we encourage the Regional Board and State Board to develop regulatory mechanisms for addressing water quality impairments resulting from naturally occurring pollutants to better enable Permittees to use their limited resources most effectively.

Furthermore, the Program considers guidance for natural source determination a high priority project, and while there may not be enough time remaining in this triennial review period to complete the project, the Program suggests initiating this project as soon as possible. Similarly, the Program supports the Regional Board staff recommendation to give high priority to this project during the next triennial review period.

**Request:** Place development of a technical guidance document for making natural source determinations on the list of priority projects for the remainder for the 2014-

The Regional Water Board considers natural sources determination as an important issue, and is recommending this project as a high priority for the next Triennial Review. In the meantime, the Regional Water Board is already taking natural sources into consideration on a case by case basis as part of TMDL technical considerations. In addition, a technical guidance developed as part of a contract with the University of California, Santa Barbara is available that can be used to determine that exceedances of water quality objectives of a given pollutant are solely or predominantly a result of natural sources of that pollutant. Besides this approach, the Regional Water Board is also involved in developing methodologies for determining natural sources of bacteria and assessing the risks from these sources. Any future guidance developed by the Regional Water Board will reflect and encompass these current approaches.

	2016 Triennial Review period.	
3.4	<p><b>3. Prioritization of projects during the remainder of triennial review period</b></p> <p>Recognizing there is limited time remaining in this triennial review period, the Program encourages Regional Board staff to focus resources on completing existing Basin Planning activities and projects before commencing work on new issues as complex as a new surface water beneficial use. We are concerned that initiating such a substantial new project will take away significant Basin Planning staff resources from completing existing priorities. Projects carried over from previous Triennial Review periods should be given high priority and completed first.</p> <p>The Program furthermore supports the inclusion of TMDL and Stormwater Permitting support to the list of priorities for the remainder of the 2014-2016 Triennial Review period as a number of modification to local TMDLs are needed. The next integrated report for the Los Angeles Region will be forthcoming in 2016, and delisting for ammonia in Reach 3 is a high priority for the Santa Clara River Watershed stakeholders. In a letter dated June 4, 2015, County of Ventura, City of Fillmore and City of Santa Paula previously submitted comments to support the reassessment and request for delisting of Santa Clara River Reach 3 for ammonia and to demonstrate the absence of impairments for nitrogen compound in the Santa Clara River Reach 32. The analysis should additionally support the removal of the TMDL Wasteload Allocations from the upcoming MS4 permit reissuance to be initiated in early 2016.</p> <p><b>Request:</b> Complete existing Basin Planning activities and projects, such as TMDL and Stormwater Permitting support, before commencing work on new issues.</p>	<p>Staff intends to complete the projects started during previous Triennial reviews. Priority for the current Triennial Review period was given to projects that are already ongoing, and remaining projects will be addressed subsequently in priority (see responses to Comments 1.3 and 3.3).</p> <p>Support to other Regional Board programs, is an inherent part of basin planning work. As such, it is a continuing project that applies to all Triennial Reviews.</p> <p>CWA section 303(d) waterbody-pollutant combination delistings are addressed under the Regional Water Board's TMDL program, and are outside the scope of the Triennial Review. While most TMDLs are adopted as Basin Plan amendments, priority setting for the Regional Board TMDL program is conducted separately through the CWA section 303(d) list process.</p>
4.1	<p>On behalf of Heal the Bay, we submit the following comments on the <i>Tentative 2014-2016 Triennial Review Selection of Basin Planning Projects, Resolution No. R15-XX</i> ("Triennial Review"). Heal the Bay is an environmental organization with over 15,000 members dedicated to improving water quality in Santa Monica Bay and Southern California coastal water for people and marine life. We appreciate this opportunity to provide comments on the Triennial Review.</p>	<p>Comment noted.</p>

	<p>We support several of the projects recommended by Staff in the Staff Report. Specifically, we support staff pursuing the following projects:</p> <ul style="list-style-type: none"> <li>- Continued development of Salt and Nutrient Management Plans for local groundwater basins</li> <li>- Regional strategy to address water quality impacts of climate change</li> </ul> <p>We also support staff's decision to not pursue several of the projects suggested by stakeholders, such as reconsideration of the designation of the Lower San Gabriel River Estuary, and development of technical guidance for making natural source determinations, though we do not believe that the latter should be included as a priority project for the next Triennial Review either. The following are comments on some of the other projects discussed in the Triennial Review.</p>	
4.2	<p><b>Update Freshwater Ammonia Objectives</b></p> <p>We are concerned about the proposed priority project to update freshwater ammonia objectives based on EPA water quality criteria since this criteria allows for determination of site specific objectives. While we understand that different sites may offer different levels of "protectiveness" to toxicity based on geochemical characteristics. Practically speaking, however, determining these differences with a high degree of certainty, and accounting for all the variability inherent to a watershed due to seasonality, weather, etc. while still ensuring that water quality objectives are adequately protective is challenging to say the least due to the complex nature of watersheds. Pursuing site specific objectives should be done with caution, and using robust and rigorous study design. In general, we are very concerned with adopting any new criteria that offer the potential of relaxing water quality standards.</p>	<p>See response to Comment No. 1.2. The recommended project has now been expanded to include an evaluation of the Basin Plan water quality objectives, including freshwater ammonia objectives, based on new recommended water quality criteria published by USEPA.</p> <p>The Regional Water Board agrees that consideration of site specific objectives should be done with caution and based on robust data.</p>
4.3	<p><b>Miscellaneous</b></p> <p>While we were glad to see exploration of surface water recharge as a new beneficial use recommended as a priority along with identification and update of beneficial uses for coastal and spring-fed streams, we were disappointed that these projects were not identified as priorities for this Triennial Review. In particular for the surface water recharge beneficial use, since this project was identified as a priority by several</p>	<p>Several considerations are taken into account when prioritizing basin planning projects as part of a triennial review. Those include whether the project:</p> <ul style="list-style-type: none"> <li>• Ensures protection of water quality and beneficial uses;</li> </ul>

	<p>stakeholders, it seems that it should be considered. In general, the Regional Board should prioritize projects that would strengthen water quality protections and deprioritize those projects that would weaken them. Updating and identifying beneficial uses is a critical first step to ensuring that water resources are properly protected.</p>	<ul style="list-style-type: none"> <li>• Addresses legal requirements;</li> <li>• Facilitates implementation of other Water Board programs;</li> <li>• Provides regulatory flexibility;</li> <li>• Improves the clarity of the Basin Plan; or</li> <li>• Addresses concerns of Board staff, USEPA and stakeholders</li> </ul> <p>Ideally, selected projects will address more than one of these factors in order to make the best use of available resources.</p> <p>Taking into account these considerations, given the short time remaining during this Triennial Review period, and the limited resources available for basin planning projects, priority for the current Triennial Review period was given to projects that are already ongoing and/or part of a state or federal mandate. For these reasons, and in light of the interest shown by stakeholders in the project, the development of a surface water recharge beneficial use was recommended as a priority for the 2017-2019 triennial Review, along with other projects of interest to stakeholders. If time allows, the Regional Water Board may explore these projects earlier.</p>
5.1	<p>Proposed:</p> <ul style="list-style-type: none"> <li>b) Continue the development of a regional strategy to address the effects of climate change on water quality;</li> <li>d) Administratively update Chapter 4 of the Basin Plan;</li> <li>e) Provide support to other Los Angeles Water Board programs, including</li> </ul>	<p>The Regional Water Board agrees that antidegradation is an important issue, and takes it into consideration in its actions. Baseline water quality conditions are</p>

	<p>TMDLs, Municipal Permitting, and Stormwater Permitting;</p> <p>Comments:</p> <p>Antidegradation Policy needs to be defined in terms of baselines. Effects cannot be determined if there is no starting point for comparison.</p>	<p>important to this consideration, and are determined using the best available data. In addition, the State Water Board is currently considering revising California's Antidegradation Policy with respect to groundwater, possibly adopting an additional policy, and/or issuing guidance regarding implementation of the policy pertaining to groundwater.</p>
5.2	<p>Water quality standards should have some basis in natural conditions and deviations from those conditions. Data is lean and even lacking completely.</p>	<p>Natural sources determination is a concern shared by the Regional Water Board and other stakeholders. See our response to Comment No. 3.3 for more details.</p>
5.3	<p>Las Virgenes–Triunfo Joint Powers Authority are concerned over the Monterey Formation. That formation effects water quality throughout the region and all related studies need to be applied instead of wasting taxpayers' money to correct a natural condition.</p>	<p>Regional Board staff are aware of possible natural source contributions from the Monterey Formation in the Malibu Creek area. See responses to Comment Nos. 3.3 and 5.3.</p>
5.4	<p>Impaired waterbodies and TMDLs need to be incorporated.</p>	<p>Issues related to the CWA section 303(d) list of impaired water bodies and TMDLs are addressed through the TMDL program, Support and administrative considerations are provided for these issues through the Basin Planning Program.</p> <p>Where applicable, TMDL-based requirements are incorporated into relevant permits issued by the Regional Water Board.</p>
5.5	<p>Recycling should be addressed in regards to water suppliers. Public Health Guidelines are lacking for stormwater capture projects not planned for distribution or sale.</p>	<p>Stormwater capture and recycling issues are generally not within the purview of the</p>

		Basin Planning program. These considerations are generally addressed by the Board's permitting programs, unless the Board determines that the development of a region-wide policy addressing one of these issues could be appropriate.
5.6	Climate change needs to be defined. It is not clear what aspect is being addressed such as greenhouse gas emissions or sea-level rise. Methane migration is an issue due to the oil formations in the region and past drilling that was unregulated.	As part of its climate change strategy, the Regional Water Board is planning to address the effects of climate change on water quality specifically, both in surface water and groundwater. Climate change effects considered include sea level rise, changing weather patterns (e.g., increased temperatures, decreased snowpack) and associated outcomes. More details can be found in the "Los Angeles Region Framework for Climate Change Adaptation and Mitigation" available on the Regional Water Board's website.
5.7	<p>Proposed:</p> <p>f) Provide support to statewide standards-related initiatives, including</p> <ul style="list-style-type: none"> <li>- The development of a groundwater workplan;</li> <li>- The development of watershed-based stormwater compliance and management guidelines and tools;</li> <li>- The development of nutrient objectives;</li> <li>- The development of a biological integrity assessment implementation plan;</li> <li>- The application of the State's Antidegradation Policy to groundwater;</li> <li>- The development of a contaminants of emerging concern (CEC) strategy</li> </ul> <p>Comments:</p> <p>Groundwater issues are complex due to adjudication issues and mineral rights. Funding needs to be addressed.</p>	<p>The Regional Water Board agrees that groundwater issues are complicated, and is taking into account this complexity in every step of its duties when applicable. However, the Board does not address adjudication issues and mineral rights.</p> <p>The Water Boards at both the state and regional level provide financial support through a variety of grant and low-interest loan programs. Other agencies also provide financial support for projects that may include water quality components.</p>



5.8	Management Guideline and Tools need to be addressed into applications of databases with real data. There is not a centralized access to data needed for this process.	Several online databases are open to the public that serve as repositories for a variety of monitoring programs, such as the California Integrated Water Quality System (CIWQS), the Stormwater Multiple Application and Report Tracking System (SMARTS), GeoTracker, GeoTracker GAMA, the California Environmental Data Exchange Network (CEDEN), or the Electronic Water Rights Information Management System (eWRIMS). Access to these databases is maintained through the State Water Board website. More details regarding these databases are available in Chapter 6 of the region's Basin Plan.
5.9	Not addressed are plans for Stormwater Capture Credits or Cap and Trade. Outfall monitoring should be addressed.	<p>Stormwater capture credits and cap and trade are not within the purview of the Basin Planning program; however, the State Water Board is considering these issues through its stormwater strategic initiative, which it is in the process of developing.</p> <p>Outfall monitoring is addressed through municipal separate storm sewer system (MS4) permits.</p>
5.10	This agency lacks in Information Technology and needs to update the systems to become usable to the public.	The Regional Water Board strives to provide the best possible access to information for the public, and is constantly working to improve its Information Technology

		resources. See also response to Comment No. 5.10.
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