LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

2016 CLEAN WATER ACT SECTIONS 305(b) AND 303(d) INTEGRATED REPORT FOR THE LOS ANGELES REGION

STAFF REPORT

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List of Acronyms and Abbreviations

Basin Plan	Water Quality Control Plan: Los Angeles Region
BPTCP	Bay Protection and Toxic Cleanup Program
BMI	Benthic Macro Invertebrates
CalWQA	California Water Quality Assessment (database)
CCC	Criteria Continuous Concentration
CCR	California Code of Regulations
CDPH	California Department of Public Health
CFR	Code of Federal Regulations
CMC	Criteria Maximum Concentration
CTR	California Toxics Rule
CWA	Clean Water Act
ºC	degrees Celsius
ºF	degrees Fahrenheit
FED	Functional Equivalent Document
DDE	Dichlorodiphenyldichloroethylene
DDT	Dichlorodiphenyltrichloroethane
DFW	Department of Fish and Wildlife, formerly Department of Fish and Game (DFG)
DO	Dissolved oxygen
dw	dry weight
ERM	Effects Range Median
HCH	Hexachlorocyclohexane
HSA	Hydrologic Sub Area
HU	Hydrologic Unit
IBI	Index of Biological Integrity
ILRP	Irrigated Lands Regulatory Program
IR	Integrated Report
kg	kilogram(s)
Listing Policy	Water Quality Control Policy for Developing California's Section 303(d) List
LOE	Line of Evidence
MCL	Maximum Contaminant Level
MDL	Method Detection Limit
mg/kg	milligrams per kilogram (parts per million)
mg/L	milligrams per liter (parts per million)
µg/g	micrograms per gram (parts per million)
µg/L	micrograms per liter (parts per billion)
MTBE	Methyl tertiary-butyl ether
MTRL	Maximum Tissue Residue Level
NAS	National Academy of Sciences
ng/g	nanograms per gram (parts per billion)
ng/L	nanograms per liter (parts per trillion)
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System

NTU	Nephelometric Turbidity Unit
oc	organic carbon
OEHHA	Office of Environmental Health Hazard Assessment
PAH	Polynuclear aromatic hydrocarbon
PBDE	Polybrominated diphenyl ethers
PCB	Polychlorinated biphenyl
PEL	Probable Effects Level
pg/L	picograms per liter
QA	Quality Assurance
QAPP	Quality Assurance Project Plan
QC	Quality Control
RBI	Relative Benthic Index
RL	Reporting Level
SCCWRP	Southern California Water Research Project
SMWP	State Mussel Watch Program
SQG	Sediment quality guideline
SWAMP	Surface Water Ambient Monitoring Program
TDS	Total Dissolved Solids
TIE	Toxicity Identification Evaluation
TMDL	Total Maximum Daily Load
TSMP	Toxic Substance Monitoring Program
TSS	Total Suspended Solids
U.S. EPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
WDR	Waste Discharge Requirement
WQO	Water quality objective
WQS	Water quality standard
ww	wet weight

1. Introduction

The federal Clean Water Act (CWA) gives states the primary responsibility for protecting and restoring water quality. Under CWA Section 305(b), states are required to report biennially to the United States Environmental Protection Agency (USEPA) on the water quality conditions of their surface waters. The USEPA then compiles these assessments into their biennial "National Water Quality Inventory Report" to Congress. Under CWA Section 303(d), states are required to review, makes changes as necessary, and submit to the USEPA a list identifying waterbodies not meeting water quality standards and identifying the water quality parameter (i.e., pollutant) not being met (303(d) list). Placement on this list generally triggers development of a pollution control plan called a total maximum daily load (TMDL) for each waterbody/pollutant pair on the list.

In 2002, the USEPA issued guidance to states requiring that the 305(b) water quality assessment and the 303(d) list of impaired waters be integrated into a single report. This report is called the Integrated Report, and it satisfies both the CWA Section 305(b) and Section 303(d) requirements. The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) is responsible for developing and adopting the 2016 Integrated Report for waters within the Los Angeles Region of California. Following adoption by the Los Angeles Water Board, the 2016 Integrated Report will be transmitted to the State Water Resources Control Board (State Water Board), where it will be considered by the State Water Board in combination with other Regional Water Board Integrated Reports.

The purpose of this staff report is to describe the assessment process (the procedures used by the State Water Board and Los Angeles Water Board staff to analyze data and information), provide a report of surface water quality in the Los Angeles Region as required by CWA Section 305(b), and provide Los Angeles Water Board staff recommendations for additions, deletions, and changes to the California CWA Section 303(d) List.

The results of the staff analysis are presented as staff recommendations in the form of fact sheets that contain a decision and supporting lines of evidence for each water body/pollutant pair assessed. A summary of staff recommendations can be found in Section 4. The fact sheets are available in Appendix ~~G~~ I of this Staff Report.

2. Legal Requirements and Policy

This section provides a summary of the federal and state legal requirements and applicable policies for the 2016 Integrated Report.

2.1 Federal Requirements

2.1.1 CWA Section 303(d) – Impaired Waters

Section 303(d) of the Clean Water Act requires states to identify waters that do not meet applicable water quality standards after the application of certain technology-based controls.[1] The Section 303(d) List must include a description of the pollutants causing the violation of water quality standards (40 CFR §130.7(b)(iii)(4)) and a priority ranking of the water quality limited segments, taking into account the severity of the pollution and the uses to be made of the waters.

Water quality standards include the designated beneficial uses of a waterbody, the adopted water quality objectives to protect those uses (numeric and narrative), and the State's Antidegradation Policy (State Water Board Resolution No. 68-16) (SWRCB 1968).

Federal regulation defines a "water quality limited segment" as "any segment [of a surface waterbody] where it is known that water quality does not meet applicable water quality standards, and/or is not expected to meet applicable water quality standards, even after application of technology-based effluent limitations required by CWA Sections 301(b) or 306" (40 CFR 130.2(j)).

States are required to review the Section 303(d) List in even-numbered years, make changes as necessary, and submit the list to the USEPA for approval. A TMDL is generally developed for a water quality limited segment. A TMDL is the sum of the individual waste load allocations for point sources, load allocations for nonpoint sources, and natural background (40 CFR 130.2(i)).

2.1.2 CWA Section 305(b) – Water Quality Assessment

Under CWA Section 305(b), states are required to report biennially to the USEPA on the water quality conditions of their surface waters. The USEPA then compiles these assessments into their biennial "National Water Quality Inventory Report" to Congress.

2.1.3 The Integrated Report and Waterbody Categories

In 2002, the USEPA issued guidance to states requiring that the 305(b) water quality assessment and the 303(d) list of impaired waters be integrated into a single report. This report is called the Integrated Report, and it satisfies both the CWA Section 305(b) and Section 303(d) requirements.

To meet CWA Section 305(b) requirements of reporting on water quality conditions, the Integrated Report places each assessed waterbody segment into one of five non-overlapping

[1] Technology-based controls are defined in CWA Section 301. They include effluent limits (primary and secondary treatment requirements) for industrial discharges and discharges from publically owned treatment works.

categories based on the overall beneficial use support of the water segment and the need for a TMDL. Water segments are evaluated for at least one of six "core" beneficial uses including: municipal and domestic supply, aquatic life support, fish consumption, shellfish harvesting, contact recreation, and non-contact recreation.

Table 1. Integrated Report Categories

Category	Description
1	All assessed beneficial uses supported and no beneficial uses known to be impaired.
2	There is insufficient information to determine beneficial use support.
3	There is insufficient data and/or information to make a beneficial use support determination but information and/or data indicates beneficial uses may be potentially threatened.
4	At least one beneficial use is not supported but TMDL is not needed.
4a	A TMDL has been developed and approved by U.S.EPA for any waterbody-pollutant combination and the approved implementation plan is expected to result in full attainment of the water quality standard within a specified time frame..
4b	Another regulatory program is reasonably expected to result in attainment of the water quality standard within a reasonable, specified time frame.
4c	The non-attainment of any applicable water quality standard for the waterbody segment is the result of pollution and is not caused by a pollutant.
5	At least one beneficial use is not supported and a TMDL is needed.

A waterbody will often have multiple pollutants impairing multiple beneficial uses. In these cases, when the waterbody has TMDLs for all the impaired uses, the waterbody is placed in category 4a; when the waterbody is lacking a TMDL for at least one impairment, the waterbody is placed in category 5.

2.2 California Requirements

On September 30, 2004, the State Water Board adopted the "Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List," also known as the Listing Policy (SWRCB 2004a) in accordance with California Water Code Section 13191.3(a). The Listing Policy identifies the process by which the State Water Board and the Regional Water Quality Control Boards will comply with the listing requirements of CWA Section 303(d). The Listing Policy became effective in December 2004. Justification of each portion of the Listing Policy is presented in the Final Functional Equivalent Document (SWRCB, 2004b) that was developed to support the provisions of the Listing Policy.

The objective of the Listing Policy is to establish a standardized approach for developing California's Section 303(d) List with the overall goal of achieving water quality standards and maintaining beneficial uses in all of California's surface waters. TMDLs will generally be developed as needed for the waters identified under the provisions of the Listing Policy.

The Listing Policy outlines a "weight of evidence" approach that provides the rules for making decisions based upon different kinds of data, an approach for analyzing data statistically, and requirements for data quality, data quantity, and the 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; nuisance 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 also requires that situation specific weight of evidence listing or delisting factors be used if available information indicates water quality standards are attained or not attained and the other decision rules do not support listing or delisting.

The Listing Policy also provides direction related to:

- The definition of readily available data and information.
- Administration of the listing process including data solicitation and fact sheet preparation.
- Interpretation of narrative water quality objectives using numeric evaluation guidelines.
- Data quality assessments.
- Data quantity assessments including waterbody specific information, data spatial and temporal representation, aggregation of data by reach/area, quantitation of chemical concentrations, evaluation of data consistent with the expression of water quality objectives or criteria, binomial model statistical evaluation, evaluation of bioassessment data, and evaluation of temperature data.

The Listing Policy requires that *all* surface waters that do not meet water quality standards be placed on the Section 303(d) List. The Policy also states that the California 303(d) List includes (1) waters still requiring a TMDL under Category 5, and (2) waters where the water quality limited segment is being addressed under Category 4. Waterbodies in the "Water Quality Limited Segments Being Addressed" category must meet either of the following conditions:

1. A TMDL has been approved by USEPA and is expected to result in full attainment of the standard within a reasonable, specified time frame (Category 4a).

2. It has been determined that an existing regulatory program is reasonably expected to result in the attainment of the water quality standard within a reasonable, specified time frame (Category 4b).

Waterbodies that are impaired by a non-pollutant source (Category 4c) do not require a TMDL and the State Water Board, in accordance with the Listing Policy, does not consider waters in Category 4c as a part of the 303(d) List. This means that, for California, waters that fall into the

Integrated Report Categories 4a, 4b, and 5 are considered part of the California 303(d) List. The USEPA considers Category 5 waterbodies as the only category that constitutes the 303(d) List.

2.3 TMDL Scheduling

In conformance with Section 5 of the Listing Policy, a TMDL completion schedule date is required for all waterbody-pollutant combinations placed on the 303(d) List. Water Board staff relied on guidance from the USEPA (1997), which states that "schedules should be expeditious and normally extend from eight to thirteen years in length, but could be shorter or slightly longer depending on State-specific factors." Therefore, the timeline for completing TMDLs for waterbodies listed for the first time as part of the 2016 Integrated Report is estimated to be no longer than thirteen years, which equates to an estimated completion date of 2029. Expected TMDL completion dates are proposed by Los Angeles Water Board staff in the fact sheets of this report (Appendix ~~G~~I).

2.4 Consequences of 303(d) listing and delisting

When a waterbody/pollutant combination is placed on the 303(d) list, it requires the Los Angeles Water Board to further evaluate the need for a TMDL to bring the waterbody into attainment status for the water quality standard within a reasonable, specified time frame.

As discussed in section 2.3, the timeline for completing a TMDL, or identifying an existing regulatory program that will fully address the impairment, is no longer than 13 years. However, in that time period, because additional 303(d) assessment will be conducted and/or other regulatory actions will require assessments, the waterbody/pollutant combination will likely be reevaluated. Because this 2016 303(d) list only includes data through 2010, it is expected that the next update to the 303(d) list, scheduled for 2022, will include many revisions, which may include listing new waterbody/pollutant combinations, potentially re-listing previously delisted waterbody/pollutant combinations, and delisting existing waterbody/pollutant combinations. These revisions may result from an evaluation of more recent data or, in less frequent cases, because the evaluation guideline (i.e., water quality objective) has changed.

As a result of the "snapshot" nature of the 303(d) list and the often lengthy intervening time period between an initial listing decision and TMDL development, the Los Angeles Water Board does not depend exclusively on the 303(d) list or the data used in the listing decision when it begins TMDL development. During the initial "problem identification" stage of TMDL development, the Los Angeles Water Board evaluates all available data, including more recent data that was not assessed as part of the 303(d) listing process. In many cases, the Los Angeles Water Board will also collect additional data for a better understanding of the waterbody impairment.

Additionally, due to the large amount of data that needs to be assessed during each update of the 303(d) list, the 303(d) list data evaluations are more general. In particular, these evaluations do not include source assessments; they rely upon existing waterbody delineations without further subdivision (e.g., Santa Monica Bay); and they typically do not entail more refined analyses such

as assessing data collected during wet weather and dry weather separately. As Board staff commences TMDL development, these more temporally and spatially refined data assessments are made along with a source analysis. Based on these analyses, staff may propose a finding of no impairment with a recommendation to delist during the next 303(d) cycle, or may refine the defined scope of the impairment to be addressed by the TMDL (e.g., wet weather only). For example, during development of the Dominguez Channel and Los Angeles and Long Beach Greater Harbor Waters Toxic Pollutants TMDL, the diazinon listing for Dominguez Channel was reassessed using additional data and found to no longer be causing an impairment; as a result, the Board did not develop a TMDL for diazinon.

Lastly, delisting a waterbody/pollutant combination from the 303(d) list does not result in any change to existing TMDLs adopted by the Los Angeles Water Board or established by the U.S. EPA. TMDLs developed to address the previously listed impairment remain as regulations in the Region's Basin Plan. Nor does a delisting negate requirements to implement TMDL wasteload allocations (WLAs) and load allocations in NPDES permits, Waste Discharge Requirements (WDRs), waivers of WDRs, or any other State or Regional Water Board orders (e.g., Time Schedule Orders, Clean-up and Abatement Orders). NPDES permits must include effluent limitations to implement available WLAs from TMDLs, and NPDES permits, WDRs and waivers of WDRs must be consistent with applicable state and regional water quality control plans, including the Region's Basin Plan. Thus, WLAs and load allocations assigned to dischargers/permittees still apply and permittees must comply with permit provisions, including water quality based effluent limitations, that have been incorporated into discharge permits to implement these TMDL allocations. A change to a permit provision required by a TMDL must be preceded by a change to the TMDL. An action to revise a TMDL is a separate, independent and administratively different action from the Water Boards' action to approve the 303(d) list.

The Los Angeles Water Board often reconsiders TMDLs and, if warranted, a TMDL may be revised to eliminate a waterbody/pollutant combination from the TMDL. For example, during the reconsideration of the Ballona Creek Estuary Toxics TMDL and Ballona Creek Metals TMDL, selenium data was reassessed and selenium was found to no longer be causing an impairment; as a result, the selenium TMDL and the associated targets and allocations were eliminated. However, the Board exercises caution when making such a decision, since the purpose of a TMDL is to ensure attainment of water quality standards and, thus, maintaining the detailed program of implementation established in the TMDL is often beneficial.

2.5 2010 303(d) List of Impaired Waters

The 2010 303(d) list was adopted by the Los Angeles Water Board on July 16, 2009, in Resolution No. R09-004; adopted by the State Water Board on August 4, 2010, in Resolution No. 2010-0040; and approved by the USEPA on October 11, 2011. The 2010 list included data submitted through February 28, 2007. The 2010 303(d) list is the most recent list which included updates from the Los Angeles Region.

2.6 Changes to California's Integrated Report 303(d) and 305(b) Process

In February 2013, the State Water Board announced a new strategy for the development of the State's Integrated Report including establishing three groups of Regional Water Boards and submitting an Integrated Report for one group per listing cycle (i.e. every two years). This strategy was formally described in an *Integrated Report Update Memo* in November 2013 (SWRCB, 2013). The Listing Policy was amended to reflect this and other changes on February 3, 2015.

Therefore, the 2012 Integrated Report consisted of data submitted for the North Coast Regional Water Quality Control Board (Region 1), the Lahontan Regional Water Quality Control Board (Region 6), and the Colorado River Basin Regional Water Quality Control Board (Region 7). On July 30, 2015, the USEPA issued its final decision this update to the 303(d) list and this 2012 303(d) list replaced the 2010 303(d) list as California's current 303(d) list.

The Central Coast Regional Water Quality Control Board (Region 3), the Central Valley Regional Water Quality Control Board (Region 5), and the San Diego Regional Water Quality Control Board (Region 9) recently approved Integrated Reports including a 303(d) list for their respective regions. Region 9 approved its 303(d) list in October 2016 and Regions 3 and 5 approved their 303(d) lists in December 2016. These updates to the 303(d) list were to be approved by the State Water Board as the 2014 303(d) list.

The 2016 Integrated Report will consist of data for the San Francisco Bay Regional Water Quality Control Board (Region 2), the Los Angeles Water Board (Region 4), and the Santa Ana Regional Water Quality Control Board (Region 8). Each of these Regions is expected to approve their lists by April 2017. Until the 2014 and 2016 303(d) list updates are approved by the USEPA, the current list is the 2012 303(d) list.

Due to the volume of data received during the 2010 data solicitation period, the State Water Board determined that no additional data would be solicited or analyzed until all the 2010 data are assessed. Each of the 2012, 2014 and 2016 303(d) lists have assessed only data from the 2010 data solicitation.

In addition, changes to the procedures included in the February 2015 amendment to the Listing Policy, included a requirement that all data be submitted to the California Environmental Data Exchange Database (CEDEN); this change will significantly improve the efficiency of the listing and delisting process so that even with regional updates only once every six years, California will have a more comprehensive assessment and 303(d) list than in the past. The CEDEN website has a new page dedicated to the 303(d) list: http://www.ceden.org/303d_list.shtml.

The data solicitation for the 2018 303(d) list was released on November 3, 2016. The 2018 303(d) list will address Regions 1, 6, and 7.

The Los Angeles Water Board will develop its next Integrated Report, including an updated 303(d) list, in 2022. Los Angeles Water Board staff estimates that the 2022 303(d) list will include data submitted through 2021.

2.7 Public Review and Board Approval of the 2016 303(d) List

Pursuant to section 6.2 of the Listing Policy, waterbodies listed in Category 4a, 4b, or 5, which make up the 303(d) list, are subject to public review and approval by the Los Angeles Water Board. Waterbodies listed in Categories 1, 2, 3, or 4c are provided to the public and to the Los Angeles Water Board as additional waterbody information. All categories will be submitted to the State Water Board for inclusion into the California Integrated Report. Once compiled, the State Water Board will provide public notice of the California Integrated Report for additional public review prior to approval by the State Water Board, as outlined in section 6.3 of the Listing Policy. Waterbodies in Categories 4a, 4b, and 5 will be considered for inclusion in the California 303(d) list.

It is anticipated that the State Water Board will approve the 2014 list updates of Regional 3, 5 and 9 and the 2016 list updates of Regions 2, 4, and 8, during the same State Water Board hearing in 2017.

The California 303(d) list will require final approval by USEPA. If USEPA determines that changes are needed to the submitted report they will initiate further public review before finalizing and publishing the report.

3. Development of the 2016 Los Angeles Region 303(d) List

This section provides a review of the data analysis for the Los Angeles Region's 2016 Integrated Report.

3.1 Data Solicitation for the 2016 303(d) List

In January of 2010, the State Water Board solicited data from the public with a formal "Notice of Public Solicitation of Water Quality Data and Information for the California Integrated Report" (Notice), which was sent to interested persons subscribed to the State Water Board's Integrated Report e-mail distribution list. In addition, the Los Angeles Water Board sent the notice to persons subscribed to the Los Angeles Water Board's Basin Plan Amendments and TMDL e-mail distribution lists. Data used as part of the 2016 Integrated Report were received through August 30, 2010. Data sources include government agencies, municipalities, environmental groups, citizen groups, receiving water data from the National Pollutant Discharge Elimination System (NPDES) dischargers and data collected by the Regional and State Water Boards under the Surface Water Ambient Monitoring Program (SWAMP).

All data and information submitted are available as part of the electronic administrative record (Appendix ~~H~~J). Data and information pertaining to specific waterbody-pollutant assessments are provided in the fact sheets (Appendix ~~G~~I) and link directly to the administrative record.

3.2 Data Processing and Analysis

All readily available data and information in the administrative record was considered in the development of the 2016 Integrated Report. However, only high-quality data supported by a Quality Assurance Project Plan was used to make determinations of water quality standards attainment. In the absence of quality assurance documentation, data is used only as supporting evidence and is not the basis of a listing decision.

Fact sheets and overall beneficial use support determinations were developed in the California Water Quality Assessment (CalWQA) database. Lines of evidence (LOE) summarize: water quality data, information pertaining to where and when the water quality monitoring took place, the pollutant sampled, the beneficial use affected, the water quality objective or guideline protective of the beneficial use, the number of samples collected, and how many samples exceeded the objective or guideline. Potential sources are identified in fact sheets in some cases, otherwise, the potential source was marked “Source Unknown”.

Data were aggregated by waterbody segment following the requirements of Section 6.1.5.4 of the Listing Policy, and assessments were performed on the individual segments. Waterbodies were segmented to account for hydrologic features.
Spatial and temporal representation of data was assessed using the requirements and guidance of the Listing Policy. The available data were used to represent concentrations during the averaging period associated with the particular pollutant and water quality objective, as required by Section 6.1.5.6 of the Listing Policy. For example, if only one data point was available during a 4-day period, it was used to represent the four-day average concentration for that period.

Following data assessment, Los Angeles Water Board staff determined whether or not the waterbody was attaining relevant water quality standards. Decision recommendations were completed to summarize all relevant LOEs for a waterbody-pollutant combination and, based on the statistical evaluation described in the Listing Policy, to state if the exceedances of water quality standards constituted an impairment of a beneficial use and, thus, necessitated a 303(d) listing.

3.3 Water Quality Standards Used in the Data Assessment

Beneficial uses for waters in the Los Angeles Region are identified in Table 2-1, 2.1a and 2.3 of the Los Angeles Regional Water Quality Control Plan (Basin Plan).

Water Board staff assessed data using regulatory limits when available. The most common regulatory limits used include water quality objectives in the Basin Plan or any statewide Water Quality Control Plans applicable to the waterbody, including objectives for toxic chemicals promulgated by the USEPA under the California Toxics Rule (40 CFR §131.38). When numeric

regulatory limits were not available, evaluation guidelines were considered to interpret narrative water quality objectives. Evaluation guidelines are selected in conformance with section 6.1.3 of the Listing Policy.

3.4 Determination of Beneficial Use Support and Integrated Report Categories

To meet CWA Section 305(b) requirements of reporting on water quality conditions, the Integrated Report places each assessed waterbody segment into one of five non-overlapping categories based on the overall beneficial use support of the water segment and the need for a TMDL. Water segments were evaluated for at least one of six "core" beneficial uses including: municipal and domestic supply, aquatic life support, fish consumption, shellfish harvesting, contact recreation, and non-contact recreation. 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 assessment of readily available data and information.

Table 2. Los Angeles Integrated Report Waterbody Categories, 2016 303(d) List

Category	Description	Waterbody Segments
1	All assessed beneficial uses supported and no beneficial uses known to be impaired.	~~38~~57
2	There is insufficient information to determine beneficial use support.	~~55~~54
3	There is insufficient data and/or information to make a beneficial use support determination but information and/or data indicates beneficial uses may be potentially threatened.	~~13~~12
4	At least one beneficial use is not supported but TMDL is not needed.	
4a	A TMDL has been developed and approved by U.S.EPA for any waterbody-pollutant combination and the approved implementation plan is expected to result in full attainment of the water quality standard within a specified time frame.	~~77~~80
4b	Another regulatory program is reasonably expected to result in attainment of the water quality standard within a reasonable, specified time frame.	~~0~~4
4c	The non-attainment of any applicable water quality standard for the waterbody segment is the result of pollution and is not caused by a pollutant.	**3**
5	At least one beneficial use is not supported and a TMDL is needed.	~~134~~132
Total Waterbodies Assessed		~~320~~342

Detailed Category Reports can be found in Appendices B-~~F~~H.

Pursuant to Section 2 of the Listing Policy, waterbodies remain in Category 5 until all 303(d)-listed pollutants are addressed by USEPA-approved TMDLs or by another regulatory program that is expected to result in the reasonable attainment of the water quality standards, at which point the waterbody will be placed into Category 4a or 4b. Impaired waters are placed in Category 4c if the impairment is not caused by a pollutant but rather caused by pollution, such as flow alteration or habitat alteration. Waterbodies placed in Category 4c are not included as part of the 303(d) list and do not require the development of a TMDL.

Waterbody-pollutant combinations listed in Category 5 (Appendix B) show the TMDL requirement status. If a "TMDL is still needed" for the waterbody-pollutant combination, the TMDL requirement status is labeled 5A. If the waterbody-pollutant combination is "being addressed by a USEPA approved TMDL", the TMDL requirement status is labeled 5B. If the waterbody-pollutant combination is "being addressed by an action other than a TMDL", the TMDL requirement status is labeled 5C. These labels were created for internal tracking and are not Integrated Report sub-categories required by the USEPA.

4. Proposed Changes to the Section 303(d) List

While, due to the changes to the 303(d) process described in Section 2.5, data review was restricted to data collected prior to September 2010, a significant number of changes to the Los Angeles Region's 303(d) list are proposed. The ~~211~~ 153 proposed new listings include:

- Additional PCB and pesticide listings arising from California's Surface Water Ambient Monitoring Program (SWAMP) water quality sampling conducted in 2009 focusing on lakes and reservoirs. For example, staff has proposed new listings for Castaic Lake (PCBs), Pyramid Lake (chlordane, dieldrin, DDT and PCBs) and Echo Park Lake (dieldrin).

- Additional pesticide and other pollutant listings in Ventura County waters draining agricultural lands including the Santa Clara Drain, Tapo Canyon, Wheeler Canyon and Boulder Cove, arising from the Ventura County Agricultural Irrigated Lands Group water quality monitoring.

- Additional toxicity listings in the Los Angeles River arising from water quality sampling conducted the City of Los Angeles' Bureau of Sanitation, required pursuant to the City's NPDES permits.

- Various other proposed listings arising from special studies or ongoing water quality monitoring programs.

Most of the proposed new listings are new waterbody segment-pollutant combinations where a TMDL will be needed. These waterbodies would then be in Category 5. However, several of

the proposed new listings identify additional impairments in watersheds already being addressed by a TMDL for that pollutant. For example, the proposed new listings for mercury in Calleguas Creek Reach 3 and the proposed DDT listings in Hondo Barranca are being addressed by the Calleguas Creek Metals TMDL and the Organochlorine Pesticides, PCBs and Siltation TMDL. In addition, the proposed Los Angeles River Reach 3 indicator bacteria listing is already being addressed by the Los Angeles River Bacteria TMDL. These waterbodies would then be in Category 4a unless another waterbody pollutant combination requires a TMDL such that the waterbody would remain in Category 5.

The proposed ~~48~~ 54 delistings include:

- Several proposed delistings for indicator bacteria at Santa Monica Beaches, including Abalone Cove Beach, Bluff Cove Beach, Outer Cabrillo Beach, Manhattan Beach and Hermosa Beach. It is important to note that the Santa Monica Bay Bacteria TMDL remains in effect for those beaches even if the delistings are fully approved.

- Various other proposed delistings arising from special studies or ongoing water quality monitoring programs.

In a number of cases, in both fresh and marine waters, listings for "coliform bacteria" were renamed "indicator bacteria" based on USEPA's recommendation and for statewide consistency.

In addition, because 21 TMDLs including 252 listings, have gone into effect since the development of the 2010 303(d) list, a number of Category changes are proposed to change waterbody-pollutant combinations from "requiring a TMDL" (Category 5A) to "being addressed by a USEPA approved TMDL" (Category 5B or, if all waterbody-pollutant combinations have been addressed for that waterbody, Category 4a).

For detailed information on proposed changes, refer to the waterbody-pollutant "fact sheets" in Appendix I~~G~~.

As discussed in Section 2.6, it is anticipated that the State Water Board will approve the 2014 list updates of Regions 3, 5 and 9 and the 2016 list updates of Regions 2, 4, and 8, during the same State Water Board hearing in 2017. Table 3, below, shows the 303(d) list changes approved by Regional Water Boards 3, 5 and 9 and the 303(d) list changes proposed, at this time, for approval by the staff of Regional Water Boards 2, 4, and 8.

Table 3. Summary of 2014 and 2016 Changes to the California 2012 303(d) List

2014-2016 INTEGRATED REPORT						
REGION	2012 303(d) LIST	2014 and 2016 303(d) List proposed changes				
	Total 303(d) Listings (Categories 4a, 4b and 5)	Regional Water Board 303(d) Listing Recommendations		Miscellaneous Changes*		Total proposed 303(d) Listings (Categories 4a, 4b and 5)
		New Listings	New Delisting	Resulting in Listings	Resulting in Delistings	
1	159	0	0	0	0	159
2	333	~~41~~30	7	0	~~9~~10	~~358~~346
3	712	269	~~48~~47	0	23	~~910~~911
4	823	~~211~~153	~~48~~54	0	0	~~986~~922
5	730	269	45	0	0	954
6	155	0	0	0	0	155
7	68	0	0	0	0	68
8	132	~~31~~28	~~16~~18	0	0	~~147~~142
9	445	~~244~~243	~~14~~17	0	0	~~675~~671
Totals	3557	~~1065~~992	~~178~~188	0	~~32~~33	~~4412~~4328

*Miscellaneous changes include adjustments to the 303 (d) list when waterbody reaches are combined or split resulting in a decrease or increase in the number of listings.

5. References

For a complete list of references used in all the assessment fact sheets, see Appendix ~~H~~J.

SWRCB. (2004a). *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List* (amended February 3, 2015). Sacramento, CA.

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U.S. EPA. (2015). *Information Concerning 2016 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Report and Listing Decisions* (Memorandum dated August 13, 2015). Washington, D.C.

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	Abalone Cove Beach	DDT (Dichlorodiphenyltrichloroethane)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Alamitos Bay	Indicator Bacteria				
		Oxygen, Dissolved	Y			
4	Alhambra Wash	Ammonia	Y			
		Benthic Community Effects	Y			
4	Aliso Canyon Wash	Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
4	Alondria Park Lake	PCBs (Polychlorinated biphenyls)	Y			
4	Amarillo Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Arroyo Seco Reach 1 (LA River to West Holly Ave.)	Benthic Community Effects				
		Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				
4	Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam)	Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				
4	Artesia-Norwalk Drain	Indicator Bacteria				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
4	Arundell Barranca (Ventura County)	Indicator Bacteria	Y			
4	Ashland Avenue Drain	Indicator Bacteria			Y	

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Organic Enrichment/Low Dissolved Oxygen				
		Toxicity				
4	Avalon Beach	Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Balboa Lake	Ammonia	Y			
		Oxygen, Dissolved	Y			
		Toxicity	Y			
4	Ballona Creek	~~Cadmium~~		Y		
		ChemA				
		Chlordane				
		Copper				
		Cyanide				
		DDT (Dichlorodiphenyltrichloroethane)				
		Dieldrin				
		Indicator Bacteria			Y	
		Lead				
		PCBs (Polychlorinated biphenyls)			Y	
		~~Selenium~~		Y		
		Silver			Y	
		Toxicity				
		Trash				
		Viruses (enteric)				
		Zinc				
		pH				
4	Ballona Creek Estuary	Cadmium				
		Chlordane			Y	
		Copper				
		DDT (Dichlorodiphenyltrichloroethane)			Y	
		Indicator Bacteria			Y	
		Lead			Y	
		PAHs (Polycyclic Aromatic Hydrocarbons)			Y	
		PCBs (Polychlorinated biphenyls)			Y	
		Silver				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Toxicity			Y	There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Zinc			Y	
4	Ballona Creek Wetlands	Exotic Vegetation				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Habitat alterations				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Hydromodification				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Reduced Tidal Flushing				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				
4	Bell Creek	Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Big Rock Beach	Coliform Bacteria				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Bluff Cove Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Boulder Creek (Ventura County)	Bifenthrin	Y			
		Toxicity	Y			
4	Brown Barranca/Long Canyon	Nitrate and Nitrite				
4	Bull Creek	Indicator Bacteria				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Bull Creek (Los Angeles County)	Ammonia	Y			
		Toxicity	Y			
4	Burbank Western Channel	Ammonia				
		Cadmium				
		Copper				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Cyanide				
		Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				
		Scum/Foam-unnatural				
		Selenium				
		Taste and odor				
		Trash				
4	Cabrillo Beach (Outer)	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)	Chlordane (tissue)				
		Copper				
		DDT (tissue & sediment)				
		Dieldrin				
		Endosulfan (tissue)				
		Mercury				
		Nickel				
		Nitrogen				
		PCBs (Polychlorinated biphenyls) (tissue)				
		Sedimentation/Siltation				
		Toxaphene				
		Toxicity			Y	
		Zinc				
4	Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)	Ammonia				
		ChemA				
		Chlordane			Y	
		Copper				
		DDT (Dichlorodiphenyltrichloroethane)				
		Dieldrin				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Endosulfan			Y	
		Indicator Bacteria				
		Nitrogen				
		PCBs (Polychlorinated biphenyls)				
		Sedimentation/Siltation				
		Toxaphene			Y	
		Toxicity				
		Trash				
4	Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)	Ammonia				
		Chlordane				
		Chloride				
		DDT (Dichlorodiphenyltrichloroethane)				
		Dieldrin				
		Indicator Bacteria	Y			
		Nitrate and Nitrite				
		PCBs (Polychlorinated biphenyls)				
		Sedimentation/Siltation				
		Total Dissolved Solids				
		Toxaphene				
		Trash				
4	Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)	Boron				
		ChemA (tissue)				
		Chlordane (tissue & sediment)				
		Chlorpyrifos (tissue)			Y	
		Diazinon				
		Dieldrin (tissue)				
		Endosulfan (tissue & sediment)			Y	
		Excess Algal Growth				
		Fecal Coliform			Y	
		Nitrate as Nitrate (NO3)				
		Nitrogen				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		PCBs (Polychlorinated biphenyls) (tissue)				
		Sedimentation/Siltation				
		Selenium				
		Sulfates				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Total DDT (sum of 4,4'- and 2,4'- isomers of DDT, DDE, and DDD)			Y	
		Total Dissolved Solids				
		Toxaphene (tissue & sediment)				
		Toxicity				
		Trash				
4	Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)	ChemA (tissue)				
		Chlordane (tissue & sediment)				
		Chlorpyrifos (tissue)				
		DDT (tissue & sediment)				
		Dacthal (sediment)				
		Diazinon				
		Dieldrin (tissue)				
		Endosulfan (tissue & sediment)				
		Excess Algal Growth				
		Nitrogen				
		PCBs (Polychlorinated biphenyls) (tissue)				
		Sedimentation/Siltation				
		Toxaphene (tissue & sediment)				
		Toxicity				
		Trash				
4	Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)	Ammonia				
		Chlordane				
		Chloride				
		Chlorpyrifos				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		DDT (sediment)				
		Diazinon				
		Dieldrin				
		Indicator Bacteria			Y	
		Nitrate and Nitrite				
		Nitrate as Nitrate (NO3)				
		Sedimentation/Siltation				
		Sulfates				
		Total Dissolved Solids				
		Toxicity				
4	Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)	Ammonia				
		Boron				
		Chloride				
		Chlorpyrifos				
		Diazinon				
		Indicator Bacteria				
		Organophosphorus Pesticides				
		Sedimentation/Siltation				
		Sulfates				
		Total Dissolved Solids				
		Toxicity				
		Trash				
4	Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)	Boron				
		Chlordane				
		Chloride				
		Chlorpyrifos				
		DDT (Dichlorodiphenyltrichloroethane)				
		Diazinon				
		Dieldrin				
		PCBs (Polychlorinated biphenyls)				
		Sedimentation/Siltation				
		Sulfates				
		Total Dissolved Solids				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Toxaphene				
4	Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)	ChemA (tissue)				
		Chlordane (tissue)				
		Chlorpyrifos				
		DDT (tissue)				
		Diazinon				
		Dieldrin (tissue)				
		Endosulfan (tissue)				
		Excess Algal Growth				
		Indicator Bacteria			Y	
		Lindane/gamma-Hexachlorocyclohexane (gamma-HCH) (tissue)				
		Nitrate as Nitrate (NO3)				
		Nitrogen, Nitrate				
		Nitrogen, Nitrite	Y			TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls) (tissue)				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene (tissue & sediment)				
		Toxicity				
		Trash				
4	Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)	Ammonia				
		ChemA (tissue)				
		Chlordane				
		Chloride				
		Chlorpyrifos				
		DDT (tissue)				
		Diazinon				
		Dieldrin				
		Endosulfan (tissue)				
		Excess Algal Growth				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene (tissue & sediment)				
		Toxicity				
		Trash				
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)	Ammonia				
		ChemA (tissue)				
		~~Chlordane~~		Y		
		Chloride				
		Chlorpyrifos				
		DDT (tissue)				
		Diazinon				
		Dieldrin				
		~~Endosulfan (tissue)~~		Y		
		Excess Algal Growth				
		Indicator Bacteria			Y	
		Malathion	Y			
		Nitrogen, Nitrite				
		PCBs (Polychlorinated biphenyls)				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene (tissue & sediment)				
		Toxicity				
		Trash				
4	Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)	Ammonia				
		ChemA (tissue)				
		Chlordane				
		DDT (tissue)				
		Dieldrin				
		Endosulfan (tissue)				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Excess Algal Growth				
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				
		Sedimentation/Siltation				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene (tissue & sediment)				
		Toxicity				
4	Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)	~~Ammonia~~		Y	Y	
		Chlordane (tissue)				
		Chlorpyrifos	Y			
		DDT (tissue)			Y	
		Diazinon	Y			
		Dieldrin				
		Malathion	Y			
		PCBs (Polychlorinated biphenyls)				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene				
4	Calleguas Creek Reach 13 (Conejo Creek South Fork, was Conejo Cr Reach 4 and part of Reach 3 on 1998 303d list)	Ammonia				
		ChemA (tissue)				
		Chlordane				
		Chloride				
		DDT (tissue)				
		Dieldrin				
		Endosulfan (tissue)				
		Excess Algal Growth				
		PCBs (Polychlorinated biphenyls)				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene (tissue & sediment)				
		Toxicity				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	Canada Larga (Ventura River Watershed)	Indicator Bacteria			Y	
		Oxygen, Dissolved			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Total Dissolved Solids				
4	Carbon Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Casitas, Lake	Mercury				
4	Castaic Lagoon	PCBs (Polychlorinated biphenyls)	Y			
4	Castaic Lake	Mercury				
		PCBs (Polychlorinated biphenyls)	Y			
4	Castlerock Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Channel Islands Harbor	Lead			Y	
		Zinc			Y	
4	Channel Islands Harbor Beach	Indicator Bacteria			Y	
4	Colorado Lagoon	Chlordane			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Dieldrin			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		Lead			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PAHs (Polycyclic Aromatic Hydrocarbons)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Zinc			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Compton Creek	Benthic Community Effects			Y	
		Copper				
		Indicator Bacteria				
		Iron	Y			
		Lead				
		Trash				
		Zinc	Y			
		pH				
4	Coyote Creek	Abnormal Fish Histology (Lesions)				
		~~Ammonia~~		Y		
		Copper, Dissolved				
		~~Diazinon~~		Y		
		Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Iron	Y			
		~~Lead~~		Y		
		Malathion	Y			
		Toxicity				
		Zinc				
		pH				
4	Coyote Creek, North Fork	Indicator Bacteria				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
4	Crystal Lake	Organic Enrichment/Low Dissolved Oxygen				
4	Dan Blocker Memorial (Coral) Beach	Indicator Bacteria			Y	
4	Dockweiler Beach	Beach Closures				
		Indicator Bacteria			Y	
4	Dominguez Channel (lined portion above Vermont Ave)	Aldrin				
		~~Ammonia~~		Y	Y	
		ChemA				
		Chlordane				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Chromium			Y	
		Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)				
		~~Diazinon~~		Y		TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Dieldrin			Y	
		Indicator Bacteria			Y	
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PAHs (Polycyclic Aromatic Hydrocarbons)				
		PCBs (Polychlorinated biphenyls)				
		Toxicity				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Zinc				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Dominguez Channel Estuary (unlined portion below Vermont Ave)	Aldrin				
		~~Ammonia~~		Y	Y	
		Benthic Community Effects				
		Benzo(a)anthracene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Benzo(a)pyrene (3,4-Benzopyrene -7-d)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		ChemA				
		Chlordane (tissue)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chromium (total)				
		Chrysene (C1-C4)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Copper	Y			
		DDT (tissue & sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Dieldrin (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PAHs (Polycyclic Aromatic Hydrocarbons)				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Phenanthrene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Pyrene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Zinc (sediment)~~		Y	Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Downtown Shoreline Marina (part of San Pedro Bay Near/Off Shore Zones)	Copper	Y			
		Oxygen, Dissolved	Y			
4	Dry Canyon Creek	Indicator Bacteria			Y	
		Selenium, Total				
4	Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	Bifenthrin	Y			
		ChemA			Y	
		Chlordane				
		Chlorpyrifos	Y			
		DDD (Dichlorodiphenyldichloroethane)	Y			
		DDE (Dichlorodiphenyldichloroethylene)	Y			
		DDT (Dichlorodiphenyltrichloroethane)				
		Nitrogen				
		Toxaphene				
		Toxicity				
4	Echo Park Lake	Algae				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Ammonia~~		Y		
		Chlordane	Y			
		~~Copper~~		Y		
		Dieldrin	Y			

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Eutrophic				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Lead~~		Y		
		Odor				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		pH				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	El Dorado Lakes	Algae				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Ammonia				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Eutrophic				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Mercury (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		pH				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Elderberry Forebay	Dieldrin	Y			
		PCBs (Polychlorinated biphenyls)	Y			
4	Elizabeth Lake	Eutrophic				
		Organic Enrichment/Low Dissolved Oxygen				
		Trash				
		pH				
4	Ellsworth Barranca	Chlorpyrifos	Y			
		DDE (Dichlorodiphenyldichloroethylene)	Y			
4	Escondido Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Flat Rock Point Beach Area	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Fox Barranca (tributary to Calleguas Creek Reach 6)	Boron				
		Chlordane	Y			
		DDE (Dichlorodiphenyldichloroethylene)	Y			
		DDT (Dichlorodiphenyltrichloroethane)	Y			
		Nitrate and Nitrite				
		Sulfates				
		Total Dissolved Solids				
4	Hermosa Beach	~~Indicator Bacteria~~		Y	Y	
4	Hobie Beach (Channel Islands Harbor)	Indicator Bacteria			Y	
4	Honda Barranca	Bifenthrin	Y			
		Chlordane	Y			
		Chlorpyrifos	Y			
		DDD (Dichlorodiphenyldichloroethane)	Y			
		DDT (Dichlorodiphenyltrichloroethane)	Y			
4	Hopper Creek	Sulfates				
		Total Dissolved Solids				
4	Hueneme Drain	Escherichia coli (E. coli)	Y			
		Trash	Y			
4	Inspiration Point Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	J Street Drain (Ventura County)	Trash	Y			
4	Javon Canyon	Benthic Community Effects	Y			
		Selenium	Y			

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	La Costa Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Lake Calabasas	Ammonia				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)			Y	
		Eutrophic				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Odor				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Organic Enrichment/Low Dissolved Oxygen				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		pH				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Lake Hughes	Algae				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Eutrophication			Y	There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		~~Fish Kills~~		Y		
		Odor				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Trash				
4	Lake Lindero	Algae				
		Chloride				
		Eutrophic				
		Odor				
		Selenium				
		Specific Conductivity				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Lake Sherwood	Algae				
		~~Ammonia~~		Y	Y	
		Eutrophic				
		Mercury (tissue)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Organic Enrichment/Low Dissolved Oxygen~~		Y	Y	
4	Las Flores Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Las Tunas Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Las Virgenes Creek	Benthic Community Effects			Y	
		Indicator Bacteria			Y	
		Invasive Species				
		Nutrients (Algae)				
		Organic Enrichment/Low Dissolved Oxygen			Y	
		Scum/Foam-unnatural				
		Sedimentation/Siltation				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Legg Lake	Ammonia				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)	Y			

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Odor				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)	Y			
		Trash				
		pH				
4	Leo Carillo Beach (South of County Line)	~~Indicator Bacteria~~		Y	Y	
4	Lincoln Park Lake	Ammonia				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Eutrophic				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Lead~~		Y		
		Odor				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Organic Enrichment/Low Dissolved Oxygen				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)	Y			
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Lindero Creek Reach 1	Algae				
		Benthic Community Effects				
		Indicator Bacteria			Y	
		Invasive Species				
		Scum/Foam-unnatural				
		Selenium				
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Lindero Creek Reach 2 (Above Lake)	Algae				
		Indicator Bacteria			Y	
		Scum/Foam-unnatural				
		Selenium				
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Long Beach City Beach	Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	Long Point Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Los Angeles Harbor - Cabrillo Marina	Benzo(a)pyrene (3,4-Benzopyrene -7-d)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Los Angeles Harbor - Consolidated Slip	2-Methylnaphthalene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Benthic Community Effects				
		Benzo(a)anthracene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Benzo(a)pyrene (3,4-Benzopyrene -7-d)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Cadmium (sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chlordane (tissue & sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chromium				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chrysene (C1-C4)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Copper (sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (tissue & sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Dieldrin				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead (sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Mercury (sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Nickel				
		PAHs (Polycyclic Aromatic Hydrocarbons)				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		PCBs (Polychlorinated biphenyls) (tissue & sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Phenanthrene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Pyrene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxaphene (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Zinc (sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Los Angeles Harbor - Fish Harbor	Benzo(a)anthracene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Benzo(a)pyrene (3,4-Benzopyrene -7-d)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chlordane				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chrysene (C1-C4)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Dibenz[a,h]anthracene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Mercury				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PAHs (Polycyclic Aromatic Hydrocarbons)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Phenanthrene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Pyrene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Zinc				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Los Angeles Harbor - Inner Cabrillo Beach Area	Beach Closures				
		Copper				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Los Angeles River Estuary (Queensway Bay)	Chlordane				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (sediment)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead (sediment)				
		PCBs (Polychlorinated biphenyls) (sediment)				
		Toxicity			Y	
		Trash				
		Zinc				
4	Los Angeles River Reach 1 (Estuary to Carson Street)	Aluminum				
		Ammonia				
		Cadmium				
		Copper, Dissolved				
		Cyanide				
		~~Diazinon~~		Y		
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				
		Nutrients (Algae)				
		Scum/Foam-unnatural				
		Trash				
		Zinc, Dissolved				
		pH				
4	Los Angeles River Reach 2 (Carson to Figueroa Street)	Ammonia				
		Copper				

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		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				
		Nutrients (Algae)				
		Oil				
		Scum/Foam-unnatural				
		Taste and odor				
		Trash				
4	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	Ammonia			Y	
		Copper				
		Indicator Bacteria	Y			
		~~Lead~~		Y		
		Nutrients (Algae)				
		Scum/Foam-unnatural				
		Taste and odor				
		Toxicity	Y			
		Trash				
4	Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)	~~Ammonia~~		Y	Y	
		Benthic Community Effects	Y			
		~~Copper~~		Y		
		Indicator Bacteria			Y	
		~~Lead~~		Y		
		Nutrients (Algae)				
		Scum/Foam-unnatural				
		Taste and odor				
		Toxicity	Y			
		Trash				
4	Los Angeles River Reach 5 (within Sepulveda Basin)	Ammonia			Y	
		Copper				
		Lead				
		Nutrients (Algae)				
		Oil				
		Scum/Foam-unnatural				
		Taste and odor				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Toxicity	Y			
		Trash				
4	Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	1,1-Dichloroethylene (DCE)/ Vinylidene Chloride				
		Copper	Y			
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Tetrachloroethylene/PCE				
		Toxicity	Y			
		Trichloroethylene/TCE				
4	Los Angeles/Long Beach Inner Harbor	~~Beach Closures~~		Y		
		Benthic Community Effects				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Benzo(a)pyrene (3,4-Benzopyrene -7-d)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chrysene (C1-C4)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PAHs (Polycyclic Aromatic Hydrocarbons)				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Zinc				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Los Angeles/Long Beach Outer Harbor (inside breakwater)	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PAHs (Polycyclic Aromatic Hydrocarbons)				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	Los Cerritos Channel	Ammonia				
		Bis(2ethylhexyl)phthalate (DEHP)				
		Chlordane (sediment)				
		Copper				
		Indicator Bacteria			Y	
		Lead				
		Trash				
		Zinc				
		pH				
4	Los Sauces Creek	Selenium	Y			
4	Lunada Bay Beach	Beach Closures				
		Indicator Bacteria				
4	Machado Lake (Harbor Park Lake)	Algae				
		Ammonia				
		ChemA			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chlordane (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Dieldrin (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Eutrophic				
		Odor				
		PCBs (Polychlorinated biphenyls) (tissue)				
		Trash				
4	Madranio Canyon	Benthic Community Effects	Y			
		Copper	Y			
		Selenium	Y			
4	Malaga Cove Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y		
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Malibou Lake	Algae				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Dieldrin	Y			
		Eutrophic				
		Organic Enrichment/Low Dissolved Oxygen				
4	Malibu Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
4	Malibu Creek	Benthic Community Effects			Y	
		Fish Barriers (Fish Passage)				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Indicator Bacteria			Y	
		Invasive Species				
		Nutrients (Algae)				
		Scum/Foam-unnatural				
		Sedimentation/Siltation				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Sulfates				
		Toxicity	Y			
		Trash				
4	Malibu Lagoon	Benthic Community Effects				
		Eutrophic				
		Indicator Bacteria			Y	
		Swimming Restrictions				
		Viruses (enteric)				
		pH				
4	Malibu Lagoon Beach (Surfrider)	Beach Closures				
		Coliform Bacteria				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Manhattan Beach	~~Indicator Bacteria~~		Y	Y	

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	Marina del Rey Harbor - Back Basins	Chlordane			Y	There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Copper			Y	
		DDT (Dichlorodiphenyltrichloroethane)			Y	
		Dieldrin			Y	
		Indicator Bacteria				
		Lead			Y	
		Oxygen, Dissolved	Y			
		PCBs (Polychlorinated biphenyls)			Y	
		Toxicity			Y	
		Zinc			Y	
4	Marina del Rey Harbor Beach	Indicator Bacteria			Y	
4	Matilija Creek Reach 1 (Jct. With N. Fork to Reservoir)	Fish Barriers (Fish Passage)				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
4	Matilija Creek Reach 2 (Above Reservoir)	Fish Barriers (Fish Passage)				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
4	Matilija Reservoir	Fish Barriers (Fish Passage)				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
4	McCoy Canyon Creek	Indicator Bacteria			Y	
		Nitrate				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Nitrogen, Nitrate				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium, Total				
4	McGrath Beach	Indicator Bacteria			Y	
4	McGrath Lake	Chlordane			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (Dichlorodiphenyltrichloroethane)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Dieldrin (sediment)				
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls) (sediment)				
		Toxicity			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Medea Creek Reach 1 (Lake to Confl. with Lindero)	Algae				
		Benthic Community Effects	Y			
		Indicator Bacteria			Y	
		Sedimentation/Siltation				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Medea Creek Reach 2 (Abv Confl. with Lindero)	Algae				
		Benthic Community Effects			Y	
		Indicator Bacteria			Y	
		Invasive Species				
		Sedimentation/Siltation				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Mint Canyon Creek Reach 1 (Confl to Rowler Cyn)	Nitrate and Nitrite				
4	Monrovia Canyon Creek	Lead				
4	Munz Lake	Eutrophic				
		Trash				
4	Nicholas Canyon Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Ormond Beach	Indicator Bacteria				
4	Ormond Beach Wetlands	Trash	Y			
		pH	Y			
4	Oxnard Drain	Escherichia coli (E. coli)	Y			

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Trash	Y			
		pH	Y			
4	Padre Juan Canyon	Benthic Community Effects	Y			
		Selenium	Y			
4	Palo Comado Creek	Indicator Bacteria			Y	
4	Palo Verde Shoreline Park Beach	Pathogens				
		Pesticides				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Paradise Cove Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Peck Road Park Lake	Chlordane (tissue)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDT (tissue)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Odor				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Organic Enrichment/Low Dissolved Oxygen				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Peninsula Beach	Indicator Bacteria				
4	Piru Creek (from gaging station below Santa Felicia Dam to headwaters)	Chloride				
		Toxicity	Y			
		pH				
4	Point Dume Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Point Fermin Park Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Point Mugu Beach	Indicator Bacteria	Y		Y	
4	Point Vicente Beach	Beach Closures				
		Indicator Bacteria				
4	Pole Creek (trib to Santa Clara River Reach 3)	Sulfates				
		Total Dissolved Solids				
4	Port Hueneme Beach Park	Indicator Bacteria	Y		Y	
4	Port Hueneme Harbor (Back Basins)	Arsenic	Y			
		Cadmium	Y			
		DDT (Dichlorodiphenyltrichloroethane)			Y	
		Dieldrin	Y			
		PAHs (Polycyclic Aromatic Hydrocarbons)	Y			
		PCBs (Polychlorinated biphenyls)			Y	
4	Port Hueneme Pier	PCBs (Polychlorinated biphenyls)				
4	Portuguese Bend Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Potrero Canyon Creek	Oxygen, Dissolved	Y			
4	Promenade Park Beach	~~Indicator Bacteria~~		Y	Y	
4	Puddingstone Reservoir	Chlordane			Y	
		DDT (Dichlorodiphenyltrichloroethane)			Y	
		Mercury			Y	
		Organic Enrichment/Low Dissolved Oxygen				
		PCBs (Polychlorinated biphenyls)			Y	
4	Puente Creek	Indicator Bacteria			Y	
		Selenium				
4	Puerco Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Pyramid Lake	Chlordane	Y			
		DDT (Dichlorodiphenyltrichloroethane)	Y			
		Dieldrin	Y			
		Mercury				
		PCBs (Polychlorinated biphenyls)	Y			
4	Redondo Beach	DDT (Dichlorodiphenyltrichloroethane)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Resort Point Beach	Beach Closures				
		Indicator Bacteria				
4	Rincon Beach	Indicator Bacteria				
4	Rincon Parkway Beach	Indicator Bacteria	Y			
4	Rio De Santa Clara/Oxnard Drain No. 3	ChemA (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chlordane (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		DDD (Dichlorodiphenyldichloroethane)	Y			
		DDE (Dichlorodiphenyldichloroethylene)	Y			
		DDT (tissue)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Nitrogen				
		PCBs (Polychlorinated biphenyls)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxaphene (tissue)				
		Toxicity			Y	
4	Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)	Copper				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				
		Toxicity				
		Trash				
		Zinc				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		pH				
4	Rio Hondo Reach 2 (At Spreading Grounds)	Ammonia				
		Coliform Bacteria				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Cyanide				
4	Robert H. Meyer Memorial Beach	~~Beach Closures~~		Y		
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Rocky Point Beach	Beach Closures				
4	Royal Palms Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Indicator Bacteria~~		Y	Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	San Antonio Creek (Tributary to Ventura River Reach 4)	Indicator Bacteria				
		Nitrogen				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Total Dissolved Solids				
4	San Buenaventura Beach	Indicator Bacteria				
4	San Gabriel River Estuary	Abnormal Fish Histology (Lesions)				
		Copper				
		Dioxin				
		Indicator Bacteria	Y			
		Nickel				
		Oxygen, Dissolved				
4	San Gabriel River Reach 1 (Estuary to Firestone)	Abnormal Fish Histology (Lesions)				
		Excess Algal Growth				
		~~Indicator Bacteria~~		Y	Y	
		Temperature, water	Y			
		Toxicity				
		pH				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam	Copper				
		Cyanide				
		~~Indicator Bacteria~~		Y	Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				
		Temperature, water	Y			
		Zinc				
4	San Gabriel River Reach 3 (Whittier Narrows to Ramona)	Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity				
4	San Gabriel River, East Fork	Benthic Community Effects	Y			
		Trash				
4	San Jose Creek Reach 1 (SG Confluence to Temple St.)	Ammonia				
		Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Temperature, water	Y			
		Total Dissolved Solids				
		Toxicity			Y	
		pH				
		Ammonia				
		Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Selenium				
		Temperature, water	Y			
		Total Dissolved Solids				
		Toxicity			Y	
		pH				
4	San Jose Creek Reach 2 (Temple to I-10 at White Ave.)	Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Excess Algal Growth				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	San Pedro Bay Near/Off Shore Zones	Chlordane				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Chromium			Y	
		Copper			Y	
		PAHs (Polycyclic Aromatic Hydrocarbons)			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Total DDT (sum of 4,4'- and 2,4'- isomers of DDT, DDE, and DDD)			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Zinc			Y	
4	Sanjon Barranca Creek	Escherichia coli (E. coli)	Y			
		Trash	Y			
4	Santa Clara River Estuary	Ammonia	Y			
		ChemA				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Nitrogen, Nitrate				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxaphene				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Toxicity				
		pH	Y			
4	Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)	Oxygen, Dissolved	Y			
		Toxicity				
		Trash	Y			
		pH	Y			
4	Santa Clara River Reach 3 (Freeman Diversion to A Street)	~~Ammonia~~		Y	Y	
		Chloride				
		Escherichia coli (E. coli)	Y			
		Indicator Bacteria	Y			

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Mercury	Y			
		Selenium	Y			
		Total Dissolved Solids				
		Toxicity				
		Trash	Y			
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)	Ammonia			Y	
		Benthic Community Effects	Y		Y	
		Chloride				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Iron				
		Nitrate and Nitrite				
		Trash	Y			
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)	Ammonia				
		Benthic Community Effects	Y			
		Chloride			Y	
		Chlorpyrifos				
		~~Copper~~		Y		
		~~Diazinon~~		Y		
		~~Indicator Bacteria~~		Y	Y	
		~~Iron~~		Y		
		Temperature, water	Y			
		Toxicity				
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)	Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Santa Clara River Reach 10 (Sespe Creek, from confl with Santa Clara River Reach 3 to above gaging station - 500 ft downstream from Little Sespe Cr)	Trash	Y			
4	Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)	Boron				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Specific Conductance				
		Sulfates				
		Total Dissolved Solids				
4	Santa Fe Dam Park Lake	Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		PCBs (Polychlorinated biphenyls)	Y			
		pH				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Santa Monica Bay Offshore/Nearshore	Arsenic	Y			
		Chlordane				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Mercury	Y			
		PAHs (Polycyclic Aromatic Hydrocarbons)				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		~~Toxicity~~		Y	Y	
		Trash			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Santa Monica Beach	Indicator Bacteria			Y	
4	Santa Monica Canyon	Indicator Bacteria				
		Lead				
4	Santa Paula Creek Reach 1 (confluence w Santa Clara River to Diverson Dam)	Trash	Y			
4	Sawpit Creek	Bis(2ethylhexyl)phthalate (DEHP)				
		~~Indicator Bacteria~~		Y	Y	
4	Sea Level Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Sepulveda Canyon	~~Ammonia~~		Y	Y	
		Copper				

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Indicator Bacteria				
		Lead				
		Selenium				
		Zinc				
4	Sespe Creek (from 500 ft below confluence with Little Sespe Cr to headwaters)	Chloride				
		pH				
4	Solstice Canyon Creek	Invasive Species				
4	South San Jose Creek (Los Angeles County)	Ammonia	Y			
		Toxicity	Y			
		pH	Y			
4	Stokes Creek	Indicator Bacteria			Y	
4	Surfers Point at Seaside	Indicator Bacteria				
4	Tapo Canyon	Chlordane	Y			
		Chloride	Y			
		DDD (Dichlorodiphenyldichloroethane)	Y			
		Malathion	Y			
		Sulfates	Y			
		Total Dissolved Solids	Y			
		Toxicity	Y			
4	Timber Canyon	Chlorpyrifos	Y			
4	Topanga Beach	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Topanga Canyon Creek	Lead				
4	Torrance Beach	Beach Closures				
		Indicator Bacteria			Y	
4	Torrance Carson Channel	Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		Lead				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
4	Torrey Canyon Creek	Nitrate and Nitrite				
4	Trancas Beach (Broad Beach)	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Triunfo Canyon Creek Reach 1	Benthic Community Effects	Y			
		Lead				
		Mercury				
		Sedimentation/Siltation				
4	Triunfo Canyon Creek Reach 2	Benthic Community Effects				
		Lead				
		Mercury				
		Sedimentation/Siltation				
4	Tujunga Wash (LA River to Hansen Dam)	Ammonia				
		Copper				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Scum/Foam-unnatural				
		Taste and odor				
		Trash				
4	Venice Beach	Indicator Bacteria			Y	
4	Ventura Harbor: Ventura Keys	Arsenic	Y			
		Cadmium	Y			
		Chlordane	Y			
		Coliform Bacteria				
		DDT (Dichlorodiphenyltrichloroethane)	Y			
		Dieldrin	Y			
		Indicator Bacteria	Y			
		PCBs (Polychlorinated biphenyls)	Y			
4	Ventura Marina Jetties	DDT (Dichlorodiphenyltrichloroethane)				
		PCBs (Polychlorinated biphenyls)				
4	Ventura River Estuary	Algae				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

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			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Eutrophic				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria			Y	
		Trash				
4	Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)	Algae				
		Benthic Community Effects	Y			
		Temperature, water	Y			
4	Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)	Benthic Community Effects	Y			
		Indicator Bacteria				
		~~Pumping~~		Y		
		Toxicity	Y			
		~~Water Diversion~~		Y		
4	Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)	Benthic Community Effects	Y			
		Pumping				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Temperature, water	Y			
		Water Diversion				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
4	Verdugo Wash Reach 1 (LA River to Verdugo Rd.)	Copper				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				
4	Verdugo Wash Reach 2 (Above Verdugo Road)	Excess Algal Growth				
		Indicator Bacteria			Y	TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Trash				
4	Walnut Creek Wash (Drains from Puddingstone Res)	Benthic Community Effects			Y	

Date: 06/09/17

2016 INTEGRATED REPORT
SUMMARY OF REGIONAL BOARD RECOMMENDED CHANGES TO THE 2012 303(d) LIST
(includes Categories 4a, 4b, and 5)

REGION	WATER BODY SEGMENT	POLLUTANT	REGIONAL BOARD 303(d) LISTING RECOMMENDATIONS		MISCELLANEOUS CHANGES	
			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		Indicator Bacteria				There have been changes to assessment information for this pollutant, but the pollutant listing decision has not changed from last 303(d) listing cycle.
		Toxicity				
		pH				
4	Westlake Lake	Algae				
		Ammonia				
		Eutrophic				
		Lead				
		Organic Enrichment/Low Dissolved Oxygen				
4	Wheeler Canyon/Todd Barranca	Chlordane	Y			
		Cypermethrin	Y			
		DDT (Dichlorodiphenyltrichloroethane)	Y			
		Nitrate and Nitrite				
		Sulfates				
		Total Dissolved Solids				
		Toxaphene	Y			
		Toxicity	Y			
4	Whites Point Beach	DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
4	Wildlife Lake	Ammonia	Y			
		Oxygen, Dissolved	Y			
4	Will Rogers Beach	Indicator Bacteria			Y	
4	Wilmington Drain	Ammonia				
		~~Copper~~		Y		
		Indicator Bacteria			Y	
		~~Lead~~		Y		
4	Zuma Beach (Westward Beach)	Beach Closures				
		DDT (Dichlorodiphenyltrichloroethane)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL
		Indicator Bacteria				

Date: 06/09/17

2016 INTEGRATED REPORT
SUMMARY OF REGIONAL BOARD RECOMMENDED CHANGES TO THE 2012 303(d) LIST
(includes Categories 4a, 4b, and 5)

REGION	WATER BODY SEGMENT	POLLUTANT	REGIONAL BOARD 303(d) LISTING RECOMMENDATIONS		MISCELLANEOUS CHANGES	
			New Listings	New Delistings	Pollutant Name Change	Other Revisions
		PCBs (Polychlorinated biphenyls)				TMDL status changed from TMDL still required to Being Addressed by Completed TMDL

** Additional listings and delistings can be an artifact created from mapping changes such as the splitting of a water body into additional segments or the merging of water bodies into one single water body. Original 303(d) listings are copied to new segments and then delisted from the old segment. This generates listings and delistings that should not be included in important counts of new listings and delistings.*

2016 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, ALT= being addressed by USEPA approved TMDL alternative

*** 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 ○ POTENTIAL SOURCES *Relevant Notes*	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	TMDL REQUIREMENT STATUS**	DATE***
4	Alamitos Bay	Bay & Harbor	40512000 / 18070104	• Indicator Bacteria ○ Source Unknown	328 Acres	2006	5A	2019
				• Oxygen, Dissolved ○ Source Unknown	328 Acres	2014	5A	2027
4	Alhambra Wash	River & Stream	40531000 / 18070105	• Ammonia ○ Other	6.9 Miles	2014	5A	2027
				• Benthic Community Effects ○ Source Unknown	6.9 Miles	2014	5A	2027
4	Alondria Park Lake	Lake & Reservoir	40512000 / 18070104	• PCBs (Polychlorinated biphenyls) ○ Source Unknown	8 Acres	2014	5A	2027
4	Arroyo Seco Reach 1 (LA River to West Holly Ave.)	River & Stream	40515010 / 18070104	• Benthic Community Effects ○ Source Unknown	5.2 Miles	2014	5A	2021
				• Indicator Bacteria ○ Source Unknown	5.2 Miles	2014	5B	2012
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	5.2 Miles	2002	5B	2008
4	Artesia-Norwalk Drain	River & Stream	40515010 / 18070104	• Indicator Bacteria ○ Source Unknown	2.5 Miles	2010	5B	2016
				• Selenium ○ Source Unknown	2.5 Miles	2010	5A	2021
4	Arundell Barranca (Ventura County)	River & Stream	40311000 / 18070103	• Indicator Bacteria ○ Source Unknown	4.9 Miles	2014	5A	2027
4	Balboa Lake	Lake & Reservoir	40521000 / 18070105	• Ammonia ○ Source Unknown	27 Acres	2014	5B	2004
				• Oxygen, Dissolved ○ Source Unknown	27 Acres	2014	5A	2027
				• Toxicity ○ Source Unknown	27 Acres	2014	5A	2027
4	Ballona Creek	River & Stream	40513000 / 18070104	• Copper ○ Source Unknown	6.5 Miles	1800	5B	2005

				• Cyanide ○ Source Unknown	6.5 Miles	1996	5A	2019
				• Indicator Bacteria ○ Nonpoint Source ○ Point Source	6.5 Miles	2014	5B	2007
				• Lead ○ Source Unknown	6.5 Miles	2002	5B	2005
				• Toxicity ○ Source Unknown	6.5 Miles	1996	5B	2005
				• Trash ○ Source Unknown	6.5 Miles	1996	5B	2001
				• Viruses (enteric) ○ Nonpoint Source ○ Point Source	6.5 Miles	1996	5B	2007
				• Zinc ○ Source Unknown	6.5 Miles	1996	5B	2005
4	Boulder Creek (Ventura County)	River & Stream	40331000 / 18070102	• Bifenthrin ○ Source Unknown	6.5 Miles	2014	5A	2027
				• Toxicity ○ Source Unknown	6.5 Miles	2014	5A	2027
4	Bull Creek (Los Angeles County)	River & Stream	40521000 / 18070105	• Ammonia ○ Source Unknown	6.5 Miles	2014	5B	2004
				• Toxicity ○ Source Unknown	6.5 Miles	2014	5A	2027
4	Burbank Western Channel	River & Stream	40521000 / 18070105	• Copper ○ Source Unknown	13 Miles	2006	5B	2005
				• Cyanide ○ Source Unknown	13 Miles	2006	5A	2019
				• Indicator Bacteria ○ Source Unknown	13 Miles	2010	5B	2012
				• Lead ○ Source Unknown	13 Miles	2006	5B	2005
				• Selenium ○ Source Unknown	13 Miles	2010	5A	2021
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	13 Miles	1996	5B	2008
4	Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)	River & Stream	40312000 / 18070103	• Ammonia ○ Nonpoint Source ○ Point Source	4.3 Miles	1996	5B	2003
				• ChemA ○ Agriculture-storm runoff *Historical use of pesticides and lubricants.*	4.3 Miles	2014	5B	2006

				• Chlordane ○ Source Unknown	4.3 Miles	1800	5B	2007
				• Copper ○ Nonpoint Source	4.3 Miles	2014	5B	2007
				• DDT (Dichlorodiphenyltrichloroethane) ○ Nonpoint Source	4.3 Miles	1996	5B	2005
				• Dieldrin ○ Source Unknown	4.3 Miles	2006	5B	2006
				• Endosulfan ○ Agriculture-storm runoff	4.3 Miles	1988	5B	2006
				• Indicator Bacteria ○ Source Unknown *Area affected is at the mouth of the creek.*	4.3 Miles	2014	5A	2006
				• Nitrogen ○ Nonpoint Source ○ Point Source	4.3 Miles	2002	5B	2003
				• PCBs (Polychlorinated biphenyls) ○ Nonpoint Source ○ Point Source	4.3 Miles	2014	5B	2005
				• Sedimentation/Siltation ○ Source Unknown	4.3 Miles	2002	5A	2005
				• Toxaphene ○ Nonpoint Source	4.3 Miles	1800	5B	2005
				• Toxicity ○ Nonpoint Source ○ Point Source	4.3 Miles	2014	5B	2005
				• Trash ○ Source Unknown	4.3 Miles	2010	5A	2021
4	Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)	River & Stream	40312000 / 18070103	• Ammonia ○ Source Unknown	3.5 Miles	1996	5B	2003
				• Chlordane ○ Source Unknown	3.5 Miles	1996	5B	2006
				• Chloride ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	3.5 Miles	2002	5B	2008
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	3.5 Miles	1996	5B	2006
				• Dieldrin ○ Source Unknown	3.5 Miles	2006	5B	2006

				• Indicator Bacteria ○ Source Unknown	3.5 Miles	2014	5A	2027
				• Nitrate and Nitrite ○ Nonpoint Source ○ Point Source	3.5 Miles	1996	5B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	3.5 Miles	1996	5B	2006
				• Sedimentation/Siltation ○ Source Unknown	3.5 Miles	2002	5A	2015
				• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	3.5 Miles	2002	5B	2008
				• Toxaphene ○ Source Unknown	3.5 Miles	1988	5B	2019
				• Trash ○ Source Unknown	3.5 Miles	2010	5A	2021
4	Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)	River & Stream	40311000 / 18070103	• ChemA (tissue) ○ Agriculture-storm runoff	7.2 Miles	1996	5B	2006
				Historical use of pesticides and lubricants.				
				• Diazinon ○ Source Unknown	7.2 Miles	2006	5B	2006
				• Dieldrin (tissue) ○ Nonpoint Source	7.2 Miles	2006	5B	2005
				• Endosulfan (tissue & sediment) ○ Agriculture-storm runoff	7.2 Miles	2006	5B	2006
				• Nitrate as Nitrate (NO3) ○ Nonpoint Source ○ Point Source	7.2 Miles	1996	5B	2003
				• Nitrogen ○ Nonpoint Source	7.2 Miles	2002	5B	2003
				• Sedimentation/Siltation ○ Source Unknown	7.2 Miles	2002	5A	2015
				• Selenium ○ Nonpoint Source	7.2 Miles	2002	5B	2007
				• Total DDT (sum of 4,4'- and 2,4'-isomers of DDT, DDE, and DDD) ○ Source Unknown	7.2 Miles	2014	5B	2005
				• Toxicity ○ Source Unknown	7.2 Miles	1996	5B	2005

				• Trash ○ Agriculture-storm runoff ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers	7.2 Miles	2002	5B	2008
4	Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)	River & Stream	40311000 / 18070103	• ChemA (tissue) ○ Agriculture-storm runoff	4.3 Miles	1996	5B	2006
				• Diazinon ○ Source Unknown	4.3 Miles	2006	5B	2006
				• Nitrogen ○ Nonpoint Source	4.3 Miles	2002	5B	2003
				• Sedimentation/Siltation ○ Source Unknown	4.3 Miles	2002	5A	2005
				• Toxicity ○ Nonpoint Source	4.3 Miles	1996	5B	2006
				• Trash ○ Agriculture-storm runoff ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers	4.3 Miles	2002	5B	2008
4	Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)	River & Stream	40362000 / 18070103	• Ammonia ○ Nonpoint Source ○ Point Source	15 Miles	1996	5B	2003
				• Chlordane ○ Source Unknown	15 Miles	1996	5B	2006
				• Chloride ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	15 Miles	2002	5B	2008
				• Chlorpyrifos ○ Source Unknown	15 Miles	2006	5B	2006
				• Diazinon ○ Source Unknown	15 Miles	2006	5B	2006
				• Dieldrin ○ Source Unknown	15 Miles	2006	5B	2006
				• Indicator Bacteria ○ Source Unknown	15 Miles	2014	5A	2027
				• Nitrate and Nitrite ○ Nonpoint Source ○ Point Source	15 Miles	1996	5B	2003
				• Nitrate as Nitrate (NO3) ○ Nonpoint Source ○ Point Source	15 Miles	1996	5B	2003

				• Sedimentation/Siltation ○ Source Unknown	15 Miles	2002	5A	2005
				• Sulfates ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	15 Miles	2002	5B	2008
				• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	15 Miles	2002	5B	2008
				• Toxicity ○ Source Unknown	15 Miles	1996	5B	2006
4	Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)	River & Stream	40367000 / 18070103	• Ammonia ○ Nonpoint Source ○ Point Source	14 Miles	1996	5B	2003
				• Boron ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	14 Miles	2002	5B	2008
				• Chloride ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	14 Miles	2002	5B	2008
				• Chlorpyrifos ○ Source Unknown	14 Miles	2006	5B	2006
				• Diazinon ○ Source Unknown	14 Miles	2006	5B	2006
				• Indicator Bacteria ○ Source Unknown	14 Miles	2002	5A	2019
				• Organophosphorus Pesticides ○ Agriculture ○ Municipal Point Sources	14 Miles	1996	5B	2006

				• Sedimentation/Siltation ○ Source Unknown	14 Miles	2002	5A	2006
				• Sulfates ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	14 Miles	2002	5B	2008
				• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	14 Miles	2002	5B	2008
				• Toxicity ○ Source Unknown	14 Miles	1996	5B	2006
				• Trash ○ Source Unknown	14 Miles	2010	5A	2021
4	Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)	River & Stream	40366000 / 18070103	• Boron ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	7.2 Miles	2002	5B	2008
				• Chlordane ○ Source Unknown	7.2 Miles	1996	5B	2006
				• Chloride ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	7.2 Miles	2002	5B	2008
				• Chlorpyrifos ○ Source Unknown	7.2 Miles	2006	5B	2006
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	7.2 Miles	1996	5B	2006
				• Diazinon ○ Source Unknown	7.2 Miles	2002	5B	2006
				• Dieldrin ○ Source Unknown	7.2 Miles	2006	5B	2006

				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	7.2 Miles	1996	5B	2006
				• Sedimentation/Siltation ○ Source Unknown	7.2 Miles	2002	5A	2015
				• Sulfates ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	7.2 Miles	2002	5B	2008
				• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	7.2 Miles	2002	5B	2008
				• Toxaphene ○ Source Unknown	7.2 Miles	1988	5B	2006
4	Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)	River & Stream	40312000 / 18070103	• ChemA (tissue) ○ Agriculture-storm runoff	1.7 Miles	1996	5B	2006
				• Chlorpyrifos ○ Source Unknown	1.7 Miles	2006	5B	2006
				• Diazinon ○ Source Unknown	1.7 Miles	2006	5B	2006
				• Indicator Bacteria ○ Source Unknown	1.7 Miles	2014	5A	2027
				• Nitrate as Nitrate (NO3) ○ Nonpoint Source ○ Point Source	1.7 Miles	1996	5B	2003
				• Nitrogen, Nitrate ○ Nonpoint Source ○ Point Source	1.7 Miles	1996	5B	2003
				• Nitrogen, Nitrite ○ Source Unknown	1.7 Miles	2014	5B	2003
				• Sulfates ○ Source Unknown	1.7 Miles	2002	5B	2008
				• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Major Municipal Point Source-dry weather discharge	1.7 Miles	2002	5B	2008

				◦ Surface Runoff				
				• Toxicity ◦ Source Unknown	1.7 Miles	1996	5B	2006
				• Trash ◦ Source Unknown	1.7 Miles	2010	5A	2021
4	Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)	River & Stream	40363000 / 18070103	• Ammonia ◦ Nonpoint Source ◦ Point Source	6.2 Miles	1996	5B	2003
				• ChemA (tissue) ◦ Agriculture-storm runoff	6.2 Miles	1996	5B	2006
				• Chlordane ◦ Source Unknown	6.2 Miles	1996	5B	2006
				• Chloride ◦ Atmospheric Deposition ◦ Domestic Use of Ground Water ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry weather discharge ◦ Surface Runoff	6.2 Miles	2002	5B	2008
				• Chlorpyrifos ◦ Source Unknown	6.2 Miles	2006	5B	2006
				• Diazinon ◦ Source Unknown	6.2 Miles	2006	5B	2006
				• Dieldrin ◦ Source Unknown	6.2 Miles	2006	5B	2006
				• Indicator Bacteria ◦ Source Unknown	6.2 Miles	2010	5A	2019
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	6.2 Miles	1996	5B	2006
				• Sulfates ◦ Source Unknown	6.2 Miles	2002	5B	2008
				• Total Dissolved Solids ◦ Source Unknown	6.2 Miles	2002	5B	2008
				• Toxicity ◦ Nonpoint Source ◦ Point Source	6.2 Miles	1996	5B	2006
				• Trash ◦ Source Unknown	6.2 Miles	2010	5A	2021
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	River & Stream	40364000 / 18070103	• Ammonia ◦ Nonpoint Source ◦ Point Source	3 Miles	1996	5B	2003

list)				
• ChemA (tissue) ○ Agriculture-storm runoff	3 Miles	1996	5B	2006
• Chlordane ○ Source Unknown	3 Miles	1996	5B	2006
• Chloride ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	3 Miles	2002	5B	2008
• Chlorpyrifos ○ Source Unknown	3 Miles	2006	5B	2006
• Diazinon ○ Source Unknown	3 Miles	2006	5B	2006
• Dieldrin ○ Source Unknown	3 Miles	2006	5B	2006
• Indicator Bacteria ○ Source Unknown	3 Miles	2014	5A	2027
• Malathion ○ Source Unknown	3 Miles	2014	5A	2029
• Nitrogen, Nitrite ○ Nonpoint Source ○ Point Source	3 Miles	1996	5B	2003
• PCBs (Polychlorinated biphenyls) ○ Source Unknown	3 Miles	1996	5B	2006
• Sulfates ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	3 Miles	2002	5B	2008
• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	3 Miles	2002	5B	2008
• Toxaphene (tissue & sediment) ○ Nonpoint Source	3 Miles	1988	5B	2006
• Toxicity ○ Nonpoint Source ○ Point Source	3 Miles	1996	5B	2010
• Trash				

				◦ Source Unknown	3 Miles	2010	5A	2021
4	Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)	River & Stream	40365000 / 18070103	• Ammonia ◦ Nonpoint Source ◦ Point Source	8.7 Miles	1996	5B	2003
				• ChemA (tissue) ◦ Agriculture-storm runoff	8.7 Miles	1996	5B	2006
				• Chlordane ◦ Source Unknown	8.7 Miles	1996	5B	2006
				• Dieldrin ◦ Source Unknown	8.7 Miles	2006	5B	2006
				• Indicator Bacteria ◦ Source Unknown	8.7 Miles	2014	5A	2027
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	8.7 Miles	1996	5B	2006
				• Sedimentation/Siltation ◦ Agriculture ◦ Natural Sources	8.7 Miles	2002	5A	2005
				• Sulfates ◦ Atmospheric Deposition ◦ Domestic Use of Ground Water ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry weather discharge ◦ Surface Runoff	8.7 Miles	2002	5B	2008
				• Total Dissolved Solids ◦ Atmospheric Deposition ◦ Domestic Use of Ground Water ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry weather discharge ◦ Surface Runoff	8.7 Miles	2002	5B	2008
				• Toxicity ◦ Nonpoint Source ◦ Point Source	8.7 Miles	1996	5B	2005
4	Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)	River & Stream	40364000 / 18070103	• Chlordane (tissue) ◦ Nonpoint Source	5.5 Miles	1996	5B	2006
				• Chlorpyrifos ◦ Source Unknown	5.5 Miles	2014	5A	2029
				• Diazinon ◦ Source Unknown	5.5 Miles	2014	5A	2029
				• Dieldrin				

				○ Source Unknown	5.5 Miles	2006	5B	2006
				• Malathion ○ Source Unknown	5.5 Miles	2014	5A	2029
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	5.5 Miles	1996	5B	2006
				• Sulfates ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	5.5 Miles	2002	5B	2008
				• Total Dissolved Solids ○ Atmospheric Deposition ○ Domestic Use of Ground Water ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry weather discharge ○ Surface Runoff	5.5 Miles	2002	5B	2008
				• Toxaphene ○ Source Unknown	5.5 Miles	1988	5B	2006
4	Canada Larga (Ventura River Watershed)	River & Stream	40210010 / 18070103	• Indicator Bacteria ○ Source Unknown *Horse stables, land use, cattle, and wildlife may be sources.*	8 Miles	2014	5A	2027
				• Oxygen, Dissolved ○ Source Unknown	8 Miles	2014	5B	2013
				• Total Dissolved Solids ○ Source Unknown	8 Miles	2010	5A	2021
4	Casitas, Lake	Lake & Reservoir	40220032 / 18070101	• Mercury ○ Natural Sources ○ Source Unknown	2069 Acres	2010	5A	2021
4	Castaic Lagoon	Lake & Reservoir	40351000 / 18070102	• PCBs (Polychlorinated biphenyls) ○ Source Unknown	183 Acres	2014	5A	2027
4	Castaic Lake	Lake & Reservoir	40351000 / 18070102	• Mercury ○ Source Unknown	2282 Acres	2010	5A	2027
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	2282 Acres	2014	5A	2027
4	Colorado Lagoon	Wetland, Tidal	40512000 / 18070104	• Chlordane ○ Source Unknown	13 Acres	2014	5B	2011
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	13 Acres	2014	5B	2011
				• Dieldrin				

				○ Source Unknown	13 Acres	2014	5B	2011
				• Indicator Bacteria ○ Source Unknown	13 Acres	2006	5A	2019
				• Lead ○ Source Unknown	13 Acres	2014	5B	2011
				• PAHs (Polycyclic Aromatic Hydrocarbons) ○ Source Unknown	13 Acres	2014	5B	2011
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	13 Acres	2014	5B	2011
				• Toxicity ○ Source Unknown	13 Acres	2014	5B	2011
				• Zinc ○ Source Unknown	13 Acres	2014	5B	2011
4	Compton Creek	River & Stream	40515010 / 18070104	• Benthic Community Effects ○ Source Unknown	8.5 Miles	2014	5A	2021
				• Copper ○ Source Unknown	8.5 Miles	1996	5B	2008
				• Indicator Bacteria ○ Source Unknown	8.5 Miles	2014	5A	2009
				• Iron ○ Source Unknown	8.5 Miles	2014	5A	2027
				• Lead ○ Source Unknown	8.5 Miles	1996	5B	2005
				• Trash ○ Nonpoint Source	8.5 Miles	2006	5B	2008
				• Zinc ○ Source Unknown	8.5 Miles	2014	5B	2008
				• pH ○ Nonpoint Source ○ Point Source	8.5 Miles	1996	5B	2004
4	Coyote Creek	River & Stream	40515010 / 18070104	• Indicator Bacteria ○ Source Unknown	13 Miles	1996	5B	2016
				• Iron ○ Source Unknown	13 Miles	2014	5A	2027
				• Malathion ○ Source Unknown	13 Miles	2014	5A	2027
				• Toxicity ○ Source Unknown	13 Miles	2002	5A	2008
				• pH ○ Source Unknown	13 Miles	2006	5A	2019
4	Coyote Creek, North Fork	River & Stream	40515010 / 18070104	• Indicator Bacteria ○ Source Unknown	5 Miles	2010	5B	2016
				• Selenium ○ Source Unknown	5 Miles	2010	5A	2021

4	Crystal Lake	Lake & Reservoir	40543000 / 18070106	• Organic Enrichment/Low Dissolved Oxygen ○ Source Unknown	3.7 Acres	1998	5A	2019
4	Dominguez Channel (lined portion above Vermont Ave)	River & Stream	40351000 / 18070104	• Copper ○ Source Unknown	6.7 Miles	1996	5B	2012
				• Indicator Bacteria ○ Source Unknown	6.7 Miles	2006	5A	2027
				• Lead ○ Source Unknown	6.7 Miles	1800	5B	2012
				• Toxicity ○ Source Unknown	6.7 Miles	2010	5B	2012
				• Zinc ○ Source Unknown	6.7 Miles	1800	5B	2012
4	Dominguez Channel Estuary (unlined portion below Vermont Ave)	Estuary	40512000 / 18070104	• Benthic Community Effects ○ Source Unknown	140 Acres	1996	5A	2019
				• Benzo(a)anthracene ○ Agriculture-storm runoff	140 Acres	2006	5B	2012
				• Benzo(a)pyrene (3,4-Benzopyrene -7-d) ○ Source Unknown	140 Acres	1996	5B	2012
				• Chrysene (C1-C4) ○ Source Unknown	140 Acres	2006	5B	2012
				• Copper ○ Other	140 Acres	2014	5B	2012
				• Indicator Bacteria ○ Source Unknown	140 Acres	2014	5A	2007
				• Lead ○ Source Unknown	140 Acres	1800	5B	2012
				• PCBs (Polychlorinated biphenyls) ○ Agriculture ○ Agriculture-animal ○ Agriculture-grazing	140 Acres	1996	5B	2012
				• Phenanthrene ○ Source Unknown	140 Acres	2006	5B	2012
				• Pyrene ○ Source Unknown	140 Acres	2006	5B	2012
				• Toxicity ○ Source Unknown	140 Acres	2014	5B	2012
4	Downtown Shoreline Marina (part of San Pedro Bay Near/Off Shore Zones)	Bay & Harbor	40512000 / 18070104	• Copper ○ Source Unknown	83 Acres	2014	5A	2027
				• Oxygen, Dissolved	83 Acres	2014	5A	2027

				◦ Source Unknown				
4	Dry Canyon Creek	River & Stream	40521000 / 18070104	• Indicator Bacteria ◦ Source Unknown	3.9 Miles	2014	5A	2027
4	Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2	River & Stream	40311000 / 18070103	• Bifenthrin ◦ Source Unknown	12 Miles	2014	5A	2027
				• ChemA ◦ Nonpoint Source	12 Miles	2014	5B	2006
				• Chlordane ◦ Source Unknown	12 Miles	1800	5B	2006
				• Chlorpyrifos ◦ Source Unknown	12 Miles	2014	5B	2006
				• DDD (Dichlorodiphenyldichloroethane) ◦ Source Unknown	12 Miles	2014	5B	2006
				• DDE (Dichlorodiphenyldichloroethylene) ◦ Source Unknown	12 Miles	2014	5B	2006
				• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	12 Miles	1800	5B	2006
				• Nitrogen ◦ Nonpoint Source	12 Miles	1996	5B	2003
				• Toxaphene ◦ Source Unknown	12 Miles	1800	5B	2006
				• Toxicity ◦ Nonpoint Source	12 Miles	1996	5B	2005
4	Elderberry Forebay	Lake & Reservoir	40351000 / 18070102	• Dieldrin ◦ Source Unknown	464 Acres	2014	5A	2027
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	464 Acres	2014	5A	2027
4	Elizabeth Lake	Lake & Reservoir	40351000 / 18070102	• Eutrophic ◦ Source Unknown	123 Acres	1996	5A	2019
				• Organic Enrichment/Low Dissolved Oxygen ◦ Source Unknown	123 Acres	1998	5A	2019
				• Trash ◦ Agriculture-storm runoff ◦ Recreational and Tourism Activities (non-boating) ◦ Urban Runoff/Storm Sewers	123 Acres	1996	5B	2008
				• pH ◦ Source Unknown	123 Acres	1996	5A	2019
4	Ellsworth Barranca	River & Stream	40321000 / 18070103	• Chlorpyrifos ◦ Source Unknown	10 Miles	2014	5A	2027

				• DDE (Dichlorodiphenyldichloroethylene) ○ Source Unknown	10 Miles	2014	5A	2030
4	Honda Barranca	River & Stream	40361000 / 18070103	• Bifenthrin ○ Source Unknown	5.7 Miles	2014	5A	2027
				• Chlordane ○ Source Unknown	5.7 Miles	2014	5B	2006
				• Chlorpyrifos ○ Source Unknown	5.7 Miles	2014	5B	2006
				• DDD (Dichlorodiphenyldichloroethane) ○ Source Unknown	5.7 Miles	2014	5B	2006
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	5.7 Miles	2014	5B	2006
4	Hopper Creek	River & Stream	40341000 / 18070102	• Sulfates ○ Source Unknown	13 Miles	2002	5A	2015
				• Total Dissolved Solids ○ Source Unknown	13 Miles	2220	5A	2019
4	Hueneme Drain	River & Stream	40311000 / 18070103	• Escherichia coli (E. coli) ○ Source Unknown	1.7 Miles	2014	5A	2027
				• Trash ○ Source Unknown	1.7 Miles	2014	5C	
4	Javon Canyon	River & Stream	40100011 / 18070101	• Benthic Community Effects ○ Source Unknown	0.9 Miles	2014	5A	2027
				• Selenium ○ Source Unknown	0.9 Miles	2014	5A	2027
4	Lake Hughes	Lake & Reservoir	40351000 / 18070102	• Algae ○ Source Unknown	21 Acres	1996	5A	2019
				• Eutrophication ○ Source Unknown	21 Acres	2014	5A	2019
				• Odor ○ Source Unknown	21 Acres	1996	5A	2019
				• Trash ○ Agriculture-storm runoff ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers	21 Acres	1996	5B	2008
4	Lake Lindero	Lake & Reservoir	40423000 / 18070104	• Algae ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems	15 Acres	1996	5B	2003

				(Septic Tanks) ○ Urban Runoff/Storm Sewers				
				• Chloride ○ Source Unknown	15 Acres	1996	5A	2019
				• Eutrophic ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	15 Acres	1996	5B	2003
				• Odor ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	15 Acres	1996	5B	2003
				• Selenium ○ Source Unknown	15 Acres	1996	5A	2019
				• Specific Conductivity ○ Source Unknown	15 Acres	1996	5A	2019
				• Trash ○ Source Unknown	15 Acres	1996	5B	2008
4	Las Virgenes Creek	River & Stream	40422010 / 18070104	• Benthic Community Effects ○ Source Unknown	12 Miles	2014	5A	2021
				• Indicator Bacteria ○ Nonpoint Source	12 Miles	2014	5B	2005
				• Invasive Species ○ Source Unknown	12 Miles	2010	5A	2021
				• Nutrients (Algae) ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	12 Miles	1998	5B	2003
				• Organic Enrichment/Low Dissolved Oxygen ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings	12 Miles	1996	5B	2003

				Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers				
				• Scum/Foam-unnatural ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	12 Miles	1996	5B	2003
				• Sedimentation/Siltation ○ Source Unknown	12 Miles	2002	5B	2013
				• Selenium ○ Source Unknown	12 Miles	1996	5A	2019
				• Trash ○ Source Unknown	12 Miles	1996	5B	2008
4	Legg Lake	Lake & Reservoir	40531000 / 18070105	• Ammonia ○ Source Unknown	25 Acres	1996	5B	2012
				• Copper ○ Source Unknown	25 Acres	1996	5B	2012
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	25 Acres	2014	5A	2027
				• Lead ○ Source Unknown	25 Acres	1996	5B	2012
				• Odor ○ Source Unknown	25 Acres	1996	5B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	25 Acres	2014	5A	2027
				• Trash ○ Agriculture-storm runoff ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers	25 Acres	1996	5B	2008
				• pH ○ Source Unknown	25 Acres	1996	5A	2019
4	Lincoln Park Lake	Lake & Reservoir	40515010 / 18070104	• Ammonia ○ Source Unknown	3.8 Acres	1996	5B	2012
				• Eutrophic ○ Source Unknown	3.8 Acres	1996	5B	2012
				• Odor ○ Source Unknown	3.8 Acres	1996	5B	2012
				• Organic Enrichment/Low Dissolved Oxygen	3.8 Acres	1998	5B	2012

				◦ Source Unknown				
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	3.8 Acres	2014	5A	2027
				• Trash ◦ Source Unknown	3.8 Acres	1996	5B	2012
4	Lindero Creek Reach 1	River & Stream	40423000 / 18070104	• Algae ◦ Agriculture-animal ◦ Atmospheric Deposition ◦ Golf course activities ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry and/or wet weather discharge ◦ Onsite Wastewater Systems (Septic Tanks) ◦ Urban Runoff/Storm Sewers	3 Miles	1996	5B	2003
				• Benthic Community Effects ◦ Source Unknown	3 Miles	2014	5A	2021
				• Indicator Bacteria ◦ Nonpoint Source	3 Miles	2014	5B	2006
				• Invasive Species ◦ Source Unknown	3 Miles	2010	5A	2021
				• Scum/Foam-unnatural ◦ Agriculture-animal ◦ Atmospheric Deposition ◦ Golf course activities ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry and/or wet weather discharge ◦ Onsite Wastewater Systems (Septic Tanks) ◦ Urban Runoff/Storm Sewers	3 Miles	1996	5B	2003
				• Selenium ◦ Source Unknown	3 Miles	1996	5A	2019
				• Trash ◦ Source Unknown	3 Miles	1996	5B	2008
4	Lindero Creek Reach 2 (Above Lake)	River & Stream	40425000 / 18070104	• Algae ◦ Agriculture-animal ◦ Atmospheric Deposition ◦ Golf course activities ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry and/or wet weather discharge ◦ Onsite Wastewater Systems (Septic Tanks) ◦ Urban Runoff/Storm Sewers	4.5 Miles	1998	5B	2003
				• Indicator Bacteria ◦ Source Unknown	4.5 Miles	2014	5B	2006
				• Scum/Foam-unnatural ◦ Agriculture-animal ◦ Atmospheric Deposition	4.5 Miles	1998	5B	2003

				Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers				
				• Selenium ○ Source Unknown	4.5 Miles	1998	5A	2019
				• Trash ○ Source Unknown	4.5 Miles	1998	5B	2008
4	Los Angeles Harbor - Consolidated Slip	Bay & Harbor	40512000 / 18070104	• 2-Methylnaphthalene ○ Source Unknown	36 Acres	1998	5B	2012
				• Benthic Community Effects ○ Source Unknown	36 Acres	1998	5A	2019
				• Benzo(a)anthracene ○ Source Unknown	36 Acres	1998	5B	2012
				This listing was made by USEPA for 2006.				
				• Benzo(a)pyrene (3,4-Benzopyrene -7-d) ○ Source Unknown	36 Acres	1998	5B	2012
				• Chromium ○ Source Unknown	36 Acres	2014	5B	2012
				• Chrysene (C1-C4) ○ Source Unknown	36 Acres	1998	5B	2012
				• Dieldrin ○ Source Unknown	36 Acres	1998	5B	2012
				• Phenanthrene ○ Source Unknown	36 Acres	1998	5B	2012
				• Pyrene ○ Source Unknown	36 Acres	1998	5B	2012
				• Toxicity ○ Source Unknown	36 Acres	2014	5B	2012
4	Los Angeles River Estuary (Queensway Bay)	Estuary	40512000 / 18070104	• Chlordane ○ Source Unknown	207 Acres	1800	5B	2012
				• Toxicity ○ Source Unknown	207 Acres	2014	5A	2019
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	207 Acres	2006	5B	2008
4	Los Angeles River Reach 1 (Estuary to Carson Street)	River & Stream	40512000 / 18070104	• Ammonia ○ Nonpoint Source ○ Point Source	3.4 Miles	2002	5B	2004
				• Cadmium ○ Source Unknown	3.4 Miles	2002	5B	2005

				• Cyanide ○ Source Unknown	3.4 Miles	2006	5A	2019
				• Indicator Bacteria ○ Source Unknown	3.4 Miles	2014	5B	2003
				• Lead ○ Nonpoint Source ○ Point Source	3.4 Miles	1996	5B	2005
				• Nutrients (Algae) ○ Nonpoint Source ○ Point Source	3.4 Miles	1998	5B	2004
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	3.4 Miles	2006	5B	2008
				• pH ○ Nonpoint Source ○ Point Source	3.4 Miles	1996	5B	2003
4	Los Angeles River Reach 2 (Carson to Figueroa Street)	River & Stream	40515010 / 18070104	• Ammonia ○ Nonpoint Source ○ Point Source	19 Miles	1996	5B	2004
				• Copper ○ Source Unknown	19 Miles	2006	5B	2005
				• Indicator Bacteria ○ Source Unknown	19 Miles	2014	5B	2012
				• Lead ○ Nonpoint Source ○ Point Source	19 Miles	1996	5B	2005
				• Nutrients (Algae) ○ Nonpoint Source ○ Point Source	19 Miles	1996	5B	2004
				• Oil ○ Natural Sources	19 Miles	1996	5A	2019
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	19 Miles	1996	5B	2008
4	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)	River & Stream	40521000 / 18070104	• Ammonia ○ Nonpoint Source ○ Point Source	7.9 Miles	1996	5B	2004
				• Copper ○ Source Unknown	7.9 Miles	2006	5B	2008
				• Indicator Bacteria ○ Source Unknown	7.9 Miles	2014	5B	2012
				• Nutrients (Algae) ○ Nonpoint Source ○ Point Source	7.9 Miles	1996	5B	2004
				• Toxicity ○ Source Unknown	7.9 Miles	2014	5A	2027
				• Trash ○ Nonpoint Source	7.9 Miles	1996	5B	2008

				◦ Surface Runoff ◦ Urban Runoff/Storm Sewers				
4	Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)	River & Stream	40521000 / 18070105	• Benthic Community Effects ◦ Source Unknown	11 Miles	2014	5A	2027
				• Indicator Bacteria ◦ Source Unknown	11 Miles	2014	5A	2019
				• Nutrients (Algae) ◦ Nonpoint Source ◦ Point Source	11 Miles	1996	5B	2004
				• Toxicity ◦ Source Unknown	11 Miles	2014	5A	2027
				• Trash ◦ Nonpoint Source ◦ Surface Runoff ◦ Urban Runoff/Storm Sewers	11 Miles	1996	5B	2008
4	Los Angeles River Reach 5 (within Sepulveda Basin)	River & Stream	40521000 / 18070105	• Ammonia ◦ Source Unknown	1.9 Miles	1996	5B	2004
				• Copper ◦ Source Unknown	1.9 Miles	2006	5B	2005
				• Lead ◦ Source Unknown	1.9 Miles	2006	5B	2005
				• Nutrients (Algae) ◦ Nonpoint Source ◦ Point Source	1.9 Miles	1996	5B	2004
				• Oil ◦ Source Unknown	1.9 Miles	1996	5A	2019
				• Toxicity ◦ Source Unknown	1.9 Miles	2014	5A	2027
				• Trash ◦ Nonpoint Source ◦ Surface Runoff ◦ Urban Runoff/Storm Sewers	1.9 Miles	1996	5B	2008
4	Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)	River & Stream	40521000 / 18070105	• Copper ◦ Source Unknown	7 Miles	2014	5B	2008
				• Indicator Bacteria ◦ Source Unknown	7 Miles	2014	5B	2012
				• Selenium ◦ Source Unknown	7 Miles	1992	5B	2005
				• Toxicity ◦ Source Unknown	7 Miles	2014	5A	2027
4	Los Cerritos Channel	Wetland, Tidal	40515010 / 18070104	• Ammonia ◦ Source Unknown	30 Acres	2002	5A	2015
				• Bis(2ethylhexyl)phthalate (DEHP) ◦ Source Unknown	30 Acres	2006	5A	2019

				• Copper ○ Source Unknown	30 Acres	2002	5A	2019
				• Indicator Bacteria ○ Source Unknown	30 Acres	2014	5A	2019
				• Lead ○ Source Unknown	30 Acres	2002	5A	2019
				• Trash ○ Source Unknown	30 Acres	2006	5A	2019
				• Zinc ○ Source Unknown	30 Acres	2002	5A	2019
				• pH ○ Source Unknown	30 Acres	2014	5A	2021
4	Los Sauces Creek	River & Stream	40100010 / 18070101	• Selenium ○ Source Unknown	2.8 Miles	2014	5A	2027
4	Machado Lake (Harbor Park Lake)	Lake & Reservoir	40512000 / 18070104	• Algae ○ Atmospheric Deposition ○ Highway/Road/Bridge Runoff ○ Internal Nutrient Cycling (primarily lakes) ○ Urban Runoff--Industrial Permitted ○ Urban Runoff/Storm Sewers	45 Acres	1996	5B	2009
				• Ammonia ○ Atmospheric Deposition ○ Highway/Road/Bridge Runoff ○ Internal Nutrient Cycling (primarily lakes) ○ Urban Runoff--Industrial Permitted ○ Urban Runoff/Storm Sewers	45 Acres	1996	5B	2009
				• ChemA ○ Source Unknown	45 Acres	2014	5B	2012
				• Eutrophic ○ Atmospheric Deposition ○ Highway/Road/Bridge Runoff ○ Internal Nutrient Cycling (primarily lakes) ○ Urban Runoff--Industrial Permitted ○ Urban Runoff/Storm Sewers	45 Acres	1992	5B	2009
				• Odor ○ Atmospheric Deposition ○ Highway/Road/Bridge Runoff ○ Internal Nutrient Cycling (primarily lakes) ○ Urban Runoff--Industrial Permitted ○ Urban Runoff/Storm Sewers	45 Acres	1996	5B	2009
				• Trash ○ Agriculture-storm runoff ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers	45 Acres	1996	5B	2008
				• Benthic Community Effects				

4	Madranio Canyon	River & Stream	40100010 / 18070101	○ Source Unknown	3.8 Miles	2014	5A	2027
				• Copper ○ Source Unknown	3.8 Miles	2014	5A	2027
				• Selenium ○ Source Unknown	3.8 Miles	2014	5A	2027
4	Malibou Lake	Lake & Reservoir	40424000 / 18070104	• Algae ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	40 Acres	1996	5B	2003
				• Dieldrin ○ Source Unknown	40 Acres	2014	5A	2027
				• Eutrophic ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	40 Acres	1996	5B	2003
				• Organic Enrichment/Low Dissolved Oxygen ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	40 Acres	1998	5B	2003
4	Malibu Creek	River & Stream	40421000 / 18070104	• Benthic Community Effects ○ Source Unknown	11 Miles	2014	5A	2021
				• Fish Barriers (Fish Passage) ○ Source Unknown	11 Miles	1996	5A	2019
				• Indicator Bacteria ○ Nonpoint Source ○ Point Source	11 Miles	2014	5B	2002
				• Invasive Species ○ Source Unknown	11 Miles	2010	5A	2021
				• Nutrients (Algae) ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities	11 Miles	1996	5B	2003

					○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Nonpoint Source ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers			
					• Scum/Foam-unnatural ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	11 Miles	1996	5B	2003
					• Sedimentation/Siltation ○ Source Unknown	11 Miles	2002	5B	2013
					• Selenium ○ Source Unknown	11 Miles	2006	5A	2019
					• Sulfates ○ Source Unknown	11 Miles	2006	5A	2019
					• Toxicity ○ Source Unknown	11 Miles	2010	5A	2027
					• Trash ○ Nonpoint Source	11 Miles	1996	5B	2009
4	Malibu Lagoon	Estuary	40421000 / 18070104		• Benthic Community Effects ○ Source Unknown	15 Acres	1998	5A	2011
					• Eutrophic ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks) ○ Urban Runoff/Storm Sewers	15 Acres	1998	5B	2003
					• Indicator Bacteria ○ Nonpoint Source ○ Point Source	15 Acres	2014	5B	2006
					• Swimming Restrictions ○ Agriculture-animal ○ Illicit Connections/Illegal Hook-ups/Dry Weather Flows ○ Natural Sources ○ Onsite Wastewater Systems (Septic Tanks) ○ Spills ○ Surface Runoff ○ Urban Runoff/Storm Sewers	15 Acres	1998	5B	2006

				Viruses (enteric) ○ Agriculture-animal ○ Illicit Connections/Illegal Hook-ups/Dry Weather Flows ○ Natural Sources ○ Onsite Wastewater Systems (Septic Tanks) ○ Spills ○ Surface Runoff ○ Urban Runoff/Storm Sewers	15 Acres	1998	5B	2006
				• pH ○ Source Unknown	15 Acres	2002	5A	2006
				Possible sources might be septic systems, storm drains, and birds.				
4	Marina del Rey Harbor - Back Basins	Bay & Harbor	40517000 / 18070104	• Chlordane ○ Nonpoint Source	391 Acres	2014	5B	2005
				• Copper ○ Source Unknown	391 Acres	1800	5B	2006
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	391 Acres	1800	5A	2005
				A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.				
				• Dieldrin ○ Source Unknown	391 Acres	1800	5A	2005
				A USEPA-approved TMDL has made a finding of non-impairment for this pollutant.				
				• Indicator Bacteria ○ Nonpoint Source	391 Acres	2006	5B	2004
				• Lead ○ Nonpoint Source	391 Acres	2014	5B	2006
				• Oxygen, Dissolved ○ Source Unknown	391 Acres	2014	5A	2027
				• PCBs (Polychlorinated biphenyls) ○ Nonpoint Source	391 Acres	2014	5B	2006
				Historical use of pesticides, storm water runoff/aerial deposition from urban areas. Shellfish harvesting advisory for PCBs in tissue.				
				• Toxicity ○ Nonpoint Source	391 Acres	2014	5B	2005
				• Zinc ○ Nonpoint Source	391 Acres	2014	5B	2006
4	McCoy Canyon Creek	River & Stream	40521000 / 18070104	• Indicator Bacteria ○ Source Unknown	4 Miles	2014	5A	2027
				• Nitrate ○ Source Unknown	4 Miles	2002	5B	2003
				• Nitrogen, Nitrate ○ Source Unknown	4 Miles	2002	5B	2003
4	McGrath Lake	Lake & Reservoir	40311000 / 18070103	• Chlordane ○ Source Unknown	20 Acres	2014	5B	2011
				• DDT (Dichlorodiphenyltrichloroethane)	20 Acres	2014	5B	2011

				◦ Source Unknown				
				• Indicator Bacteria ◦ Source Unknown	20 Acres	2014	5A	2027
				• Toxicity ◦ Source Unknown	20 Acres	2014	5B	2011
4	Medea Creek Reach 1 (Lake to Confl. with Lindero)	River & Stream	40424000 / 18070104	• Algae ◦ Agriculture-animal ◦ Atmospheric Deposition ◦ Golf course activities ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry and/or wet weather discharge ◦ Onsite Wastewater Systems (Septic Tanks) ◦ Urban Runoff/Storm Sewers	2.6 Miles	1996	5B	2003
				• Benthic Community Effects ◦ Source Unknown	2.6 Miles	2014	5A	2027
				• Indicator Bacteria ◦ Nonpoint Source	2.6 Miles	2014	5B	2006
				• Sedimentation/Siltation ◦ Source Unknown	2.6 Miles	2002	5B	2013
				• Selenium ◦ Source Unknown	2.6 Miles	1996	5A	2027
				• Trash ◦ Source Unknown	2.6 Miles	1996	5B	2008
4	Medea Creek Reach 2 (Abv Confl. with Lindero)	River & Stream	40423000 / 18070104	• Algae ◦ Agriculture-animal ◦ Atmospheric Deposition ◦ Golf course activities ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry and/or wet weather discharge ◦ Onsite Wastewater Systems (Septic Tanks) ◦ Urban Runoff/Storm Sewers	5.4 Miles	1996	5B	2003
				• Benthic Community Effects ◦ Source Unknown	5.4 Miles	2014	5A	2021
				• Indicator Bacteria ◦ Nonpoint Source	5.4 Miles	2014	5B	2006
				• Invasive Species ◦ Source Unknown	5.4 Miles	2010	5A	2021
				• Sedimentation/Siltation ◦ Source Unknown	5.4 Miles	2002	5B	2013
				• Selenium ◦ Source Unknown	5.4 Miles	1996	5A	2019
				• Trash ◦ Source Unknown	5.4 Miles	1996	5B	2008
				• Eutrophic				

4	Munz Lake	Lake & Reservoir	40351000 / 18070102	○ Source Unknown	6.6 Acres	1996	5A	2019
				• Trash ○ Agriculture-storm runoff ○ Nonpoint Source ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers	6.6 Acres	1996	5B	2008
4	Ormond Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Indicator Bacteria ○ Source Unknown	3.1 Miles	2002	5A	2027
4	Ormond Beach Wetlands	Wetland, Tidal	40311000 / 18070103	• Trash ○ Source Unknown	99 Acres	2014	5C	
				• pH ○ Source Unknown	99 Acres	2014	5A	2027
4	Oxnard Drain	River & Stream	40311000 / 18070103	• Escherichia coli (E. coli) ○ Source Unknown	3 Miles	2014	5A	2027
				• Trash ○ Source Unknown	3 Miles	2014	5C	
				• pH ○ Source Unknown	3 Miles	2014	5A	2027
4	Padre Juan Canyon	River & Stream	40100011 / 18070101	• Benthic Community Effects ○ Source Unknown	1.9 Miles	2014	5A	2027
				• Selenium ○ Source Unknown	1.9 Miles	2014	5A	2027
4	Peninsula Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Indicator Bacteria ○ Source Unknown *Area affected is beach area north of South Jetty.*	0.15 Miles	2002	5A	2019
4	Piru Creek (from gaging station below Santa Felicia Dam to headwaters)	River & Stream	40342000 / 18070102	• Chloride ○ Source Unknown	67 Miles	2006	5A	2019
				• Toxicity ○ Source Unknown	67 Miles	2014	5A	2027
				• pH ○ Source Unknown	67 Miles	2002	5A	2019
4	Point Mugu Beach	Coastal & Bay Shoreline	40311000 / 18070104	• Indicator Bacteria ○ Other	0.36 Miles	2010	5A	2027
4	Pole Creek (trib to Santa Clara River Reach 3)	River & Stream	40331000 / 18070102	• Sulfates ○ Source Unknown	9 Miles	2002	5A	2019
				• Total Dissolved Solids ○ Source Unknown	9 Miles	2002	5A	2019

4	Port Hueneme Beach Park	Coastal & Bay Shoreline	40311000 / 18070103	• Indicator Bacteria ○ Other	1.2 Miles	2010	5A	2027
4	Port Hueneme Harbor (Back Basins)	Bay & Harbor	40311000 / 18070103	• Arsenic ○ Source Unknown	65 Acres	2014	5A	2027
				• Cadmium ○ Source Unknown	65 Acres	2014	5A	2027
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	65 Acres	2014	5C	
				• Dieldrin ○ Source Unknown	65 Acres	2014	5A	2027
				• PAHs (Polycyclic Aromatic Hydrocarbons) ○ Source Unknown	65 Acres	2014	5A	2027
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	65 Acres	2014	5C	
4	Port Hueneme Pier	Coastal & Bay Shoreline	40311000 / 18070103	• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.33 Miles	2006	5A	2019
4	Potrero Canyon Creek	River & Stream	40425000 / 18070104	• Oxygen, Dissolved ○ Source Unknown	0.95 Miles	2014	5A	2027
4	Puddingstone Reservoir	Lake & Reservoir	40552000 / 18070106	• Chlordane ○ Source Unknown	243 Acres	2014	5A	2019
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	243 Acres	2014	5A	2019
				• Mercury ○ Source Unknown	243 Acres	2014	5A	2019
				• Organic Enrichment/Low Dissolved Oxygen ○ Source Unknown	243 Acres	1996	5A	2019
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	243 Acres	2014	5A	2019
4	Puente Creek	River & Stream	40515010 / 18070104	• Indicator Bacteria ○ Source Unknown	5.8 Miles	2010	5A	2027
				• Selenium ○ Source Unknown	5.8 Miles	2010	5A	2021
4	Pyramid Lake	Lake & Reservoir	40342000 / 18070102	• Chlordane ○ Source Unknown	1483 Acres	2014	5A	2027
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1483 Acres	2014	5A	2027
				• Dieldrin ○ Source Unknown	1483 Acres	2014	5A	2027

				• Mercury ○ Source Unknown	1483 Acres	2010	5A	2021
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1483 Acres	2014	5A	2027
4	Rincon Beach	Coastal & Bay Shoreline	40100010 / 18070101	• Indicator Bacteria ○ Source Unknown *Area affected is 50 yards south of mouth of Rincon Creek.*	0.38 Miles	2002	5A	2015
4	Rincon Parkway Beach	Coastal & Bay Shoreline	40100011 / 18070101	• Indicator Bacteria ○ Source Unknown	0.03 Miles	2014	5A	2027
4	Rio De Santa Clara/Oxnard Drain No. 3	River & Stream	40311000 / 18070103	• ChemA (tissue) ○ Source Unknown	1.9 Miles	1996	5B	2011
				• DDD (Dichlorodiphenyldichloroethane) ○ Source Unknown	1.9 Miles	2014	5B	2011
				• DDE (Dichlorodiphenyldichloroethylene) ○ Source Unknown	1.9 Miles	2014	5B	2011
				• Nitrogen ○ Major Municipal Point Source-dry and/or wet weather discharge	1.9 Miles	1996	5B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.9 Miles	2014	5B	2011
				• Toxicity ○ Source Unknown	1.9 Miles	2014	5A	2019
4	Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)	River & Stream	40515010 / 18070104	• Copper ○ Nonpoint Source ○ Point Source	4.6 Miles	1996	5B	2005
				• Indicator Bacteria ○ Source Unknown	4.6 Miles	2014	5B	2012
				• Lead ○ Nonpoint Source ○ Point Source	4.6 Miles	1996	5B	2005
				• Toxicity ○ Source Unknown	4.6 Miles	2010	5A	2021
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	4.6 Miles	1996	5B	2008
				• Zinc ○ Nonpoint Source ○ Point Source	4.6 Miles	1996	5B	2005
				• pH ○ Nonpoint Source ○ Point Source	4.6 Miles	1996	5B	2004

4	Rio Hondo Reach 2 (At Spreading Grounds)	River & Stream	40515010 / 18070104	• Cyanide ○ Source Unknown	4.9 Miles	2010	5A	2021
4	Rio Hondo Reach 3 (above Spreading Grounds)	River & Stream	4412.310000 / 18070104	• Indicator Bacteria ○ Source Unknown	8.1 Miles	2014	5B	2012
				• Iron ○ Source Unknown	8.1 Miles	2014	5A	2027
				• Oxygen, Dissolved ○ Source Unknown	8.1 Miles	2014	5A	2027
4	San Antonio Creek (Tributary to Ventura River Reach 4)	River & Stream	40220023 / 18070101	• Indicator Bacteria ○ Source Unknown	9.8 Miles	2010	5A	2021
				• Nitrogen ○ Source Unknown	9.8 Miles	2002	5B	2013
				• Total Dissolved Solids ○ Source Unknown	9.8 Miles	2010	5A	2023
4	San Buenaventura Beach	Coastal & Bay Shoreline	40210000 / 18070103	• Indicator Bacteria ○ Source Unknown	1.8 Miles	1800	5A	2015
				This listing includes the area of San Buenaventura Beach at San Jon Rd.				
4	San Gabriel River Estuary	River & Stream	40516000 / 18070104	• Copper ○ Source Unknown	3.4 Miles	1996	5B	2007
				• Dioxin ○ Source Unknown	3.4 Miles	2010	5A	2021
				• Indicator Bacteria ○ Source Unknown	3.4 Miles	2014	5B	2016
				• Nickel ○ Source Unknown	3.4 Miles	2010	5A	2021
				• Oxygen, Dissolved ○ Source Unknown	3.4 Miles	2010	5A	2021
4	San Gabriel River Reach 1 (Estuary to Firestone)	River & Stream	40515010 / 18070104	• Temperature, water ○ Source Unknown	6.4 Miles	2014	5A	2027
				• pH ○ Source Unknown	6.4 Miles	1996	5A	2009
4	San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam	River & Stream	40515010 / 18070104	• Cyanide ○ Source Unknown	12 Miles	2010	5A	2021
				• Lead ○ Nonpoint Source ○ Point Source	12 Miles	1996	5B	2007
				• Temperature, water ○ Source Unknown	12 Miles	2014	5A	2027

4	San Gabriel River, East Fork	River & Stream	40543000 / 18070106	• Benthic Community Effects ○ Source Unknown	5.9 Miles	2014	5A	2029
				• Trash ○ Nonpoint Source	5.9 Miles	1996	5B	2000
4	San Jose Creek Reach 1 (SG Confluence to Temple St.)	River & Stream	4405.200000,4405.510000 / 18070105	• Ammonia ○ Nonpoint Source ○ Point Source	29 Miles	1996	5C	
				• Indicator Bacteria ○ Source Unknown	29 Miles	2014	5B	2016
				• Temperature, water ○ Source Unknown	29 Miles	2014	5A	2027
				• Total Dissolved Solids ○ Source Unknown	29 Miles	2010	5A	2021
				• Toxicity ○ Source Unknown	29 Miles	1996	5A	2019
				• pH ○ Source Unknown	29 Miles	2010	5A	2021
4	Sanjon Barranca Creek	River & Stream	40210000 / 18070101	• Escherichia coli (E. coli) ○ Source Unknown	0.22 Miles	2014	5A	2027
				• Trash ○ Source Unknown	0.22 Miles	2014	5C	
4	Santa Clara River Estuary	Estuary	40311000 / 18070103	• Ammonia ○ Source Unknown	49 Acres	2014	5A	2027
				• ChemA ○ Source Unknown	49 Acres	1998	5B	2011
				• Indicator Bacteria ○ Source Unknown	49 Acres	2014	5B	2012
				• Nitrogen, Nitrate ○ Source Unknown	49 Acres	2010	5B	2004
				• Toxaphene ○ Source Unknown	49 Acres	1998	5B	2011
				• Toxicity ○ Source Unknown	49 Acres	2010	5A	2019
				• pH ○ Source Unknown	49 Acres	2014	5A	2027
4	Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)	River & Stream	40311000 / 18070103	• Oxygen, Dissolved ○ Source Unknown	10 Miles	2014	5A	2027
				• Toxicity ○ Source Unknown	10 Miles	2006	5A	2019
				• Trash ○ Source Unknown	10 Miles	2014	5C	
				• pH ○ Source Unknown	10 Miles	2014	5A	2027

4	Santa Clara River Reach 3 (Freeman Diversion to A Street)	River & Stream	40331000 / 18070103	• Chloride ○ Nonpoint Source ○ Point Source	31 Miles	2002	5B	2010
				• Escherichia coli (E. coli) ○ Source Unknown	31 Miles	2014	5A	2027
				• Indicator Bacteria ○ Source Unknown	31 Miles	2014	5B	2012
				• Mercury ○ Source Unknown	31 Miles	2014	5A	2027
				• Selenium ○ Source Unknown	31 Miles	2014	5A	2027
				• Total Dissolved Solids ○ Source Unknown	31 Miles	2002	5A	2015
				• Toxicity ○ Source Unknown	31 Miles	2010	5A	2021
				• Trash ○ Source Unknown	31 Miles	2014	5C	
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	4403.410000,4403.510000 / 18070102	• Benthic Community Effects ○ Source Unknown	8.7 Miles	2014	5A	2029
				• Chloride ○ Nonpoint Source ○ Point Source	8.7 Miles	2006	5B	2005
				• Indicator Bacteria ○ Source Unknown	8.7 Miles	2014	5B	2012
				• Iron ○ Source Unknown	8.7 Miles	2010	5A	2029
				• Trash ○ Source Unknown	8.7 Miles	2014	5C	
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	4403.510000 / 18070102	• Benthic Community Effects ○ Source Unknown	3.6 Miles	2014	5A	2027
				• Chloride ○ Nonpoint Source ○ Point Source *Chloride was relisted by USEPA in 2002.*	3.6 Miles	1998	5B	2005
				• Chlorpyrifos ○ Source Unknown	3.6 Miles	2006	5A	2029
				• Temperature, water ○ Source Unknown	3.6 Miles	2014	5A	2027

				Toxicity ○ Source Unknown	3.6 Miles	2006	5A	2029
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	• Boron ○ Source Unknown	6.2 Miles	2006	5A	2019
				• Specific Conductance ○ Source Unknown	6.2 Miles	2010	5A	2021
				• Sulfates ○ Source Unknown	6.2 Miles	2006	5A	2019
				• Total Dissolved Solids ○ Source Unknown	6.2 Miles	2010	5A	2021
4	Santa Fe Dam Park Lake	Lake & Reservoir	40531000 / 18070105	• Copper ○ Source Unknown	20 Acres	1996	5B	2012
				• Lead ○ Source Unknown	20 Acres	1996	5B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	20 Acres	2014	5A	2027
				• pH ○ Source Unknown	20 Acres	1996	5B	2012
4	Santa Monica Bay Offshore/Nearshore	Bay & Harbor	40513000 / 18070104	• Arsenic ○ Source Unknown	146645 Acres	2014	5A	2027
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	146645 Acres	2014	5B	2012
				• Mercury ○ Source Unknown	146645 Acres	2014	5A	2027
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	146645 Acres	1800	5B	2012
				• Trash ○ Source Unknown	146645 Acres	2014	5B	2012
4	Santa Monica Canyon	River & Stream	40513000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	2.7 Miles	1996	5B	2003
				• Lead ○ Source Unknown	2.7 Miles	1996	5A	2019
4	Sawpit Creek	River & Stream	40531000 / 18070105	• Bis(2ethylhexyl)phthalate (DEHP) ○ Source Unknown	3.9 Miles	2006	5A	2019
				• Indicator Bacteria ○ Source Unknown	3.9 Miles	2014	5A	2027
4	Sespe Creek (from 500 ft below confluence with	River & Stream	40332020 / 18070102	• Chloride ○ Source Unknown	54 Miles	2006	5A	2019

	Little Sespe Cr to headwaters)							
				• pH ○ Source Unknown	54 Miles	2006	5A	2019
4	Solstice Canyon Creek	River & Stream	40432000 / 18070104	• Invasive Species ○ Source Unknown	4.8 Miles	2010	5A	2021
4	South San Jose Creek (Los Angeles County)	River & Stream	40551000 / 18070106	• Ammonia ○ Source Unknown	3.3 Miles	2014	5A	2027
				• Toxicity ○ Source Unknown	3.3 Miles	2014	5A	2027
				• pH ○ Source Unknown	3.3 Miles	2014	5A	2027
4	Surfers Point at Seaside	Coastal & Bay Shoreline	40210000 / 18070101	• Indicator Bacteria ○ Source Unknown	0.4 Miles	2002	5A	2015
				Area affected is the end of the access path via a wooden gate.				
4	Tapo Canyon	River & Stream	40341000 / 18070103	• Chlordane ○ Source Unknown	4.1 Miles	2014	5A	2027
				• Chloride ○ Source Unknown	4.1 Miles	2014	5A	2027
				• DDD (Dichlorodiphenyldichloroethane) ○ Source Unknown	4.1 Miles	2014	5A	2027
				• Malathion ○ Source Unknown	4.1 Miles	2014	5A	2027
				• Sulfates ○ Source Unknown	4.1 Miles	2014	5A	2027
				• Total Dissolved Solids ○ Source Unknown	4.1 Miles	2014	5A	2027
				• Toxicity ○ Source Unknown	4.1 Miles	2014	5A	2027
4	Timber Canyon	River & Stream	40331000 / 18070102	• Chlorpyrifos ○ Source Unknown	5.4 Miles	2014	5A	2027
4	Topanga Canyon Creek	River & Stream	40411000 / 18070104	• Lead ○ Source Unknown	8.6 Miles	1996	5A	2019
4	Torrance Carson Channel	River & Stream	40512000 / 18070104	• Copper ○ Source Unknown	3.4 Miles	1996	5B	2012
				• Indicator Bacteria ○ Source Unknown	3.4 Miles	2014	5A	2007
				• Lead ○ Source Unknown	3.4 Miles	1996	5B	2012
4	Triunfo Canyon	River &	40424000 / 18070104	• Benthic Community Effects ○ Source Unknown	2.5 Miles	2014	5A	2029

	Creek Reach 1	Stream						
				• Lead ○ Source Unknown	2.5 Miles	1996	5A	2019
				• Mercury ○ Source Unknown	2.5 Miles	1996	5A	2019
				• Sedimentation/Siltation ○ Source Unknown	2.5 Miles	2002	5A	2019
4	Triunfo Canyon Creek Reach 2	River & Stream	40424000 / 18070104	• Benthic Community Effects ○ Source Unknown	3.3 Miles	2014	5A	2021
				• Lead ○ Source Unknown	3.3 Miles	1996	5A	2019
				• Mercury ○ Source Unknown	3.3 Miles	1996	5A	2019
				• Sedimentation/Siltation ○ Source Unknown	3.3 Miles	2002	5A	2019
4	Ventura Harbor: Ventura Keys	Bay & Harbor	40311000 / 18070103	• Arsenic ○ Source Unknown	179 Acres	2014	5A	2027
				• Cadmium ○ Source Unknown	179 Acres	2014	5A	2027
				• Chlordane ○ Source Unknown	179 Acres	2014	5A	2027
				• Coliform Bacteria ○ Source Unknown	179 Acres	1996	5A	2019
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	179 Acres	2014	5A	2027
				• Dieldrin ○ Source Unknown	179 Acres	2014	5A	2027
				• Indicator Bacteria ○ Source Unknown	179 Acres	2014	5A	2027
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	179 Acres	2014	5A	2027
4	Ventura Marina Jetties	Coastal & Bay Shoreline	40311000 / 18070103	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.69 Miles	2006	5A	2019
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.69 Miles	2006	5A	2019
4	Ventura River Estuary	River & Stream	40210011 / 18070101	• Algae ○ Source Unknown	0.2 Miles	1998	5B	2013
				• Eutrophic ○ Source Unknown	0.2 Miles	1998	5B	2013
				• Indicator Bacteria ○ Source Unknown	0.2 Miles	2014	5A	2019
				Stables and horse property may be the sources.				
				• Trash	0.2 Miles	1998	5B	2008

				Agriculture-storm runoff ○ Recreational and Tourism Activities (non-boating) ○ Urban Runoff/Storm Sewers				
4	Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)	River & Stream	40210011 / 18070101	• Algae ○ Source Unknown	4.5 Miles	1996	5A	2019
				• Benthic Community Effects ○ Source Unknown	4.5 Miles	2014	5A	2029
				• Temperature, water ○ Source Unknown	4.5 Miles	2014	5A	2027
4	Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)	River & Stream	40210011 / 18070101	• Benthic Community Effects ○ Source Unknown	2.8 Miles	2014	5A	2029
				• Indicator Bacteria ○ Source Unknown	2.8 Miles	2010	5A	2021
				• Toxicity ○ Source Unknown	2.8 Miles	2014	5A	2027
4	Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)	River & Stream	40220021 / 18070101	• Benthic Community Effects ○ Source Unknown	19 Miles	2014	5A	2029
				• Pumping ○ Source Unknown	19 Miles	1996	5A	2019
				This is Category 4c - impairment due to pollution and does not require a TMDL or any other specific regulatory action.				
				• Temperature, water ○ Source Unknown	19 Miles	2014	5A	2027
				• Water Diversion ○ Source Unknown	19 Miles	1996	5A	2019
				This is Category 4c - impairment due to pollution and does not require a TMDL or any other specific regulatory action.				
4	Walnut Creek Wash (Drains from Puddingstone Res)	River & Stream	40531000 / 18070106	• Benthic Community Effects ○ Source Unknown	12 Miles	2014	5A	2012
				• Indicator Bacteria ○ Source Unknown	12 Miles	2010	5A	2027
				• pH ○ Source Unknown	12 Miles	1996	5A	2007
4	Westlake Lake	Lake & Reservoir	40425000 / 18070104	• Algae ○ Agriculture-animal ○ Atmospheric Deposition ○ Golf course activities ○ Groundwater Loadings ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge	119 Acres	1996	5B	2003

				Onsite Wastewater Systems (Septic Tanks) o Urban Runoff/Storm Sewers				
				• Ammonia o Agriculture-animal o Atmospheric Deposition o Golf course activities o Groundwater Loadings o Irrigated Crop Production o Major Municipal Point Source-dry and/or wet weather discharge o Onsite Wastewater Systems (Septic Tanks) o Urban Runoff/Storm Sewers	119 Acres	1996	5B	2003
				• Eutrophic o Agriculture-animal o Atmospheric Deposition o Golf course activities o Groundwater Loadings o Irrigated Crop Production o Major Municipal Point Source-dry and/or wet weather discharge o Onsite Wastewater Systems (Septic Tanks) o Urban Runoff/Storm Sewers	119 Acres	1996	5B	2003
				• Lead o Source Unknown	119 Acres	1996	5A	2019
				• Organic Enrichment/Low Dissolved Oxygen o Agriculture-animal o Atmospheric Deposition o Golf course activities o Groundwater Loadings o Irrigated Crop Production o Major Municipal Point Source-dry and/or wet weather discharge o Onsite Wastewater Systems (Septic Tanks) o Urban Runoff/Storm Sewers	119 Acres	1996	5B	2003
4	Wheeler Canyon/Todd Barranca	River & Stream	40321000 / 18070102	• Chlordane o Source Unknown	10 Miles	2014	5A	2027
				• Cypermethrin o Source Unknown	10 Miles	2014	5A	2027
				• DDT (Dichlorodiphenyltrichloroethane) o Source Unknown	10 Miles	2014	5A	2027
				• Nitrate and Nitrite o Nonpoint Source	10 Miles	1998	5B	2004
				• Sulfates o Source Unknown	10 Miles	2002	5A	2019
				• Total Dissolved Solids o Source Unknown	10 Miles	2002	5A	2019
				• Toxaphene o Source Unknown	10 Miles	2014	5A	2027

				• Toxicity ○ Source Unknown	10 Miles	2014	5A	2027
4	Wildlife Lake	Lake & Reservoir	40521000 / 18070105	• Ammonia ○ Source Unknown	15 Acres	2014	5B	2004
				• Oxygen, Dissolved ○ Source Unknown	15 Acres	2014	5A	2027
4	Wilmington Drain	River & Stream	40342000 / 18070104	• Indicator Bacteria ○ Source Unknown	0.56 Miles	2014	5A	2007

2016 CALIFORNIA WATERS IMPACTED BY POLLUTION

Category 4C Criteria: A water that is impacted by non-pollutant related cause(s).

* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = is the State Water Resources Control Board hydrological subunit area or even smaller area delineation.

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER / USGS HUC	POLLUTION	ESTIMATED AREA ASSESSED
4	Matilija Creek Reach 1 (Jct. With N. Fork to Reservoir)	River & Stream	40220012 / 18070101	• Fish Barriers (Fish Passage)	0.63 Miles
4	Matilija Creek Reach 2 (Above Reservoir)	River & Stream	40220010 / 18070101	• Fish Barriers (Fish Passage)	15 Miles
4	Matilija Reservoir	Lake & Reservoir	40220012 / 18070101	• Fish Barriers (Fish Passage)	121 Acres

2016 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 action(s) other than TMDL.

* USGS HUC = US Geological Survey Hydrologic Unit Code. Calwater = is the State Water Resources Control Board hydrological subunit area or even smaller area delineation.

REGION	WATER BODY NAME	WATER TYPE	WATERSHED* CALWATER / USGS HUC	• POLLUTANT ○ POTENTIAL SOURCES *Relevant Notes*	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	PROGRAM COMPLETION DATE
4	J Street Drain (Ventura County)	River & Stream	40311000 / 18070103	• Trash ○ Source Unknown	2.3 Miles	2014	2027
4	Santa Clara River Reach 10 (Sespe Creek, from confl with Santa Clara River Reach 3 to above gaging station - 500 ft downstream from Little Sespe Cr)	River & Stream	40331000 / 18070102	• Trash ○ Source Unknown	9 Miles	2014	2027
4	Santa Clara River Reach 4A (A Street, Fillmore to Piru Creek)	River & Stream	4403.310000,4403.410000 /	• Trash ○ Source Unknown	7.9 Miles	2014	2027
4	Santa Paula Creek Reach 1 (confluence w Santa Clara River to Diverson Dam)	River & Stream	40321000 / 18070102	• Trash ○ Source Unknown	1.8 Miles	2014	2027

2016 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 ○ POTENTIAL SOURCES *Relevant Notes*	ESTIMATED AREA ASSESSED	FIRST YEAR LISTED	ADDRESSED BY**	USEPA TMDL APPROVAL DATE
4	Abalone Cove Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.1 Miles	2014	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.1 Miles	1998	B	2012
4	Aliso Canyon Wash	River & Stream	40521000 / 18070105	• Copper ○ Source Unknown	10 Miles	1996	B	2008
				• Indicator Bacteria ○ Source Unknown	10 Miles	2014	B	2012
				• Selenium ○ Nonpoint Source	10 Miles	1996	B	2005
4	Amarillo Beach	Coastal & Bay Shoreline	40431000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown *Fish Consumption Advisory for DDT.*	0.64 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown *Fish Consumption Advisory for PCBs.*	0.64 Miles	1998	B	2012
4	Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam)	River & Stream	40515010 / 18070104	• Indicator Bacteria ○ Source Unknown	4.4 Miles	2014	B	2012
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	4.4 Miles	1996	B	2008
4	Avalon Beach	Coastal & Bay Shoreline	40511000 / 18070107	• Indicator Bacteria ○ Source Unknown	0.67 Miles	2002	B	2014
4	Ballona Creek Estuary	River & Stream	40513000 / 18070104	• Cadmium ○ Source Unknown	2.3 Miles	1992	B	2005
				• Chlordane ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2005

				• Copper ○ Source Unknown	2.3 Miles	1992	B	2005
				• DDT (Dichlorodiphenyltrichloroethane) ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2005
				• Indicator Bacteria ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2007
				• Lead ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2005
				• PAHs (Polycyclic Aromatic Hydrocarbons) ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2005
				• PCBs (Polychlorinated biphenyls) ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2005
				• Silver ○ Source Unknown	2.3 Miles	1992	B	2005
				• Toxicity ○ Nonpoint Source ○ Point Source	2.3 Miles	2010	B	2005
				• Zinc ○ Nonpoint Source ○ Point Source	2.3 Miles	2014	B	2005
4	Ballona Creek Wetlands	Wetland, Tidal	40517000 / 18070104	• Exotic Vegetation ○ Source Unknown	289 Acres	1996	B	2012
				• Habitat alterations ○ Source Unknown	289 Acres	1996	B	2012
				• Hydromodification ○ Source Unknown	289 Acres	1996	B	2012
				• Reduced Tidal Flushing ○ Source Unknown	289 Acres	1996	B	2012
				• Trash ○ Nonpoint Source	289 Acres	1996	B	2019
4	Bell Creek	River & Stream	40521000 / 18070104	• Indicator Bacteria ○ Source Unknown	8.9 Miles	2014	B	2012
4	Big Rock Beach	Coastal & Bay Shoreline	40431000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown *Fish Consumption Advisory for DDT.*	0.74 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown *Fish Consumption Advisory for PCBs.*	0.74 Miles	1998	B	2012

4	Bluff Cove Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ See TMDL documentation	0.55 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ See TMDL documentation	0.55 Miles	1998	B	2012
4	Brown Barranca/Long Canyon	River & Stream	40321000 / 18070103	• Nitrate and Nitrite ○ Agriculture-storm runoff ○ Atmospheric Deposition ○ Groundwater Loadings ○ Groundwater Withdrawal ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet weather discharge ○ Onsite Wastewater Systems (Septic Tanks)	2.6 Miles	1998	B	2004
4	Bull Creek	River & Stream	40521000 / 18070105	• Indicator Bacteria ○ Source Unknown	2.3 Miles	2010	B	2012
4	Cabrillo Beach (Outer)	Coastal & Bay Shoreline	40512000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.58 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.58 Miles	1998	B	2012
4	Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)	Estuary	40311000 / 18070103	• Chlordane (tissue) ○ Nonpoint Source	344 Acres	1992	B	2005
				• Copper ○ Nonpoint Source ○ Point Source	344 Acres	1996	B	2007
				• Dieldrin ○ Source Unknown	344 Acres	2006	B	2006
				• Endosulfan (tissue) ○ Agriculture-storm runoff	344 Acres	2006	B	2006
				• Mercury ○ Nonpoint Source ○ Point Source	344 Acres	1996	B	2007
				• Nickel ○ Nonpoint Source ○ Point Source	344 Acres	1996	B	2007
				• Nitrogen ○ Nonpoint Source ○ Point Source	344 Acres	1996	B	2003
				• PCBs (Polychlorinated biphenyls) (tissue) ○ Nonpoint Source ○ Point Source	344 Acres	1996	B	2005
				• Sedimentation/Siltation	344 Acres	1992	B	2007

				◦ Agriculture ◦ Natural Sources				
				• Toxaphene ◦ Source Unknown	344 Acres	2006	B	2006
				• Toxicity ◦ Nonpoint Source ◦ Point Source	344 Acres	2014	B	2005
				• Zinc ◦ Source Unknown	344 Acres	1996	B	2007
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	• Ammonia ◦ Nonpoint Source ◦ Point Source	17 Miles	1996	B	2003
				• ChemA (tissue) ◦ Agriculture-storm runoff	17 Miles	1996	B	2006
				• Chlordane ◦ Source Unknown	17 Miles	1996	B	2006
				• Chloride ◦ Atmospheric Deposition ◦ Domestic Use of Ground Water ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry weather discharge ◦ Surface Runoff	17 Miles	2002	B	2008
				• Dieldrin ◦ Source Unknown	17 Miles	2006	B	2006
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	17 Miles	1996	B	2006
				• Sulfates ◦ Atmospheric Deposition ◦ Domestic Use of Ground Water ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry weather discharge ◦ Surface Runoff	17 Miles	2002	B	2008
				• Total Dissolved Solids ◦ Atmospheric Deposition ◦ Domestic Use of Ground Water ◦ Groundwater Loadings ◦ Irrigated Crop Production ◦ Major Municipal Point Source-dry weather discharge	17 Miles	2002	B	2008

				◦ Surface Runoff				
				• Toxicity ◦ Nonpoint Source ◦ Point Source	17 Miles	1996	B	2006
4	Carbon Beach	Coastal & Bay Shoreline	40416000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	1.5 Miles	1998	B	2012
				• Indicator Bacteria ◦ Source Unknown	1.5 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown *Fish Consumption Advisory for PCBs.*	1.5 Miles	1998	B	2012
4	Castlerock Beach	Coastal & Bay Shoreline	40513000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	0.21 Miles	1998	B	2012
				• Indicator Bacteria ◦ Nonpoint Source ◦ Point Source	0.21 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	0.21 Miles	1998	B	2012
4	Channel Islands Harbor Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Indicator Bacteria ◦ Major Municipal Point Source-wet weather discharge ◦ Natural Sources ◦ Unknown Nonpoint Source	0.03 Miles	2002	B	2008
4	Dan Blocker Memorial (Coral) Beach	Coastal & Bay Shoreline	40431000 / 18070104	• Indicator Bacteria ◦ Source Unknown	2.1 Miles	2014	B	2002
4	Dockweiler Beach	Coastal & Bay Shoreline	40512000 / 18070104	• Indicator Bacteria ◦ Nonpoint Source	4.6 Miles	1998	B	2003
4	Echo Park Lake	Lake & Reservoir	40515010 / 18070104	• Algae ◦ Source Unknown	13 Acres	1996	B	2012
				• Chlordane ◦ Source Unknown	13 Acres	2014	B	2012
				• Dieldrin ◦ Source Unknown	13 Acres	2014	B	2012
				• Eutrophic ◦ Source Unknown	13 Acres	1996	B	2012
				• Odor ◦ Source Unknown	13 Acres	1996	B	2012
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	13 Acres	2014	B	2012
				• Trash	13 Acres	1996	B	2012

				◦ Source Unknown				
				• pH ◦ Source Unknown	13 Acres	1996	B	2012
4	El Dorado Lakes	Lake & Reservoir	40515010 / 18070104	• Algae ◦ Source Unknown	31 Acres	1996	B	2012
				• Ammonia ◦ Source Unknown	31 Acres	1996	B	2012
				• Copper ◦ Source Unknown	31 Acres	1996	B	2012
				• Eutrophic ◦ Source Unknown	31 Acres	1996	B	2012
				• Lead ◦ Source Unknown	31 Acres	1996	B	2012
				• pH ◦ Source Unknown	31 Acres	1996	B	2012
4	Escondido Beach	Coastal & Bay Shoreline	40434000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	1.2 Miles	1998	B	2012
				• Indicator Bacteria ◦ Nonpoint Source	1.2 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	1.2 Miles	1998	B	2012
4	Flat Rock Point Beach Area	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	0.11 Miles	1998	B	2012
				• Indicator Bacteria ◦ Nonpoint Source	0.11 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	0.11 Miles	1998	B	2012
				Fish Consumption Advisory for PCBs.				
4	Fox Barranca (tributary to Calleguas Creek Reach 6)	River & Stream	40362000 / 18070103	• Boron ◦ Other	6.7 Miles	1998	B	2008
				• Chlordane ◦ Source Unknown	6.7 Miles	2014	B	2006
				• DDE (Dichlorodiphenyldichloroethylene) ◦ Source Unknown	6.7 Miles	2014	B	2006
				• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	6.7 Miles	2014	B	2006
				• Nitrate and Nitrite ◦ Nonpoint Source	6.7 Miles	1998	B	2003

				• Sulfates ○ Other	6.7 Miles	1998	B	2006
				• Total Dissolved Solids ○ Other	6.7 Miles	1998	B	2006
4	Hobie Beach (Channel Islands Harbor)	Coastal & Bay Shoreline	40311000 / 18070103	• Indicator Bacteria ○ Natural Sources ○ Nonpoint Source ○ Urban Runoff/Storm Sewers	0.1 Miles	2002	B	2008
4	Inspiration Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.14 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	0.14 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.14 Miles	1998	B	2012
4	La Costa Beach	Coastal & Bay Shoreline	40416000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown *Fish Consumption Advisory for DDT.*	0.74 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	0.74 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown *Fish Consumption Advisory for PCBs.*	0.74 Miles	1998	B	2012
4	Lake Calabasas	Lake & Reservoir	40521000 / 18070105	• Ammonia ○ Source Unknown	18 Acres	1996	B	2012
				• Eutrophic ○ Source Unknown	18 Acres	1996	B	2012
				• Odor ○ Source Unknown	18 Acres	1996	B	2012
				• Organic Enrichment/Low Dissolved Oxygen ○ Source Unknown	18 Acres	1998	B	2012
				• pH ○ Source Unknown	18 Acres	1996	B	2012
4	Lake Sherwood	Lake & Reservoir	40426000 / 18070104	• Algae ○ Agriculture-animal ○ Golf course activities	135 Acres	1996	B	2003
				• Eutrophic ○ Agriculture-animal ○ Golf course activities	135 Acres	1996	B	2003
				• Mercury (tissue) ○ Source Unknown	135 Acres	1996	B	2012
				• DDT				

4	Las Flores Beach	Coastal & Bay Shoreline	40415000 / 18070104	(Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.1 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	1.1 Miles	2014	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.1 Miles	1998	B	2012
4	Las Tunas Beach	Coastal & Bay Shoreline	40412000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.2 Miles	1998	B	2012
				• Indicator Bacteria ○ Source Unknown	1.2 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.2 Miles	1998	B	2012
4	Long Beach City Beach	Coastal & Bay Shoreline	40512000 / 18070104	• Indicator Bacteria ○ Source Unknown	4.7 Miles	2006	B	2012
				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	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.7 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.7 Miles	1998	B	2012
4	Los Angeles Harbor - Cabrillo Marina	Bay & Harbor	40512000 / 18070104	• Benzo(a)pyrene (3,4-Benzopyrene -7-d) ○ Source Unknown	77 Acres	2010	B	2012
				• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	77 Acres	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	77 Acres	1998	B	2012
4	Los Angeles Harbor - Fish Harbor	Bay & Harbor	40518000 / 18070104	• Benzo(a)anthracene ○ Source Unknown	91 Acres	1998	B	2012
				• Benzo(a)pyrene (3,4-Benzopyrene -7-d) ○ Source Unknown	91 Acres	1998	B	2012
				• Chlordane ○ Source Unknown	91 Acres	1998	B	2012
				• Chrysene (C1-C4) ○ Source Unknown	91 Acres	1998	B	2012
				• Copper ○ Source Unknown	91 Acres	1998	B	2012
				• DDT (Dichlorodiphenyltrichloroethane)	91 Acres	1998	B	2012

				◦ Source Unknown				
				• Dibenz[a,h]anthracene ◦ Source Unknown	91 Acres	1998	B	2012
				• Lead ◦ Source Unknown	91 Acres	1998	B	2016
				• Mercury ◦ Source Unknown	91 Acres	1998	B	2012
				• PAHs (Polycyclic Aromatic Hydrocarbons) ◦ Source Unknown	91 Acres	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	91 Acres	1998	B	2012
				• Phenanthrene ◦ Source Unknown	91 Acres	1998	B	2012
				• Pyrene ◦ Source Unknown	91 Acres	1998	B	2012
				• Toxicity ◦ Source Unknown	91 Acres	2014	B	2013
				• Zinc ◦ Source Unknown	91 Acres	1998	B	2012
4	Los Angeles Harbor - Inner Cabrillo Beach Area	Bay & Harbor	40512000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown *Fish Consumption Advisory for DDT.*	82 Acres	1998	B	2012
				• Indicator Bacteria ◦ Source Unknown	82 Acres	1998	B	2004
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown *Fish Consumption Advisory for PCBs.*	82 Acres	1998	B	2013
4	Los Angeles/Long Beach Inner Harbor	Bay & Harbor	40518000 / 18070104	• Benthic Community Effects ◦ Source Unknown	3003 Acres	1998	B	2012
				• Benzo(a)pyrene (3,4-Benzopyrene -7-d) ◦ Source Unknown	3003 Acres	2010	B	2012
				• Chrysene (C1-C4) ◦ Source Unknown	3003 Acres	2010	B	2012
				• Copper ◦ Source Unknown	3003 Acres	1998	B	2012
				• DDT (Dichlorodiphenyltrichloroethane) ◦ Source Unknown	3003 Acres	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ◦ Source Unknown	3003 Acres	1998	B	2012

				• Toxicity ○ Source Unknown	3003 Acres	2014	B	2012
				• Zinc ○ Source Unknown	3003 Acres	1988	B	2012
4	Los Angeles/Long Beach Outer Harbor (inside breakwater)	Bay & Harbor	40512000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	4042 Acres	1988	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	4042 Acres	1988	B	2012
				• Toxicity ○ Source Unknown	4042 Acres	2014	B	2011
4	Lunada Bay Beach	Coastal & Bay Shoreline	40511000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	0.63 Miles	1998	B	2003
4	Malaga Cove Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ See TMDL documentation	0.39 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ See TMDL documentation	0.39 Miles	1998	B	2012
4	Malibu Beach	Coastal & Bay Shoreline	40421000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.77 Miles	1998	B	2012
				• Indicator Bacteria ○ Source Unknown	0.77 Miles	1998	B	2003
4	Malibu Lagoon Beach (Surfrider)	Coastal & Bay Shoreline	40421000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown *Fish Consumption Advisory for DDT.*	1 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1 Miles	1998	B	2012
4	Marina del Rey Harbor Beach	Coastal & Bay Shoreline	40517000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	0.29 Miles	1998	B	2004
4	McGrath Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Indicator Bacteria ○ Nonpoint Source	1.7 Miles	2014	B	2003
4	Mint Canyon Creek Reach 1 (Confl to Rowler Cyn)	River & Stream	40351000 / 18070102	• Nitrate and Nitrite ○ Agriculture-storm runoff ○ Atmospheric Deposition ○ Groundwater Loadings ○ Groundwater Withdrawal ○ Irrigated Crop Production ○ Major Municipal Point Source-dry and/or wet	8.1 Miles	1998	B	2004

				weather discharge ○ Onsite Wastewater Systems (Septic Tanks)				
4	Monrovia Canyon Creek	River & Stream	40531000 / 18070105	• Lead ○ Nonpoint Source	3.4 Miles	1996	B	2005
4	Nicholas Canyon Beach	Coastal & Bay Shoreline	40444000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.7 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.7 Miles	1998	B	2012
4	Palo Comado Creek	River & Stream	40423000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	6.8 Miles	2014	B	2006
4	Palo Verde Shoreline Park Beach	Coastal & Bay Shoreline	40511000 / 18070104	• Pathogens ○ Nonpoint Source	0.24 Miles	1998	B	2003
				• Pesticides ○ Source Unknown	0.24 Miles	1998	B	2012
4	Paradise Cove Beach	Coastal & Bay Shoreline	40435000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.7 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	1.7 Miles	2014	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.7 Miles	1998	B	2012
4	Peck Road Park Lake	Lake & Reservoir	40531000 / 18070105	• Chlordane (tissue) ○ Source Unknown	103 Acres	1996	B	2012
				• DDT (tissue) ○ Source Unknown	103 Acres	1996	B	2012
				• Lead ○ Source Unknown	103 Acres	1996	B	2012
				• Odor ○ Source Unknown	103 Acres	1996	B	2012
				• Organic Enrichment/Low Dissolved Oxygen ○ Source Unknown	103 Acres	1996	B	2012
				• Trash ○ Source Unknown	103 Acres	1996	B	2012
4	Point Dume Beach	Coastal & Bay Shoreline	40435000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	2.5 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	2.5 Miles	1996	B	2012
4	Point Fermin	Coastal &	40512000 / 18070104	• DDT	1.6 Miles	1996	B	2012

	Park Beach	Bay Shoreline		(Dichlorodiphenyltrichloroethane) ○ Source Unknown • PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.6 Miles	1998	B	2012
4	Point Vicente Beach	Coastal & Bay Shoreline	40511000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	0.63 Miles	1994	B	2003
4	Portuguese Bend Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown *Fish Consumption Advisory for DDT.*	1.4 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.4 Miles	1998	B	2012
4	Puerco Beach	Coastal & Bay Shoreline	40431000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.5 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	0.5 Miles	1998	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.5 Miles	1998	B	2012
4	Redondo Beach	Coastal & Bay Shoreline	40512000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.5 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	1.5 Miles	2014	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.5 Miles	1998	B	2012
4	Resort Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	0.15 Miles	1998	B	2003
4	Robert H. Meyer Memorial Beach	Coastal & Bay Shoreline	40441000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.2 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.2 Miles	1998	B	2012
4	Royal Palms Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.1 Miles	1998	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.1 Miles	1998	B	2012
4	San Gabriel River Reach 3 (Whittier	River & Stream	40531000 / 18070104	• Indicator Bacteria ○ Source Unknown	7.2 Miles	2010	B	2016

	Narrows to Ramona)							
4	San Jose Creek Reach 2 (Temple to I-10 at White Ave.)	River & Stream	4405.510000,4405.520000 / 18070106	• Indicator Bacteria ○ Source Unknown	12 Miles	2014	B	2016
4	San Pedro Bay Near/Off Shore Zones	Bay & Harbor	40512000 / 18070104	• Chlordane ○ Source Unknown	8173 Acres	2006	B	2012
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	8173 Acres	1996	B	2012
				• Total DDT (sum of 4,4'- and 2,4'-isomers of DDT, DDE, and DDD) ○ Source Unknown	8173 Acres	2014	B	2012
				• Toxicity ○ Source Unknown	8173 Acres	2014	B	2012
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	• Indicator Bacteria ○ Source Unknown	21 Miles	2014	B	2012
4	Santa Monica Beach	Coastal & Bay Shoreline	40513000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	3 Miles	1998	B	2003
4	Sea Level Beach	Coastal & Bay Shoreline	40441000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	0.21 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	0.21 Miles	2006	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	0.21 Miles	1998	B	2012
4	Sepulveda Canyon	River & Stream	40513000 / 18070104	• Copper ○ Source Unknown	0.83 Miles	2006	B	2005
				• Indicator Bacteria ○ Nonpoint Source	0.83 Miles	1996	B	2003
				• Lead ○ Nonpoint Source	0.83 Miles	1996	B	2005
				• Selenium ○ Source Unknown	0.83 Miles	2006	B	2005
				• Zinc ○ Source Unknown	0.83 Miles	2006	B	2005

4	Stokes Creek	River & Stream	40422020 / 18070104	• Indicator Bacteria ○ Nonpoint Source	4.7 Miles	2014	B	2006
4	Topanga Beach	Coastal & Bay Shoreline	40413000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	2.5 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	2.5 Miles	2014	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	2.5 Miles	1998	B	2012
4	Torrance Beach	Coastal & Bay Shoreline	40512000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	1.1 Miles	2014	B	2003
4	Torrey Canyon Creek	River & Stream	40341000 / 18070103	• Nitrate and Nitrite ○ Nonpoint Source	1.7 Miles	1998	B	2004
4	Trancas Beach (Broad Beach)	Coastal & Bay Shoreline	40437000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.7 Miles	1998	B	2012
				• Indicator Bacteria ○ Nonpoint Source	1.7 Miles	2014	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.7 Miles	1998	B	2012
4	Tujunga Wash (LA River to Hansen Dam)	River & Stream	40521000 / 18070105	• Ammonia ○ Nonpoint Source	9.7 Miles	1996	B	2004
				• Copper ○ Nonpoint Source	9.7 Miles	1996	B	2005
				• Indicator Bacteria ○ Source Unknown	9.7 Miles	2014	B	2012
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	9.7 Miles	1996	B	2008
4	Venice Beach	Coastal & Bay Shoreline	40513000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	2.5 Miles	2006	B	2003
4	Verdugo Wash Reach 1 (LA River to Verdugo Rd.)	River & Stream	40521000 / 18070105	• Copper ○ Source Unknown	2 Miles	2010	B	2008
				• Indicator Bacteria ○ Source Unknown	2 Miles	2014	B	2012
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	2 Miles	1996	B	2008

4	Verdugo Wash Reach 2 (Above Verdugo Road)	River & Stream	40524000 / 18070105	• Indicator Bacteria ○ Source Unknown	7.6 Miles	2014	B	2012
				• Trash ○ Nonpoint Source ○ Surface Runoff ○ Urban Runoff/Storm Sewers	7.6 Miles	1996	B	2008
4	Whites Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.1 Miles	2006	B	2012
				• Indicator Bacteria ○ Nonpoint Source	1.1 Miles	2006	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.1 Miles	2006	B	2012
4	Will Rogers Beach	Coastal & Bay Shoreline	40513000 / 18070104	• Indicator Bacteria ○ Nonpoint Source	3 Miles	2006	B	2003
4	Zuma Beach (Westward Beach)	Coastal & Bay Shoreline	40436000 / 18070104	• DDT (Dichlorodiphenyltrichloroethane) ○ Source Unknown	1.6 Miles	2006	B	2012
				• Indicator Bacteria ○ Nonpoint Source	1.6 Miles	2006	B	2003
				• PCBs (Polychlorinated biphenyls) ○ Source Unknown	1.6 Miles	2006	B	2012

2016 CALIFORNIA WATERS WITH INSUFFICIENT INFORMATION TO ASSESS BENEFICIAL USE SUPPORT BUT SOME USES MAY BE POTENTIALLY THREATENED

Common 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 is insufficient to determine an appropriate decision recommendation, but the available data and information that does exist indicates beneficial uses may be potentially threatened.

* 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	• COMMON BENEFICIAL USE ○ *California Beneficial Use* Pollutant Assessed	ESTIMATED AREA ASSESSED
4	**Cold Creek (Los Angeles County)**	**River & Stream**	**40421000 / 18070104**	• **Drinking Water Supply** ○ ***Municipal & Domestic Supply*** **Sulfates** • **Aquatic Life Support** ○ ***Cold Freshwater Habitat*** **Benthic Community Effects, Invasive Species, Oxygen, Dissolved, pH**	**0.85 Miles**
4	**Cold Creek, unnamed tributary along Dry Canyon Cold Creek Road (Los Angeles County)**	**River & Stream**	**40421000 / 18070104**	• **Secondary Contact** ○ ***Non-Contact Recreation*** **pH** • **Swimming** ○ ***Water Contact Recreation*** **Manganese, pH** • **Aquatic Life Support** ○ ***Fish Spawning*** **Oxygen, Dissolved** ○ ***Cold Freshwater Habitat*** **Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel,**	**2.5 Miles**

				Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	
4	La Vista Drain (Ventura County)	River & Stream	40361000 / 18070103	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* Indicator Bacteria, pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Cadmium, DDD (Dichlorodiphenyldichloroethane), DDE (Dichlorodiphenyldichloroethylene), Endrin aldehyde, Manganese, Nitrogen, Nitrate, Nitrogen, Nitrite, Specific Conductivity, alpha.-BHC (Benzenehexachloride or alpha-HCH), beta-BHC (Benzenehexachloride or beta-HCH) • Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Azinphos-methyl (Guthion), Benthic Community Effects, Bifenthrin, Cadmium, Chlordane, Chloride, Chlorpyrifos, Chromium, Copper, Cyfluthrin, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Iron, Lead , Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Mercury, Methidathion, Methoxychlor, Methyl Parathion, Mirex, Nickel, Oxygen, Dissolved, Parathion, Permethrin, Phorate, Phosmet, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxaphene, Toxicity, Zinc, pH	1.2 Miles
4	Lachusa Canyon Creek	River & Stream	40442000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	2.9 Miles

				• **Aquatic Life Support** ◦ ***Warm Freshwater Habitat*** **Benthic Community Effects**	
4	**Las Virgenes Creek, East**	**River & Stream**	**40422010 / 18070104**	• **Secondary Contact** ◦ ***Non-Contact Recreation*** **pH** • **Swimming** ◦ ***Water Contact Recreation*** **pH** • **Aquatic Life Support** ◦ ***Warm Freshwater Habitat*** **Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Zinc, pH** ◦ ***Marine Habitat*** **Arsenic, Bifenthrin, Cadmium, Copper, Cypermethrin, Lead , Nickel, Permethrin, Selenium, Silver, Zinc, pH** ◦ ***Estuarine Habitat*** **Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cypermethrin, Lead , Nickel, Permethrin, Selenium, Silver, Zinc** ◦ ***Fish Spawning*** **Ammonia, Oxygen, Dissolved** ◦ ***Cold Freshwater Habitat*** **Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Temperature, water, Toxicity, Zinc, pH** • **Fish Consumption** ◦ ***Commercial or recreational collection of fish, shellfish, or organisms*** **Manganese, Nickel, Selenium**	**2 Miles**
				• **Aquatic Life Support**	

4	San Gabriel River Reach 4 (Morris Dam to Ramona Blvd)	River & Stream	40531000 / 18070106	◦ *Warm Freshwater Habitat* Benthic Community Effects	16 Miles
4	San Gabriel River, West Fork	River & Stream	40543000 / 18070106	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming ◦ *Water Contact Recreation* pH • Aquatic Life Support ◦ *Warm Freshwater Habitat* Alkalinity as CaCO3, Ammonia, Chloride, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Sulfates, Temperature, water, pH ◦ *Marine Habitat* pH ◦ *Fish Spawning* Ammonia, Oxygen, Dissolved ◦ *Cold Freshwater Habitat* Alkalinity as CaCO3, Ammonia, Benthic Community Effects, Chloride, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Sulfates, Temperature, water, pH	9.3 Miles
4	San Jose Creek, unnamed tributary at Rose Hill (Los Angeles County)	River & Stream	40531000 / 18070104	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Benthic Community Effects	2.2 Miles
4	San Nicolas Island at Freighter Dock	Coastal & Bay Shoreline	40511000 / 18070107	• Fish Consumption ◦ *Commercial or recreational collection of fish, shellfish, or organisms* Arsenic, Cadmium, Chlordane, Chlorpyrifos, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PAHs (Polycyclic Aromatic Hydrocarbons), PCBs (Polychlorinated biphenyls), Selenium	0.28 Miles
4	Santa Clara River Reach 2	River & Stream	40311000 / 18070103	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming	17 Miles

- *Water Contact Recreation*

  pH

- Aquatic Life Support
  - *Warm Freshwater Habitat*

    Alkalinity as CaCO3, Aluminum, Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Nitrogen, ammonia (Total Ammonia), Oxygen, Dissolved, Permethrin, total, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Zinc, pH
  - *Marine Habitat*

    Arsenic, Bifenthrin, Cadmium, Copper, Cypermethrin, Lead , Nickel, Permethrin, total, Selenium, Silver, Zinc, pH
  - *Estuarine Habitat*

    Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cypermethrin, Lead , Nickel, Permethrin, total, Selenium, Silver, Zinc
  - *Fish Spawning*

    Oxygen, Dissolved
  - *Cold Freshwater Habitat*

    Alkalinity as CaCO3, Aluminum, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Nitrogen, ammonia (Total Ammonia), Oxygen, Dissolved, Permethrin, total, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH
- Fish Consumption
  - *Commercial or recreational collection of fish, shellfish, or organisms*

    Manganese, Nickel, Selenium

4	Santa Clara River Reach 4B (Piru Creek to Blue Cut Gaging Station)	River & Stream	4403.410000 /	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation*	5.2 Miles

				Manganese, pH • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chloride, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	
4	Wiley Canyon	River & Stream	40351000 / 18070102	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Manganese, Specific Conductivity • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH ○ *Estuarine Habitat* Chromium ○ *Fish Spawning* Ammonia, Oxygen, Dissolved ○ *Cold Freshwater Habitat* pH	1.3 Miles

2016 CALIFORNIA WATERS WITH INSUFFICIENT INFORMATION TO ASSESS BENEFICIAL USE SUPPORT

Common 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: A water with water quality information that is insufficient to determine an appropriate decision recommendation, 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	COMMON BENEFICIAL USE *California Beneficial Use* Pollutant Assessed	ESTIMATED AREA ASSESSED
4	Ashland Avenue Drain	River & Stream	40513000 / 18070104	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Aquatic Life Support ○ *Warm Freshwater Habitat* Organic Enrichment/Low Dissolved Oxygen, Toxicity	2.3 Miles
4	Avalon Drain	River & Stream	40515010 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aluminum, Arsenic, Cadmium, Chromium, Copper, Iron, Lead , Nickel, Selenium, Zinc	2.2 Miles
4	Belvedere Park Lake	Lake & Reservoir	40515010 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT	3.6 Acres

				(Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	
4	Big Sycamore Canyon	River & Stream	40447000 / 18070104	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Aquatic Life Support ○ *Warm Freshwater Habitat* Ammonia, Arsenic, Azinphos-methyl (Guthion), Cadmium, Chloride, Chlorpyrifos, Copper, Diazinon, Dichlorvos, Dimethoate, Disulfoton, Dyfonate (Fonofos or Fonophos), Ethoprop, Lead , Malathion, Methidathion, Methyl Parathion, Molinate, Nickel, Oxygen, Dissolved, Parathion, Phorate, Phosmet, Selenium, Silver, Temperature, water, Terbufos, Thiobencarb/Bolero, Zinc, pH ○ *Cold Freshwater Habitat* Benthic Community Effects, Oxygen, Dissolved, Toxicity, pH	6.2 Miles
4	Bouquet Canyon Creek (below Bouqet Reservoir)	River & Stream	40352000 / 18070102	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Aluminum, Ammonia, Arsenic, Cadmium, Chromium, Copper, Iron, Lead , Manganese, Nickel, Nitrogen, Nitrate, Nitrogen, Nitrite, Selenium, Silver, Specific Conductivity, Sulfates, Total Dissolved Solids, pH • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin,	14 Miles

				Cadmium, Chlordane, Chlorpyrifos, Chromium, Copper, Cyfluthrin, Cyhalothrin, Lambda, Cypermethrin, DDD (Dichlorodiphenyldichloroethane), DDE (Dichlorodiphenyldichloroethylene), DDT (Dichlorodiphenyltrichloroethane), Deltamethrin, Diazinon, Dieldrin, Endrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Fipronil, Fipronil Sulfide, Fipronil Sulfone, Iron, Lead , Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	
4	Camarillo Hills Drain (tributary to Revolon Slough)	River & Stream	40311000 / 18070103	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Azinphos-methyl (Guthion), Chlordane, Chlorpyrifos, Demeton, Diazinon, Endosulfan, Endrin, Methoxychlor, Methyl Parathion, Metribuzin, Mirex, Pentachlorophenol (PCP)	3.2 Miles
4	Carbon Canyon Creek	River & Stream	40515010 / 18070104	• Drinking Water Supply ◦ *Municipal & Domestic Supply* Chloride, Sulfates	8.8 Miles
4	Carlisle Canyon Creek	River & Stream	40426000 / 18070104	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	3.3 Miles
4	Castaic Creek Reach 1 (confluence of Santa Clara River to Castaic Lagoon)	River & Stream	40351000 / 18070102	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Ammonia, Chlorpyrifos, Diazinon, Nitrate/Nitrite (Nitrite + Nitrate as N), Toxicity	11 Miles
4	Cheeseboro Canyon	River & Stream	40423000 / 18070104	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Benthic Community Effects, Oxygen, Dissolved, pH	5.3 Miles
4	Compton Creek, unnamed tributary at Santa Fe Rd	River & Stream	40515010 / 18070104	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Aluminum, Arsenic, Cadmium, Chlorpyrifos, Chromium, Copper, Demeton, Diazinon, Iron, Lead ,	1.1 Miles

				Malathion, Methyl Parathion, Nickel, Selenium, Zinc	
4	Corral Canyon Creek	River & Stream	40431000 / 18070104	• Drinking Water Supply ◦ *Municipal & Domestic Supply* Sulfates	4.1 Miles
4	Drain along Gerry Rd to Calleguas Creek Reach 9	River & Stream	40363000 / 18070103	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming ◦ *Water Contact Recreation* DDD (Dichlorodiphenyldichloroethane), Endrin aldehyde, pH • Aquatic Life Support ◦ *Warm Freshwater Habitat* Aldrin, Ammonia, Azinphos-methyl (Guthion), Bifenthrin, Chlordane, Chloride, Chlorpyrifos, Cyfluthrin, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methidathion, Methoxychlor, Methyl Parathion, Mirex, Oxygen, Dissolved, Parathion, Permethrin, Phorate, Phosmet, Sulfates, Temperature, water, Total Dissolved Solids, Toxaphene, pH ◦ *Marine Habitat* Aldrin, Azinphos-methyl (Guthion), Bifenthrin, Chlordane, Chlorpyrifos, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Demeton, Diazinon, Dieldrin, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Permethrin, Toxaphene, pH ◦ *Fish Spawning* Oxygen, Dissolved	1.7 Miles
4	Encinal Canyon Creek	River & Stream	40441000 / 18070104	• Secondary Contact ◦ *Non-Contact Recreation*	2.7 Miles

				pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	
4	Escondido Canyon Creek	River & Stream	40434000 / 18070104	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Aluminum, Ammonia, Arsenic, Cadmium, Chromium, Copper, Iron, Lead , Manganese, Nickel, Nitrogen, Nitrate, Nitrogen, Nitrite, Selenium, Silver, Specific Conductivity, Sulfates, Total Dissolved Solids, pH • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	4.6 Miles
4	Hammond Canyon	River & Stream	40210010 / 18070101	• Aquatic Life Support ○ *Warm Freshwater Habitat*	4.5 Miles

				Benthic Community Effects	
4	Hansen Lake	Lake & Reservoir	40523000 / 18070105	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) ○ *Cold Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	118 Acres
4	Hidden Valley Creek (Ventura County)	River & Stream	40426000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	2.2 Miles
4	Hollenback Park Lake	Lake & Reservoir	40515010 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) ○ *Cold Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma	4.5 Acres

				Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	
4	John Ford Park Lake	Lake & Reservoir	40515010 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	14 Acres
4	Kenneth Hahn Park Lake	Lake & Reservoir	40513000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane),	28 Acres

				Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	
4	La Jolla Canyon Creek	River & Stream	40448000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved	0.9 Miles
4	Lake Eleanor Creek	River & Stream	40425000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	2.7 Miles
4	Lang Creek	River & Stream	40368000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	8.2 Miles
4	Las Flores Canyon Creek	River & Stream	40415000 / 18070104	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	3.6 Miles
4	Las Virgenes Reservoir	Lake & Reservoir	40424000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma	123 Acres

				Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	
4	Latigo Canyon Creek	River & Stream	40433000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	2.9 Miles
4	Lion Creek (from confluence w San Antonio Creek to Resservoir)	River & Stream	40231010 / 18070101	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	5.2 Miles
4	Los Alisos Canyon Creek	River & Stream	40442000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	2.9 Miles
4	Los Cerritos Estuary	Estuary	40512000 / 18070104	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Aquatic Life Support ○ *Marine Habitat* Oxygen, Dissolved ○ *Estuarine Habitat* pH	53 Acres
4	Malaga Canyon Creek	River & Stream	40512000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Chloride, Sulfates	2.6 Miles
4	Mandeville Canyon Creek	River & Stream	40513000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	1.5 Miles
4	Marie Canyon Creek	River & Stream	40431000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	1.8 Miles

4	Pena Canyon Creek	River & Stream	40413000 / 18070104	• Drinking Water Supply ◦ *Municipal & Domestic Supply* Sulfates	1.6 Miles
4	Piru, Lake	Lake & Reservoir	40341000 / 18070102	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) ◦ *Cold Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ◦ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	1220 Acres
4	Puerco Canyon Creek	River & Stream	40431000 / 18070104	• Drinking Water Supply ◦ *Municipal & Domestic Supply* Sulfates	2.4 Miles
4	Ramirez Canyon Creek	River & Stream	40435000 / 18070104	• Drinking Water Supply ◦ *Municipal & Domestic Supply* Sulfates • Aquatic Life Support ◦ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	4.2 Miles
4	Rocky Point Beach	Coastal & Bay Shoreline	40511000 / 18070104	• Swimming ◦ *Water Contact Recreation* Beach Closures	0.49 Miles

4	Rustic Canyon Creek	River & Stream	40513000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	7.6 Miles
4	San Clemente Island Darter	Coastal & Bay Shoreline	40511000 / 18070107	• Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Arsenic, Cadmium, Mercury, Selenium	0.25 Miles
4	San Nicolas Canyon Creek	River & Stream	40443000 / 18070104	• Secondary Contact ○ *Non-Contact Recreation* Trash • Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	2.4 Miles
4	Santa Clara Drain (Ventura County)	River & Stream	40311000 / 18070103	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Chloride, Nitrogen, Nitrate, Specific Conductivity, Total Dissolved Solids • Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Ammonia, Azinphos-methyl (Guthion), Bifenthrin, Chlordane, Chlorpyrifos, Cyfluthrin, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methidathion, Methoxychlor, Methyl Parathion, Mirex, Oxygen, Dissolved, Parathion, Permethrin, Phorate, Phosmet, Sulfates, Temperature, water, Toxaphene, pH ○ *Marine Habitat* Aldrin, Azinphos-methyl (Guthion),	2.4 Miles

Bifenthrin, Chlordane, Chlorpyrifos, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Demeton, Diazinon, Dieldrin, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Permethrin, Toxaphene, pH

- ***Estuarine Habitat***

  Aldrin, Azinphos-methyl (Guthion), Bifenthrin, Chlordane, Chlorpyrifos, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Demeton, Diazinon, Dieldrin, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Permethrin, Toxaphene

- ***Fish Spawning***

  Oxygen, Dissolved

- ***Cold Freshwater Habitat***

  Aldrin, Ammonia, Azinphos-methyl (Guthion), Bifenthrin, Chlordane, Chlorpyrifos, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methidathion, Methoxychlor, Methyl Parathion, Mirex, Oxygen, Dissolved, Parathion, Permethrin, Phorate, Phosmet, Temperature, water, Toxaphene, pH

- **Fish Consumption**
  - ***Commercial or recreational collection of fish, shellfish, or organisms***

    Aldrin, Chlordane, DDD (Dichlorodiphenyldichloroethane), DDE (Dichlorodiphenyldichloroethylene), DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endosulfan sulfate, Endrin, Endrin aldehyde, Heptachlor, Heptachlor epoxide, Toxaphene, alpha.-BHC (Benzenehexachloride or alpha-HCH), beta-BHC (Benzenehexachloride or beta-HCH), delta-BHC

				(Benzenehexachloride or delta-HCH)	
4	Santa Ynez Canyon	River & Stream	40513000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates	5 Miles
4	South Catalina Island Bird Rock	Coastal & Bay Shoreline	40511000 / 18070107	• Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Arsenic, Cadmium, Chlordane, Chlorpyrifos, Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PAHs (Polycyclic Aromatic Hydrocarbons), PCBs (Polychlorinated biphenyls), Selenium, Total DDT (sum of 4,4'- and 2,4'- isomers of DDT, DDE, and DDD)	0.24 Miles
4	Sullivan Canyon Creek	River & Stream	40513000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates • Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved	5.3 Miles
4	Sweetwater Canyon Creek	River & Stream	40421000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Chloride, Sulfates	1.6 Miles
4	Temescal Canyon Creek (Los Angeles County)	River & Stream	40513000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved	4.2 Miles
4	Thacher Creek	River & Stream	40232011 / 18070101	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Aldrin, Ammonia, Chlordane, Chloride, Chlorpyrifos, DDD (Dichlorodiphenyldichloroethane), DDE	2.2 Miles

(Dichlorodiphenyldichloroethylene), DDT (Dichlorodiphenyltrichloroethane), Dacthal, Diazinon, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Endrin aldehyde, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methoxychlor, Nitrogen, Nitrate, Phorate, Specific Conductivity, Sulfates, Total Dissolved Solids, Toxaphene, alpha.-BHC (Benzenehexachloride or alpha-HCH), beta-BHC (Benzenehexachloride or beta-HCH), pH

- **Aquatic Life Support**
  - ***Warm Freshwater Habitat***

    Aldrin, Ammonia, Bifenthrin, Chlordane, Chloride, Chlorpyrifos, Cyfluthrin, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methoxychlor, Methyl Parathion, Mirex, Oxygen, Dissolved, Permethrin, Phorate, Sulfates, Temperature, water, Total Dissolved Solids, Toxaphene, Toxicity, pH

  - ***Fish Spawning***

    Oxygen, Dissolved

  - ***Cold Freshwater Habitat***

    Aldrin, Ammonia, Bifenthrin, Chlordane, Chloride, Chlorpyrifos, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methoxychlor, Methyl Parathion, Mirex, Oxygen, Dissolved, Permethrin, Phorate,

				Sulfates, Temperature, water, Total Dissolved Solids, Toxaphene, pH • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Aldrin	
4	Toluca Lake	Lake & Reservoir	40521000 / 18070105	• Aquatic Life Support ○ *Warm Freshwater Habitat* Aldrin, Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), PCBs (Polychlorinated biphenyls) • Fish Consumption ○ *Commercial or recreational collection of fish, shellfish, or organisms* Chlordane, DDT (Dichlorodiphenyltrichloroethane), Dieldrin, Endosulfan, Endrin, Heptachlor epoxide, Hexachlorobenzene/ HCB, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, Mirex, PCBs (Polychlorinated biphenyls), Selenium	4.3 Acres
4	Trancas Canyon Creek	River & Stream	40437000 / 18070104	• Drinking Water Supply ○ *Municipal & Domestic Supply* Chloride, Sulfates	6.4 Miles
4	Trancas Canyon Creek, West Fork	River & Stream	40437000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	1.9 Miles
4	Tuna Canyon Creek	River & Stream	40412000 / 18070104	• Secondary Contact ○ *Non-Contact Recreation* Trash • Drinking Water Supply ○ *Municipal & Domestic Supply* Sulfates • Aquatic Life Support ○ *Warm Freshwater Habitat* Nitrate	2.4 Miles
4	Zone Ditch 1 (LA River Watershed)	River & Stream	40531000 / 18070104	• Swimming ○ *Water Contact Recreation*	1.5 Miles

				Indicator Bacteria
				• Aquatic Life Support
				  ○ *Warm Freshwater Habitat*
				  Arsenic, Cadmium, Chromium, Copper, Lead , Mercury, Nickel, Selenium, Silver, Zinc	

4	Zuma Canyon	River & Stream	40436000 / 18070104	• Secondary Contact
				  ○ *Non-Contact Recreation*
				  pH
				• Swimming
				  ○ *Water Contact Recreation*
				  pH
				• Drinking Water Supply
				  ○ *Municipal & Domestic Supply*
				  Aluminum, Ammonia, Arsenic, Cadmium, Chromium, Copper, Iron, Lead , Manganese, Nickel, Nitrogen, Nitrate, Nitrogen, Nitrite, Selenium, Silver, Specific Conductivity, Sulfates, Total Dissolved Solids, pH
				• Aquatic Life Support
				  ○ *Warm Freshwater Habitat*
				  Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Zinc, pH
				  ○ *Fish Spawning*
				  Ammonia, Oxygen, Dissolved
				  ○ *Cold Freshwater Habitat*
				  Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Oxygen, Dissolved, Permethrin, Selenium, Silver, Temperature, water, Toxicity, Zinc, pH
					7.5 Miles

2016 CALIFORNIA WATERS SUPPORTING ALL ASSESSED BENEFICIAL USES

Common 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 1 Criteria: 1) A water that fully supports at least one of its California beneficial uses; 2) has other uses that are not assessed or lack sufficient information to be assessed; and 3) No assessed uses are not supported.

* 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	• COMMON BENEFICIAL USE ○ *California Beneficial Use* Pollutant Assessed	ESTIMATED AREA ASSESSED
4	Agua Blanca Creek and its tributaries (above Lake Piru)	River & Stream	4403.320200,4403.420000 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	169 Miles
4	Arroyo Seco Reach 3 (above Devils Gate Dam)	River & Stream	40532000 / 18070105	• Aquatic Life Support ○ *Warm Freshwater Habitat* Benthic Community Effects	4.1 Miles
4	Arroyo Sequit (from confluence of East and West Forks to mouth)	River & Stream	40444000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Benthic Community Effects, Oxygen, Dissolved, pH	3.2 Miles
4	Bear Canyon and its tributaries	River & Stream	4412.320000 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	6.7 Miles
4	Bear Creek (Los Angeles County)	River & Stream	40543000 / 18070106	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Aquatic Life Support	11 Miles

				◦ *Warm Freshwater Habitat* Alkalinity as CaCO3, Ammonia, Chloride, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Sulfates, Temperature, water, pH ◦ *Fish Spawning* Ammonia, Oxygen, Dissolved ◦ *Cold Freshwater Habitat* Alkalinity as CaCO3, Ammonia, Benthic Community Effects, Chloride, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Sulfates, Temperature, water, pH	
4	Bear Creek and its tributaries	River & Stream	4405.430000 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic-Macroinvertebrate Bioassessments	59 Miles
4	Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list), unnamed tributary at Olsen Road	River & Stream	40364000 / 18070103	• Aquatic Life Support ◦ *Warm Freshwater Habitat* Cyanide, Lead , Zinc	2.8 Miles
4	Channel Islands Harbor	Bay & Harbor	40311000 / 18070103	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming ◦ *Water Contact Recreation* pH • Aquatic Life Support ◦ *Marine Habitat* 2-Methylnaphthalene, Aldrin, Arsenic, Azinphos-methyl (Guthion), Benzo(a)anthracene, Benzo(a)pyrene (3,4-Benzopyrene -7-d), Cadmium, Chlordane, Chlorpyrifos, Chromium, Chrysene (C1-C4), Copper, DDT (Dichlorodiphenyltrichloroethane), Diazinon, Dibenz[a,h]anthracene, Dieldrin, Endosulfan, Endrin, Heptachlor, Heptachlor epoxide, Lead , Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, PAHs (Polycyclic Aromatic Hydrocarbons), PCBs (Polychlorinated biphenyls),	209 Acres

				Phenanthrene, Pyrene, Selenium, Silver, Toxicity, Zinc, alpha-Endosulfan (Endosulfan 1), beta-Endosulfan (Endosulfan 2), pH • Fish Consumption ◦ *Commercial or recreational collection of fish, shellfish, or organisms* Acenaphthene, Aldrin, Anthracene, Arsenic, Benzo(a)anthracene, Benzo(a)pyrene (3,4-Benzopyrene -7-d), Benzo[k]fluoranthene, Cadmium, Chlordane, Chlorpyrifos, Chrysene (C1-C4), DDD (Dichlorodiphenyldichloroethane), DDE (Dichlorodiphenyldichloroethylene), DDT (Dichlorodiphenyltrichloroethane), Diazinon, Dibenz[a,h]anthracene, Dieldrin, Endosulfan, Endosulfan sulfate, Endrin, Endrin aldehyde, Fluoranthene, Fluorene, Heptachlor, Heptachlor epoxide, Hexachlorobenzene/ HCB, Indeno[1,2,3-cd]pyrene, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Manganese, Mercury, Mirex, Nickel, PAHs (Polycyclic Aromatic Hydrocarbons), PCBs (Polychlorinated biphenyls), Pyrene, Selenium, alpha-Endosulfan (Endosulfan 1), beta-Endosulfan (Endosulfan 2)	
4	Clearwater Canyon	River & Stream	40351000 / 18070102	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming ◦ *Water Contact Recreation* Manganese, pH • Aquatic Life Support ◦ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	1.8 Miles

4	County Line Beach	Coastal & Bay Shoreline	40445000 / 18070104	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	0.7 Miles
4	Deer Creek Beach	Coastal & Bay Shoreline	40446000 / 18070104	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	1.2 Miles
4	Elizabeth Lake Canyon	River & Stream	40351000 / 18070102	• Secondary Contact ○ *Non-Contact Recreation* pH • Swimming ○ *Water Contact Recreation* pH • Drinking Water Supply ○ *Municipal & Domestic Supply* Aluminum, Ammonia, Arsenic, Cadmium, Chloride, Chromium, Copper, Iron, Lead , Manganese, Nickel, Nitrogen, Nitrate, Nitrogen, Nitrite, Selenium, Silver, Specific Conductivity, Sulfates, Total Dissolved Solids, pH • Aquatic Life Support ○ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic Community Effects, Bifenthrin, Cadmium, Chloride, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH ○ *Cold Freshwater Habitat* Benthic Community Effects	12 Miles
4	Emma Woods State Beach	Coastal & Bay Shoreline	40100011 / 18070101	• Swimming ○ *Water Contact Recreation* Indicator Bacteria	1.6 Miles

				Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	
4	Faria County Park Beach	Coastal & Bay Shoreline	40100011 / 18070101	• Swimming ○ *Water Contact Recreation* Indicator Bacteria	0.68 Miles
4	Hermosa Beach	Coastal & Bay Shoreline	40512000 / 18070104	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	2 Miles
4	Hobson County Park	Coastal & Bay Shoreline	40100010 / 18070101	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	0.1 Miles
4	Hollywood Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	1.4 Miles
4	La Conchita Beach	Coastal & Bay Shoreline	40100010 / 18070101	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	1.3 Miles
4	Leo Carillo Beach (South of County Line)	Coastal & Bay Shoreline	40444000 / 18070104	• Swimming ○ *Water Contact Recreation* Indicator Bacteria	1.8 Miles
4	Lion Canyon and its tributaries	River & Stream	4403.320200 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	56 Miles
4	Little Sycamore Canyon	River & Stream	40445000 / 18070104	• Secondary Contact ○ *Non-Contact Recreation* pH	4.8 Miles

				• Swimming ◦ *Water Contact Recreation* Manganese, pH • Aquatic Life Support ◦ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Azinphos-methyl (Guthion), Benthic Community Effects, Bifenthrin, Cadmium, Chlorpyrifos, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Diazinon, Dichlorvos, Dimethoate, Disulfoton, Dyfonate (Fonofos or Fonophos), Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Iron, Lead , Malathion, Methidathion, Methyl Parathion, Molinate, Nickel, Oxygen, Dissolved, Parathion, Permethrin, Phorate, Phosmet, Selenium, Silver, Sulfates, Temperature, water, Terbufos, Thiobencarb/Bolero, Toxicity, Zinc, pH ◦ *Fish Spawning* Ammonia, Oxygen, Dissolved	
4	Mandos Cove Beach	Coastal & Bay Shoreline	40100011 / 18070101	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	0.69 Miles
4	Manhattan Beach	Coastal & Bay Shoreline	40512000 / 18070104	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	2 Miles
4	Marina Park Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	0.33 Miles
4	Matilija Creek, North Fork	River & Stream	40220014 / 18070101	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria	7.7 Miles

				• Drinking Water Supply ◦ *Municipal & Domestic Supply* Total Dissolved Solids • Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	
4	McGrath Lake Agricultural Drain	River & Stream	40311000 / 18070103	• Aquatic Life Support ◦ *Preservation of Rare & Endangered Species* Chloride ◦ *Cold Freshwater Habitat* Aldrin, Ammonia, Azinphos-methyl (Guthion), Bifenthrin, Chlordane, Chlorpyrifos, Cyfluthrin, Cyhalothrin, Lambda, Cypermethrin, DDT (Dichlorodiphenyltrichloroethane), Dacthal, Deltamethrin, Demeton, Diazinon, Dichlorvos, Dicofol, Dieldrin, Dimethoate, Disulfoton, Endosulfan, Endosulfan sulfate, Endrin, Esfenvalerate/Fenvalerate, Ethoprop, Fenpropathrin, Heptachlor, Heptachlor epoxide, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Malathion, Methidathion, Methoxychlor, Methyl Parathion, Mirex, Oxygen, Dissolved, Parathion, Permethrin, Phorate, Phosmet, Temperature, water, Toxaphene, pH	0.57 Miles
4	Mussel Shoals Beach	Coastal & Bay Shoreline	40100010 / 18070101	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	0.39 Miles
4	North Fork San Gabriel River and its Tributaries	River & Stream	4405.430000 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	84 Miles
4	Oil Piers Beach	Coastal & Bay Shoreline	40100010 / 18070101	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	1.2 Miles

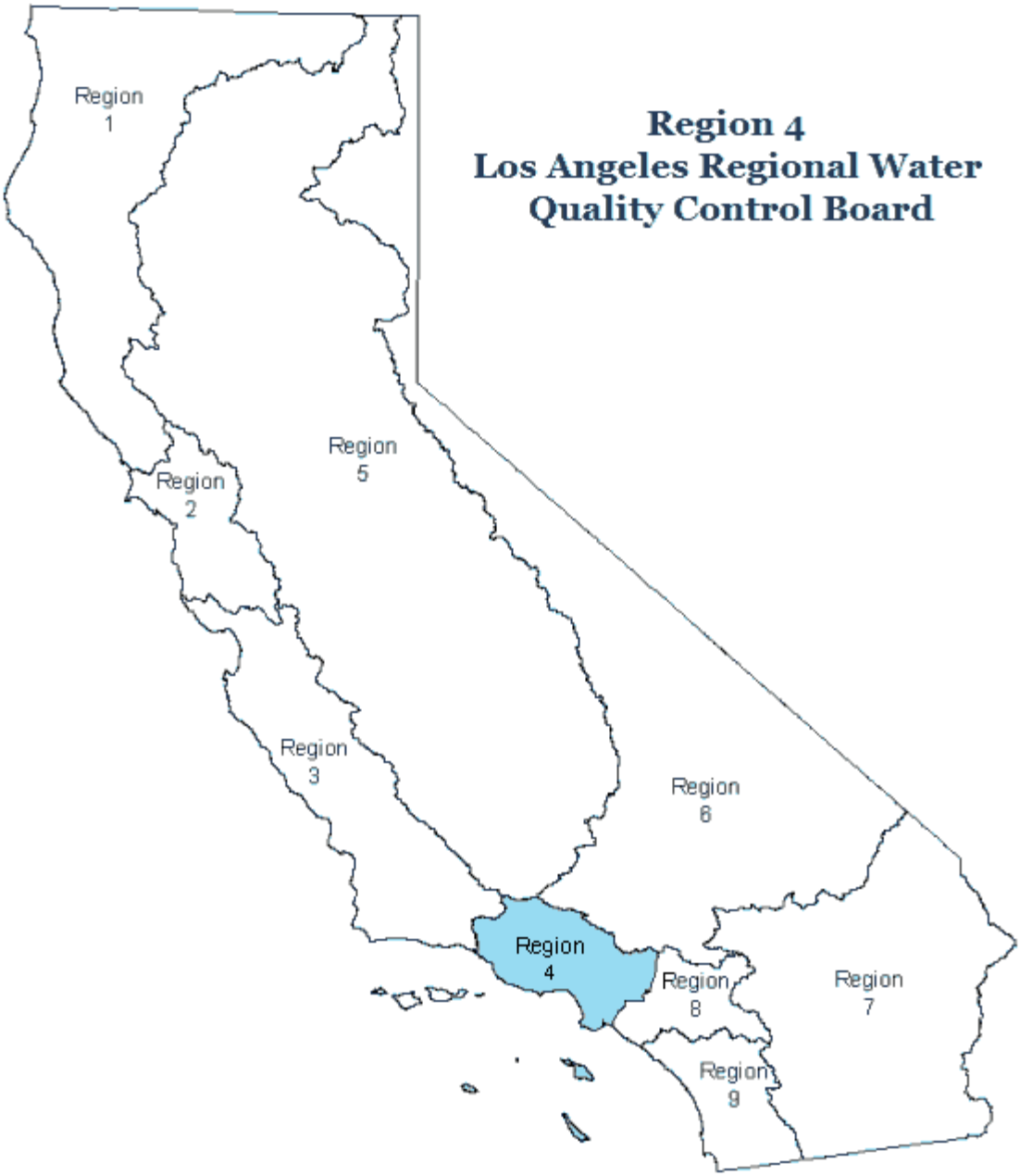
4	Oxnard Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria	1 Miles
4	Oxnard Beach Park	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria	0.65 Miles
4	Piedra Blanca Creek and its Tributaries	River & Stream	4403.320200,4403.420000 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	63 Miles
4	Promenade Park Beach	Coastal & Bay Shoreline	40210000 / 18070101	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria	0.58 Miles
4	Rose Valley Creek	River & Stream	40332020 / 18070102	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming ◦ *Water Contact Recreation* pH • Aquatic Life Support ◦ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Zinc, pH ◦ *Marine Habitat* Arsenic, Bifenthrin, Cadmium, Copper, Cypermethrin, Lead , Nickel, Permethrin, Selenium, Silver, Zinc, pH ◦ *Estuarine Habitat* Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cypermethrin, Lead , Nickel, Permethrin, Selenium, Silver, Zinc ◦ *Fish Spawning* Ammonia, Oxygen, Dissolved ◦ *Cold Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic	2.6 Miles

				Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH • Fish Consumption ◦ *Commercial or recreational collection of fish, shellfish, or organisms* Manganese, Nickel, Selenium	
4	San Gabriel River, North Fork	River & Stream	40543000 / 18070106	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	10 Miles
4	Santa Ana Creek, North Fork	River & Stream	40220030 / 18070101	• Secondary Contact ◦ *Non-Contact Recreation* pH • Swimming ◦ *Water Contact Recreation* pH • Drinking Water Supply ◦ *Municipal & Domestic Supply* Aluminum, Ammonia, Arsenic, Cadmium, Chromium, Copper, Iron, Lead , Manganese, Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Selenium, Silver, Specific Conductivity, Sulfates, Total Dissolved Solids, pH • Aquatic Life Support ◦ *Warm Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Zinc, pH ◦ *Fish Spawning* Ammonia, Oxygen, Dissolved ◦ *Cold Freshwater Habitat* Alkalinity as CaCO3, Aluminum, Ammonia, Arsenic, Benthic	2.8 Miles

				Community Effects, Bifenthrin, Cadmium, Chromium, Copper, Cyhalothrin, Lambda, Cypermethrin, Deltamethrin, Esfenvalerate/Fenvalerate, Fenpropathrin, Iron, Lead , Nickel, Nitrate/Nitrite (Nitrite + Nitrate as N), Oxygen, Dissolved, Permethrin, Selenium, Silver, Sulfates, Temperature, water, Total Dissolved Solids, Toxicity, Zinc, pH	
4	Santa Clara River Estuary Beach-Surfers Knoll	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	1 Miles
4	Santa Paula Creek and its Tributaries	River & Stream	4403.210000,4403.220000 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	103 Miles
4	Seaside Wilderness Park Beach	Coastal & Bay Shoreline	40210011 / 18070101	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	0.74 Miles
4	Silverstrand Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing ○ *Shellfish Harvesting* Indicator Bacteria	0.98 Miles
4	Sisar Creek and its Tributaries	River & Stream	4403.220000 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	32 Miles
4	Solimar Beach	Coastal & Bay Shoreline	40100011 / 18070101	• Swimming ○ *Water Contact Recreation* Indicator Bacteria	1.6 Miles
4	South Jetty Beach	Coastal & Bay Shoreline	40311000 / 18070103	• Swimming ○ *Water Contact Recreation* Indicator Bacteria • Shellfishing	0.24 Miles

				◦ *Shellfish Harvesting* Indicator Bacteria	
4	Southern Tributary to Sespe Creek (Between Potrero John Creek and Munson Creek)	River & Stream	4403.320200 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	5.2 Miles
4	Staircase Beach (Leo Carillo Beach, North of County Line)	Coastal & Bay Shoreline	40445000 / 18070104	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	0.51 Miles
4	Susanna Canyon and East Fork Susanna Canyon	River & Stream	4405.430000 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	4.8 Miles
4	Sycamore Cove Beach	Coastal & Bay Shoreline	40447000 / 18070104	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	0.32 Miles
4	Thacher Creek and its Tributaries	River & Stream	4402.320001 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic Community Effects	14 Miles
4	Thornhill Broome Beach	Coastal & Bay Shoreline	40447000 / 18070104	• Swimming ◦ *Water Contact Recreation* Indicator Bacteria • Shellfishing ◦ *Shellfish Harvesting* Indicator Bacteria	1.3 Miles
4	Tributary to East Fork San Gabriel River	River & Stream	4405.430000 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat* Benthic-Macroinvertebrate Bioassessments	1.4 Miles
4	Tributary to Lockwood	River & Stream	4403.420000 /	• Aquatic Life Support ◦ *Cold Freshwater Habitat*	14 Miles

	Creek			Benthic-Macroinvertebrate Bioassessments	
4	Tributary to North Fork Matilija Creek	River & Stream	4402.200104 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	7.2 Miles
4	Tributary to South Fork Santa Clara River	River & Stream	4403.510000 /	• Aquatic Life Support ○ *Warm Freshwater Habitat* Benthic Community Effects	10 Miles
4	Upper North Fork Matilija Creek and its tributaries	River & Stream	4402.200102,4402.200103 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	53 Miles
4	West Fork Coyote Creek and its Tributaries	River & Stream	4402.200301 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	11 Miles
4	West Fork San Gabriel River and its Tributaries	River & Stream	4405.430000 /	• Aquatic Life Support ○ *Cold Freshwater Habitat* Benthic Community Effects	26 Miles
4	Westlake Creek	River & Stream	40425000 / 18070104	• Aquatic Life Support ○ *Warm Freshwater Habitat* Oxygen, Dissolved, pH	4.3 Miles



Region 4
Los Angeles Regional Water Quality Control Board

Draft

Draft California 2014 Integrated Report (303(d) List/305(b) 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)	Regional Board 4

- **Ballona Creek**
  - Cadmium (33380)
  - Chlordane (32617)
  - DDT (Dichlorodiphenyltrichloroethane) (32717)
  - Dieldrin (33158)
- **Burbank Western Channel**
  - Excess Algal Growth (34342)
- **Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)**
  - Sulfates (42845)
  - Total Dissolved Solids (42771)
- **Channel Islands Harbor**
  - Lead (42844)
  - Zinc (42376)
- **Coyote Creek**
  - Diazinon (33100)
  - Zinc (32733)
- **Dominguez Channel (lined portion above Vermont Ave)**
  - Ammonia (35134)
- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - Ammonia (34669)

- Chromium (total) (34075)

- **Echo Park Lake**
  - Ammonia (34696)
  - Copper (33998)
  - Lead (34700)

- **Lake Calabasas**
  - DDT (Dichlorodiphenyltrichloroethane) (42257)

- **Lake Hughes**
  - Fish Kills (34344)

- **Los Angeles River Estuary (Queensway Bay)**
  - Zinc (43337)

- **Los Angeles River Reach 1 (Estuary to Carson Street)**
  - Diazinon (32542)

- **Los Angeles/Long Beach Outer Harbor (inside breakwater)**
  - PAHs (Polycyclic Aromatic Hydrocarbons) (33119)

- **Promenade Park Beach**
  - Indicator Bacteria (42266)

- **San Gabriel River Reach 1 (Estuary to Firestone)**
  - Indicator Bacteria (38273)
  - Toxicity (32625)

- **San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam**
  - Copper (33327)
  - Zinc (32705)

- **San Gabriel River Reach 3 (Whittier Narrows to Ramona)**
  - Toxicity (32521)

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Selenium (33931)

- **San Pedro Bay Near/Off Shore Zones**
  - Copper (44434)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (43259)
  - Zinc (42798)

- **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)**
  - Copper (35886)
  - Diazinon (44805)
  - Indicator Bacteria (34307)
  - Iron (36249)

- **Santa Monica Bay Offshore/Nearshore**
  - Chlordane (37492)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (32656)
  - Toxicity (34120)

- **Sepulveda Canyon**
  - Ammonia (36981)

- **Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)**
  - Pumping (34271)

- **Walnut Creek Wash (Drains from Puddingstone Res)**
  - Toxicity (42360)

- **Wilmington Drain**
  - Copper (44676)
  - Lead (35085)

Delist from 303(d) list (being addressed by USEPA approved TMDL)	Regional Board 4

- **Abalone Cove Beach**
  - Indicator Bacteria (32427)

- **Ballona Creek**
  - Selenium (32566)

- **Bluff Cove Beach**
  - Indicator Bacteria (32848)

- **Cabrillo Beach (Outer)**
  - Indicator Bacteria (32486)

- **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)**
  - Endosulfan (tissue) (43177)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)**
  - Ammonia (36414)

- **Coyote Creek**
  - Lead (43334)

- **Dominguez Channel (lined portion above Vermont Ave)**
  - Diazinon (33061)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - Zinc (sediment) (38512)

- **Hermosa Beach**
  - Indicator Bacteria (32408)

- **Lake Sherwood**
  - Ammonia (34406)
  - Organic Enrichment/Low Dissolved Oxygen (43370)

- **Leo Carillo Beach (South of County Line)**

Indicator Bacteria (33000)

- **Lincoln Park Lake**
  - Lead (34817)

- **Long Point Beach**
  - Indicator Bacteria (33003)

- **Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)**
  - Lead (34632)

- **Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)**
  - Ammonia (32913)
  - Copper (33749)
  - Lead (37137)

- **Los Angeles/Long Beach Inner Harbor**
  - Beach Closures (34207)

- **Malaga Cove Beach**
  - Indicator Bacteria (32565)

- **Manhattan Beach**
  - Indicator Bacteria (32409)

- **Nicholas Canyon Beach**
  - Indicator Bacteria (33001)

- **Point Fermin Park Beach**
  - Indicator Bacteria (32429)

- **Portuguese Bend Beach**
  - Indicator Bacteria (32379)

- **Rio Hondo Reach 2 (At Spreading Grounds)**
  - Ammonia (32501)

- **Robert H. Meyer Memorial Beach**
  - Beach Closures (44531)

- **Royal Palms Beach**
  - Indicator Bacteria (32423)

- **San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam**
  - Indicator Bacteria (32640)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Ammonia (32846)

- **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 (34352)

Delist from 303(d) list (being addressed by action other than TMDL) Regional Board 4

- **Coyote Creek**
  - Ammonia (37877)

Do Not Delist from 303(d) list (TMDL required list) Regional Board 4

- **Alamitos Bay**
  - Indicator Bacteria (42846)
- **Arroyo Seco Reach 1 (LA River to West Holly Ave.)**
  - Benthic Community Effects (44553)
- **Ballona Creek**
  - Cyanide (32970)
- **Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)**
  - Indicator Bacteria (32899)
- **Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)**
  - Fecal Coliform (32738)
- **Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)**
  - Indicator Bacteria (32747)
- **Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)**
  - Indicator Bacteria (32697)
- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - Indicator Bacteria (32585)
- **Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)**
  - Indicator Bacteria (33490)
- **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)**
  - Indicator Bacteria (32561)
- **Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)**
  - Indicator Bacteria (32574)
- **Canada Larga (Ventura River Watershed)**
  - Indicator Bacteria (32883)
- **Casitas, Lake**
  - Mercury (40196)
- **Castaic Lake**
  - Mercury (40191)
- **Colorado Lagoon**

- Indicator Bacteria (44721)

- **Coyote Creek**
  - Toxicity (35132)
  - pH (32677)

- **Dominguez Channel (lined portion above Vermont Ave)**
  - Indicator Bacteria (32822)

- **Dry Canyon Creek**
  - Indicator Bacteria (34674)

- **Hopper Creek**
  - Sulfates (33395)
  - Total Dissolved Solids (33405)

- **Lake Lindero**
  - Selenium (33135)

- **Las Virgenes Creek**
  - Benthic Community Effects (44467)
  - Selenium (44477)

- **Lindero Creek Reach 2 (Above Lake)**
  - Selenium (33006)

- **Los Angeles River Estuary (Queensway Bay)**
  - PCBs (Polychlorinated biphenyls) (sediment) (33886)

- **Machado Lake (Harbor Park Lake)**
  - PCBs (Polychlorinated biphenyls) (tissue) (33285)

- **Malibu Creek**
  - Benthic Community Effects (44554)
  - Selenium (32716)
  - Sulfates (32394)

- **McCoy Canyon Creek**
  - Indicator Bacteria (32548)

- **McGrath Lake**
  - Indicator Bacteria (33512)

- **Medea Creek Reach 1 (Lake to Confl. with Lindero)**
  - Selenium (34182)

- **Medea Creek Reach 2 (Abv Confl. with Lindero)**
  - Benthic Community Effects (44495)
  - Selenium (44642)

- **Ormond Beach**
  - Indicator Bacteria (42278)

- **Peninsula Beach**

Indicator Bacteria (32757)

- **Piru Creek (from gaging station below Santa Felicia Dam to headwaters)**
  - Chloride (32547)
  - pH (33044)

- **Pole Creek (trib to Santa Clara River Reach 3)**
  - Sulfates (33347)

- **Puddingstone Reservoir**
  - Chlordane (44911)
  - DDT (Dichlorodiphenyltrichloroethane) (36272)
  - Mercury (33092)
  - PCBs (Polychlorinated biphenyls) (34832)

- **Puente Creek**
  - Indicator Bacteria (40779)

- **Pyramid Lake**
  - Mercury (39684)

- **Rincon Beach**
  - Indicator Bacteria (42386)

- **Rio De Santa Clara/Oxnard Drain No. 3**
  - Toxaphene (tissue) (33565)
  - Toxicity (35083)

- **San Antonio Creek (Tributary to Ventura River Reach 4)**
  - Total Dissolved Solids (39724)

- **San Buenaventura Beach**
  - Indicator Bacteria (44599)

- **San Gabriel River Estuary**
  - Nickel (38039)
  - Oxygen, Dissolved (38237)

- **San Gabriel River Reach 1 (Estuary to Firestone)**
  - pH (33507)

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Toxicity (33989)
  - pH (35237)

- **Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)**
  - Toxicity (33258)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Total Dissolved Solids (33967)

- **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)**
  - Iron (35383)

- **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)**
  - Chlorpyrifos (33024)
  - Toxicity (33550)

- **Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)**
  - Sulfates (33366)
  - Total Dissolved Solids (37475)

- **Sawpit Creek**
  - Indicator Bacteria (32719)

- **Sespe Creek (from 500 ft below confluence with Little Sespe Cr to headwaters)**
  - Chloride (36680)
  - pH (34156)

- **Surfers Point at Seaside**
  - Indicator Bacteria (36752)

- **Topanga Canyon Creek**
  - Lead (34158)

- **Triunfo Canyon Creek Reach 1**
  - Lead (34225)

- **Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)**
  - Indicator Bacteria (39229)

- **Walnut Creek Wash (Drains from Puddingstone Res)**
  - Benthic Community Effects (43696)

- **Wheeler Canyon/Todd Barranca**
  - Sulfates (32633)
  - Total Dissolved Solids (32647)

Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)	Regional Board 4

- **Avalon Beach**
  - Indicator Bacteria (39065)

- **Ballona Creek**
  - Copper (32340)
  - Indicator Bacteria (33769)
  - Lead (34316)
  - Toxicity (34253)
  - Zinc (32927)

- **Bell Creek**
  - Indicator Bacteria (34439)

- **Big Rock Beach**
  - Coliform Bacteria (32468)

- **Burbank Western Channel**
  - Indicator Bacteria (44606)

- **Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)**
  - Chlordane (tissue) (34564)
  - DDT (tissue & sediment) (39503)
  - Dieldrin (33966)
  - Endosulfan (tissue) (33982)
  - Mercury (33758)
  - PCBs (Polychlorinated biphenyls) (tissue) (34667)

- **Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)**
  - Ammonia (33002)
  - Chlordane (39436)
  - DDT (Dichlorodiphenyltrichloroethane) (32727)
  - Dieldrin (34728)
  - Endosulfan (34175)
  - Toxaphene (34561)

- **Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)**
  - Ammonia (33436)
  - Chlordane (34193)
  - Chloride (42314)
  - DDT (Dichlorodiphenyltrichloroethane) (33979)
  - Dieldrin (33929)
  - PCBs (Polychlorinated biphenyls) (44060)

- **Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)**
  - Chlordane (tissue & sediment) (33351)
  - Chlorpyrifos (tissue) (34402)
  - Diazinon (34729)
  - Dieldrin (tissue) (34531)
  - Endosulfan (tissue & sediment) (34641)
  - Selenium (34524)
  - Total DDT (sum of 4,4'- and 2,4'- isomers of DDT, DDE, and DDD) (36487)
  - Toxaphene (tissue & sediment) (33712)

- **Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)**
  - Ammonia (32814)
  - Sulfates (42710)
  - Total Dissolved Solids (42961)
  - Toxicity (33983)

- **Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)**
  - Chlorpyrifos (33794)
  - Diazinon (39437)
  - Toxicity (34714)

- **Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)**
  - Sulfates (42815)
  - Total Dissolved Solids (42401)

- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - Nitrogen, Nitrate (32706)
  - Sulfates (42315)
  - Total Dissolved Solids (34332)

Toxicity (34046)

- **Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)**
  - Ammonia (34090)
  - Sulfates (42383)
  - Total Dissolved Solids (42411)
  - Toxicity (34145)

- **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)**
  - Chlordane (33675)
  - Chlorpyrifos (33957)
  - Diazinon (34637)
  - Toxaphene (tissue & sediment) (35191)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)**
  - Chlordane (tissue) (35158)
  - DDT (tissue) (35174)
  - Sulfates (42412)
  - Total Dissolved Solids (34221)
  - Toxaphene (33959)

- **Canada Larga (Ventura River Watershed)**
  - Oxygen, Dissolved (34288)

- **Channel Islands Harbor Beach**
  - Indicator Bacteria (44192)

- **Colorado Lagoon**
  - Chlordane (38427)
  - DDT (Dichlorodiphenyltrichloroethane) (35144)
  - Dieldrin (38428)
  - Lead (44941)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (43286)
  - PCBs (Polychlorinated biphenyls) (33858)
  - Zinc (36238)

- **Compton Creek**
  - Copper (36286)
  - Lead (34507)
  - pH (32967)

- **Coyote Creek**
  - Copper, Dissolved (32520)
  - Indicator Bacteria (38245)

- **Coyote Creek, North Fork**
  - Indicator Bacteria (40292)

- **Dan Blocker Memorial (Coral) Beach**
  - Indicator Bacteria (32474)

- **Dockweiler Beach**
  - Indicator Bacteria (32464)

- **Dominguez Channel (lined portion above Vermont Ave)**

- Copper (37227)
- Lead (37347)
- Toxicity (43000)
- Zinc (33114)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - Benzo(a)anthracene (33810)
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (33025)
  - Chlordane (tissue) (34671)
  - Chrysene (C1-C4) (33807)
  - DDT (tissue & sediment) (34076)
  - Lead (34613)
  - PCBs (Polychlorinated biphenyls) (33063)
  - Phenanthrene (33588)
  - Pyrene (33568)
  - Toxicity (43062)

- **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2**
  - Chlordane (33912)
  - DDT (Dichlorodiphenyltrichloroethane) (33978)
  - Toxaphene (33913)
  - Toxicity (33660)

- **Echo Park Lake**
  - PCBs (Polychlorinated biphenyls) (33999)

- **El Dorado Lakes**
  - Mercury (tissue) (37448)

- **Fox Barranca (tributary to Calleguas Creek Reach 6)**
  - Sulfates (43740)
  - Total Dissolved Solids (43728)

- **Hobie Beach (Channel Islands Harbor)**
  - Indicator Bacteria (33239)

- **Lake Calabasas**
  - Odor (38524)

- **Lake Sherwood**
  - Mercury (tissue) (32850)

- **Las Tunas Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (44943)
  - PCBs (Polychlorinated biphenyls) (44476)

- **Las Virgenes Creek**
  - Indicator Bacteria (34006)
  - Organic Enrichment/Low Dissolved Oxygen (42753)

- **Lindero Creek Reach 1**
  - Indicator Bacteria (34063)

- **Lindero Creek Reach 2 (Above Lake)**
  - Indicator Bacteria (33974)

- **Long Beach City Beach**
  - Indicator Bacteria (42787)

- **Los Angeles Harbor - Consolidated Slip**
  - Cadmium (sediment) (33475)
  - Chlordane (tissue & sediment) (33508)
  - Chromium (33143)
  - Copper (sediment) (33140)
  - DDT (tissue & sediment) (37822)
  - Dieldrin (33363)
  - Lead (sediment) (37852)
  - Mercury (sediment) (33203)
  - PCBs (Polychlorinated biphenyls) (tissue & sediment) (44944)
  - Toxaphene (tissue) (33157)
  - Zinc (sediment) (33171)

- **Los Angeles Harbor - Fish Harbor**
  - DDT (Dichlorodiphenyltrichloroethane) (39670)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (37480)

- **Los Angeles Harbor - Inner Cabrillo Beach Area**
  - DDT (Dichlorodiphenyltrichloroethane) (33085)
  - Indicator Bacteria (37836)
  - PCBs (Polychlorinated biphenyls) (33642)

- **Los Angeles River Estuary (Queensway Bay)**
  - Chlordane (33641)
  - DDT (sediment) (37650)

- **Los Angeles River Reach 1 (Estuary to Carson Street)**
  - Indicator Bacteria (35171)

- **Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)**
  - Ammonia (32974)
  - Copper (33775)

- **Los Angeles River Reach 5 (within Sepulveda Basin)**
  - Ammonia (32567)
  - Copper (33614)
  - Lead (33664)

- **Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)**
  - Selenium (33615)

- **Los Angeles/Long Beach Inner Harbor**
  - Copper (33551)
  - DDT (Dichlorodiphenyltrichloroethane) (33147)
  - PCBs (Polychlorinated biphenyls) (33803)
  - Zinc (33644)

- **Los Angeles/Long Beach Outer Harbor (inside breakwater)**
  - DDT (Dichlorodiphenyltrichloroethane) (34015)
  - PCBs (Polychlorinated biphenyls) (33591)
  - Toxicity (33930)

- **Machado Lake (Harbor Park Lake)**

- **San Gabriel River Reach 3 (Whittier Narrows to Ramona)**
  - Indicator Bacteria (38851)

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Indicator Bacteria (37897)

- **San Jose Creek Reach 2 (Temple to I-10 at White Ave.)**
  - Indicator Bacteria (34242)

- **San Pedro Bay Near/Off Shore Zones**
  - Chlordane (34442)
  - PCBs (Polychlorinated biphenyls) (33722)
  - Total DDT (sum of 4,4'- and 2,4'- isomers of DDT, DDE, and DDD) (33721)
  - Toxicity (34701)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Chloride (44278)

- **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)**
  - Chloride (32396)
  - Indicator Bacteria (34306)

- **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)**
  - Chloride (32397)

- **Santa Monica Bay Offshore/Nearshore**
  - DDT (Dichlorodiphenyltrichloroethane) (35166)
  - PCBs (Polychlorinated biphenyls) (33180)

- **Santa Monica Beach**
  - Indicator Bacteria (32401)

- **Topanga Beach**
  - Indicator Bacteria (32578)

- **Trancas Beach (Broad Beach)**
  - Indicator Bacteria (32480)

- **Venice Beach**
  - Indicator Bacteria (32952)

- **Will Rogers Beach**
  - Indicator Bacteria (32965)

Do Not Delist from 303(d) list (being addressed with action other than TMDL)	Regional Board 4

- **Port Hueneme Harbor (Back Basins)**
  - PCBs (Polychlorinated biphenyls) (42748)

- **Agua Blanca Creek and its tributaries (above Lake Piru)**
  - Benthic Community Effects (67421)

- **Alamitos Bay**
  - Copper (54822)
  - Toxicity (55141)
  - Zinc (54879)
  - pH (54878)

- **Alhambra Wash**
  - Alkalinity as CaCO3 (55200)
  - Chloride (55204)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (55209)
  - Oxygen, Dissolved (60207)
  - Sulfates (55195)
  - Temperature, water (56151)
  - pH (55147)

- **Alondria Park Lake**
  - Aldrin (60210)
  - Chlordane (60212)
  - DDT (Dichlorodiphenyltrichloroethane) (60219)
  - Dieldrin (60216)
  - Endosulfan (60218)
  - Endrin (60213)
  - Heptachlor (60214)
  - Heptachlor epoxide (60215)
  - Hexachlorobenzene/ HCB (60221)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (60222)
  - Mercury (60223)
  - Mirex (60220)
  - Selenium (60217)

- **Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam)**
  - Benthic Community Effects (65548)

- **Arroyo Seco Reach 3 (above Devils Gate Dam)**
  - Benthic Community Effects (65554)

- **Arroyo Sequit (from confluence of East and West Forks to mouth)**
  - Benthic Community Effects (65655)
  - Oxygen, Dissolved (60209)
  - pH (60208)

- **Avalon Drain**
  - Aluminum (60230)
  - Arsenic (60231)
  - Cadmium (60232)
  - Chromium (60243)
  - Copper (60245)
  - Iron (60249)
  - Lead (60250)
  - Nickel (60226)
  - Selenium (60227)

- **Ballona Creek Estuary**
  - Antimony | Arsenic | Benzo(a)anthracene | Benzo(a)pyrene (3,4-Benzopyrene -7-d) | Chromium (total) | Chrysene (C1-C4) | Dibenz[a,h]anthracene | Mercury | Phenanthrene | Pyrene | Sediment Toxicity (34273)

- **Bear Canyon and its tributaries**
  - Benthic Community Effects (67422)

- **Bear Creek (Los Angeles County)**
  - Alkalinity as CaCO3 (60409)
  - Ammonia (60411)
  - Benthic Community Effects (65657)
  - Chloride (60412)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (60415)
  - Oxygen, Dissolved (60418)
  - Sulfates (60421)
  - Temperature, water (60422)
  - pH (60419)

- **Bear Creek and its tributaries**
  - Benthic-Macroinvertebrate Bioassessments (67423)

- **Belvedere Park Lake**
  - Aldrin (60427)
  - Chlordane (60436)
  - DDT (Dichlorodiphenyltrichloroethane) (60444)
  - Dieldrin (60437)
  - Endosulfan (60439)
  - Endrin (60440)
  - Heptachlor (60428)
  - Heptachlor epoxide (60441)
  - Hexachlorobenzene/ HCB (60429)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (60442)
  - Mercury (60431)
  - Mirex (60432)
  - PCBs (Polychlorinated biphenyls) (60443)
  - Selenium (60435)

- **Big Sycamore Canyon**
  - Ammonia (60469)
  - Arsenic (60447)
  - Azinphos-methyl (Guthion) (60448)
  - Cadmium (60449)
  - Chloride (60450)
  - Chlorpyrifos (60451)
  - Copper (60452)
  - Diazinon (60453)
  - Dichlorvos (60454)
  - Dimethoate (60455)
  - Disulfoton (60456)
  - Dyfonate (Fonofos or Fonophos) (60457)
  - Ethoprop (60458)
  - Lead (60459)
  - Malathion (60461)
  - Methidathion (60462)
  - Methyl Parathion (60464)
  - Molinate (60465)
  - Nickel (60466)
  - Oxygen, Dissolved (60479)

- Alkalinity as CaCO3 (60540)
- Aluminum (60549)
- Ammonia (60557)
- Arsenic (60550)
- Bifenthrin (60570)
- Cadmium (60551)
- Chlordane (60577)
- Chlorpyrifos (60578)
- Chromium (60552)
- Copper (60553)
- Cyfluthrin (60579)
- Cyhalothrin, Lambda (60571)
- Cypermethrin (60572)
- DDD (Dichlorodiphenyldichloroethane) (67341)
- DDE (Dichlorodiphenyldichloroethylene) (67342)
- DDT (Dichlorodiphenyltrichloroethane) (60587)
- Deltamethrin (60574)
- Diazinon (60580)
- Dieldrin (60582)
- Endrin (60583)
- Esfenvalerate/Fenvalerate (60575)
- Fenpropathrin (60576)
- Fipronil (60584)
- Fipronil Sulfide (60585)
- Fipronil Sulfone (60586)
- Iron (60554)
- Lead (60555)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (60581)
- Manganese (60541)
- Nickel (60556)
- Nitrate/Nitrite (Nitrite + Nitrate as N) (60542)
- Nitrogen, Nitrate (60543)
- Nitrogen, Nitrite (60544)
- Oxygen, Dissolved (60546)
- Permethrin (60573)
- Selenium (60558)
- Silver (60559)
- Specific Conductivity (60548)
- Sulfates (60560)
- Temperature, water (60547)
- Total Dissolved Solids (60561)
- Toxicity (60562)
- Zinc (60545)
- pH (60563)

- **Bull Creek (Los Angeles County)**
  - Alkalinity as CaCO3 (60588)
  - Chloride (60589)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (60590)
  - Oxygen, Dissolved (60594)
  - Sulfates (60593)
  - Temperature, water (60595)
  - pH (60596)

- **Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)**
  - Arsenic (60639)
  - Cadmium (60632)
  - Chlorpyrifos (60633)
  - Endosulfan (60926)
  - Endrin (60640)

- Heptachlor epoxide (60641)
- Hexachlorobenzene/ HCB (60642)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (60644)
- Mirex (60645)
- PAHs (Polycyclic Aromatic Hydrocarbons) (60646)
- Selenium (60922)

- **Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)**
  - Aldrin (60934)
  - Azinphos-methyl (Guthion) (60936)
  - Bifenthrin (60937)
  - Chloride (61022)
  - Chlorpyrifos (60939)
  - Cyfluthrin (60941)
  - Cyhalothrin, Lambda (60942)
  - Cypermethrin (60943)
  - DDD (Dichlorodiphenyldichloroethane) (67330)
  - Dacthal (60946)
  - Deltamethrin (60947)
  - Demeton (60951)
  - Diazinon (60952)
  - Dichlorvos (60959)
  - Dicofol (60960)
  - Dimethoate (60961)
  - Disulfoton (60963)
  - Endosulfan sulfate (60965)
  - Endrin (60966)
  - Endrin aldehyde (61007)
  - Esfenvalerate/Fenvalerate (60967)
  - Ethoprop (60969)
  - Fenpropathrin (60970)
  - Heptachlor (60971)
  - Heptachlor epoxide (60972)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (60973)
  - Malathion (60974)
  - Methidathion (60991)
  - Methoxychlor (60982)
  - Methyl Parathion (60988)
  - Mirex (60990)
  - Oxygen, Dissolved (61000)
  - Parathion (60992)
  - Permethrin (60993)
  - Phorate (60984)
  - Phosmet (60985)
  - Sulfates (61012)
  - Temperature, water (61002)
  - Total Dissolved Solids (61035)
  - pH (60986)

- **Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)**
  - Alkalinity as CaCO3 (61058)
  - Aluminum (61059)
  - Arsenic (61060)
  - Bifenthrin (61061)
  - Cadmium (61062)
  - Chlorpyrifos (61063)
  - Chromium (61064)
  - Copper (61065)
  - Cyfluthrin (61066)
  - Cyhalothrin, Lambda (61067)

- Cypermethrin (61068)
- DDD (Dichlorodiphenyldichloroethane) (67335)
- DDE (Dichlorodiphenyldichloroethylene) (67336)
- Deltamethrin (61069)
- Diazinon (61070)
- Endrin (61071)
- Esfenvalerate/Fenvalerate (61072)
- Fenpropathrin (61073)
- Lead (61080)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (61074)
- Mercury (61085)
- Methyl Parathion (61075)
- Nickel (61082)
- Nitrate/Nitrite (Nitrite + Nitrate as N) (61076)
- Oxygen, Dissolved (61088)
- Permethrin (61078)
- Selenium (61091)
- Silver (61092)
- Sulfates (61090)
- Temperature, water (61089)
- Zinc (61079)
- pH (61093)

- **Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)**
  - Aldrin (61114)
  - Aluminum (61104)
  - Ammonia (61201)
  - Azinphos-methyl (Guthion) (61105)
  - Bifenthrin (61175)
  - Cadmium (61103)
  - Chloride (61177)
  - Chromium (61106)
  - Copper (61107)
  - Cyfluthrin (61208)
  - Cyhalothrin, Lambda (61099)
  - Cypermethrin (61209)
  - Dacthal (61115)
  - Deltamethrin (61100)
  - Demeton (61101)
  - Dichlorvos (61102)
  - Dicofol (61158)
  - Dimethoate (61160)
  - Disulfoton (61116)
  - Endosulfan sulfate (61165)
  - Endrin (61166)
  - Endrin aldehyde (61161)
  - Esfenvalerate/Fenvalerate (61167)
  - Ethoprop (61162)
  - Fenpropathrin (61163)
  - Heptachlor (61171)
  - Heptachlor epoxide (61172)
  - Lead (61108)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (61168)
  - Malathion (61199)
  - Mercury (61211)
  - Methidathion (61111)
  - Methoxychlor (61169)
  - Methyl Parathion (61164)
  - Mirex (61096)
  - Nickel (61109)

- Oxygen, Dissolved (61215)
- Parathion (61112)
- Permethrin (61213)
- Phorate (61170)
- Phosmet (61173)
- Silver (61110)
- Temperature, water (61216)
- Zinc (61113)
- pH (61174)

- **Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)**
  - Alkalinity as CaCO3 (61226)
  - Aluminum (61227)
  - Arsenic (61228)
  - Bifenthrin (61229)
  - Cadmium (61230)
  - Chromium (61231)
  - Copper (61232)
  - Cyhalothrin, Lambda (61233)
  - Cypermethrin (61234)
  - Deltamethrin (61235)
  - Esfenvalerate/Fenvalerate (61236)
  - Fenpropathrin (61237)
  - Iron (61238)
  - Lead (61241)
  - Manganese (67485)
  - Nickel (61242)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (61247)
  - Oxygen, Dissolved (61255)
  - Permethrin (61239)
  - Selenium (61246)
  - Silver (61244)
  - Temperature, water (61256)
  - Zinc (61240)
  - pH (61257)

- **Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)**
  - Bifenthrin (61279)
  - Chlordane (61288)
  - Cyfluthrin (61280)
  - Cyhalothrin, Lambda (61281)
  - Cypermethrin (61282)
  - DDD (Dichlorodiphenyldichloroethane) (67343)
  - DDE (Dichlorodiphenyldichloroethylene) (67344)
  - DDT (Dichlorodiphenyltrichloroethane) (61290)
  - Deltamethrin (61286)
  - Dieldrin (61283)
  - Endrin (61284)
  - Esfenvalerate/Fenvalerate (61285)
  - Fenpropathrin (61287)
  - Fipronil (61291)
  - Fipronil Sulfide (61292)
  - Fipronil Sulfone (61293)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (65426)
  - Permethrin (61289)

- **Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)**
  - Alkalinity as CaCO3 (61297)
  - Aluminum (61299)

- Cadmium (61431)
- Chromium (61432)
- Copper (61439)
- Cyhalothrin, Lambda (61448)
- Cypermethrin (61449)
- Deltamethrin (61450)
- Esfenvalerate/Fenvalerate (61451)
- Fenpropathrin (61452)
- Iron (61440)
- Lead (61441)
- Manganese (67487)
- Nickel (61442)
- Nitrate/Nitrite (Nitrite + Nitrate as N) (61454)
- Oxygen, Dissolved (39747)
- Permethrin (61459)
- Selenium (61446)
- Silver (61444)
- Temperature, water (61462)
- Zinc (61458)
- pH (61460)

- **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)**
  - Cyhalothrin, Lambda (67494)
  - Endrin (61464)
  - Heptachlor (61468)
  - Methoxychlor (61465)
  - Pentachlorophenol (PCP) (61466)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)**
  - Alkalinity as CaCO3 (61501)
  - Aluminum (61484)
  - Arsenic (61485)
  - Azinphos-methyl (Guthion) (61506)
  - Bifenthrin (61502)
  - Cadmium (61486)
  - Chromium (61516)
  - Chromium, hexavalent (61519)
  - Copper (61487)
  - Cyhalothrin, Lambda (61507)
  - Cypermethrin (61508)
  - Deltamethrin (61509)
  - Endosulfan (61496)
  - Esfenvalerate/Fenvalerate (61510)
  - Fenpropathrin (61511)
  - Heptachlor epoxide (61498)
  - Iron (61488)
  - Lead (61489)
  - Mercury (61500)
  - Methyl Parathion (61494)
  - Metribuzin (61515)
  - Mirex (61499)
  - Nickel (61492)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (61512)
  - Nitrogen, ammonia (Total Ammonia) (61493)
  - Oxygen, Dissolved (61524)
  - Pentachlorophenol (PCP) (61495)
  - Permethrin (61525)
  - Selenium (61491)
  - Silver (61513)

- Temperature, water (61523)
- Toxicity (61514)
- Zinc (61490)
- pH (61520)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list), unnamed tributary at Olsen Road**
  - Cyanide (65423)
  - Lead (65424)
  - Zinc (65425)

- **Camarillo Hills Drain (tributary to Revolon Slough)**
  - Azinphos-methyl (Guthion) (61692)
  - Chlordane (61694)
  - Chlorpyrifos (61695)
  - Demeton (61696)
  - Diazinon (61697)
  - Endosulfan (61698)
  - Endrin (61699)
  - Methoxychlor (61700)
  - Methyl Parathion (61704)
  - Metribuzin (61705)
  - Mirex (61707)
  - Pentachlorophenol (PCP) (61706)

- **Canada Larga (Ventura River Watershed)**
  - Ammonia (61708)
  - Temperature, water (61709)

- **Carlisle Canyon Creek**
  - Oxygen, Dissolved (61710)
  - pH (61711)

- **Casitas, Lake**
  - Aldrin (61730)
  - Chlordane (61720)
  - DDT (Dichlorodiphenyltrichloroethane) (61727)
  - Dieldrin (61721)
  - Endosulfan (61723)
  - Endrin (61722)
  - Heptachlor (61732)
  - Heptachlor epoxide (61724)
  - Hexachlorobenzene/ HCB (61733)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (61725)
  - Mirex (61735)
  - PCBs (Polychlorinated biphenyls) (61729)
  - Selenium (61734)

- **Castaic Creek Reach 1 (confluence of Santa Clara River to Castaic Lagoon)**
  - Ammonia (61743)
  - Chlorpyrifos (61738)
  - Diazinon (61740)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (61742)
  - Toxicity (61741)

- **Castaic Lagoon**
  - Aldrin (61745)
  - Chlordane (61751)

- DDT (Dichlorodiphenyltrichloroethane) (61756)
- Dieldrin (61762)
- Endosulfan (61752)
- Endrin (61754)
- Heptachlor (61746)
- Heptachlor epoxide (61758)
- Hexachlorobenzene/ HCB (61747)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (61755)
- Mercury (61748)
- Mirex (61749)
- Selenium (61750)

- **Castaic Lake**
  - Aldrin (61770)
  - Chlordane (61713)
  - DDT (Dichlorodiphenyltrichloroethane) (61767)
  - Dieldrin (61769)
  - Endosulfan (61764)
  - Endrin (61765)
  - Heptachlor (61772)
  - Heptachlor epoxide (61768)
  - Hexachlorobenzene/ HCB (61773)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (61766)
  - Mirex (61775)
  - Selenium (61774)

- **Channel Islands Harbor**
  - 2-Methylnaphthalene (61792)
  - Acenaphthene (61787)
  - Aldrin (61804)
  - Anthracene (61788)
  - Arsenic (61819)
  - Azinphos-methyl (Guthion) (61789)
  - Benzo(a)anthracene (61807)
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (61820)
  - Benzo[k]fluoranthene (61790)
  - Cadmium (61828)
  - Chlordane (61811)
  - Chlorpyrifos (61829)
  - Chromium (61793)
  - Chrysene (C1-C4) (61808)
  - Copper (61791)
  - DDD (Dichlorodiphenyldichloroethane) (67345)
  - DDE (Dichlorodiphenyldichloroethylene) (67346)
  - DDT (Dichlorodiphenyltrichloroethane) (61814)
  - Diazinon (61830)
  - Dibenz[a,h]anthracene (61809)
  - Dieldrin (61831)
  - Endosulfan (61832)
  - Endosulfan sulfate (61796)
  - Endrin (61833)
  - Endrin aldehyde (61797)
  - Fluoranthene (61798)
  - Fluorene (61799)
  - Heptachlor (61805)
  - Heptachlor epoxide (61834)
  - Hexachlorobenzene/ HCB (61835)
  - Indeno[1,2,3-cd]pyrene (61821)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (61836)
  - Manganese (61800)

- Cadmium (61934)
- Chromium (61935)
- Copper (61937)
- Cyhalothrin, Lambda (61948)
- Cypermethrin (61951)
- Deltamethrin (61952)
- Esfenvalerate/Fenvalerate (61954)
- Fenpropathrin (61955)
- Iron (61938)
- Lead (61939)
- Manganese (67489)
- Nickel (61940)
- Nitrate/Nitrite (Nitrite + Nitrate as N) (61958)
- Oxygen, Dissolved (61943)
- Permethrin (61959)
- Selenium (61944)
- Silver (61945)
- Sulfates (61966)
- Temperature, water (61980)
- Total Dissolved Solids (61972)
- Toxicity (61965)
- Zinc (61963)

- **Compton Creek**
  - Aluminum (62053)
  - Ammonia (62051)
  - Anthracene (62025)
  - Arsenic (62044)
  - Benzo(a)anthracene (62026)
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (62027)
  - Cadmium (62028)
  - Chlordane (62029)
  - Chlorpyrifos (62030)
  - Chromium (62031)
  - Chromium, trivalent (62047)
  - Chrysene (C1-C4) (62032)
  - DDD (Dichlorodiphenyldichloroethane) (67347)
  - DDE (Dichlorodiphenyldichloroethylene) (67348)
  - DDT (Dichlorodiphenyltrichloroethane) (62046)
  - Demeton (62033)
  - Diazinon (62034)
  - Dieldrin (62035)
  - Endrin (62036)
  - Fluoranthene (62037)
  - Heptachlor epoxide (62038)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (62048)
  - Mercury (62039)
  - Methyl Parathion (62049)
  - Naphthalene (62040)
  - Nickel (62045)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (62042)
  - Phenanthrene (62041)
  - Pyrene (62043)
  - Selenium (62050)

- **Compton Creek, unnamed tributary at Santa Fe Rd**
  - Aluminum (62062)
  - Arsenic (62055)
  - Cadmium (62063)
  - Chlorpyrifos (62065)

- Chromium (62056)
- Copper (62069)
- Demeton (62064)
- Diazinon (62066)
- Iron (62059)
- Lead (62060)
- Malathion (62067)
- Methyl Parathion (62068)
- Nickel (62057)
- Selenium (62058)
- Zinc (62061)

- **County Line Beach**
  - Indicator Bacteria (42965)

- **Coyote Creek**
  - Aluminum (32918)
  - Arsenic (62152)
  - Cadmium (62153)
  - Chlorpyrifos (62158)
  - Chromium (62154)
  - Chromium, hexavalent (62159)
  - Endosulfan (62160)
  - Endrin (62161)
  - Heptachlor epoxide (62162)
  - Mercury (62155)
  - Nickel (62156)
  - Nitrogen, ammonia (Total Ammonia) (62164)
  - Oxygen, Dissolved (37972)
  - Selenium (32400)
  - Silver (62157)
  - Temperature, water (62165)
  - Toxaphene (62163)

- **Crystal Lake**
  - Aldrin (62178)
  - Chlordane (62170)
  - DDT (Dichlorodiphenyltrichloroethane) (62177)
  - Dieldrin (62171)
  - Endosulfan (62172)
  - Endrin (62173)
  - Heptachlor (62179)
  - Heptachlor epoxide (62174)
  - Hexachlorobenzene/ HCB (62180)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (62175)
  - Mercury (62182)
  - Mirex (62183)
  - PCBs (Polychlorinated biphenyls) (62176)
  - Selenium (62181)

- **Deer Creek Beach**
  - Indicator Bacteria (42662)

- **Dockweiler Beach**
  - Arsenic (62209)
  - Cadmium (62214)
  - Chlordane (62210)
  - Chlorpyrifos (62215)
  - DDT (Dichlorodiphenyltrichloroethane) (62223)

- Dieldrin (62211)
- Endosulfan (62216)
- Endrin (62217)
- Heptachlor epoxide (62218)
- Hexachlorobenzene/ HCB (62219)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (62220)
- Mercury (62221)
- Mirex (62224)
- PAHs (Polycyclic Aromatic Hydrocarbons) (62212)
- PCBs (Polychlorinated biphenyls) (62213)
- Selenium (62222)

- **Dominguez Channel (lined portion above Vermont Ave)**
  - Benthic Community Effects (66165)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - 2-Methylnaphthalene (62228)
  - Acenaphthene (62226)
  - Acenaphthylene (62229)
  - Anthracene (62231)
  - Cadmium (62235)
  - Dibenz[a,h]anthracene (62232)
  - Fluoranthene (62239)
  - Fluorene (62233)
  - Naphthalene (62230)
  - Nickel (62237)
  - Nitrogen, ammonia (Total Ammonia) (62234)
  - Tributyltin TBT (Tributylstanne) (62227)

- **Downtown Shoreline Marina (part of San Pedro Bay Near/Off Shore Zones)**
  - Toxicity (62244)
  - Zinc (62245)
  - pH (62247)

- **Drain along Gerry Rd to Calleguas Creek Reach 9**
  - Aldrin (62428)
  - Ammonia (62422)
  - Azinphos-methyl (Guthion) (62248)
  - Bifenthrin (62474)
  - Chlordane (62429)
  - Chloride (62476)
  - Chlorpyrifos (62430)
  - Cyfluthrin (62480)
  - Cyhalothrin, Lambda (62485)
  - Cypermethrin (62249)
  - DDD (Dichlorodiphenyldichloroethane) (67349)
  - DDT (Dichlorodiphenyltrichloroethane) (62502)
  - Dacthal (62408)
  - Deltamethrin (62487)
  - Demeton (62409)
  - Diazinon (62431)
  - Dichlorvos (62489)
  - Dicofol (62490)
  - Dieldrin (62433)
  - Dimethoate (62411)
  - Disulfoton (62412)
  - Endosulfan (62414)
  - Endosulfan sulfate (62416)
  - Endrin (62435)

- Endrin aldehyde (67482)
- Esfenvalerate/Fenvalerate (62417)
- Ethoprop (62493)
- Fenpropathrin (62494)
- Heptachlor (62436)
- Heptachlor epoxide (62437)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (62438)
- Malathion (62418)
- Methidathion (62495)
- Methoxychlor (62420)
- Methyl Parathion (62496)
- Mirex (62497)
- Oxygen, Dissolved (62503)
- Parathion (62499)
- Permethrin (62478)
- Phorate (62426)
- Phosmet (62427)
- Sulfates (62504)
- Temperature, water (62510)
- Total Dissolved Solids (62505)
- Toxaphene (62439)
- pH (62506)

- **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2**
  - Aldrin (62595)
  - Ammonia (62611)
  - Azinphos-methyl (Guthion) (62600)
  - Chloride (62593)
  - Cypermethrin (62601)
  - Dacthal (62602)
  - Demeton (62604)
  - Diazinon (62587)
  - Dieldrin (62596)
  - Dimethoate (62603)
  - Disulfoton (62605)
  - Endosulfan (62588)
  - Endosulfan sulfate (62589)
  - Endrin (62597)
  - Endrin aldehyde (62590)
  - Heptachlor (62598)
  - Heptachlor epoxide (62599)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (62591)
  - Malathion (62606)
  - Methoxychlor (62607)
  - Oxygen, Dissolved (62644)
  - Permethrin (62614)
  - Phorate (62612)
  - Phosmet (62613)
  - alpha.-BHC (Benzenehexachloride or alpha-HCH) (62592)
  - beta-BHC (Benzenehexachloride or beta-HCH) (62594)
  - delta-BHC (Benzenehexachloride or delta-HCH) (62610)
  - pH (62619)

- **Echo Park Lake**
  - Aldrin (62663)
  - DDT (Dichlorodiphenyltrichloroethane) (62678)
  - Endosulfan (62674)
  - Endrin (62675)
  - Heptachlor (62664)
  - Heptachlor epoxide (62677)

- **Lake Eleanor Creek**
  - Oxygen, Dissolved (63696)
  - pH (63697)

- **Lake Hughes**
  - Aldrin (63698)
  - Chlordane (63715)
  - DDT (Dichlorodiphenyltrichloroethane) (63721)
  - Dieldrin (63722)
  - Endosulfan (63716)
  - Endrin (63717)
  - Heptachlor (63699)
  - Heptachlor epoxide (63723)
  - Hexachlorobenzene/ HCB (63711)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (63718)
  - Mercury (63712)
  - Mirex (63713)
  - PCBs (Polychlorinated biphenyls) (63719)
  - Selenium (63714)

- **Lake Lindero**
  - Aldrin (63733)
  - Chlordane (63727)
  - DDT (Dichlorodiphenyltrichloroethane) (63732)
  - Dieldrin (63728)
  - Endosulfan (63724)
  - Endrin (63725)
  - Heptachlor (63735)
  - Heptachlor epoxide (63729)
  - Hexachlorobenzene/ HCB (63736)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (63726)
  - Mercury (63738)
  - Mirex (63739)
  - PCBs (Polychlorinated biphenyls) (63731)

- **Lake Sherwood**
  - Aldrin (59589)
  - Chlordane (63808)
  - DDT (Dichlorodiphenyltrichloroethane) (63812)
  - Dieldrin (63814)
  - Endosulfan (63809)
  - Endrin (63810)
  - Heptachlor (63804)
  - Heptachlor epoxide (63815)
  - Hexachlorobenzene/ HCB (63805)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (63811)
  - Mirex (63816)
  - PCBs (Polychlorinated biphenyls) (63813)
  - Selenium (63806)
  - pH (63818)

- **Lang Creek**
  - Oxygen, Dissolved (63820)
  - pH (63823)

- **Las Flores Canyon Creek**
  - Alkalinity as CaCO3 (63877)
  - Aluminum (63876)

- Zinc (64459)
- pH (64664)

- **Los Angeles River Reach 5 (within Sepulveda Basin)**
  - Anthracene (64466)
  - Arsenic (64467)
  - Benzo(a)anthracene (64468)
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (64469)
  - Cadmium (64470)
  - Chlordane (64483)
  - Chromium (64471)
  - Chrysene (C1-C4) (64472)
  - DDD (Dichlorodiphenyldichloroethane) (64473)
  - DDE (Dichlorodiphenyldichloroethylene) (64484)
  - DDT (Dichlorodiphenyltrichloroethane) (64474)
  - Dieldrin (64476)
  - Endrin (64477)
  - Fluorene (64478)
  - Heptachlor epoxide (64485)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (64486)
  - Mercury (64487)
  - Nickel (64479)
  - Oxygen, Dissolved (64661)
  - PCBs (Polychlorinated biphenyls) (64480)
  - Pyrene (64481)
  - Temperature, water (64488)
  - Zinc (64482)
  - pH (64660)

- **Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)**
  - 1,1,2-Trichloroethane (64493)
  - Acrolein (64526)
  - Alkalinity as CaCO3 (64539)
  - Ammonia (64524)
  - Arsenic (64631)
  - Azinphos-methyl (Guthion) (64491)
  - Benthic Community Effects (66234)
  - Cadmium (64516)
  - Chlordane (64497)
  - Chloride (64630)
  - Chlorpyrifos (64530)
  - Chromium (64511)
  - Cyanide (64618)
  - Demeton (64498)
  - Diazinon (64519)
  - Endosulfan (64499)
  - Endrin (64500)
  - Heptachlor (64501)
  - Lead (64629)
  - Malathion (64494)
  - Mercury (64628)
  - Methoxychlor (64505)
  - Methyl Parathion (64495)
  - Mirex (64506)
  - Nickel (64513)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (64520)
  - Oxygen, Dissolved (64617)
  - PCBs (Polychlorinated biphenyls) (64508)
  - Silver (64496)
  - Sulfates (64615)

Mandos Cove Beach
  - Indicator Bacteria (42923)

- **Marina Park Beach**
  - Indicator Bacteria (42935)

- **Marina del Rey Harbor - Back Basins**
  - pH (61606)

- **Matilija Creek Reach 2 (Above Reservoir)**
  - Alkalinity as CaCO3 (61670)
  - Aluminum (61621)
  - Ammonia (61672)
  - Arsenic (61625)
  - Bifenthrin (61627)
  - Cadmium (61631)
  - Chloride (61633)
  - Chromium (61644)
  - Copper (61646)
  - Cyhalothrin, Lambda (61647)
  - Cypermethrin (61654)
  - Deltamethrin (61657)
  - Esfenvalerate/Fenvalerate (61659)
  - Fenpropathrin (61661)
  - Iron (61662)
  - Lead (61663)
  - Nickel (61664)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (61671)
  - Oxygen, Dissolved (61673)
  - Permethrin (61665)
  - Selenium (61666)
  - Silver (61667)
  - Sulfates (61674)
  - Temperature, water (61675)
  - Total Dissolved Solids (61669)
  - Toxicity (61676)
  - Zinc (61668)
  - pH (61677)

- **McCoy Canyon Creek**
  - Acrolein (61931)
  - Aldrin (61949)
  - Chlordane (61973)
  - DDT (Dichlorodiphenyltrichloroethane) (61946)
  - Diazinon (61953)
  - Dieldrin (61956)
  - Endosulfan (61977)
  - Endrin (61986)
  - Heptachlor (61936)
  - Heptachlor epoxide (61960)
  - Methoxychlor (61970)
  - Pentachlorophenol (PCP) (61942)
  - Toxaphene (61947)

- **McGrath Lake Agricultural Drain**
  - Aldrin (61999)
  - Ammonia (62109)
  - Azinphos-methyl (Guthion) (62074)

- **Padre Juan Canyon**
  - Ammonia (62479)
  - Arsenic (62333)
  - Azinphos-methyl (Guthion) (62335)
  - Cadmium (62337)
  - Chlorpyrifos (62467)
  - Copper (62339)
  - Diazinon (62340)
  - Dichlorvos (62341)
  - Dimethoate (62342)
  - Disulfoton (62346)
  - Dyfonate (Fonofos or Fonophos) (62348)
  - Ethoprop (62468)
  - Lead (62475)
  - Malathion (62469)
  - Methidathion (62470)
  - Methyl Parathion (62471)
  - Molinate (62472)
  - Nickel (62477)
  - Oxygen, Dissolved (62492)
  - Parathion (62481)
  - Phorate (62483)
  - Phosmet (62484)
  - Silver (62511)
  - Temperature, water (62514)
  - Terbufos (62486)
  - Thiobencarb/Bolero (62488)
  - Toxicity (62512)
  - Zinc (62513)
  - pH (62515)

- **Palo Comado Creek**
  - Alkalinity as CaCO3 (62516)
  - Aluminum (62517)
  - Ammonia (62616)
  - Arsenic (62518)
  - Bifenthrin (62519)
  - Cadmium (62520)
  - Chloride (62550)
  - Chromium (62522)
  - Copper (62523)
  - Cyhalothrin, Lambda (62524)
  - Cypermethrin (62526)
  - Deltamethrin (62527)
  - Esfenvalerate/Fenvalerate (62529)
  - Fenpropathrin (62531)
  - Iron (62532)
  - Lead (62533)
  - Nickel (62535)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (62615)
  - Oxygen, Dissolved (62554)
  - Permethrin (62537)
  - Selenium (62547)
  - Silver (62548)
  - Sulfates (62551)
  - Temperature, water (62552)
  - Total Dissolved Solids (62553)
  - Toxicity (62555)
  - Zinc (62549)

pH (62556)

- **Peck Road Park Lake**
  - Aldrin (62618)
  - Dieldrin (62628)
  - Endosulfan (62629)
  - Endrin (62631)
  - Heptachlor (62620)
  - Heptachlor epoxide (62632)
  - Hexachlorobenzene/ HCB (62621)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (62634)
  - Mercury (62623)
  - Mirex (62622)
  - PCBs (Polychlorinated biphenyls) (62635)
  - Selenium (62624)

- **Piedra Blanca Creek and its Tributaries**
  - Benthic Community Effects (67426)

- **Piru Creek (from gaging station below Santa Felicia Dam to headwaters)**
  - Alkalinity as CaCO3 (62637)
  - Aluminum (62639)
  - Ammonia (65847)
  - Arsenic (62643)
  - Bifenthrin (62645)
  - Cadmium (62646)
  - Chromium (62647)
  - Copper (62648)
  - Cyhalothrin, Lambda (62649)
  - Cypermethrin (62650)
  - Deltamethrin (62651)
  - Esfenvalerate/Fenvalerate (62652)
  - Fenpropathrin (62653)
  - Iron (62654)
  - Lead (62655)
  - Manganese (62656)
  - Nickel (62657)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (65846)
  - Nitrogen, Nitrate (65824)
  - Nitrogen, Nitrite (65825)
  - Oxygen, Dissolved (62672)
  - Permethrin (62658)
  - Selenium (62659)
  - Silver (62660)
  - Specific Conductivity (62661)
  - Sulfates (62662)
  - Temperature, water (62665)
  - Total Dissolved Solids (62669)
  - Zinc (62671)

- **Piru, Lake**
  - Aldrin (62785)
  - Chlordane (62786)
  - DDT (Dichlorodiphenyltrichloroethane) (62804)
  - Dieldrin (62790)
  - Endosulfan (62792)
  - Endrin (62795)
  - Heptachlor (62796)
  - Heptachlor epoxide (62797)

- **Pyramid Lake**
  - Aldrin (62839)
  - Endosulfan (62842)
  - Endrin (62872)
  - Heptachlor (62876)
  - Heptachlor epoxide (62877)
  - Hexachlorobenzene/ HCB (62879)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (65945)
  - Mirex (65947)
  - Selenium (65946)

- **Ramirez Canyon Creek**
  - Oxygen, Dissolved (65958)
  - pH (65959)

- **Redondo Beach**
  - Arsenic (65984)
  - Cadmium (65966)
  - Chlordane (65967)
  - Chlorpyrifos (65968)
  - Dieldrin (65986)
  - Endosulfan (65969)
  - Endrin (65970)
  - Heptachlor epoxide (65971)
  - Hexachlorobenzene/ HCB (65972)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (65980)
  - Mercury (65981)
  - Mirex (65987)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (65982)
  - Selenium (65983)

- **Rio De Santa Clara/Oxnard Drain No. 3**
  - Aldrin (66021)
  - Ammonia (66059)
  - Azinphos-methyl (Guthion) (66026)
  - Bifenthrin (66025)
  - Chloride (66081)
  - Chlorpyrifos (66023)
  - Cypermethrin (66005)
  - Dacthal (66028)
  - Demeton (66006)
  - Diazinon (66017)
  - Dieldrin (66022)
  - Dimethoate (66027)
  - Disulfoton (66049)
  - Endosulfan (66007)
  - Endosulfan sulfate (66008)
  - Endrin (66020)
  - Endrin aldehyde (66009)
  - Heptachlor (66019)
  - Heptachlor epoxide (66018)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66015)
  - Malathion (66057)
  - Methoxychlor (66058)
  - Oxygen, Dissolved (66083)
  - Permethrin (66010)
  - Phorate (66072)
  - Phosmet (66073)
  - alpha.-BHC (Benzenehexachloride or alpha-HCH) (66011)

- beta-BHC (Benzenehexachloride or beta-HCH) (66012)
- delta-BHC (Benzenehexachloride or delta-HCH) (66074)
- pH (66041)

- **Rio Hondo Reach 3 (above Spreading Grounds)**
  - Aluminum (67454)
  - Arsenic (67455)
  - Cadmium (67456)
  - Chromium (67458)
  - Copper (67459)
  - Diazinon (67460)
  - Endosulfan (67461)
  - Heptachlor epoxide (67462)
  - Lead (67464)
  - Mercury (67465)
  - Nickel (67466)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (67467)
  - Nitrogen, ammonia (Total Ammonia) (67468)
  - Selenium (67471)
  - Silver (67472)
  - Toxaphene (67473)
  - Toxicity (67474)
  - Zinc (67475)
  - pH (67470)

- **Rose Valley Creek**
  - Alkalinity as CaCO3 (62880)
  - Aluminum (62881)
  - Ammonia (62960)
  - Arsenic (62882)
  - Benthic Community Effects (66878)
  - Bifenthrin (62883)
  - Cadmium (62885)
  - Chromium (62886)
  - Copper (62887)
  - Cyhalothrin, Lambda (62888)
  - Cypermethrin (62889)
  - Deltamethrin (62890)
  - Esfenvalerate/Fenvalerate (62891)
  - Fenpropathrin (62892)
  - Iron (62893)
  - Lead (62894)
  - Manganese (62895)
  - Nickel (62896)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (62958)
  - Oxygen, Dissolved (62897)
  - Permethrin (62922)
  - Selenium (62925)
  - Silver (62926)
  - Sulfates (62930)
  - Temperature, water (62931)
  - Total Dissolved Solids (62932)
  - Toxicity (62933)
  - Zinc (62950)
  - pH (62957)

- **Royal Palms Beach**
  - Arsenic (66184)
  - Cadmium (66167)

Lead (66214)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66209)
- Mercury (66217)
- Methyl Parathion (66210)
- Nickel (66218)
- Oxygen, Dissolved (66241)
- Permethrin (66211)
- Selenium (66238)
- Silver (66239)
- Zinc (66215)

- **San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam**
  - Aluminum (32384)
  - Arsenic (66298)
  - Cadmium (66299)
  - Chromium (66311)
  - Iron (32392)
  - Mercury (66303)
  - Nickel (66302)
  - Nitrogen, ammonia (Total Ammonia) (66305)
  - Oxygen, Dissolved (66308)
  - Selenium (66306)
  - Silver (66304)
  - Toxicity (66307)
  - pH (66309)

- **San Gabriel River Reach 3 (Whittier Narrows to Ramona)**
  - Aluminum (63315)
  - Ammonia (32644)
  - Arsenic (66312)
  - Cadmium (66314)
  - Chlordane (66325)
  - Chromium (66358)
  - Copper (66315)
  - Diazinon (66349)
  - Endosulfan (66357)
  - Heptachlor epoxide (66347)
  - Iron (66320)
  - Lead (38557)
  - Malathion (66351)
  - Mercury (66316)
  - Nickel (66313)
  - Oxygen, Dissolved (66321)
  - Parathion (66346)
  - Selenium (66317)
  - Silver (66318)
  - Temperature, water (66323)
  - Toxaphene (66324)
  - Zinc (66319)
  - pH (66322)

- **San Gabriel River, East Fork**
  - Alkalinity as CaCO3 (63281)
  - Ammonia (63310)
  - Chloride (63282)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (66359)
  - Oxygen, Dissolved (63283)
  - Sulfates (63285)
  - Temperature, water (63286)

pH (63302)

- **San Gabriel River, North Fork**
  - Benthic Community Effects (67407)

- **San Gabriel River, West Fork**
  - Alkalinity as CaCO3 (63269)
  - Ammonia (66365)
  - Chloride (63270)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (66362)
  - Oxygen, Dissolved (63272)
  - Sulfates (63273)
  - Temperature, water (63271)
  - pH (63280)

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Aluminum (65132)
  - Arsenic (65133)
  - Cadmium (65134)
  - Chromium (65512)
  - Copper (65135)
  - Diazinon (65136)
  - Endosulfan (65505)
  - Endrin (65506)
  - Heptachlor epoxide (65507)
  - Iron (65508)
  - Lead (65518)
  - Malathion (65521)
  - Mercury (65522)
  - Nickel (65523)
  - Nitrogen, ammonia (Total Ammonia) (66397)
  - Oxygen, Dissolved (66407)
  - Parathion (66399)
  - Silver (66400)
  - Toxaphene (66398)
  - Zinc (66406)

- **San Nicolas Canyon Creek**
  - Trash (67427)

- **San Nicolas Island at Freighter Dock**
  - Arsenic (66426)
  - Cadmium (66412)
  - Chlordane (66413)
  - Chlorpyrifos (66414)
  - DDT (Dichlorodiphenyltrichloroethane) (66424)
  - Dieldrin (66415)
  - Endosulfan (66416)
  - Endrin (66417)
  - Heptachlor epoxide (66418)
  - Hexachlorobenzene/ HCB (66419)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66420)
  - Mercury (66421)
  - Mirex (66425)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (66422)
  - PCBs (Polychlorinated biphenyls) (66427)
  - Selenium (66423)

San Pedro Bay Near/Off Shore Zones

- Arsenic (66440)
- Cadmium (66430)
- Chlorpyrifos (66431)
- Dieldrin (66441)
- Endosulfan (66432)
- Endrin (66433)
- Heptachlor epoxide (66434)
- Hexachlorobenzene/ HCB (66436)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66437)
- Mercury (66438)
- Mirex (66442)
- Oxygen, Dissolved (66435)
- Selenium (66439)
- pH (66443)

- **Santa Ana Creek, North Fork**
  - Alkalinity as CaCO3 (63097)
  - Aluminum (63098)
  - Ammonia (63192)
  - Arsenic (63100)
  - Benthic Community Effects (66886)
  - Bifenthrin (63101)
  - Cadmium (63102)
  - Chromium (63104)
  - Copper (63106)
  - Cyhalothrin, Lambda (63108)
  - Cypermethrin (63111)
  - Deltamethrin (63113)
  - Esfenvalerate/Fenvalerate (63116)
  - Fenpropathrin (63117)
  - Iron (63118)
  - Lead (63119)
  - Manganese (63121)
  - Nickel (63122)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (63191)
  - Oxygen, Dissolved (63123)
  - Permethrin (63124)
  - Selenium (63126)
  - Silver (63183)
  - Specific Conductivity (63184)
  - Sulfates (63185)
  - Temperature, water (63186)
  - Total Dissolved Solids (63187)
  - Toxicity (63188)
  - Zinc (63189)
  - pH (63190)

- **Santa Clara Drain (Ventura County)**
  - Aldrin (66521)
  - Ammonia (66502)
  - Azinphos-methyl (Guthion) (66507)
  - Bifenthrin (66509)
  - Chlordane (66523)
  - Chloride (66548)
  - Chlorpyrifos (66538)
  - Cyfluthrin (66479)
  - Cyhalothrin, Lambda (66480)
  - Cypermethrin (66539)
  - DDD (Dichlorodiphenyldichloroethane) (66542)

- DDT (Dichlorodiphenyltrichloroethane) (66612)
- Deltamethrin (66613)
- Diazinon (66614)
- Dieldrin (66615)
- Endrin (66616)
- Esfenvalerate/Fenvalerate (66617)
- Fenpropathrin (66618)
- Lead (66619)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66620)
- Mercury (66621)
- Methyl Parathion (66622)
- Nickel (66623)
- PCBs (Polychlorinated biphenyls) (66625)
- Permethrin (66626)
- Phosphate (67451)
- Temperature, water (66630)
- Zinc (66624)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Aldrin (66709)
  - Aluminum (66759)
  - Azinphos-methyl (Guthion) (66718)
  - Bifenthrin (66720)
  - Cadmium (66760)
  - Cadmium (66761)
  - Chlordane (66947)
  - Chlorpyrifos (66948)
  - Chromium (66763)
  - Copper (66764)
  - Cyfluthrin (66950)
  - Cyhalothrin, Lambda (66721)
  - Cypermethrin (66951)
  - DDD (Dichlorodiphenyldichloroethane) (66952)
  - DDT (Dichlorodiphenyltrichloroethane) (66949)
  - Dacthal (66710)
  - Deltamethrin (66722)
  - Demeton (66723)
  - Diazinon (66770)
  - Dichlorvos (66724)
  - Dicofol (66725)
  - Dieldrin (66711)
  - Dimethoate (66712)
  - Disulfoton (66713)
  - Endosulfan (66771)
  - Endosulfan sulfate (66714)
  - Endrin (66872)
  - Endrin aldehyde (66734)
  - Esfenvalerate/Fenvalerate (66715)
  - Ethoprop (66735)
  - Fenpropathrin (66736)
  - Heptachlor (66873)
  - Heptachlor epoxide (66874)
  - Lead (66765)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66716)
  - Malathion (66941)
  - Methidathion (66956)
  - Methoxychlor (66942)
  - Methyl Parathion (66944)
  - Metribuzin (66755)
  - Mirex (66945)

- Nickel (66767)
- Oxygen, Dissolved (66962)
- Parathion (66957)
- Pentachlorophenol (PCP) (66946)
- Permethrin (66958)
- Phorate (66717)
- Phosmet (66719)
- Silver (66768)
- Sulfates (66960)
- Temperature, water (66964)
- Toxaphene (66959)
- Zinc (66769)
- pH (66961)

- **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)**
  - Alkalinity as CaCO3 (67035)
  - Aluminum (33444)
  - Arsenic (66999)
  - Bifenthrin (67007)
  - Cadmium (67000)
  - Chromium (67001)
  - Copper (67002)
  - Cyhalothrin, Lambda (67012)
  - Cypermethrin (67008)
  - Deltamethrin (67013)
  - Diazinon (36980)
  - Endosulfan (67022)
  - Endrin (67014)
  - Esfenvalerate/Fenvalerate (67009)
  - Fenpropathrin (67010)
  - Heptachlor epoxide (67017)
  - Lead (67003)
  - Manganese (67011)
  - Mercury (67023)
  - Nickel (67004)
  - Oxygen, Dissolved (67025)
  - Permethrin (67032)
  - Phosphate (33208)
  - Selenium (67005)
  - Silver (67006)
  - Specific Conductance (36095)
  - Sulfates (67027)
  - Temperature, water (67026)
  - Total Dissolved Solids (67028)
  - Toxaphene (67018)
  - Toxicity (67031)
  - Zinc (67016)
  - pH (67030)

- **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)**
  - Alkalinity as CaCO3 (67481)
  - Aluminum (67477)
  - Arsenic (67037)
  - Bifenthrin (67048)
  - Cadmium (67040)
  - Chromium (67043)
  - Cyfluthrin (67049)
  - Cyhalothrin, Lambda (67050)

- Cypermethrin (67051)
- DDD (Dichlorodiphenyldichloroethane) (67052)
- DDE (Dichlorodiphenyldichloroethylene) (67053)
- DDT (Dichlorodiphenyltrichloroethane) (67055)
- Deltamethrin (67054)
- Dieldrin (67056)
- Endrin (67057)
- Esfenvalerate/Fenvalerate (67058)
- Fenpropathrin (67059)
- Lead (67038)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (67060)
- Mercury (67041)
- Methyl Parathion (67061)
- Nickel (67042)
- Oxygen, Dissolved (67067)
- PCBs (Polychlorinated biphenyls) (67062)
- Permethrin (67063)
- Phosphate (33848)
- Selenium (67065)
- Silver (67066)
- Sulfates (67479)
- Total Dissolved Solids (67480)
- Zinc (67039)
- pH (67069)

- **Santa Clara River Reach 10 (Sespe Creek, from confl with Santa Clara River Reach 3 to above gaging station - 500 ft downstream from Little Sespe Cr)**
  - Alkalinity as CaCO3 (67136)
  - Aluminum (67102)
  - Arsenic (67106)
  - Bifenthrin (67089)
  - Cadmium (67107)
  - Chlordane (67113)
  - Chloride (67131)
  - Chlorpyrifos (67114)
  - Chromium (67108)
  - Copper (67110)
  - Cyfluthrin (67116)
  - Cyhalothrin, Lambda (67091)
  - Cypermethrin (67092)
  - DDD (Dichlorodiphenyldichloroethane) (67117)
  - DDE (Dichlorodiphenyldichloroethylene) (67119)
  - DDT (Dichlorodiphenyltrichloroethane) (67130)
  - Deltamethrin (67093)
  - Diazinon (67120)
  - Dieldrin (67121)
  - Endrin (67122)
  - Escherichia coli (E. coli) (67450)
  - Esfenvalerate/Fenvalerate (67094)
  - Fenpropathrin (67095)
  - Iron (67096)
  - Lead (67111)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (67123)
  - Manganese (67124)
  - Mercury (67125)
  - Methyl Parathion (67126)
  - Nickel (67109)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (67097)
  - Nitrogen, Nitrate (67127)
  - Nitrogen, Nitrite (67128)

- Nitrogen, ammonia (Total Ammonia) (67098)
- Oxygen, Dissolved (67134)
- PCBs (Polychlorinated biphenyls) (67129)
- Permethrin, total (67100)
- Selenium (67104)
- Silver (67101)
- Specific Conductivity (67135)
- Sulfates (33259)
- Temperature, water (67137)
- Total Dissolved Solids (67132)
- Toxicity (67103)
- Zinc (67099)
- pH (67133)

- **Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)**
  - Alkalinity as CaCO3 (64838)
  - Aluminum (64839)
  - Arsenic (64840)
  - Bifenthrin (64841)
  - Cadmium (64842)
  - Chloride (33439)
  - Chromium (64846)
  - Copper (64847)
  - Cyhalothrin, Lambda (64848)
  - Cypermethrin (64849)
  - Deltamethrin (64850)
  - Esfenvalerate/Fenvalerate (64851)
  - Fenpropathrin (64852)
  - Iron (64853)
  - Lead (64854)
  - Manganese (64855)
  - Nickel (64856)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (67140)
  - Nitrogen, Nitrate (67141)
  - Nitrogen, Nitrite (67142)
  - Nitrogen, ammonia (Total Ammonia) (67138)
  - Oxygen, Dissolved (64857)
  - Permethrin (64858)
  - Selenium (64859)
  - Silver (64860)
  - Specific Conductivity (64861)
  - Temperature, water (64863)
  - Toxicity (64862)
  - Zinc (64864)
  - pH (64865)

- **Santa Clara River Reach 2**
  - Alkalinity as CaCO3 (67180)
  - Aluminum (67143)
  - Arsenic (67159)
  - Bifenthrin (67152)
  - Cadmium (67160)
  - Chromium (67153)
  - Copper (67161)
  - Cyhalothrin, Lambda (67144)
  - Cypermethrin (67154)
  - Deltamethrin (67145)
  - Esfenvalerate/Fenvalerate (67146)
  - Fenpropathrin (67147)

- Iron (67150)
- Lead (67162)
- Manganese (67148)
- Nickel (67164)
- Nitrate/Nitrite (Nitrite + Nitrate as N) (67170)
- Nitrogen, ammonia (Total Ammonia) (67151)
- Oxygen, Dissolved (67178)
- Permethrin, total (67156)
- Selenium (67166)
- Silver (67163)
- Sulfates (67179)
- Temperature, water (67181)
- Total Dissolved Solids (67182)
- Toxicity (67185)
- Zinc (67158)
- pH (67183)

- **Santa Clara River Reach 4B (Piru Creek to Blue Cut Gaging Station)**
  - Alkalinity as CaCO3 (66994)
  - Aluminum (66967)
  - Ammonia (66998)
  - Arsenic (66968)
  - Bifenthrin (66979)
  - Cadmium (66969)
  - Chloride (66980)
  - Chromium (66970)
  - Copper (66971)
  - Cyhalothrin, Lambda (66981)
  - Cypermethrin (66982)
  - Deltamethrin (66983)
  - Esfenvalerate/Fenvalerate (66984)
  - Fenpropathrin (66985)
  - Iron (66972)
  - Lead (66973)
  - Manganese (66986)
  - Nickel (66974)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (66987)
  - Oxygen, Dissolved (66992)
  - Permethrin (66990)
  - Selenium (66976)
  - Silver (66975)
  - Sulfates (66977)
  - Temperature, water (66993)
  - Total Dissolved Solids (66978)
  - Toxicity (66991)
  - Zinc (66996)
  - pH (66997)

- **Santa Fe Dam Park Lake**
  - Aldrin (67186)
  - Chlordane (67192)
  - DDT (Dichlorodiphenyltrichloroethane) (67196)
  - Dieldrin (67197)
  - Endosulfan (67193)
  - Endrin (67194)
  - Heptachlor (67187)
  - Heptachlor epoxide (67198)
  - Hexachlorobenzene/ HCB (67188)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (67195)
  - Mercury (67189)

- Mirex (67190)
- Selenium (67191)

- **Santa Monica Bay Offshore/Nearshore**
  - Cadmium (67206)
  - Chromium (67200)
  - Copper (67205)
  - Lead (67201)
  - Nickel (67210)
  - Nitrogen, ammonia (Total Ammonia) (67214)
  - Selenium (67203)
  - Silver (67202)
  - Zinc (67204)
  - pH (67215)

- **Santa Paula Creek Reach 1 (confluence w Santa Clara River to Diverson Dam)**
  - Alkalinity as CaCO3 (64669)
  - Aluminum (64670)
  - Ammonia (67225)
  - Arsenic (64672)
  - Bifenthrin (64673)
  - Cadmium (64674)
  - Chromium (64675)
  - Copper (64676)
  - Cyhalothrin, Lambda (64677)
  - Cypermethrin (64678)
  - Deltamethrin (64679)
  - Escherichia coli (E. coli) (67449)
  - Esfenvalerate/Fenvalerate (64680)
  - Fenpropathrin (64681)
  - Iron (64682)
  - Lead (64683)
  - Manganese (64684)
  - Nickel (64686)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (67223)
  - Nitrogen, Nitrate (67224)
  - Nitrogen, Nitrite (67222)
  - Oxygen, Dissolved (64687)
  - Permethrin (64693)
  - Selenium (64694)
  - Silver (64695)
  - Specific Conductivity (64688)
  - Sulfates (64690)
  - Temperature, water (64689)
  - Total Dissolved Solids (64691)
  - Toxicity (64697)
  - Zinc (64696)
  - pH (64692)

- **Santa Paula Creek and its Tributaries**
  - Benthic Community Effects (67419)

- **Seaside Wilderness Park Beach**
  - Indicator Bacteria (42349)

- **Sespe Creek (from 500 ft below confluence with Little Sespe Cr to headwaters)**
  - Alkalinity as CaCO3 (64633)
  - Aluminum (64634)
  - Arsenic (64635)

- **Sullivan Canyon Creek**
  - Oxygen, Dissolved (67260)

- **Susanna Canyon and East Fork Susanna Canyon**
  - Benthic Community Effects (67439)

- **Sycamore Cove Beach**
  - Indicator Bacteria (42268)

- **Tapo Canyon**
  - Aldrin (64346)
  - Ammonia (67272)
  - Azinphos-methyl (Guthion) (64347)
  - Bifenthrin (64349)
  - Chlorpyrifos (64352)
  - Cyfluthrin (64353)
  - Cyhalothrin, Lambda (64354)
  - Cypermethrin (64355)
  - DDT (Dichlorodiphenyltrichloroethane) (64447)
  - Dacthal (64448)
  - Deltamethrin (64475)
  - Demeton (64449)
  - Diazinon (64492)
  - Dichlorvos (64502)
  - Dicofol (64504)
  - Dieldrin (64507)
  - Dimethoate (64450)
  - Disulfoton (64451)
  - Endosulfan (64452)
  - Endosulfan sulfate (64453)
  - Endrin (64510)
  - Endrin aldehyde (64512)
  - Esfenvalerate/Fenvalerate (64454)
  - Ethoprop (64515)
  - Fenpropathrin (64517)
  - Heptachlor (64518)
  - Heptachlor epoxide (64522)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (64523)
  - Methidathion (64527)
  - Methoxychlor (64455)
  - Methyl Parathion (64528)
  - Mirex (64529)
  - Oxygen, Dissolved (64532)
  - Parathion (64533)
  - Permethrin (64534)
  - Phorate (64535)
  - Phosmet (64537)
  - Temperature, water (64541)
  - Toxaphene (64543)
  - pH (64547)

- **Temescal Canyon Creek (Los Angeles County)**
  - Oxygen, Dissolved (64548)

- **Thacher Creek**
  - Aldrin (64299)
  - Ammonia (67279)
  - Bifenthrin (64300)

- Heptachlor epoxide (66687)
- Hexachlorobenzene/ HCB (66688)
- Lead (66689)
- Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66690)
- Malathion (66691)
- Manganese (66692)
- Mercury (66693)
- Methidathion (66694)
- Methoxychlor (66695)
- Methyl Parathion (66706)
- Mirex (66696)
- Molinate (66697)
- Naphthalene (66707)
- Nickel (66788)
- Oxygen, Dissolved (67312)
- PAHs (Polycyclic Aromatic Hydrocarbons) (66789)
- PCBs (Polychlorinated biphenyls) (66790)
- Parathion (66791)
- Phenanthrene (66792)
- Phorate (66698)
- Phosmet (66699)
- Pyrene (66793)
- Selenium (66794)
- Silver (66795)
- Temperature, water (66796)
- Terbufos (66700)
- Thiobencarb/Bolero (66701)
- Toxicity (66797)
- Zinc (66705)
- pH (66702)

- **Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)**
  - Aluminum (64169)
  - Arsenic (64170)
  - Bifenthrin (66821)
  - Cadmium (64171)
  - Chlordane (64172)
  - Chlorpyrifos (66798)
  - Chromium (66799)
  - Copper (66800)
  - Cyfluthrin (66801)
  - Cyhalothrin, Lambda (66802)
  - Cypermethrin (66803)
  - DDD (Dichlorodiphenyldichloroethane) (66804)
  - DDE (Dichlorodiphenyldichloroethylene) (66805)
  - DDT (Dichlorodiphenyltrichloroethane) (67316)
  - Deltamethrin (66806)
  - Diazinon (66807)
  - Dieldrin (66808)
  - Endrin (66809)
  - Esfenvalerate/Fenvalerate (66810)
  - Fenpropathrin (66811)
  - Iron (66816)
  - Lead (66817)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (66812)
  - Mercury (66818)
  - Methyl Parathion (66814)
  - Nickel (66819)
  - Nitrate/Nitrite (Nitrite + Nitrate as N) (67317)
  - Nitrogen, ammonia (Total Ammonia) (67318)

- Copper (63335)
  - Indicator Bacteria (63345)
  - Lead (63337)
  - Mercury (63339)
  - Nickel (63340)
  - Selenium (63341)
  - Silver (63342)
  - Zinc (63343)

- **Zuma Canyon**
  - Alkalinity as CaCO3 (55754)
  - Aluminum (63360)
  - Ammonia (63448)
  - Arsenic (63361)
  - Bifenthrin (63362)
  - Cadmium (63407)
  - Chromium (63408)
  - Copper (63409)
  - Cyhalothrin, Lambda (63415)
  - Cypermethrin (63416)
  - Deltamethrin (63417)
  - Esfenvalerate/Fenvalerate (63444)
  - Fenpropathrin (63446)
  - Iron (63414)
  - Lead (63410)
  - Manganese (63447)
  - Nickel (63411)
  - Nitrogen, Nitrate (63449)
  - Nitrogen, Nitrite (63450)
  - Oxygen, Dissolved (63451)
  - Permethrin (63452)
  - Selenium (63412)
  - Silver (63413)
  - Specific Conductivity (63453)
  - Sulfates (63454)
  - Temperature, water (63455)
  - Total Dissolved Solids (63456)
  - Toxicity (63457)
  - Zinc (63458)
  - pH (55751)

List on 303(d) list (TMDL required list)	Regional Board 4

- **Alamitos Bay**
  - Oxygen, Dissolved (54877)

- **Alhambra Wash**
  - Ammonia (60083)
  - Benthic Community Effects (65544)

- **Alondria Park Lake**
  - PCBs (Polychlorinated biphenyls) (60211)

- **Arundell Barranca (Ventura County)**
  - Indicator Bacteria (64923)

- **Balboa Lake**
  - Oxygen, Dissolved (60379)
  - Toxicity (60276)

- **Boulder Creek (Ventura County)**
  - Bifenthrin (60530)
  - Toxicity (60538)

- **Bull Creek (Los Angeles County)**
  - Toxicity (60592)

- **Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)**
  - Indicator Bacteria (61084)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)**
  - Chlorpyrifos (67492)
  - Diazinon (67493)
  - Malathion (67491)

- **Castaic Lagoon**
  - PCBs (Polychlorinated biphenyls) (61757)

- **Castaic Lake**
  - PCBs (Polychlorinated biphenyls) (61776)

- **Compton Creek**
  - Iron (62052)

- **Coyote Creek**
  - Iron (62167)
  - Malathion (62166)

- **Downtown Shoreline Marina (part of San Pedro Bay Near/Off Shore Zones)**
  - Copper (62243)
  - Oxygen, Dissolved (62242)

- **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2**
  - Bifenthrin (62625)

- **Elderberry Forebay**
  - Dieldrin (62708)
  - PCBs (Polychlorinated biphenyls) (62709)

- **Ellsworth Barranca**
  - Chlorpyrifos (62845)
  - DDE (Dichlorodiphenyldichloroethylene) (67360)

- **Honda Barranca**
  - Bifenthrin (63180)

- **Hueneme Drain**
  - Escherichia coli (E. coli) (67434)

- **Javon Canyon**
  - Benthic Community Effects (66198)

- **Sanjon Barranca Creek**
  - Escherichia coli (E. coli) (67429)

- **Santa Clara River Estuary**
  - Ammonia (66589)
  - pH (66591)

- **Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)**
  - Oxygen, Dissolved (66628)
  - pH (66629)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Escherichia coli (E. coli) (67437)
  - Mercury (66954)
  - Selenium (66955)

- **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)**
  - Benthic Community Effects (44468)

- **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 Community Effects (44626)
  - Temperature, water (67068)

- **Santa Fe Dam Park Lake**
  - PCBs (Polychlorinated biphenyls) (67199)

- **Santa Monica Bay Offshore/Nearshore**
  - Arsenic (67208)
  - Mercury (67209)

- **South San Jose Creek (Los Angeles County)**
  - Ammonia (67259)
  - Toxicity (64781)
  - pH (64824)

- **Tapo Canyon**
  - Chlordane (64350)
  - Chloride (64351)
  - DDD (Dichlorodiphenyldichloroethane) (64445)
  - Malathion (64525)
  - Sulfates (64540)
  - Total Dissolved Solids (64542)
  - Toxicity (64544)

- **Timber Canyon**
  - Chlorpyrifos (64725)

- **Triunfo Canyon Creek Reach 1**
  - Benthic Community Effects (66897)

- **Ventura Harbor: Ventura Keys**
  - Arsenic (67176)
  - Cadmium (67177)

- Chlordane (67207)
- DDT (Dichlorodiphenyltrichloroethane) (67211)
- Dieldrin (67212)
- Indicator Bacteria (67293)
- PCBs (Polychlorinated biphenyls) (67271)

- **Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)**
  - Benthic Community Effects (66899)
  - Temperature, water (66824)

- **Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)**
  - Benthic Community Effects (66900)
  - Toxicity (63974)

- **Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)**
  - Benthic Community Effects (66901)
  - Pumping (44793)
  - Temperature, water (63875)
  - Water Diversion (44534)

- **Walnut Creek Wash (Drains from Puddingstone Res)**
  - Indicator Bacteria (42989)

- **Wheeler Canyon/Todd Barranca**
  - Chlordane (63509)
  - Cypermethrin (63563)
  - DDT (Dichlorodiphenyltrichloroethane) (63592)
  - Toxaphene (63587)
  - Toxicity (67369)

- **Wildlife Lake**
  - Oxygen, Dissolved (66373)

List on 303(d) list (being addressed by USEPA approved TMDL)	Regional Board 4

- **Abalone Cove Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (35058)
  - PCBs (Polychlorinated biphenyls) (34339)

- **Aliso Canyon Wash**
  - Copper (32949)
  - Indicator Bacteria (32515)

- **Amarillo Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34340)

- **Arroyo Seco Reach 1 (LA River to West Holly Ave.)**
  - Indicator Bacteria (35135)

- **Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam)**
  - Indicator Bacteria (34670)

- **Artesia-Norwalk Drain**

Indicator Bacteria (36938)

- **Balboa Lake**
  - Ammonia (60378)

- **Ballona Creek Wetlands**
  - Exotic Vegetation (44746)
  - Habitat alterations (34697)
  - Hydromodification (34699)
  - Reduced Tidal Flushing (44747)

- **Big Rock Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34441)
  - PCBs (Polychlorinated biphenyls) (34611)

- **Bluff Cove Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34721)
  - PCBs (Polychlorinated biphenyls) (34588)

- **Bull Creek**
  - Indicator Bacteria (43227)

- **Bull Creek (Los Angeles County)**
  - Ammonia (60597)

- **Cabrillo Beach (Outer)**
  - DDT (Dichlorodiphenyltrichloroethane) (44611)
  - PCBs (Polychlorinated biphenyls) (35005)

- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - Nitrogen, Nitrite (33703)

- **Carbon Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34248)
  - Indicator Bacteria (44248)
  - PCBs (Polychlorinated biphenyls) (36216)

- **Castlerock Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34249)
  - PCBs (Polychlorinated biphenyls) (34250)

- **Colorado Lagoon**
  - Toxicity (34304)

- **Compton Creek**
  - Zinc (62054)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - Copper (33751)
  - Dieldrin (tissue) (34645)

- **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2**
  - Chlorpyrifos (62638)
  - DDD (Dichlorodiphenyldichloroethane) (67337)
  - DDE (Dichlorodiphenyldichloroethylene) (67338)

- **Echo Park Lake**
  - Algae (34030)
  - Chlordane (62679)
  - Dieldrin (62680)
  - Eutrophic (34698)
  - Odor (34756)
  - Trash (32435)
  - pH (44748)

- **El Dorado Lakes**
  - Algae (34440)
  - Ammonia (38445)
  - Copper (34610)
  - Eutrophic (34720)

- **Escondido Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (39085)
  - Indicator Bacteria (34279)
  - PCBs (Polychlorinated biphenyls) (35052)

- **Fox Barranca (tributary to Calleguas Creek Reach 6)**
  - Chlordane (63031)
  - DDE (Dichlorodiphenyldichloroethylene) (67361)
  - DDT (Dichlorodiphenyltrichloroethane) (63029)

- **Honda Barranca**
  - Chlordane (63179)
  - Chlorpyrifos (63146)
  - DDD (Dichlorodiphenyldichloroethane) (67363)
  - DDT (Dichlorodiphenyltrichloroethane) (63181)

- **Inspiration Point Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34834)
  - PCBs (Polychlorinated biphenyls) (44913)

- **La Costa Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34835)

- **Lake Calabasas**
  - Ammonia (34334)
  - Eutrophic (34222)
  - Organic Enrichment/Low Dissolved Oxygen (34223)
  - pH (39032)

- **Lake Lindero**
  - Trash (44910)

- **Las Flores Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (33820)
  - PCBs (Polychlorinated biphenyls) (44612)

- **Las Virgenes Creek**
  - Trash (34348)

- **Legg Lake**

- **Los Angeles/Long Beach Inner Harbor**
  - Benthic Community Effects (34208)
  - Benzo(a)pyrene (3,4-Benzopyrene -7-d) (42749)
  - Chrysene (C1-C4) (42671)

- **Machado Lake (Harbor Park Lake)**
  - ChemA (34362)

- **Malaga Cove Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (35165)
  - PCBs (Polychlorinated biphenyls) (35182)

- **Malibu Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (36696)

- **Malibu Creek**
  - Sedimentation/Siltation (34815)

- **Malibu Lagoon Beach (Surfrider)**
  - DDT (Dichlorodiphenyltrichloroethane) (34239)
  - PCBs (Polychlorinated biphenyls) (34258)

- **McCoy Canyon Creek**
  - Nitrate (37996)

- **McGrath Lake**
  - Chlordane (34166)

- **Medea Creek Reach 1 (Lake to Confl. with Lindero)**
  - Sedimentation/Siltation (34180)
  - Trash (38861)

- **Medea Creek Reach 2 (Abv Confl. with Lindero)**
  - Sedimentation/Siltation (34244)
  - Trash (38862)

- **Nicholas Canyon Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (37686)
  - PCBs (Polychlorinated biphenyls) (35169)

- **Palo Verde Shoreline Park Beach**
  - Pesticides (35170)

- **Paradise Cove Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (37498)
  - PCBs (Polychlorinated biphenyls) (44650)

- **Peck Road Park Lake**
  - Lead (44679)
  - Odor (34130)
  - Organic Enrichment/Low Dissolved Oxygen (34189)
  - Trash (32390)

- **Point Fermin Park Beach**

- DDT (Dichlorodiphenyltrichloroethane) (35384)
- PCBs (Polychlorinated biphenyls) (34210)

- **Portuguese Bend Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34211)
  - PCBs (Polychlorinated biphenyls) (34353)

- **Puerco Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (44912)
  - PCBs (Polychlorinated biphenyls) (43257)

- **Rio De Santa Clara/Oxnard Drain No. 3**
  - ChemA (tissue) (33195)
  - DDD (Dichlorodiphenyldichloroethane) (66079)
  - DDE (Dichlorodiphenyldichloroethylene) (66080)
  - PCBs (Polychlorinated biphenyls) (35082)

- **Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)**
  - Indicator Bacteria (35084)

- **Rio Hondo Reach 2 (At Spreading Grounds)**
  - Coliform Bacteria (35152)

- **Rio Hondo Reach 3 (above Spreading Grounds)**
  - Indicator Bacteria (67476)

- **Robert H. Meyer Memorial Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (34286)
  - PCBs (Polychlorinated biphenyls) (34287)

- **San Gabriel River Estuary**
  - Indicator Bacteria (67332)

- **Santa Clara River Estuary**
  - ChemA (34243)
  - Indicator Bacteria (35722)
  - Nitrogen, Nitrate (35380)
  - Toxaphene (36274)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Indicator Bacteria (66965)

- **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)**
  - Indicator Bacteria (44532)

- **Santa Fe Dam Park Lake**
  - Copper (34321)
  - Lead (44765)
  - pH (35145)

- **Santa Monica Bay Offshore/Nearshore**
  - Trash (34119)

- **Sea Level Beach**

- DDT (Dichlorodiphenyltrichloroethane) (35902)
- PCBs (Polychlorinated biphenyls) (36557)

- **Topanga Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (36309)
  - PCBs (Polychlorinated biphenyls) (34157)

- **Torrance Carson Channel**
  - Copper (44916)
  - Lead (34159)

- **Trancas Beach (Broad Beach)**
  - DDT (Dichlorodiphenyltrichloroethane) (36325)
  - PCBs (Polychlorinated biphenyls) (34224)

- **Tujunga Wash (LA River to Hansen Dam)**
  - Indicator Bacteria (35044)

- **Ventura River Estuary**
  - Algae (35061)

- **Verdugo Wash Reach 1 (LA River to Verdugo Rd.)**
  - Copper (42106)
  - Indicator Bacteria (35010)

- **Verdugo Wash Reach 2 (Above Verdugo Road)**
  - Indicator Bacteria (39840)

- **Whites Point Beach**
  - DDT (Dichlorodiphenyltrichloroethane) (39841)
  - PCBs (Polychlorinated biphenyls) (44279)

- **Wildlife Lake**
  - Ammonia (66374)

- **Zuma Beach (Westward Beach)**
  - DDT (Dichlorodiphenyltrichloroethane) (44589)
  - PCBs (Polychlorinated biphenyls) (37494)

List on 303(d) list (being addressed by action other than TMDL)	Regional Board 4

- **Hueneme Drain**
  - Trash (67433)

- **J Street Drain (Ventura County)**
  - Trash (63443)

- **Ormond Beach Wetlands**
  - Trash (67430)

- **Oxnard Drain**
  - Trash (67436)

- **Sanjon Barranca Creek**
  - Trash (67428)

- **Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)**
  - Trash (66631)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Trash (67446)

- **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)**
  - Trash (67445)

- **Santa Clara River Reach 10 (Sespe Creek, from confl with Santa Clara River Reach 3 to above gaging station - 500 ft downstream from Little Sespe Cr)**
  - Trash (67448)

- **Santa Clara River Reach 4A (A Street, Fillmore to Piru Creek)**
  - Trash (67453)

- **Santa Paula Creek Reach 1 (confluence w Santa Clara River to Diverson Dam)**
  - Trash (67447)

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.

ORIGINAL FACT SHEETS

Delist from 303(d) list (TMDL required list)	Regional Board 4

- **Arroyo Seco Reach 1 (LA River to West Holly Ave.)**
  - Excess Algal Growth (32855)

- **Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam)**
  - Excess Algal Growth (32354)

- **Ashland Avenue Drain**
  - Indicator Bacteria (33906)
  - Organic Enrichment/Low Dissolved Oxygen (34056)
  - Toxicity (33740)

Ballona Creek

- ChemA (32784)
- PCBs (Polychlorinated biphenyls) (32743)
- Silver (32417)
- pH (32951)

- **Bluff Cove Beach**
  - Beach Closures (34417)

- **Burbank Western Channel**
  - Cadmium (32938)
  - Scum/Foam-unnatural (34503)
  - Taste and odor (34575)

- **Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)**
  - Boron (42741)
  - Excess Algal Growth (34416)

- **Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)**
  - Dacthal (sediment) (34396)
  - Excess Algal Growth (34541)

- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - Excess Algal Growth (33816)

- **Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)**
  - Excess Algal Growth (34542)

- **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)**
  - Excess Algal Growth (39590)

- **Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)**
  - Excess Algal Growth (34456)

- **Calleguas Creek Reach 13 (Conejo Creek South Fork, was Conejo Cr Reach 4 and part of Reach 3 on 1998 303d list)**
  - Excess Algal Growth (34457)

- **Carbon Beach**
  - Beach Closures (32854)

- **Coyote Creek**
  - Abnormal Fish Histology (Lesions) (33373)
  - Excess Algal Growth (36718)

- **Dockweiler Beach**
  - Beach Closures (37565)

- **Dominguez Channel (lined portion above Vermont Ave)**
  - Aldrin (34620)
  - ChemA (34426)
  - Chlordane (34427)
  - Chromium (34430)
  - DDT (Dichlorodiphenyltrichloroethane) (36720)
  - Dieldrin (42330)

PAHs (Polycyclic Aromatic Hydrocarbons) (34431)
    - PCBs (Polychlorinated biphenyls) (34429)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
    - Aldrin (34428)
    - ChemA (34751)
    - PAHs (Polycyclic Aromatic Hydrocarbons) (37949)

- **Escondido Beach**
    - Beach Closures (32451)

- **Flat Rock Point Beach Area**
    - Beach Closures (32943)

- **Inspiration Point Beach**
    - Beach Closures (32992)

- **La Costa Beach**
    - Beach Closures (32361)

- **Las Tunas Beach**
    - Beach Closures (32577)

- **Los Angeles Harbor - Consolidated Slip**
    - Nickel (33361)
    - PAHs (Polycyclic Aromatic Hydrocarbons) (37793)

- **Los Angeles Harbor - Inner Cabrillo Beach Area**
    - Beach Closures (34747)
    - Copper (42802)

- **Los Angeles River Estuary (Queensway Bay)**
    - Lead (sediment) (33458)

- **Los Angeles River Reach 1 (Estuary to Carson Street)**
    - Aluminum (34488)
    - Scum/Foam-unnatural (34205)

- **Los Angeles River Reach 2 (Carson to Figueroa Street)**
    - Scum/Foam-unnatural (34191)
    - Taste and odor (34192)

- **Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)**
    - Scum/Foam-unnatural (37361)
    - Taste and odor (34556)

- **Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)**
    - Scum/Foam-unnatural (37154)
    - Taste and odor (37152)

- **Los Angeles River Reach 5 (within Sepulveda Basin)**
    - Scum/Foam-unnatural (35233)
    - Taste and odor (37174)

- **Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin)**

- Scum/Foam-unnatural (34379)
- Taste and odor (36753)

- **Ventura River Reach 3 (Weldon Canyon to Confl. w/ Coyote Cr)**
  - Water Diversion (33817)

- **Verdugo Wash Reach 1 (LA River to Verdugo Rd.)**
  - Excess Algal Growth (32931)

- **Verdugo Wash Reach 2 (Above Verdugo Road)**
  - Excess Algal Growth (32932)

- **Wilmington Drain**
  - Ammonia (34349)

- **Zuma Beach (Westward Beach)**
  - Beach Closures (32372)

Delist from 303(d) list (being addressed by USEPA approved TMDL)	Regional Board 4

- **Burbank Western Channel**
  - Ammonia (32774)

- **Point Dume Beach**
  - Indicator Bacteria (34118)

- **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)**
  - Nitrate and Nitrite (32484)

- **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 (32462)

Do Not Delist from 303(d) list (TMDL required list)	Regional Board 4

- **Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)**
  - Sedimentation/Siltation (34228)

- **Compton Creek**
  - Benthic Community Effects (44498)

- **Los Angeles River Estuary (Queensway Bay)**
  - Toxicity (37684)

- **Los Cerritos Channel**
  - Ammonia (44252)
  - Chlordane (sediment) (33506)

- **Malibu Lagoon**

- Benthic Community Effects (42364)
- pH (32543)

- **Marina del Rey Harbor - Back Basins**
  - DDT (Dichlorodiphenyltrichloroethane) (34405)
  - Dieldrin (34355)

- **McGrath Lake**
  - Dieldrin (sediment) (33442)
  - PCBs (Polychlorinated biphenyls) (sediment) (32981)

- **Pole Creek (trib to Santa Clara River Reach 3)**
  - Total Dissolved Solids (33055)

- **Ventura River Estuary**
  - Indicator Bacteria (32663)

Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)	Regional Board 4

- **Ballona Creek Estuary**
  - Toxicity (39181)

- **Los Angeles Harbor - Fish Harbor**
  - PCBs (Polychlorinated biphenyls) (44513)

- **Los Angeles/Long Beach Inner Harbor**
  - Toxicity (34495)

Do Not Delist from 303(d) list (being addressed with action other than TMDL)	Regional Board 4

- **Port Hueneme Harbor (Back Basins)**
  - DDT (Dichlorodiphenyltrichloroethane) (36221)

Do Not List on 303(d) list (TMDL required list)	Regional Board 4

- **Aliso Canyon Wash**
  - Diazinon (32856)
  - Zinc (32402)

- **Artesia-Norwalk Drain**
  - Copper (32461)

- **Balboa Lake**
  - Lead (60257)

- **Ballona Creek**
  - Ammonia (32758)

- **Ballona Creek Estuary**
  - Dieldrin (38268)

- **Big Sycamore Canyon**
  - Benthic Community Effects (66082)

- **Bouquet Canyon Creek (below Bouqet Reservoir)**
  - Benthic Community Effects (66084)

- **Bull Creek**
  - Toxicity (39159)

- **Bull Creek (Los Angeles County)**
  - Benthic Community Effects (66085)

- **Burbank Western Channel**
  - Aluminum (32875)
  - Diazinon (32750)
  - Oxygen, Dissolved (32355)
  - Toxicity (43316)
  - Zinc (32842)

- **Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)**
  - Benthic Community Effects (66087)

- **Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)**
  - Benthic Community Effects (66141)

- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - Benthic Community Effects (66151)

- **Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)**
  - Benthic Community Effects (66152)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)**
  - Benthic Community Effects (66156)

- **Canada Larga (Ventura River Watershed)**
  - Benthic Community Effects (66157)

- **Carbon Canyon Creek**
  - Chloride (33497)
  - Sulfates (33742)

- **Cheeseboro Canyon**
  - Benthic Community Effects (66159)

- **Cold Creek (Los Angeles County)**
  - Benthic Community Effects (66163)
  - Invasive Species (43544)
  - Sulfates (36237)

- **Cold Creek, unnamed tributary along Dry Canyon Cold Creek Road (Los Angeles County)**
  - Benthic Community Effects (66164)
  - pH (61981)

- **Compton Creek**
  - Toxicity (42688)

- **Corral Canyon Creek**
  - Sulfates (34513)

- **Coyote Creek**
  - Chloride (37293)
  - Cyanide (32958)
  - Fluoride (37930)
  - Lindane/gamma Hexachlorocyclohexane (gamma-HCH) (35757)
  - Nitrogen, Nitrite (32337)
  - Pentachlorophenol (PCP) (37184)

- **Coyote Creek, North Fork**
  - Copper (39223)
  - Zinc (39542)

- **Dominguez Channel (lined portion above Vermont Ave)**
  - Aluminum (33261)
  - Cadmium (33501)
  - Iron (36719)
  - Manganese (33476)
  - Mercury (32728)
  - Silver (32670)
  - Thallium (38761)
  - Turbidity (33344)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - Mercury (33676)

- **Encinal Canyon Creek**
  - Benthic Community Effects (66183)

- **Escondido Canyon Creek**
  - Benthic Community Effects (66190)

- **Hammond Canyon**
  - Benthic Community Effects (66195)

- **Hollywood Beach**
  - Indicator Bacteria (42922)

- **La Vista Drain (Ventura County)**
  - Benthic Community Effects (66222)

- **Lachusa Canyon Creek**
  - Benthic Community Effects (66223)
  - Sulfates (33321)

- **Las Flores Canyon Creek**
  - Benthic Community Effects (66224)

- **Las Virgenes Creek, East**

- **Malibu Creek**
  - Toxaphene (61578)

- **Malibu Lagoon**
  - Antimony | Arsenic | Benzo(a)anthracene | Benzo(a)pyrene (3,4-Benzopyrene -7-d) | Chrysene (C1-C4) | Copper | Dibenz[a,h]anthracene | Lead | Phenanthrene | Pyrene | Zinc (36054)
  - Toxicity (42897)

- **Mandeville Canyon Creek**
  - Sulfates (33688)

- **Marie Canyon Creek**
  - Sulfates (33209)

- **Matilija Creek Reach 1 (Jct. With N. Fork to Reservoir)**
  - Benthic Community Effects (66258)
  - Indicator Bacteria (39636)

- **Matilija Creek Reach 2 (Above Reservoir)**
  - Benthic Community Effects (66260)
  - Indicator Bacteria (39659)

- **Matilija Creek, North Fork**
  - Benthic Community Effects (66262)
  - Indicator Bacteria (39875)
  - Total Dissolved Solids (39224)

- **McGrath Lake Agricultural Drain**
  - Demeton (62089)

- **Oxnard Beach Park**
  - Indicator Bacteria (42348)

- **Palo Comado Creek**
  - Benthic Community Effects (66268)

- **Pena Canyon Creek**
  - Sulfates (33210)

- **Piru Creek (from gaging station below Santa Felicia Dam to headwaters)**
  - Benthic Community Effects (66875)

- **Pole Creek (trib to Santa Clara River Reach 3)**
  - Benthic Community Effects (66876)

- **Puerco Canyon Creek**
  - Sulfates (33911)

- **Ramirez Canyon Creek**
  - Sulfates (33096)

- **Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)**
  - Benthic Community Effects (66877)

- **Rustic Canyon Creek**
  - Sulfates (33437)

- **San Antonio Creek (Tributary to Ventura River Reach 4)**
  - Benthic Community Effects (66879)

- **San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam**
  - Chloride (32628)
  - Nitrogen, Nitrite (38365)
  - Total Dissolved Solids (32629)

- **San Gabriel River Reach 4 (Morris Dam to Ramona Blvd)**
  - Benthic Community Effects (66881)

- **San Gabriel River, West Fork**
  - Benthic Community Effects (66882)

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Benthic Community Effects (67457)

- **San Jose Creek, unnamed tributary at Rose Hill (Los Angeles County)**
  - Benthic Community Effects (66885)

- **San Nicolas Canyon Creek**
  - Sulfates (33438)

- **Santa Clara River Estuary**
  - Arsenic (36060)

- **Santa Clara River Estuary Beach-Surfers Knoll**
  - Indicator Bacteria (42384)

- **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 (35726)
  - DDT (Dichlorodiphenyltrichloroethane) (35969)
  - Dichlorobromomethane (36115)
  - PCBs (Polychlorinated biphenyls) (37728)

- **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) (35899)
  - Chlordane (67064)
  - Chlorodibromomethane (36390)
  - Dichlorobromomethane (36189)
  - Nitrate and Nitrite (37051)
  - Specific Conductance (36575)

- **Santa Clara River Reach 10 (Sespe Creek, from confl with Santa Clara River Reach 3 to above gaging station - 500 ft downstream from Little Sespe Cr)**
  - Benthic Community Effects (66887)

- **Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)**
  - Benthic Community Effects (66888)

- **Santa Clara River Reach 2**
  - Benthic Community Effects (66889)

- **Santa Clara River Reach 4B (Piru Creek to Blue Cut Gaging Station)**
  - Benthic Community Effects (66890)

- **Santa Monica Canyon**
  - Sulfates (33440)

- **Santa Paula Creek Reach 1 (confluence w Santa Clara River to Diverson Dam)**
  - Benthic Community Effects (66891)

- **Santa Ynez Canyon**
  - Sulfates (33257)

- **Sawpit Creek**
  - Aluminum (33269)
  - Iron (33270)

- **Sespe Creek (from 500 ft below confluence with Little Sespe Cr to headwaters)**
  - Benthic Community Effects (66893)

- **Solstice Canyon Creek**
  - Benthic Community Effects (66894)

- **Stokes Creek**
  - Benthic Community Effects (66895)

- **Sullivan Canyon Creek**
  - Sulfates (34444)

- **Sweetwater Canyon Creek**
  - Chloride (34445)
  - Sulfates (36142)

- **Topanga Canyon Creek**
  - Benthic Community Effects (66896)

- **Trancas Canyon Creek**
  - Chloride (34497)
  - Sulfates (36161)

- **Triunfo Canyon Creek Reach 1**
  - Invasive Species (43301)

- **Tujunga Wash (LA River to Hansen Dam)**
  - Benthic Community Effects (66898)
  - Toxicity (42808)

- **Tuna Canyon Creek**
  - Nitrate (42329)
  - Sulfates (37306)

- **Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)**

- Indicator Bacteria (39258)
- Total Dissolved Solids (39564)

- **Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)**
  - Indicator Bacteria (39961)

- **Walnut Creek Wash (Drains from Puddingstone Res)**
  - Copper (35700)
  - Lead (36401)

- **Wiley Canyon**
  - Benthic Community Effects (66902)

- **Zuma Canyon**
  - Benthic Community Effects (66903)

List on 303(d) list (TMDL required list)	Regional Board 4

- **Artesia-Norwalk Drain**
  - Selenium (35869)

- **Burbank Western Channel**
  - Cyanide (32817)
  - Selenium (43271)

- **Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)**
  - Sedimentation/Siltation (35163)
  - Trash (43407)

- **Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)**
  - Sedimentation/Siltation (34346)
  - Trash (41500)

- **Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)**
  - Sedimentation/Siltation (35074)

- **Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)**
  - Sedimentation/Siltation (34278)

- **Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)**
  - Sedimentation/Siltation (34461)

- **Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)**
  - Sedimentation/Siltation (34462)
  - Trash (36548)

- **Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)**
  - Sedimentation/Siltation (35125)

- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - Trash (43452)

Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)
  - Trash (43453)

- **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)**
  - Malathion (67483)
  - Trash (43400)

- **Canada Larga (Ventura River Watershed)**
  - Total Dissolved Solids (39621)

- **Compton Creek**
  - Indicator Bacteria (40596)

- **Coyote Creek, North Fork**
  - Selenium (40415)

- **Crystal Lake**
  - Organic Enrichment/Low Dissolved Oxygen (35133)

- **Dominguez Channel Estuary (unlined portion below Vermont Ave)**
  - Benthic Community Effects (38511)
  - Indicator Bacteria (34672)

- **Elizabeth Lake**
  - Eutrophic (34264)
  - Organic Enrichment/Low Dissolved Oxygen (34384)
  - pH (34266)

- **Lake Lindero**
  - Chloride (33005)
  - Specific Conductivity (35057)

- **Las Virgenes Creek**
  - Invasive Species (42701)

- **Legg Lake**
  - pH (35262)

- **Lindero Creek Reach 1**
  - Benthic Community Effects (44366)
  - Invasive Species (42791)
  - Selenium (34167)

- **Los Angeles Harbor - Consolidated Slip**
  - Benthic Community Effects (35168)

- **Los Angeles River Reach 1 (Estuary to Carson Street)**
  - Cyanide (32807)

- **Los Angeles River Reach 2 (Carson to Figueroa Street)**
  - Oil (34203)

- **Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)**
  - Indicator Bacteria (37153)

- **Los Angeles River Reach 5 (within Sepulveda Basin)**
  - Oil (34188)

- **Los Cerritos Channel**
  - Bis(2ethylhexyl)phthalate (DEHP) (36398)
  - Copper (35154)
  - Indicator Bacteria (35153)
  - Lead (33933)
  - Trash (34110)
  - Zinc (35155)
  - pH (44691)

- **Malibu Creek**
  - Invasive Species (42700)

- **Medea Creek Reach 2 (Abv Confl. with Lindero)**
  - Invasive Species (43364)

- **Munz Lake**
  - Eutrophic (34263)

- **Port Hueneme Pier**
  - PCBs (Polychlorinated biphenyls) (36256)

- **Puddingstone Reservoir**
  - Organic Enrichment/Low Dissolved Oxygen (34831)

- **Puente Creek**
  - Selenium (40656)

- **Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)**
  - Toxicity (33392)

- **Rio Hondo Reach 2 (At Spreading Grounds)**
  - Cyanide (44719)

- **San Antonio Creek (Tributary to Ventura River Reach 4)**
  - Indicator Bacteria (39972)

- **San Gabriel River Estuary**
  - Dioxin (38323)

- **San Gabriel River Reach 2 (Firestone to Whittier Narrows Dam**
  - Cyanide (38135)

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Total Dissolved Solids (36679)

- **Santa Clara River Estuary**
  - Toxicity (35422)

- **Santa Clara River Reach 3 (Freeman Diversion to A Street)**
  - Toxicity (34614)

- **Santa Clara River Reach 11 (Piru Creek, from confluence with Santa Clara River Reach 4 to gaging station below Santa Felicia Dam)**
  - Boron (36292)
  - Specific Conductance (37476)

- **Santa Monica Canyon**
  - Lead (44822)

- **Sawpit Creek**
  - Bis(2ethylhexyl)phthalate (DEHP) (32627)

- **Solstice Canyon Creek**
  - Invasive Species (43291)

- **Torrance Carson Channel**
  - Indicator Bacteria (36310)

- **Triunfo Canyon Creek Reach 1**
  - Mercury (35059)
  - Sedimentation/Siltation (44766)

- **Triunfo Canyon Creek Reach 2**
  - Benthic Community Effects (43610)
  - Lead (36162)
  - Mercury (35242)
  - Sedimentation/Siltation (35060)

- **Ventura Harbor: Ventura Keys**
  - Coliform Bacteria (35045)

- **Ventura Marina Jetties**
  - DDT (Dichlorodiphenyltrichloroethane) (33138)
  - PCBs (Polychlorinated biphenyls) (33187)

- **Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)**
  - Algae (44533)

- **Walnut Creek Wash (Drains from Puddingstone Res)**
  - pH (35243)

- **Westlake Lake**
  - Lead (36569)

- **Wilmington Drain**
  - Indicator Bacteria (34234)

List on 303(d) list (being addressed by USEPA approved TMDL)	Regional Board 4

- **Aliso Canyon Wash**
  - Selenium (34184)

- **Amarillo Beach**

- PCBs (Polychlorinated biphenyls) (46186)

- **Arroyo Seco Reach 1 (LA River to West Holly Ave.)**
  - Trash (42303)

- **Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam)**
  - Trash (34673)

- **Ballona Creek**
  - Trash (32421)
  - Viruses (enteric) (33738)

- **Ballona Creek Estuary**
  - Cadmium (33948)
  - Chlordane (33453)
  - Copper (39502)
  - DDT (Dichlorodiphenyltrichloroethane) (33943)
  - Indicator Bacteria (33739)
  - Lead (44280)
  - PAHs (Polycyclic Aromatic Hydrocarbons) (33985)
  - PCBs (Polychlorinated biphenyls) (32536)
  - Silver (34520)
  - Zinc (33452)

- **Ballona Creek Wetlands**
  - Trash (34068)

- **Brown Barranca/Long Canyon**
  - Nitrate and Nitrite (32863)

- **Burbank Western Channel**
  - Copper (32764)
  - Lead (32882)
  - Trash (34265)

- **Calleguas Creek Reach 1 (was Mugu Lagoon on 1998 303(d) list)**
  - Copper (34363)
  - Nickel (34337)
  - Nitrogen (32724)
  - Sedimentation/Siltation (40121)
  - Toxaphene (40366)
  - Toxicity (34009)
  - Zinc (34443)

- **Calleguas Creek Reach 2 (estuary to Potrero Rd- was Calleguas Creek Reaches 1 and 2 on 1998 303d list)**
  - ChemA (34291)
  - Copper (32841)
  - Nitrogen (32859)
  - PCBs (Polychlorinated biphenyls) (34665)
  - Toxicity (34176)

- **Calleguas Creek Reach 3 (Potrero Road upstream to confluence with Conejo Creek on 1998 303d list)**
  - Nitrate and Nitrite (32860)
  - Total Dissolved Solids (40367)
  - Toxaphene (33435)

Calleguas Creek Reach 4 (was Revolon Slough Main Branch: Mugu Lagoon to Central Avenue on 1998 303d list)

- ChemA (tissue) (40444)
- Nitrate as Nitrate (NO3) (32868)
- Nitrogen (34521)
- PCBs (Polychlorinated biphenyls) (tissue) (34666)
- Toxicity (33422)
- Trash (44549)

- **Calleguas Creek Reach 5 (was Beardsley Channel on 1998 303d list)**
  - ChemA (tissue) (40135)
  - Chlordane (tissue & sediment) (34557)
  - Chlorpyrifos (tissue) (35176)
  - DDT (tissue & sediment) (34725)
  - Diazinon (33527)
  - Dieldrin (tissue) (35069)
  - Endosulfan (tissue & sediment) (44714)
  - Nitrogen (33356)
  - PCBs (Polychlorinated biphenyls) (tissue) (34664)
  - Toxaphene (tissue & sediment) (35127)
  - Toxicity (44447)
  - Trash (34285)

- **Calleguas Creek Reach 6 (was Arroyo Las Posas Reaches 1 and 2 on 1998 303d list)**
  - Chlordane (33267)
  - Chloride (34347)
  - Chlorpyrifos (34098)
  - DDT (sediment) (35192)
  - Diazinon (34634)
  - Dieldrin (36490)
  - Nitrate and Nitrite (32871)
  - Nitrate as Nitrate (NO3) (32870)

- **Calleguas Creek Reach 7 (was Arroyo Simi Reaches 1 and 2 on 1998 303d list)**
  - Ammonia (32341)
  - Boron (34360)
  - Chloride (42864)
  - Organophosphorus Pesticides (35177)
  - Sulfates (44550)
  - Total Dissolved Solids (42368)

- **Calleguas Creek Reach 8 (was Tapo Canyon Reach 1)**
  - Boron (42817)
  - Chlordane (39678)
  - Chloride (42959)
  - Chlorpyrifos (34624)
  - DDT (Dichlorodiphenyltrichloroethane) (33902)
  - Diazinon (39679)
  - Dieldrin (33903)
  - PCBs (Polychlorinated biphenyls) (34692)
  - Toxaphene (34217)

- **Calleguas Creek Reach 9A (was lower part of Conejo Creek Reach 1 on 1998 303d list)**
  - ChemA (tissue) (34254)
  - Chlordane (tissue) (32991)
  - Chlorpyrifos (34691)
  - DDT (tissue) (34604)
  - Diazinon (39696)
  - Dieldrin (tissue) (33268)

Endosulfan (tissue) (39311)
  - Lindane/gamma-Hexachlorocyclohexane (gamma-HCH) (tissue) (35116)
  - Nitrate as Nitrate (NO3) (40304)
  - PCBs (Polychlorinated biphenyls) (tissue) (32631)
  - Toxaphene (tissue & sediment) (39730)

- **Calleguas Creek Reach 9B (was part of Conejo Creek Reaches 1 and 2 on 1998 303d list)**
  - ChemA (tissue) (34500)
  - Chlordane (34715)
  - Chloride (42816)
  - Chlorpyrifos (34218)
  - DDT (tissue) (34074)
  - Diazinon (39748)
  - Dieldrin (33674)
  - Endosulfan (tissue) (35126)
  - PCBs (Polychlorinated biphenyls) (33944)
  - Toxaphene (tissue & sediment) (39574)

- **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)**
  - Ammonia (33927)
  - ChemA (tissue) (37471)
  - Chloride (36639)
  - DDT (tissue) (36215)
  - Dieldrin (33616)
  - Nitrogen, Nitrite (32562)
  - PCBs (Polychlorinated biphenyls) (34638)
  - Sulfates (42818)
  - Total Dissolved Solids (35161)
  - Toxicity (34060)

- **Calleguas Creek Reach 11 (Arroyo Santa Rosa, was part of Conejo Creek Reach 3 on 1998 303d list)**
  - Ammonia (33656)
  - ChemA (tissue) (34407)
  - Chlordane (34639)
  - DDT (tissue) (36413)
  - Dieldrin (35078)
  - Endosulfan (tissue) (36227)
  - PCBs (Polychlorinated biphenyls) (34380)
  - Sulfates (35162)
  - Total Dissolved Solids (32637)
  - Toxaphene (tissue & sediment) (34251)
  - Toxicity (34748)

- **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list)**
  - Dieldrin (33958)
  - PCBs (Polychlorinated biphenyls) (34679)

- **Calleguas Creek Reach 13 (Conejo Creek South Fork, was Conejo Cr Reach 4 and part of Reach 3 on 1998 303d list)**
  - Ammonia (33015)
  - ChemA (tissue) (39073)
  - Chlordane (33923)
  - Chloride (37624)
  - DDT (tissue) (33872)
  - Dieldrin (34591)
  - Endosulfan (tissue) (34256)
  - PCBs (Polychlorinated biphenyls) (34680)
  - Sulfates (42415)
  - Total Dissolved Solids (42414)

- **Lunada Bay Beach**
  - Indicator Bacteria (34394)

- **Machado Lake (Harbor Park Lake)**
  - Algae (34305)
  - Ammonia (42416)
  - Eutrophic (42417)
  - Odor (42262)
  - Trash (35181)

- **Malibou Lake**
  - Algae (43284)
  - Eutrophic (44726)
  - Organic Enrichment/Low Dissolved Oxygen (42673)

- **Malibu Beach**
  - Indicator Bacteria (32363)

- **Malibu Creek**
  - Indicator Bacteria (34350)
  - Nutrients (Algae) (42674)
  - Scum/Foam-unnatural (36747)
  - Trash (44833)

- **Malibu Lagoon**
  - Eutrophic (34816)
  - Indicator Bacteria (34351)
  - Swimming Restrictions (42857)
  - Viruses (enteric) (42854)

- **Marina del Rey Harbor - Back Basins**
  - Chlordane (36798)
  - Indicator Bacteria (32347)
  - Lead (36797)
  - PCBs (Polychlorinated biphenyls) (37217)
  - Zinc (34605)

- **McCoy Canyon Creek**
  - Selenium, Total (34123)

- **Medea Creek Reach 1 (Lake to Confl. with Lindero)**
  - Algae (38948)
  - Indicator Bacteria (33975)

- **Medea Creek Reach 2 (Abv Confl. with Lindero)**
  - Algae (43372)
  - Indicator Bacteria (34383)

- **Mint Canyon Creek Reach 1 (Confl to Rowler Cyn)**
  - Nitrate and Nitrite (32398)

- **Monrovia Canyon Creek**
  - Lead (37685)

- **Munz Lake**
  - Trash (34275)

- **Palo Comado Creek**
  - Indicator Bacteria (34414)

- **Palo Verde Shoreline Park Beach**
  - Pathogens (32412)

- **Point Vicente Beach**
  - Indicator Bacteria (34644)

- **Puerco Beach**
  - Indicator Bacteria (32450)

- **Redondo Beach**
  - Indicator Bacteria (32897)

- **Resort Point Beach**
  - Indicator Bacteria (33986)

- **Rio De Santa Clara/Oxnard Drain No. 3**
  - Nitrogen (42325)

- **Rio Hondo Reach 1 (Confl. LA River to Snt Ana Fwy)**
  - Copper (34540)
  - Lead (34108)
  - Trash (35136)
  - Zinc (36167)
  - pH (32833)

- **San Gabriel River, East Fork**
  - Trash (32420)

- **Santa Monica Canyon**
  - Indicator Bacteria (32367)

- **Sea Level Beach**
  - Indicator Bacteria (34723)

- **Sepulveda Canyon**
  - Copper (33678)
  - Indicator Bacteria (32494)
  - Lead (33899)
  - Selenium (33522)
  - Zinc (34633)

- **Stokes Creek**
  - Indicator Bacteria (36141)

- **Torrance Beach**
  - Indicator Bacteria (32910)

- **Torrey Canyon Creek**
  - Nitrate and Nitrite (33592)

- **Tujunga Wash (LA River to Hansen Dam)**

- Ammonia (32873)
- Copper (34354)
- Trash (34107)

- **Ventura River Estuary**
  - Eutrophic (35046)
  - Trash (42352)

- **Verdugo Wash Reach 1 (LA River to Verdugo Rd.)**
  - Trash (42302)

- **Verdugo Wash Reach 2 (Above Verdugo Road)**
  - Trash (42853)

- **Westlake Lake**
  - Algae (43360)
  - Ammonia (43319)
  - Eutrophic (43361)
  - Organic Enrichment/Low Dissolved Oxygen (42712)

- **Wheeler Canyon/Todd Barranca**
  - Nitrate and Nitrite (32788)

- **Whites Point Beach**
  - Indicator Bacteria (32426)

- **Zuma Beach (Westward Beach)**
  - Indicator Bacteria (33659)

List on 303(d) list (being addressed by action other than TMDL)	Regional Board 4

- **San Jose Creek Reach 1 (SG Confluence to Temple St.)**
  - Ammonia (35062)

Regional Board 4 - Los Angeles Region References

- Comments
- Data and Information
- QA Document
- Standards and Guidelines

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Revised Response to Comments on the Draft 2016 303(d) List
Comment Deadline: March 30, 2017

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
1.	Wishtoyo Foundation and Ventura Coastkeeper (VCK), March 24, 2017		
1.1	In reviewing the Draft 303(d)/305(b) List and in corresponding with Los Angeles Regional Water Quality Control Board ("Los Angeles Regional Board") staff, it has come to our attention that almost all of the proposed 303(d)/305(b) listings (See Attachment A) and accompanying supporting data timely submitted on August 30, 2010 by Wishtoyo Foundation's Ventura Coastkeeper Program ("VCK") were not assessed for inclusion in the Draft 303(d)/305(b) List. Attachment A and Attachment B **<u>Nicholas Canyon Creek (San Nicolas Canyon Creek)</u>** Trash. Five out of 7 Nicholas Canyon Creek monitoring events showed the presence of trash.	Inadvertently, the data submitted by Wishtoyo was not entered into the CalWQA database for assessment. Los Angeles Water Board Staff is working with State Board staff to assess all the data from Wishtoyo that were submitted by August 30, 2010. These data will be assessed and used in decision-making either as the State Board staff prepares the 303(d) list for approval by the State Board in the fall, or prior to the next listing cycle that includes the Los Angeles Region.	The data collected by Wishtoyo has been entered into the CalWQA database. For trash in Nicholas Canyon Creek, trash was assessed as 4 out of 6 exceedances and the recommended decision is "do not list" due to insufficient information per Table 3.2 of the Listing Policy. Data collected the same week from site NC-1 were averaged per the Listing Policy 6.1.5.6.
1.2	**<u>San Jon Barranca / Creek (Sanjon Barranca Creek)</u>** Trash. Eight out of 8 San Jon Barranca / Creek monitoring events showed the presence of trash. E. Coli. Five out of 8 San Jon Barranca / Creek monitoring events showed exceedance of E coli.	See response to comment 1.1.	The data has been entered into the CalWQA database. The recommended decision for *E. coli* is "list" and the recommended decision for trash is "list, being addressed by an action other than TMDL." The trash related impairment is being addressed by implementation actions required under State Water Resources Control Board Resolution 2015-0019 "Amendment to the Water Quality Control Plan for Ocean Waters of California to Control Trash and Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California".

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
			."
1.3	**Ormond Beach Lagoon (Ormond Beach Wetlands)** Trash. Nine out of 9 Ormond Beach Lagoon monitoring events showed the presence of trash. E. Coli. Six out of 32 monitoring events showed exceedance of E coli. pH. Six out of 8 monitoring events showed exceedance of pH. Nitrate. Eleven out of 14 monitoring events showed exceedance of Nitrate.	See response to comment 1.1.	The data has been entered into the CalWQA database. The recommended decision for pH is "list" and the recommended decision for trash is "list." The recommended decision for total coliform is "do not list" due to insufficient information per Table 3.2 of the Listing Policy (3 exceedances out of eleven). Data collected the same week from the same site were averaged per the Listing Policy 6.1.5.6. The recommended decision for trash is "list, being addressed by an action other than TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL." Nitrate was not assessed because the Ormond Beach Wetlands do not have an MUN beneficial use and no evaluation guideline is available for nitrate for other beneficial uses.
1.4	**Bubbling Springs (Hueneme Drain)** Trash. Nine out of 9 monitoring events showed presence of trash. VCK's Data not assessed E. coli. Five out of 11 monitoring events showed exceedance of E coli. VCK's Data not assessed	See response to comment 1.1.	The data has been entered into the CalWQA database. The recommended decision for *E. coli* is "list" and the recommended decision for trash is "list, being addressed by an action other than TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL."
1.5	**J-Street Drain**	See response to comment 1.1.	The data has been entered into the CalWQA

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Trash. Nine out of 9 monitoring events showed presence of trash.		database. The recommended decision for trash is "list, being addressed by an action other than TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL."
1.6	**<u>Oxnard Industrial Drain (Oxnard Drain)</u>** Trash. Eight out of 8 monitoring events showed presence of trash. E. Coli. Five out of 11 monitoring events showed exceedance of E coli. pH. Six out of 7 monitoring events showed exceedance of pH. Nitrate. Eight out of 8 monitoring events showed exceedance of Nitrate.	See response to comment 1.1.	The data has been entered into the CalWQA database. The recommended decision for pH is "list" and the recommended decision for *E coli* is "list." The recommended decision for trash is "list, being addressed by an action other than TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL." Nitrate was not assessed because Oxnard Drain does not have an MUN beneficial use and no evaluation guideline is available for nitrate for other beneficial uses.
1.7	**<u>Santa Clara River Estuary</u>** Trash. Eight out of 8 monitoring events showed presence of trash. Dissolved Oxygen. The City's sondes, violated the Basin Plan numeric water quality standard for Dissolved Oxygen of 5 mg/l for surface waters designated as WARM and 6mg/l for surface waters designated as COLD on over 40 days between 2009 and 2010. Nitrate. Eight out of 8 monitoring events showed exceedance of Nitrate.	See response to comment 1.1. The Los Angeles Water Board is not considering listing decisions for flow at this time. See response to comments 21.1-21.11 for a detailed discussion of flow.	The trash data has been entered into the CalWQA database. The recommended decision for trash is "do not list" with one out of five exceedances. The recommended nitrate decision is "list, being addressed by a TMDL." The phosphate data was added to the CalWQA database, but there is no evaluation guideline for phosphate at this time.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Phosphate. Ten out of 10 monitoring events showed exceedance of Phosphate. pH. E recordings taken on separate days in the Santa Clara River Estuary via the City's North and South Sondes, pH levels in the Santa Clara River Estuary water column exceeded Low Flows. Santa Clara River Reach 1, and Santa Clara River Reach 2 are deprived of sufficient flows during the wet season for Southern California Steelhead smolt and migrating adults		The pH data has been entered into the CalWQA database. The recommended decision for pH is "list."
1.8	**Santa Clara River Reach 1** Low Flows. Santa Clara River Reach 1, and Santa Clara River Reach 2 are deprived of sufficient flows during the wet season for Southern California Steelhead smolt and migrating adults. Trash. Nine out of 9 monitoring events showed presence of trash.	See response to comment 1.1. The Los Angeles Water Board is not considering listing decisions for flow at this time. See response to comments 21.1-21.11 for a detailed discussion of flow.	The recommended decision for trash is "list, being addressed by an action other than TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL."
1.9	**Santa Clara River Reach 2** Low Flows. Santa Clara River Reach 1, and Santa Clara River Reach 2 are deprived of sufficient flows during the wet season for Southern California Steelhead smolt and migrating adults Fish Passage. the Vern Freeman Diversion Dam with its current fish ladder are a fish barrier to migrating Southern California Steelhead in Santa Clara River Reach 2 and 3.	The Los Angeles Water Board is not considering listing decisions for flow at this time. See response to comments 21.1-21.11 for a detailed discussion of flow.	
1.10	**Santa Clara River Reach 3** E Coli. Five out of 27 monitoring events showed exceedance of E coli. Trash. Trash. Twenty-six out of 31 monitoring events showed presence of trash.	The Los Angeles Water Board is not considering listing decisions for flow at this time. See response to comments 21.1 21.11 for a detailed discussion of flow.	The data has been entered into the CalWQA database. The recommended decision for E. coli is "list" (this will be revised to "list, being addressed by a TMDL" during the State Board Public

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Fish Passage. the Vern Freeman Diversion Dam with its current fish ladder are a fish barrier to migrating Southern California Steelhead in Santa Clara River Reach 2 and 3.		Comment Period) and the recommended decision for trash is "list, being addressed by an action other than a TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL."
1.11	**Santa Clara River Reach 4a** Trash. Seven out of 8 monitoring events showed presence of trash.	See response to comment 1.1.	The data has been entered into the CalWQA database. The recommended decision for trash is "list, being addressed by an action other than a TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL."
1.12	**Santa Clara River Reach 5 or 6** Trash. Five out of 7 monitoring events showed presence of trash.	See response to comment 1.1.	The data has been entered into the CalWQA database in Reach 5. The recommended decision for trash is "list, being addressed by an action other than a TMDL." See response to comment 1.2 for trash as "being addressed by an action other than TMDL."
1.13	We thus respectfully request the Los Angeles Regional Board assess all of VCK's proposed 303(d)/305(b) listings and accompanying data submitted in 2010, and ensure VCK's proposed listings are included in the 2016 303(d)/305(b) List. All of VCK's proposed listings meet the requirements for listing in the State Water Resources Control Board's Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List. Notably, as demonstrated by VCK August 30, 2010 proposed listing submission, VCK's watershed monitoring data supporting the proposed listings were collected and analyzed in accordance with VCK's Quality Assurance Project Plan (QAPP) approved by the Los Angeles Regional Water Quality Control Board.	See response to comment 1.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
1.14	Furthermore, we ask the Board to include on the list, the dissolved oxygen ("DO") data submitted by VCK that supports the Santa Clara River Estuary ("Estuary") being included on the 2016 Draft 303(d)/305(b) list for DO impairment. Even one event where DO levels drops below Basin Plan thresholds can be catastrophic for native and endangered aquatic life, including the Southern California Steelhead and Tidewater Goby that use the Estuary as habitat and that need healthy and suitable water quality in the Estuary to survive and recover. It only takes one event of low DO for these species to perish, and the Los Angeles Regional Board was provided over 200 separate data entries indicating that DO fell in the Estuary below Basin Plan thresholds and non-harmful levels for aquatic life. Attached to this letter is are two studies by a Regional Board Scientist (Carter 2005 and 2008) that further details the harms of low DO on aquatic life and native and endangered species, including Southern California Steelhead.	See responses to comments 1.1 and 1.7.	
1.15	VCK's mission is to protect, preserve, and restore the ecological integrity and water quality of Ventura County's inland and coastal waterways. In 2009 and 2010, VCK, in coordination with the Los Angeles Regional Water Quality Control Board and State Water Resources Control Board Clean Water Team, dedicated a tremendous amount of resources to its watershed monitoring program that resulted in VCK's proposed 303(d)/305(b) listings. These resources include VCK running volunteer stream teams, utilizing staff time to collect and analyze water quality data, purchasing and maintaining field equipment, and running a laboratory. It would be a shame, and detrimental to Ventura County's inland and coastal waterways and their beneficial uses, if the water quality impairments discovered, rigorously documented by VCK, and provided to the state did not result in 2016 303(d)/305(b) listings, especially on the account that they were not assessed. It is without second thought that the Los Angeles Regional Board assessing our proposed 303(d)/305(b) listings and accompanying data from August 30, 2010, and ensuring these proposed listings are included in the 2016 303(d)/305(b) List, is critical to the protection of Ventura County's waters for all the people, wildlife, communities, and the Chumash Native American Peoples that depend upon clean	See response to comment 1.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	and healthy waters to sustain their health, wellbeing, and life ways.		
2.	City of Rolling Hills Estates, March 28, 2017		
2.1	The City is pleased that that Palos Verdes Peninsula beaches are being proposed for delisting for indicator bacteria. This is also consistent with Regional Board Resolution No. 2006-008 reviewing the Implementation Plan submitted by Jurisdictional Group 7 for the Santa Monica Bay Beaches Bacteria Wet Weather TMDL which noted that "Palos Verdes Peninsula have had historically fewer exceedances than the reference beach". and " .... existing water quality is equivalent to compliance with the Santa Monica Bay Beaches Wet Weather TMDL."	Comment noted.	
2.2	**City of Rolling Hills Estates Comments on Proposed Revisions to 303(d) List** **Water Body/Pollutant: Los Angeles-Long Beach Inner Harbor/Zinc** **Comment:** We are in agreement with Decision ID 33644 LARWCB staff recommendation to delist the water body both due to flaws in the original listing and because applicable water quality standards are not being exceeded this recommendation, however Appendix A does not reflect this proposed change. **Recommendation:** Add a "Y" in the New Delistings column in Appendix A for Zinc in Los Angeles-Long Beach Inner Harbor.	The Los Angeles-Long Beach Inner Harbor recommendation for Zinc is DO NOT DELIST. This is unchanged from 2006. The Water Board recommendation in 2006 was to delist, however EPA decided to not delist based on information in the LOEs indicating sediment toxicity. The factsheet has been edited for clarity and to update that the listing is being addressed by the Dominguez Channel Los Angeles and Long Beach Greater Harbor Waters Toxic Pollutants TMDL.	
2.3	**Wilmington Drain/Lead** **Comment:** We are in agreement with Appendix G Decision ID 35085 to delist the Wilmington Drain for lead based on the weight of evidence. Additionally, the weight of evidence is stronger than indicated because data was included in this fact sheet from Compton Creek. LOE 90133 included in Fact Sheet 35085	As noted by the commenter, the current decision is to delist Wilmington Drain for lead. Los Angeles Water Board staff will work with State Board staff to correct the LOEs and the decision, if necessary, as the State Board staff prepare the Integrated	The LOE 90133 has been removed from the listing decision for lead in Wilmington Drain. The decision remains "delist."

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	describes data collected in Compton Creek which is unrelated to the Wilmington Drain. **Recommendation:** Remove LOE 90133 from Fact Sheet 35085 and revise the supporting evidence statement to the Regional Board Staff Conclusion to state that "0 of 33 samples exceeded the CRITERIA."	Report and 303(d) list for State Board approval later this year, or not later than the next listing cycle that includes the Los Angeles Region.	
2.4	**Wilmington Drain/Copper** **Comment:** The Appendix G Decision ID 44676 regarding copper in Wilmington Drain includes a data set that should not have been included: LOE ID 90473 describes data collected in Compton Creek which is unrelated to Wilmington Drain. Removal of this data set from Decision ID 44676 would still leave LOE ID 90131 which is described as 33 samples, only two (2) of which exceeded the criteria for copper. This revised data set now meets the SWRCB Delisting criteria because the number of exceedances is 2 or less in a data set size of 28-36 samples. **Recommendation:** Remove LOE ID data set 90473 from Decision ID 44676 and revise the recommendation to Delist from 303(d) List.	Los Angeles Water Board staff will work with State Board staff to correct the LOEs and the decision, as appropriate, as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval later this year, or not later than the next listing cycle that includes the Los Angeles Region.	The LOE 90473 has been removed from the listing decision for copper in Wilmington Drain. The recommended decision has been revised to "delist."
2.5	**Machado Lake/Algae, Ammonia, ChemA, Eutrophic, Odor, Trash** **Comment:** These listings for Machado Lake are included in Appendix B Category 5 (a water segment where standards are not met and a TMDL is required but not yet completed) however all of these pollutant listings are being addressed by USEPA approved TMDLs. **Recommendation:** These listings should be moved to Category 4a in Appendix C. An explanation that "TMDL status changed from TMDL still required to Being Addressed by Completed TMDL" should be included in Appendix A under the "Other Revisions" column for each of these pollutants in Machado Lake.	The Machado Lake listings for Algae, Ammonia, Eutrophic, Odor and Trash were assigned to category 4a in 2010 and that assessment has not changed. ChemA was reassigned to 4a in this listing cycle. Because all the individual Machado Lake listings were categorized as 5B (category 5B is for listings "being addressed by a TMDL"), the waterbody as a whole should have been in the Category 4 Appendix, not the Category 5 Appendix. The Category Appendices have been updated to make	

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		this correction.	
2.6	**Los Angeles-Long Beach Outer Harbor (inside breakwater)/DDT, PCBs and Toxicity; Los Angeles Harbor Inner Cabrillo Beach/DDT, PCBs; San Pedro Bay Near-Off Shore/Chlordane, PCBs, Total DDT, and Toxicity** **Comment:** These are included in Appendix B Category 5 (a water segment where standards are not met and a TMDL is required but not yet completed) however all of these listings are being addressed by the USEPA approved TMDL for Dominguez Channel and Greater Los Angeles and Long Beach Harbors. These changes are explained in Appendix A summary under "other revisions". **Recommendation:** These listings for DDT, PCBs and Toxicity should be moved to Category 4a in Appendix C.	Although the Los Angeles-Long Beach Outer Harbor (inside breakwater) DDT and PCBs listings were included in the Category 5 Appendix, they were listed as "being addressed by a TMDL" (5B); however, the toxicity listing was incorrectly categorized as needing a TMDL (5A). The toxicity listing has now been updated to "being addressed by a TMDL," so the waterbody as a whole will move to category 4a. Los Angeles Harbor Inner Cabrillo Beach DDT and PCBs listings have been reassigned to "being addressed by a TMDL" and the waterbody as a whole will move to category 4a. Although the San Pedro Bay Near-Off Shore Chlordane, PCBs, and Total DDT listings were included in the Category 5 Appendix, they were listed as "being addressed by a TMDL" (5B); however, the toxicity listing was incorrectly categorized as needing a TMDL (5A). The toxicity listing has now been updated to "being addressed by a TMDL," so the waterbody as a whole will move to category 4a.	
2.7	**San Pedro Bay Near-Off Shore Zones/Zinc** **Comment:** Appendix G Decision ID 42798 to Delist San Pedro Bay Near/Off Shore Zones for Zinc because applicable water quality standards are not being exceeded. This recommendation is not reflected in Appendix A summary of	Zinc was delisted in the 2010 303(d) list. New data was assessed during this listing cycle but the decision remains "delist." This is not a New Delisting.	

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	recommended changes. **Recommendation:** Insert a "Y" in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for zinc.	Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
2.8	**San Pedro Bay Near-Off Shore Zones/Chromium** **Comment:** Appendix G Decision ID 42525 restates and does not revise the original recommendation to delist San Pedro Bay Near/Off Shore Zones for Chromium, however delisting does not seem to have occurred since the pollutant-waterbody combination still appears in Appendix A. **Recommendation:** Insert a "Y" in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for PAHs and remove the "Y" from the Pollutant Name Changes column since there does not appear to have been any name change made for this pollutant.	Chromium was delisted in the 2010 303(d) list. This is not a New Delisting. The name has been changed. In the 2010 list it was "chromium (sediment)" and now it is "chromium". Chromium is included in Appendix A to show the recommended name change. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
2.9	**San Pedro Bay Near-Off Shore Zones/Copper** **Comment:** Appendix G Decision ID 44434 to Delist San Pedro Bay Near/Off Shore Zones for Copper based on flaws in the original listing. This recommendation is not reflected in Appendix A summary of recommended changes. **Recommendation:** Insert a "Y" in the New Delistings column of Appendix A for	Copper was delisted in the 2010 303(d) list. New data was assessed during this listing cycle but the decision remains "delist." This is not a New Delisting. The name has been changed. In the 2010 list it was "Copper (sediment)" and now it is "copper". Copper is included in Appendix A to show the recommended name change.	

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	San Pedro Bay Near/Off Shore Zones for copper.	Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
2.10	**San Pedro Bay Near-Off Shore Zones/ Polycyclic Aromatic Hydrocarbons (PAHs)** **Comment**: Appendix G Decision ID 43259 to Delist San Pedro Bay Near/Off Shore Zones for PAHs because applicable water quality standards are not being exceeded. This recommendation is not reflected in Appendix A summary of recommended changes. **Recommendation:** Insert a "Y" in the New Delistings column of Appendix A for San Pedro Bay Near/Off Shore Zones for PAHs.	PAHs (Polycyclic Aromatic Hydrocarbons) was delisted in the 2010 303(d) list. New data was assessed during this listing cycle but the decision remains "delist." This is not a New Delisting. The name has been changed. In the 2010 list it was "PAHs (Polycyclic Aromatic Hydrocarbons) (sediment)" and now it is "PAHs (Polycyclic Aromatic Hydrocarbons)". PAHs (Polycyclic Aromatic Hydrocarbons) is included in Appendix A to show the recommended name change.	
2.11	**Santa Monica Bay Offshore- Nearshore/Chlordane** **Comment:** The revised Appendix G Fact Sheet associated with Decision ID 37492 recommending delisting Santa Monica Bay Offshore-Nearshore waters for chlordane is not reflected in the Appendix A summary of recommended changes. **Recommendation:** Revise Appendix A to place a "Y" in the New Delisting column for Santa Monica Bay Offshore/Nearshore line for Chlordane.	Chlordane was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
2.12	**Santa Monica Bay Offshore- Nearshore/ Polycyclic Aromatic Hydrocarbons (PAHs)**	PAHs were delisted in 2010. Appendix A includes proposed changes to the 303(d) list	

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	Comment: The revised Appendix G Fact Sheet associated with Decision ID 32656 recommending delisting Santa Monica Bay Offshore-Nearshore waters for PAHs is not reflected in the Appendix A summary of recommended changes. **Recommendation:** Revise Appendix A to place a "Y" in the New Delisting column for Santa Monica Bay Offshore/Nearshore line for PAHs.	including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
2.13	**Santa Monica Bay Offshore- Nearshore/ Arsenic** **Comment:** Santa Monica Bay Offshore-Nearshore areas are being proposed for listing for Arsenic based on sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit. Samples were collected during August 2006, October and November 2007, and August through September of 2007 from nearfield and from Zones 4 & 5—these sampling areas are north of Redondo Beach Pier. **Recommendation:** This listing should be narrowed in geographic scope and should exclude Offshore-Nearshore waters of the Palos Verdes Peninsula because the data supporting the listing is not spatially representative of the Palos Verdes Peninsula waters since there is little to no influence from the Hyperion Wastewater Treatment Plant discharge on these waters. The fact sheet (Decision ID 67208) should be revised to discuss the spatial extent of this listing in relation to the data supporting the listing and to exclude areas south of Redondo Beach Pier which are outside of Zones 4 and 5.	The CalWQA database does not at this time allow for listing only portions of defined waterbodies. However, the fact sheet does state where the fish were collected. At the time a TMDL is developed, or other regulatory program is developed, for arsenic in Santa Monica Bay, then the more detailed geographic scope can be identified considering collection sites and fish movement. However, a review of this decision is in process at this time in order to review the data included in the analysis and the applicable evaluation guideline.	See response to comment 11.21 for a discussion of the arsenic evaluation guideline.
2.14	**Santa Monica Bay Offshore- Nearshore/Mercury** **Comment:** Santa Monica Bay Offshore-Nearshore areas are being proposed for listing for Mercury based on sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit. Samples were collected during August 2006, October and November 2007, and August through September of 2007 from nearfield and from Zones 4 & 5.	The CalWQA database does not at this time allow for listing only portions of defined waterbodies. The fact sheet does state where the fish were collected.	The mercury data has been re-assessed and the appropriate data was used and the decision remains "list."

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Recommendation: This listing should be narrowed in geographic scope and should exclude Offshore-Nearshore waters of the Palos Verdes Peninsula because the data supporting the listing is not spatially representative of the Palos Verdes Peninsula waters since there is little to no influence from the Hyperion Wastewater Treatment Plant discharge on these waters. The fact sheet should be revised to (Decision ID 67209) discuss the spatial extent of this listing in relation to the data supporting the listing and to exclude areas south of Redondo Beach Pier which are outside of Zones 4 and 5.	At the time a TMDL is developed, or other regulatory program is developed, for mercury in Santa Monica Bay, then the more detailed geographic scope can be identified considering collection sites and fish movement. However, a review of this decision is in process at this time in order to review the data included in the analysis.	
3.	City of Rosemead, March 28, 2017		
3.1	**I. Summary** The 2016 303(d) revisions for the several reaches (water quality segments) of the Los Angeles River and tributaries propose to de-list, do not de-list, and do not list metals-related pollutants including copper, lead, selenium and zinc. These pollutants are the subject of the Total Maximum Daily Loads for Metals for the Los Angeles River (LARMTMDL) adopted by Regional Board in 2007. This TMDL has been incorporated into the current Los Angeles County MS4 Permit MS4 Permit (MS4 Permit). The MS4 Permit enables compliance with TMDL waste load allocations (WLAs) -- also referred to as numeric targets. The numeric targets are translated into water quality based effluent limitations (WQBELs) which are applied to MS4 outfall discharges and to receiving waters as limitations. To comply with both, the MS4 Permit coercively encourages compliance through Watershed Management Programs (E/WMPs). Although many metals have either been placed on the "de-list" or "do not list" categories for Los Angeles River water quality segments, many also have been placed on the "list" and do not de-list categories. These listings should be voided because:	Comments on TMDLs and MS4 permits are outside the scope of this action. Pollutants, including metals, are assessed as "de-list," "do not list," "list," and “do not delist” based on available data, not on the status of TMDLs. See also, response to comment 3.2, 3.3, and 3.4.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	1. Although the LAR-MTMDL claims to have developed water quality standards (includes TMDLs) in accordance with the federal California Toxic Rule (CTR) adopted in 2000, it actually has not; and 2. The LAR-MTMDL is based on water quality samples that were conducted before the Water Quality Control Policy for California's Clean Water Act Section 303(d) List (Listing Policy), which was adopted in 2004.		
3.2	**California Toxic Rule** CTR was adopted to provide a mathematical method for establishing ambient (dry weather) water quality standards for toxics necessary to protect beneficial uses of receiving waters. The LAR-MTMDL, however, along with other TMDLs, does not comply with CTR in two significant respects. First, the TMDL calculates numeric water quality standards/TMDLs for both wet weather and ambient receiving water conditions instead of only on ambient. The LAR-MTMDL misinterprets CTR by claiming EPA did not differentiate between wet and dry weather conditions when establishing metals and toxics limitations. There is nothing in CTR that supports that view. CTR makes it clear that its purpose is to establish ambient water quality standards: *This final rule establishes ambient water quality for priority toxic pollutants*. USEPA defines ambient as: *Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact to human health.* In other words, ambient is the normal reference condition of a receiving water. This is also the clear understanding of the Regional Board's Surface Water Ambient Monitoring Program (SWAMP). MS4 and other point source stormwater (wet weather) outfall discharges, using sampling and analysis results, are	Comments on TMDLs are outside the scope of this proposed action.	The CTR criteria apply at all times during wet and dry weather to inland surface waters. (See, 40 CFR 131.38(a), (c)(1), and (d)(1).) There is no exception for wet-weather conditions. Aquatic life is present in wet weather conditions and the CTR is legally necessary to protect these uses.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	measured against the ambient target for a pollutant established by CTR. For example, suppose a copper limitation is set at 37 micrograms per liter for a given water body. This limit is required to protect fish. Persistent exceedances of the limit based on outfall monitoring would necessitate a revision to the MS4 Permittee's stormwater management program. Second, CTR requires a hardness parameter (calcium carbonate) to make chemical water quality analysis of toxics more accurate. Generally, the higher the hardness value the higher the toxic pollutant expressed as a numeric limit. The LAR-MTMDL calculates CTR for metals/toxics using a hardness value of 100 milligrams per liter (mg/l). It contends that this is the hardness value required by CTR. This is false. CTR requires actual hardness to be determined by water quality sampling and analysis at the same time a toxic pollutant is sampled. The Regional Board's SWAMP abides by this requirement. Therefore, the LAR-MTMDL establishes limitations for metals and toxics that are more stringent than necessary. This provides another reason for voiding the LAR-MTMDL and revising it with a recalculated limitation for each metal by using an actual hardness value based on future ambient water quality sampling and analysis.		
3.3	**California 303(d) Listing Policy (Listing Policy)** The Listing Policy was adopted to provide a statistical method to determine how many water quality samples that exceed a water quality standard are required to place a pollutant on the 303(d) list. That method is a binomial distribution based on the rejection of a null hypothesis measured against sample sizes (see attachment #1). A review of the 2016 303(d) list fact sheets reveals that the metals placed on previous 303(d) lists did not conform to the Listing Policy. In fact, the LAR-MTMDL is based on water quality data that was developed prior to the adoption of the Listing Policy in 2004. According to the LAR-MTMDL, the metals numeric targets were based on data that was limited to 2002. Based on this fact alone the LAR-MTMDL should be voided.	The Los Angeles Water Board disagrees. While the current and past 303(d) lists of impaired waterbodies pre-date the State's Listing Policy, this does not invalidate previous listing decisions. The Listing Policy does not support delisting a waterbody pollutant combination simply because it was listed prior to adoption of the Listing Policy and, as such, a different data assessment method may have been used. The 303(d) list includes assessments of readily available data and uses data assessment guidelines	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		available at the time of preparation. The list is periodically updated based on newer readily available data and, if newer assessment guidelines or methods are available, these are used. Accordingly, several of the existing waterbody pollutant combinations originally listed in the TMDL are recommended for delisting, while several are not recommended for delisting. Additionally, several new waterbody pollutant combinations for metals are recommended for listing based on new readily available data since the last update of the list for the Los Angeles Region. Finally, comments on the LA River Metals TMDL are outside the scope of this proposed action.	
3.4	MS4 Permittees located in Reach 2 of the Rio Hondo will be pleased to know that the 2016 303(d) list does not propose to list it for any of the metals covered by the LARMTDL. This makes sense given that this reach was not listed for metals impairment on the 2010 303(d) list. Further, LAR-MTMDL makes no mention of Reach 2 of the Rio Hondo. As result, the following cities should not be subject to this TMDL: Alhambra (partially); Arcadia; Bradbury; Duarte; El Monte; Irwindale (partially); Montebello (partially); Monterey Park; Pasadena (partially); Rosemead; San Gabriel; San Marino; South El Monte; Irwindale (partially); and South Pasadena (partially). However, it is noted that Reaches 1 and 2 of the Arroyo Seco was not placed on the "do not list" for metals. It should have been for the same reason Reach 2 of the Rio Hondo was. Neither Reach 1 nor Reach 2 of the Arroyo Seco appears on the 2010, 2006, or 2002 303(d) list for metals. The Regional Board may wish to update the 2016 303(d) list to place the Arroyo Seco on the "do not list" category.	Comments on the applicability of TMDLs are outside the scope of this action. The Integrated Report and the 303(d) list do not include any decisions for metals in the Arroyo Seco because no metals data were available or assessed for the Arroyo Seco. The decision “do not list” is only made when there are data in the CalWQA database that support a “do not list” decision.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
4.	City of Compton, March 29, 2017		
4.1	**I. Summary** The 2016 303(d) revisions for the several reaches (water quality segments) of the Los Angeles River and tributaries propose to de-list, do not de-list, and do not list metals-related pollutants including copper, lead, selenium and zinc. These pollutants are the subject of the Total Maximum Daily Loads for Metals for the Los Angeles River (LARMTMDL) adopted by Regional Board in 2007. This TMDL has been incorporated into the current Los Angeles County MS4 Permit MS4 Permit (MS4 Permit). The MS4 Permit enables compliance with TMDL waste load allocations (WLAs) -- also referred to as numeric targets. The numeric targets are translated into water quality based effluent limitations (WQBELs) which are applied to MS4 outfall discharges and to receiving waters as limitations. To comply with both, the MS4 Permit coercively encourages compliance through Watershed Management Programs (E/WMPs). Although many metals have either been placed on the "de-list" or "do not list" categories for Los Angeles River water quality segments, many also have been placed on the "list" and do not de-list categories. These listings should be voided because: 1. Although the LAR-MTMDL claims to have developed water quality standards (includes TMDLs) in accordance with the federal California Toxic Rule (CTR) adopted in 2000, it actually has not; and 2. The LAR-MTMDL is based on water quality samples that were conducted before the Water Quality Control Policy for California's Clean Water Act Section 303(d) List (Listing Policy), which was adopted in 2004.	See response to comment 3.1.	
4.2	**California Toxic Rule**	See comment 3.2.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	CTR was adopted to provide a mathematical method for establishing ambient (dry weather) water quality standards for toxics necessary to protect beneficial uses of receiving waters. The LAR-MTMDL, however, along with other TMDLs, does not comply with CTR in two significant respects. First, the TMDL calculates numeric water quality standards/TMDLs for both wet weather and ambient receiving water conditions instead of only on ambient. The LAR-MTMDL misinterprets CTR by claiming EPA did not differentiate between wet and dry weather conditions when establishing metals and toxics limitations. There is nothing in CTR that supports that view. CTR makes it clear that its purpose is to establish ambient water quality standards: *This final rule establishes ambient water quality for priority toxic pollutants*. USEPA defines ambient as: *Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact to human health.* In other words, ambient is the normal reference condition of a receiving water. This is also the clear understanding of the Regional Board's Surface Water Ambient Monitoring Program (SWAMP). MS4 and other point source stormwater (wet weather) outfall discharges, using sampling and analysis results, are measured against the ambient target for a pollutant established by CTR. For example, suppose a copper limitation is set at 37 micrograms per liter for a given water body. This limit is required to protect fish. Persistent exceedances of the limit based on outfall monitoring would necessitate a revision to the MS4 Permittee's stormwater management program. Second, CTR requires a hardness parameter (calcium carbonate) to make chemical water quality analysis of toxics more accurate. Generally, the higher the hardness value the higher the toxic pollutant expressed as a numeric limit. The LAR-		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	MTMDL calculates CTR for metals/toxics using a hardness value of 100 milligrams per liter (mg/l). It contends that this is the hardness value required by CTR. This is false. CTR requires actual hardness to be determined by water quality sampling and analysis at the same time a toxic pollutant is sampled. The Regional Board's SWAMP abides by this requirement. Therefore, the LAR-MTMDL establishes limitations for metals and toxics that are more stringent than necessary. This provides another reason for voiding the LAR-MTMDL and revising it with a recalculated limitation for each metal by using an actual hardness value based on future ambient water quality sampling and analysis.		
4.3	**California 303(d) Listing Policy (Listing Policy)** The Listing Policy was adopted to provide a statistical method to determine how many water quality samples that exceed a water quality standard are required to place a pollutant on the 303(d) list. That method is a binomial distribution based on the rejection of a null hypothesis measured against sample sizes (see attachment #1). A review of the 2016 303(d) list fact sheets reveals that the metals placed on previous 303(d) lists did not conform to the Listing Policy. In fact, the LAR-MTMDL is based on water quality data that was developed prior to the adoption of the Listing Policy in 2004. According to the LAR-MTMDL, the metals numeric targets were based on data that was limited to 2002. Based on this fact alone the LAR-MTMDL should be voided.	See comment 3.3.	
4.4	**II. Los Angeles River Reach/Tributary Specific Comments** Presented below are specific justifications for removing metals that fall under either the "list" or "do not list" categories because they do not conform to CTR or the Listing Policy. Almost all of them fall into these categories. **1. Compton Creek**	"DO NOT DELIST" is the appropriate recommendation for copper and lead. Section 3.1 and Table 3.1 of the Listing Policy include a *minimum* sample size to *list* a pollutant, while Section 4.1 of the Listing Policy states, "[t]he binomial distribution cannot be used to support a delisting with sample sizes less than 28." Listed waterbodies are evaluated and delisting decisions	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Of the 4 subject LAR-MTMDL metals, the 2016 303(d) list only places selenium on the "do not list" for the Creek. According to the fact sheet, copper is placed on the "do not de-list" based on 1 of 15 samples that exceeded dissolved copper. This result, however, does not meet the 3.1 Listing Policy's binomial test requirement. The policy explains that the application of the binomial test requires a minimum sample size between 2 and 24, with at least 2 exceedances required for 303(d) listing placement. But, the Listing Policy also mentions that a sample size less than 16 is insufficient to meet the listing test. Lead is also placed under the "do not de-list" category. <u>This appears to be in error</u>. According to the fact sheet, 1 of 15 samples and 0 of 3 samples exceeded the criteria for this sample size to determine the applicable beneficial use. However, 1 exceedance out of 15 and 0 out of 3 samples do not meet the Listing Policy for 303(d) list placement. Not only is the exceedance frequency insufficient, but the sample size is too small. The same is true of zinc, which was placed on the "list" category because 2 of the 15 samples exceeded the allowable frequency. That cannot be. Once again, a sample size of 15 is too small. Further, it is not clear whether the samples were taken from the Creek during a storm event or during an ambient water body condition. It should also be noted that according Regional Board SWAMP data taken in June of 2005, no exceedances were reported for copper, lead, or zinc. Based on the foregoing, it is recommended that copper, lead, and zinc be placed on the "do not list" category. Table I Compton Creek **[See the posted letter for Table I]**	are made based on Section 4 of Listing Policy, not Section 3. Based on Section 4, there are insufficient samples to delist based on the binomial distribution. The SWAMP line of evidence has also been considered in the decision recommendation. The LOEs that support the copper and lead listings are "placeholder" LOEs to show a finding of impairment made prior to 2006. The lead recommendation also includes a third LOE, which is a "placeholder" LOE to show a finding of impairment made prior to 2006. The "placeholder" LOEs are valid LOEs; however, the data for these are not in the CalWQA database. However, Section 4.1 of the Listing Policy still requires a minimum of 28 samples (and fewer exceedances than listed in Table 4.1) to delist. See response to comment 3.3 for additional discussion on listing prior to the adoption of the Listing Policy.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
4.5	**2. Los Angeles River Reach 1 (Estuary to Carson)** Copper, lead, and zinc were listed, while selenium was not. The justification for their listing is questionable. The listing fact sheet indicates 7 out of 18 samples exceeded CTR criteria. Because the LAR-MTMDL asserts that CTR limitations can be based on both wet weather and dry weather (ambient) sampling, the Regional Board needs to provide data that shows which samples were based on wet weather and dry weather. As mentioned above, CTR limitations are exclusively expressed as ambient standards. Wet weather samples should be excluded. If the number of excluded samples does not meet the Listing Policy requirement for minimum sample size, then the sampling data is invalid. Further, it is not clear when the samples were taken, nor whether the actual hardness value was applied. Based on this information, copper, lead, and zinc should be de-listed. Table II LAR Reach 1. **[See the posted letter for Table II]**	The decisions for copper, lead, and zinc are previous listing decisions. No new data were assessed by the Board for the current cycle. See response to comment 4.4 regarding "placeholder" LOEs. The Listing Policy neither indicates that wet weather data should be excluded from the assessment nor that data from wet and dry weather must be assessed separately. While Section 6.1.5.3 of the Listing Policy states "… *If the majority of samples were collected on a single day or during a single short-term natural event (e.g., a storm, flood, or wildfire), the data shall not be used as the primary data set supporting the listing decision*", it does not state that wet weather samples should be excluded from the assessment. Comments on the TMDL are outside the scope of this action.	
4.6	**3. Los Angeles River Reach 2 (Carson to Figueroa)** Copper and lead are carried-over from the 2010 303(d) list and placed in the "do not delist" category. Selenium and zinc were not listed. Copper and lead should be de-listed because according to the 303(d) listing fact sheet, 0 samples were taken.	The LOEs which support the copper and lead listings are "placeholder" LOEs to show a finding of impairment made prior to 2006. The CalWQA database does not include the "placeholder" LOE data from decisions made prior to 2006.	

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	Based on this information copper and lead should be should be de-listed. Table III LAR Reach 2. **[See the posted letter for Table III]**	There is no additional data in the CalWQA database that would support delisting. See, also, response to comment 4.4.	
5.	City of Redondo Beach, March 29, 2017		
5.1	However, after reviewing the proposed changes to the 303(d) List, the City remains concerned about a number of specific issues, which are detailed below. The City's comments are generally grouped within two categories: • Segment specific comments on the proposed 303(d) List; and • Inconsistencies within the 303(d) List. **I. Segment Specific Comments on the Proposed 303(d) List** **A. Dominguez Channel (lined portion above Vermont)** <u>Comment 1: The benthic community effects listing (Decision ID 66165) appears to be flawed and should be removed.</u> The listing for benthic community effects should be removed because it is based on flawed data and/or analyses. The basis for this comment is as follows: • The sample size did not meet the minimum criteria pursuant to the Listing Policy. According to Section 3.9 Degradation of Biological Populations and Communities of the Listing Policy, *The analysis should rely on measurements from at least two stations.* The Appendix G Fact Sheets list only one sample site, however it treats the data from the one site as three separate samples, which is incorrect. As a result, there are not enough data to justify a listing. • The benthic community effects listing for the lined portion of Dominguez Channel lacks a sufficient reference site. Since this section of the Dominguez channel is lined, it does not have a traditional bed structure or substrates found in a typical stream. The classic Index of Biotic Integrity (181) stream assessment score does not take into consideration that lined	Listings related to benthic community impairment in the Dominguez Channel and other channels that are lined entirely with concrete have been reassigned to Category 3 (i.e., insufficient information to assess beneficial use support, but some uses may be threatened) until such time as benthic community condition scores have been more specifically calibrated for concrete-lined channels. See response to comments 11.19 and 11.24.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	channels naturally have lower IBI scores as noted in the recently released SCCWRP Special Study on Engineered Channels. In order to make a robust assessment, the reference site should also be a lined channel that has not been subject to anthropogenic influences, however such a reference site was not used in the analysis. • The IBI is not the assessment tool that should be used to determine benthic community effects. As acknowledged in the Appendix G Fact Sheets: *The CSCI is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. The CSCI will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs).* We agree with this statement and also note that some IBI scores are especially skewed when utilized for hardened channels since they heavily rely on macroinvertebrates, which are inherently more common in natural bottom stream beds. Other assessment tools such as the diatom IBI may also be used to assess the benthic community of a hardened channel as demonstrated by the SCCWRP Study on Engineered Channels referenced earlier. Therefore, the IBI assessment tool should not be used as the sole basis for a listing in this lined channel. • The benthic community effects exceedance should not be linked to diazinon as a way to establish a causal effect since this pollutant has been delisted with respect to the Dominguez Channel (lined portion above Vermont) (Decision ID 33061). *Requested Action*: • *Remove the benthic community effects listing/or Dominguez Channel since the sample size does not meet the minimum criteria, this section of channel lacks a proper reference site, and is based on an inappropriate assessment tool*. • *If the listing is not removed, the diazinon linkage to benthic community*		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	effects should be removed since this pollutant has been delisted.		
5.2	<u>Comment 2: The ammonia listing (Decision ID 35134) should be updated to consider all readily available data.</u> Ammonia was not de listed based on the existence of 2 exceedances out of 21 samples collected from 7/1/2009 to 8/13/2009 at Western Ave., Manhattan Beach Blvd, and El Segundo Blvd. Additional samples were also collected at a sample site just across Vermont Ave. (33° 52' 16" N, 118° 17' 23" W), however these samples were not included in the analysis. The Basin Plan lists Vermont Ave. as the reach break between the Dominguez Channel and Dominguez Channel Estuary and, therefore, it appears a decision was made to include the Vermont Ave. samples in the downstream segment - the Dominguez Channel Estuary (unlined portion below Vermont Ave.) The City maintains that the Vermont Ave. samples should be considered in the Dominguez Channel (lined portion above Vermont) based on their direct proximity to the end of the reach, offering optimal spatial representation of the water body segment. Furthermore, the sample site is located less than 100 meters from the lined portion of Dominguez Channel and according to the Listing Policy, a sample collected 200 meters upstream, in the lined portion of the Channel, would be considered the same station location. If the additional 8 samples from the Vermont Ave. station are included in the Dominguez Channel (lined portion above Vermont) analysis, the total samples in exceedance would be 2 out of 29. These data would then meet the requirement to delist ammonia as stated in Section 4.1 of the California Delisting Factors set in the Listing Policy - i.e., these samples support rejection of the null hypothesis using the binomial distribution and the sample size is greater than 28. Specifically, Table 4.1 at page 14 of the Listing Policy demonstrates that where 2 or less exceedances are identified in a sample size of 28-36 samples, such as here, then the water segment shall be removed from the 303(d) List. Therefore, based on the	See response to comment 11.6.	The LOE has been revised to include the data from the Vermont Ave sampling site. The recommended decision has been revised to "delist."

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	updated and appropriate sample size, which includes Vermont Ave. samples, and number of exceedances, ammonia should be delisted for this reach. *Requested Action*: • *Include the Vermont Ave. sampling data in the analysis of the ammonia listing for Dominguez Channel (lined portion above Vermont).* • *Delist ammonia based on the updated analysis*.		
5.3	**B. Dominguez Channel Estuary (unlined portion below Vermont Ave)** <u>Comment 3: Delist Ammonia (unionized) due to lack of exceedances.</u> A listing for ammonia was shown in the Appendix G Fact Sheets, however none of the cited lines of evidence (LOE) shows evidence of an exceedance. One LOE is an unspecified placeholder for a listing decision made prior to 2006, however the other two LOE show 0 out of 28 and 0 out of 7 exceedances. Based on the data, this pollutant meets the Section 4 California Delisting Factors set in the Listing Policy. *Requested Action*: • *Delist ammonia (unionized) (Decision ID 34669) based on lack of evidence and exceedances*.	The decision has been updated to "DELIST."	
5.4	**C. Santa Monica Bay Offshore/Nearshore** <u>Comment 4: The arsenic and mercury fish tissue listings are not based on all readily available data, are not spatially representative of the water body, and samples were not treated as temporally independent.</u> The samples used for the proposed 5A Arsenic and Mercury fish tissue listings (Decision ID: 67208 and 67209) are not spatially representative of the water body. Samples used for these listings were collected for the City of Los Angeles Hyperion Treatment Plant NPDES Permit (NO. CA0109991). The permit designates 5 different sampling zones along the coast of the Santa Monica Bay of	See response to comment 2.13 for Arsenic and 2.14 for Mercury and spatial representativeness. See response to comment 32.3 for a discussion of readily available data. See response to comment 11.21 and 11.22 for fish temporal independence.	See response to comment 11.21 for a discussion of the arsenic evaluation guideline.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	which the City falls along the border of zones 4 and 3 (see map in Attachment B). All of the samples used for these listings were collected from zones 4 and 5 - no representative samples were collected from zone 3, which includes the southern end of Santa Monica Bay and a substantial portion of the City's drainage area. Therefore, using current samples to list the entire Santa Monica Bay Offshore/Nearshore would incorrectly list zone 3 of the bay despite a lack of representative samples from this area. This would contradict the Listing Policy which states that "*samples should represent statistically or in a consistent targeted manner the segment of the water body*". The spatial coverage of the samples should be considered and the listing reassessed by either segmenting the water body or using samples from all representative zones of Santa Monica Bay. In addition, sampling data beyond the 19 samples collected in 2006-2007 should be available from the City of Los Angeles' Hyperion Treatment Plant NPDES permit. It is unclear why only the 2006-2007 samples were used when there are presumably more samples available from the Hyperion Treatment Plant NPDES monitoring program. The City requests that the Water Board review all available data for fish tissue before making a listing for Arsenic and/or Mercury. Finally, the fish tissue assessment for arsenic and mercury did not properly categorize the data in a way that is temporally independent. The Listing Policy states that samples should be temporally independent; however, in some cases fish collected on the same day were treated as unique data points. In addition, the samples collected were from August 2006, October 2007- November 2007, and August - September 2007. Because both arsenic and mercury bioaccumulate over the lifetime of the individual species an averaging period of at least a year should be considered. Therefore, instead of considering 19 individual samples these data should only be considered representative of 2 years thus supporting the need for additional data as previously requested. *Requested Action*:		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• *Either (1) segment the Santa Monica Bay listing since the data used to list arsenic and mercury are not representative of the entire water body as required by the Listing Policy, or (2) seek additional data from all zones<~(Santa Monica Bay to ensure proper spatial representation of the data prior to listing.* • *Seek and reanalyze additional sample data from the City of Los Angeles beyond the 19 samples from 2006 and 2007 that were originally used/or the analysis.* • *The mercury and arsenic fish tissue data should be aggregated based on a more reasonable temporal resolution.*		
5.5	<u>Comment 5: Sediment toxicity should be delisted; no justification was provided for the name change in the Fact Sheets</u>. The Santa Monica Bay Offshore/Nearshore toxicity listing (Decision ID 34120) was marked only as a name change in Appendix A. However, a TMDL for DDTs and PCBs was developed and approved by USEPA in 201210 which evaluated sediment toxicity resulting in a recommendation for delisting: *"Our evaluation of the data showed only 3 out of 116 samples exhibited toxicity. Following the California listing policy, Santa Monica Bay is meeting the toxicity objective and there is sufficient evidence to delist sediment toxicity. We therefore make a finding that there is no significant toxicity in Santa Monica Bay and recommend that Santa Monica Bay not be identified as impaired by toxicity in the California's next 303(d) list."* Based on the statement above and data summarized on pages 19 and 20 of the TMDL there is sufficient evidence to delist sediment toxicity for Santa Monica Bay Offshore/Nearshore. The listed name change appears to be a change from "sediment toxicity" to "toxicity" based on the Appendix G Fact Sheets. We assume that this name change	The decision recommendation has been updated to "DELIST." The name change is not in error. The 303(d) list no longer includes separate listings for different environmental media, that is, data for sediment toxicity and data for water toxicity are both considered in an assessment of toxicity. In fact, water, sediment and tissue may be considered in one assessment for waterbodies that have data for all three environmental media.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	is the result of the Water Board's acknowledged systems and clerical errors in Appendix A. In the event that it is not a mere error that will be corrected by the Water Board, the City requests that justification be provided to support the name change. This name change should only occur if new data is used to support the observation of toxicity in the water column as outlined in section 3.6 of the Listing Policy, however no new data was presented and a reason for this name change was not discussed in the staff report. *Requested Action*: • *Delist sediment toxicity for Santa Monica Bay based on the data analysis performed in the 2012 DDTs and PCBs TMDL.* • *Correct the name change error*		
5.6	**II. Inconsistencies within the 303(d) List** As noted by Water Board staff, the Appendices of the proposed 303(d) List have a number of inconsistencies. The inconsistencies listed below are a few examples and should not be considered an exhaustive list. We request that the Water Board do a thorough review of all of the Appendices to ensure that they are internally consistent with the changes listed in the Appendix G Fact Sheets. Table 1. Inconsistencies in the Proposed 303(d) List Appendices **Waterbody Segment: Dominguez Channel (lined portion above Vermont)** **Pollutant(s)**: Diazinon **Comment/Requested Action**: This pollutant is shown as "delisted" in Appendix A with a note "TMDL status changed from TMDL still required to Being Addressed by Completed TMDL ". In Appendix G the same pollutant is listed as "Delist from 303(d) list (being addressed by USEPA approved TMDL)".	Diazinon is recommended for delisting for the Dominguez Channel above Vermont. Los Angles Water Board staff found several inconsistencies with Appendix A as released for public comment. Appendix G is correct and Appendix A has been revised to align with the fact sheets in Appendix G.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The City would like clarification that this listing will be entirely removed from the 303(d) list and not categorized as 4A as indicated by the note in Appendix A.		
5.7	**Waterbody Segment: Dominguez Channel (lined portion above Vermont)** **Pollutant(s):** Aldrin, Chem A, Chlordane, Chromium, DDT, Dieldrin, PAHs, and PCBs **Comment/Requested Action**: These pollutants are shown as delisted in the Appendix G factsheets, however they are not listed as changed in Appendix A. **All of these pollutants should be delisted due to flaws in the original listing (as noted within the factsheets).**	Aldrin, Chem A, Chlordane, Chromium, DDT, Dieldrin, PAHs, and PCBs were delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
5.8	**Waterbody Segment: Dominguez Channel (lined portion above Vermont)** **Pollutant(s)**: Chromium and Dieldrin **Comment/Requested Action**: These pollutants are shown as "name changes" in Appendix A, however we could find no evidence of a name change throughout the rest of the document. **Any name change should be supported by a reason detailing the need for the change in the Fact Sheets. Furthermore both of these listing should be delisted based on the comment above.**	In prior 303(d) lists, "Chromium" was "Chromium (total)" and "Dieldrin" was "Dieldrin (tissue)."	
5.9	**Waterbody Segment: Dominguez Channel Estuary (unlined portion below Vermont Ave)** **Pollutant(s)**: Aldrin, Chem A, Chromium (total), and PAHs **Comment/Requested Action**: These pollutants are not listed as a change in Appendix A, but shown as "delisted" in Appendix G.	Aldrin, Chem A, Chromium (total), and PAHs were delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	All listings should be delisted either because of flaws in the original listing or lack of an exceedance.	A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
5.10	**Waterbody Segment: Dominguez Channel Estuary (unlined portion below Vermont Ave)** **Pollutant(s)**: DDT **Comment/Requested Action**: This listing is missing from Appendix B or C and has not been listed as changed in Appendix A, however the Appendix G factsheets lists DDT as being addressed with a USEPA approved TMDL and therefore **should be categorized as 5B or 4A**.	The waterbody pollutant combination, Dominguez Channel Estuary/DDT, is categorized 5B because it is being addressed by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxics TMDL. Appendix G is correct and Appendix A has been revised to align with it.	
5.11	**Waterbody Segment: Dominguez Channel Estuary (unlined portion below Vermont Ave)** **Pollutant(s)**: Dieldrin **Comment/Requested Action**: Listed in Appendix A as "*TMDL status changed from TMDL still required to Being Addressed by Completed TMDL*", however the pollutant does not appear in Appendix B or C and is listed as "*List on 303(d) list (being addressed by USEPA approved TMDL*)" in Appendix G. **This pollutant should be listed as 4A or delisted.**	The waterbody pollutant combination, Dominguez Channel Estuary/Dieldrin is categorized 5B; it is being addressed by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxics TMDL. Appendix G is correct and Appendix A has been revised to align with it.	
5.12	**Waterbody Segment: Dominguez Channel Estuary (unlined portion below Vermont Ave)** **Pollutant(s)**: Chlordane (tissue) **Comment/Requested Action**: Listed in Appendix A as unchanged but not found in Appendix B or C. The Appendix G Fact Sheets list this pollutant as "*Do not delist (being addressed with USEPA approved TMDL)*". **The City would like clarification if this pollutant has been delisted or recategorized as 5B.**	The waterbody pollutant combination, Dominguez Channel Estuary/Chlordane is categorized 5B; it is being addressed by the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxics TMDL. The pollutant was recategorized as 5B.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
5.13	**Waterbody Segment: The Santa Monica Bay Offshore/Nearshore** **Pollutant(s)**: Chlordane and PAHs **Comment/Requested Action**: Not listed as a change in Appendix A but shown as "delisted" in Appendix G. **These pollutants should be delisted.**	Chlordane and PAHs were recommended for delisting in the 2010 303(d) list. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
5.14	**Waterbody Segment: Redondo Beach** **Pollutant(s)**: DDT **Comment/Requested Action**: Listed in Appendix A only as a "name change", however Appendix G lists this as "*TMDL status changed from TMDL still required to Being Addressed by Completed TMDL*". The 2010 303(d) list shows Redondo Beach DDT listing was Category SA however in the newly proposed 303(d) list the pollutant is listed as 4A in Appendix C. Category 4A is the correct category for this pollutant since a USEPA-approved TMDL does exist to manage DDT which is expected to result in full attainment of the water quality standard within a specified time frame. **The City would like Appendix A edited to reflect new 4A listing**. Furthermore if this is in fact a name change, as stated in Appendix A, **an explanation including supporting data for the name change should be included in the Appendix G Fact Sheets**.	Redondo Beach DDT is both a name change and a TMDL status change. Los Angles Water Board staff has found several inconsistencies with Appendix A as released for public comment. Appendix G is correct and Appendix A has been revised to align with it. In prior 303(d) lists, "DDT" was "DDT (Dichlorodiphenyltrichloroethane)."	
6.	City of Santa Clarita, March 29, 2017		
6.1	**Change All Listings to "*Being Addressed by Action Other Than a TMDL*"** Due to the extensive studies and long term implementation efforts contained in the	The implementation of the EWMPs is likely to make a significant improvement in water quality in the affected watersheds. However, MS4	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	EWMP, the City requests all pollutants remaining on the 303(d) list without a developed TMDL should be changed to the Category 4B for the Clean Water Act as "Being Addressed by Action Other Than a TMDL." More specifically, the pollutants will be addressed through the long-term implementation of the EWMP. In addition, the City requests a focus be placed on "Delisting" pollutants by the Regional Board so that limited resources can be better applied to applying long-term strategies of the approved EWMP.	discharges may not be the only source of pollutants causing the impairment of these waterbodies; therefore, the actions identified in the EWMPs may not be the only implementation required. A source assessment and linkage analysis, during development of a TMDL, or during development of another regulatory program, or as a special study would be necessary to determine the relative contribution of all the sources and all the actions necessary to restore affected waterbodies to a condition of full water quality standards attainment.	
6.2	The City requests the following amendments for the 2017 303(d) List. The affected water quality objectives are listed below. **Affected Waterbodies, Water Quality Objectives, and Suggested Revisions** *Santa Clara River Reach 5 (Blue Cut Gauging Station to West Pier Highway 99 Bridge)* Ammonia should be revised to "Being Addressed by Completed TMDL." The Nitrogen and Effects TMDL for the Santa Clara River was completed in 2004. The Los Angeles County Sanitation Districts revised their operations at the Saugus Water Reclamation Plant and the Valencia Water Reclamation Plant and installed a Nitrification-Denitrification (NDN) process in 2004. The applicable water quality standards for nitrate, nitrite, and ammonia are not being exceeded. Decision ID 34352 states that no discharges exceeded limits.	Because the applicable water quality standard for ammonia is not being exceeded, Santa Clara River Reach 5 Ammonia is proposed to be delisted (CalWQA Decision 34352). The listing decision is "Delist from 303(d) list (being addressed by USEPA approved TMDL)."	
6.3	Benthic Community Effects should be revised to "Being Addressed by Action Other Than a TMDL." Decision ID 44468 states that the water body is impaired	See response to comment 6.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	with multiple pollutants, including zinc, iron, bacteria, and chloride. However, Line of Evidence 88732 states that 0 out of 153 samples had any exceedance for zinc. Although iron is naturally occurring in the Santa Clara River watershed, Line of Evidence 88656 found 6 of 81 samples exceeded and Line of Evidence 88648 found 0 of 2 samples exceeding water quality limits. There were no samples taken for coliform bacteria, and therefore, no exceedances recorded as per Line of Evidence 4156. Line of Evidence 88792 states that none of the two samples taken exceeded the criterion for chloride. Further, the listing was based on the Southern Coastal California Index of Biotic Integrity (SCIBI). However, the SCIBI-based analysis is inadequate for use in low-gradient and low-elevation waters, such as the Upper Santa Clara River. Through the implementation of the EWMP, the benthic community should rebound to its natural populations as the EWMP addresses toxicity, metals, pesticides, and other metrics that affect benthic communities.	For a discussion of low elevation and benthic macroinvertebrate impairments, see response to comment 26.13.	
6.4	Chloride should be revised to “Being Addressed by Completed TMDL.” The Santa Clara River chloride TMDL was approved by the United States Environmental Protection Agency (USEPA) on April 28, 2005. The site-specific water quality objective for Santa Clara River Reach 5 is 100 mg/L. The primary source of chloride was determined to be potable water derived from a blend of the State Water Project and local groundwater. Santa Clarita Valley residents have relinquished over 8,200 salt-based water softeners that had previously contributed to excessive chloride levels found in the Santa Clara River. The Los Angeles County Sanitation Districts has proposed to install reverse-osmosis technology at their Valencia Water Reclamation Plant and Saugus Water Reclamation Plant, as part of an overall chloride reduction plan.	The listing decision (Decision 32396) is, in fact, "Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)" and so does not require revision.	
6.5	Indicator bacteria should be revised to “Being Addressed by Action Other Than a TMDL.” Through the implementation of the EWMP, indicator bacteria should fall to levels found in ambient waters.	The listing decision (Decision 34306) is "Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)" as the waterbody pollutant combination is currently being addressed	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		by the TMDL for Indicator Bacteria in Santa Clara River Estuary and Reaches 3, 5, 6, and 7 (approved by USEPA on Jan. 31, 2012). The listing decision does not require revision.	
6.6	Iron should be revised to "Being Addressed by Action Other Than a TMDL." Iron was modeled and will be addressed by the implementation of the EWMP for the Upper Santa Clara River.	See response to comment 6.1.	
6.7	Nitrate and nitrite should be revised to "Being Addressed by Completed TMDL." The Nitrogen and Effects TMDL for the Santa Clara River was approved by the USEPA in 2004. The original listing was made in 1998. Since then, the Los Angeles County Sanitation Districts underwent significant upgrades to their operations including incorporation of nitrification/de-nitrification treatment at the Valencia Water Reclamation Plant in 2003, specifically aimed at addressing nitrogen in the Upper Santa Clara River. Decision ID 32484 states that the decision to delist from 303(d) list was previously approved by the State Water Resources Control Board and the USEPA.	The listing decision for Decision 32484 is "Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)" as the waterbody pollutant combination is currently being addressed by the Santa Clara River Nitrogen Compounds TMDL. The listing decision does not require revision.	
6.8	Toxicity should be revised to "Being Addressed by Action Other Than a TMDL." Toxicity was modeled and will be addressed by the implementation of the EWMP for the Upper Santa Clara River.	See response to comment 6.1.	
6.9	*Santa Clara River Reach 6 (West Pier Highway 99 to Bouquet Canyon Road)* Ammonia should be revised to "Being Addressed by Completed TMDL" or "Delist from 303(d) list." The Nitrogen and Effects TMDL for the Santa Clara River was approved by the USEPA in 2004. The original listing was made in 1998. Since then, the Los Angeles County Sanitation Districts underwent significant upgrades to their operations, including incorporation of nitrification/de-nitrification treatment at the Valencia Water Reclamation Plant in 2003,	Santa Clara River Reach 6 Ammonia is proposed to be delisted. The listing decision (Decision 32462) is "Delist from 303(d) list (being addressed by USEPA approved TMDL)" and does not require revision.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	specifically aimed at addressing nitrogen in the Upper Santa Clara River. Decision ID 32462 states that the decision to delist from 303(d) list was previously approved by the State Water Resources Control Board and the USEPA.		
6.10	Chloride should be revised to "Being Addressed by Completed TMDL" or "Delist from 303(d) list." The Santa Clara River chloride TMDL was approved by the USEPA on April 28, 2005. The site-specific water quality objective for Santa Clara River Reach 5 is 100 mg/L. The primary source of chloride was determined to be potable water derived from a blend of the State Water Project and local groundwater. Santa Clarita Valley residents have relinquished over 8,200 salt-based water softeners that had previously contributed to excessive chloride levels found in the Santa Clara River. The Los Angeles County Sanitation Districts has proposed to install reverse-osmosis technology at their Valencia Water Reclamation Plant and Saugus Water Reclamation Plant, as part of an overall chloride reduction plan.	Decision 32397 is a “carryover” decision. No new data was assessed or LOE created, so the listing remains what it was on the last 303(d) list. The listing decision is "List on 303(d) list (being addressed by USEPA approved TMDL)" as the waterbody pollutant combination is currently being addressed by the Upper Santa Clara River Chloride TMDL. The listing decision does not require revision.	
6.11	For chlorpyrifos, Decision ID 33024 states samples were collected from August 2002 through April 2003. It should be noted that USEPA phased out all residential use of chlorpyrifos products since 2004. Since the samples were taken prior to being phased out and no further positive results are presented, this information is no longer relevant. Due to the long term implementation efforts contained in the EWMP, this pollutant should be changed to “Being Addressed by Action Other Than a TMDL.”	Decision 33024 was made based on LOE 2134, where 10 of 39 samples were found to exceed the evaluation guidelines. While USEPA phased out all residential use of chlorpyrifos products since 2004 and the data used in LOE 2134 were collected from August 2002 to April 2003, there is no new evidence/data in CalWQA to support a delisting decision. Therefore, the listing decision remains as "Do Not Delist". See, also, response to comment 6.1.	
6.12	Copper was modeled for and will be addressed by the implementation of the EWMP for the Upper Santa Clara River. Copper should be revised to “Being Addressed by Action Other Than a TMDL.”	See response to comment 6.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
6.13	Decision ID 44805 states samples for diazinon were collected from August 2002 through April 2003. It should be noted that USEP A phased out all residential use of diazinon products since 2004. Only data generated from after the ban should be considered. For a sample size of 28-36, Table 4.1 of the State's Listing Policy recommends delisting a previously listed pollutant if the numbers of exceedances are less than two. Since no other samples show an exceedance, diazinon should be delisted. In addition, due to the implementation of the EWMP, this pollutant could also be changed to "Being Addressed by Action Other Than a TMDL."	Decision 44805 was made based on LOE 2135, where 28 of 29 samples were found to exceed the evaluation guideline. While USEPA phased out all residential use of diazinon products since 2004 and the data used in LOE 2135 were collected from August 2002 to April 2003, there is no new evidence/data indicating that the waterbody is not impaired by diazinon. Therefore, the listing decision should remain as "Do Not Delist". See, also, response to comment 6.1.	
6.14	Iron is abundant in the natural soils in the Santa Clarita Valley. In addition, iron was modeled for and will be addressed by the implementation of the EWMP for the Upper Santa Clara River. Iron should be revised to "Being Addressed by Action Other Than a TMDL."	Regional board staff reassessed the LOEs associated with this decision. The listing decision has been changed to "Delist from 303(d) list".	
6.15	According to the National Weather Service, ambient air temperature for Santa Clarita during the summer months regularly exceeds 100 degrees Fahrenheit due to a semi-arid climate. The Santa Clara River is an ephemeral stream with water flow quickly subsiding into the natural sandy, soft- bottom riverbed. It is noted that all samples registering over 80 degrees Fahrenheit occurred between the months of May and August. It is reasonable that hot and dry air temperatures correlate to warmer water temperatures in shallow, sandy soils. Receiving waters in the Santa Clara River registering above 80 degrees Fahrenheit are the result of natural, ambient conditions and should not be considered as a result of storm drain or treatment discharge.	See response to comment 17.4.	
6.16	In Line of Evidence 88683, it is noted that toxicity data was not reported with a control, and therefore anything reported as < 100% (chronic) or < 100% survival	Decision 33550 is supported by two LOEs. 4 of 4 samples were in exceedance in LOE 2137 and 4 of	LOE 88683 has been revised to show zero exceedances.

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	(acute) was considered an exceedance. In addition, toxicity was modeled for and will be addressed by the implementation of the EWMP for the Upper Santa Clara River. Toxicity should be revised to "Being Addressed by Action Other Than a TMDL."	40 samples were in exceedance in LOE 88683. Even though there was lack of control data for LOE 88683, the original listing decision was justified by LOE 2137 and there is no new evidence/data supporting a delisting decision. Therefore, the listing decision will remain as "Do Not Delist". A review of LOE 88683 is in process at this time. For a more detailed discussion of toxicity, see response to comment 26.7. See, also, response to comment 6.1.	
7.	Farm Bureau of Ventura County (FBVC), March 29, 2017		
7.1	Approximately 98 of the new 303(d) listings being proposed by the Los Angeles Regional Water Quality Control Board (Regional Board) are in Ventura County, and many are apparently driven by data collected through VCAILG's Conditional Waiver monitoring program. We have reviewed these proposed listings, and found numerous factual and legal errors that must be corrected. In some cases, the errors or ambiguities in the proposed listings are such that we and our technical consultants found it impossible to properly analyze them.	See response to comment 7.4 -7.102 for specific responses.	
7.2	The development and implementation of TMDLs represents a significant investment of our members' resources, and compliance imposes a significant burden on agricultural operators, so it is critical that the 303(d) list be based on sound science and methodologies. We therefore ask that the issues identified in this letter be addressed, and that the proposed 303(d) list be revised and released for another 60-day comment period before adoption.	The Los Angeles Water Board recognizes the significant implications of the 303(d) list and TMDLs. The 303(d) list is based on sound science and readily available data. However, as the Los Angeles Water Board determines its priorities for TMDL development or other regulatory programs, it will not depend	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		exclusively on the 303(d) list or the data contained therein (currently only through 2010). See response to comment 32.1 for additional discussion of additional comment periods.	
7.3	The requested modifications fall into four general categories: 1. New Category 4 and 5 listings that should not be listed due to incorrect thresholds being applied for the beneficial use and incorrect interpretation of the data (e.g. mismatched units, incorrectly assigned sample locations). This comment category also addresses the issue of agricultural drains and ditches — which are not legally recognized as waterbodies — being inappropriately included in the listings. 2. Potential delistings that may be justified if all watershed data were evaluated (e.g. TMDL monitoring program and all wastewater treatment plant NPDES monitoring). 3. New Category 5A listings that should be categorized as Category 5B because TMDLs already exist to address the pollutants. 4. Errors in the listing information that make it difficult to fully evaluate the listings. Examples include inconsistencies between the Category 5 list (Appendix B) and the Proposed updates to the 303(d) list (Appendix A), incorrect HUC/Calwater designations, incorrect beneficial uses listed for the applicable water quality objectives, and inconsistent use of thresholds for interpreting narrative objectives.	See response to comment 7.4 -7.102 for specific responses. Los Angeles Water Board staff will make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval later this year, or during the next Listing Cycle that includes the Los Angeles Region.	
7.4	The remaining sections of this letter provide the detailed list of requested changes to the 303(d) list and the rationale for the requests. In summary, FBVC requests that all waterbody pollutant combinations in Table 1 not be listed on the 303(d) list, that waterbody pollutant combinations in Table 3 and Table 4 be designated as being addressed by a TMDL if they remain on the 303(d) list after the	See response to comment 7.4 -7.102 for specific responses.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	reassessment, and the errors and inconsistencies identified in Comment IV be addressed for all waterbodies. Furthermore, FBVC supports the 303(d) list comment letter submitted by the Stakeholders Implementing TMDLs in the Calleguas Creek Watershed.		
7.5	**I. REQUESTED MODIFICATIONS TO THE LISTING STATUS** Based on a review of the proposed Category 4 and 5 waterbody pollutant combinations, FBVC has identified a number of waterbodies that we feel should either be delisted based on available data, or which should not be listed based on errors in the evaluation. The requested modifications are shown in Table 1, below, with a summary of the justifications for the requested change. A detailed discussion of each of the justifications follows the table. **Table 1. Waterbody-pollutant combinations that should not be listed** Waterbody segment: **Boulder Creek (Ventura County)** Pollutant: Chlordane Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • J-flagged data incorrectly used in assessment (WARM).	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83044 will be retired. Los Angeles Water Board staff's intention will be to make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval later this year or prior to the next Listing Cycle that includes the Los Angeles Region. J-flagged data was incorrectly used in the original assessment. LOE 83043 will be modified. Decision 60531 will be changed to "Do Not List" due to insufficient information. Los Angeles Water Board staff's intention will be to enter the data, as appropriate, into the CalWQA database and make the listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval later this year or prior to the next Listing Cycle that includes the Los Angeles Region.	Nearly all the LOEs and decisions depending on a P*MUN beneficial use have been reassessed. The majority of these P*MUN LOEs were retired and their associated decisions were either modified or retired as well. In cases where the P*MUN LOE was the only LOE that supported a decision, an alternative beneficial use was assigned to the LOE, which was then re-evaluated and modified based on the water quality objective associated with the alternative beneficial use. There are about 60 remaining P*MUN LOEs that need to be reassessed, which will be either retired or re-evaluated based on a alternative beneficial use during the State Water Board's public comment period. LOE 83043 has been revised and Decision 60531 has been changed to "do not list."
7.6	**Boulder Creek (Ventura County)** Pollutant: Nitrogen, Nitrate	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN	LOE 83048 and Decision 60506 have been retired and Boulder Creek is no longer recommended for

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	Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	beneficial use designation. LOE 83048 and Decision 60506 will be retired. Los Angeles Water Board staff's intention will be to make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval or prior to the next Listing Cycle that includes the Los Angeles Region.	a Nitrogen, Nitrate listing.
7.7	**Boulder Creek (Ventura County)** Pollutant: Specific Conductivity Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83138 and Decision 60539 will be retired. Los Angeles Water Board staff's intention will be to make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval or prior to the next Listing Cycle that includes the Los Angeles Region.	LOE 83138 and Decision 60539 have been retired and Boulder Creek is no longer recommended for a Specific Conductivity listing.
7.8	**Boulder Creek (Ventura County)** Pollutant: Toxicity Justification: • Listed based on toxicity observed during a single sampling event (6/4/07). According to the Listing Policy, a larger number of samples is required to justify this listing.	Because the data collected are temporally independent, it is appropriate to assess the data as individual samples even though they were collected at the same site. However, a review of the decision is in process at this time in order to confirm the number of toxicity tests completed.	The LOE and decision will be reassessed during the State Board public comment period.
7.9	Waterbody segment: **McGrath Lake Agricultural Drain** Pollutant: Bifenthrin	The decision for this waterbody-pollutant combination has been changed to "do not list,"	

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	Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	due to insufficient information at this time to determine whether the McGrath Lake Agricultural Drain should be included in the region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act. Once such a determination is made by the Los Angeles Water Board, necessary changes, if any, will be transmitted to the State Water Board, so that the GIS mapping component of CalWQA can be updated. Additionally, the Los Angeles Water Board will re-evaluate the LOE(s), as appropriate.	
7.10	**McGrath Lake Agricultural Drain** Pollutant: Chlordane Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • This pollutant is already covered by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL.	See response to comment 7.9. This notwithstanding, as noted by the commenter, should McGrath Lake Agricultural Drain be included in the region's water quality assessment, chlordane would be categorized as 5B, which recognizes that it is being addressed by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL.	
7.11	**McGrath Lake Agricultural Drain** Pollutant: Chlorpyrifos Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.9.	
7.12	**McGrath Lake Agricultural Drain** Pollutant: DDT Justification:	See response to comment 7.9. This notwithstanding, as noted by the commenter,	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Data from agricultural drain rather than waterbody used as basis for listing decision. • This pollutant is already covered by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL.	should McGrath Lake Agricultural Drain be included in the region's water quality assessment, DDT would be categorized as 5B, which recognizes that it is being addressed by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL.	
7.13	**McGrath Lake Agricultural Drain** Pollutant: Toxaphene Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • This pollutant is already covered by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL.	See response to comment 7.9. This notwithstanding, note that toxaphene as an individual pollutant was not addressed by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL.	
7.14	Waterbody segment: **Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	The decisions for Calleguas Creek Reach 2 have been revised to not use the data from the Ventura County Agriculture Irrigated Lands Group (VCAILG) monitoring site at Broome Ranch Road (02D_BROOM). This site is not located in Calleguas Creek Reach 2. If the Los Angeles Water Board determines that this monitoring site should be included in the region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act, staff will work with the State Water Board to modify the GIS mapping component of CalWQA and re-evaluate the LOE(s). Additionally, the Los Angeles Water Board will not assess any water body or pollutant on the basis	LOE 83361 has been modified and does not reference a MUN use.

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		of a P* MUN beneficial use designation. LOE 83361 will be modified. These changes are in process at this time.	
7.15	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.14. Additionally, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83362 will be modified. These changes are in process at this time.	The Calleguas Creek Reach 2 listing decisions have been modified and do not reference a MUN use.
7.16	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Dimethoate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.14. Additionally, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. The LOE will be modified. These changes are in process at this time.	Dimethoate LOEs are now evaluated for protection of the Warm Freshwater Habitat and Cold Freshwater Habitat Beneficial Uses.
7.17	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Nitrogen, Nitrate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.14. Additionally, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83204 and Decision 61025 will be retired. These changes are in process at this time.	LOE 83204 and Decision 61025 have been retired and the waterbody is no longer recommended for a Nitrogen, Nitrate listing.
7.18	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Specific Conductivity Justification:	See response to comment 7.14. Additionally, the Los Angeles Water Board will	LOE 83257 and Decision 61028 have been retired and the waterbody is no longer recommended for a Specific Conductivity listing.

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	• Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83257 and Decision 61028 will be retired. These changes are in process at this time.	
7.19	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Total Dissolved Solids Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • Salts criteria do not apply below Potrero Rd.	See response to comment 7.14. Additionally, there is no water quality objective applied to this waterbody segment, since this reach is tidally influenced. LOE 83270 and Decision 61035 will be retired. These changes are in process at this time.	LOE 83270 and Decision 61035 have been revised to no longer refer to the MUN beneficial use.
7.20	Waterbody segment: **Calleguas Creek Reach 3 (Potrero Road upstream to Conejo Creek confluence)** Pollutant: Mercury Justification: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	Data did not exceed the objectives. LOE 83210 will be modified. Decision 61085 will be changed to "Do Not List". These changes are in process at this time.	LOE 83210 has been modified. Decision 61085 has been changed to "Do Not List".
7.21	Waterbody segment: **Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Ammonia Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • TMDL data demonstrates delisting possible.	The decisions for Calleguas Creek Reach 4 have been revised to not use the data from the VCAILG monitoring sites at Etting Road (04D_ETTG) and S. Las Posas Road (04D_LAS). These sites are not located in Calleguas Creek Reach 4. If the Los Angeles Water Board determines that these monitoring sites should be included in the region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act, staff will work with the State Water Board to modify	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		the GIS mapping component of CalWQA and re-evaluate the LOE(s). For a discussion of readily available data see response to comment 32.3	
7.22	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Bifenthrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.21.	
7.23	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Chloride Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.21. Additionally, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83171 will be retired. These changes are in process at this time.	LOE 83171 has been retired.
7.24	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Cyfluthrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.21.	
7.25	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Cypermethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.21.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
7.26	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Malathion Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.21.	
7.27	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Mercury Justification: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	Data did not exceed the objectives. LOE 83434 will be modified. Decision 61211 will be changed to "Do Not List". These changes are in process at this time.	LOE 83434 has been modified. Decision 61211 has been changed to "Do Not List".
7.28	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Nitrogen, Nitrate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.21. Additionally, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83450 and Decision 61212 will be retired. These changes are in process at this time.	LOE 83450 and Decision 61212 have been retired.
7.29	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Permethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • This pollutant is already covered by the Calleguas Toxicity TMDL.	See response to comment 7.21. Permethrin is not addressed in the Calleguas Creek Toxicity TMDL.	
7.30	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Specific Conductivity Justification:	See response to comment 7.21. The Los Angeles Water Board will not assess any	LOE 83410 and Decision 61214 have been retired.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83410 and Decision 61214 will be retired. These changes are in process at this time.	
7.31	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Sulfate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.21. The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83411 will be retired. Decision 42845 will be changed to "Do Not List" due to insufficient information. These changes are in process at this time.	LOE 83411 has been retired. Decision 42845 has been changed to "Do Not List" due to insufficient information.
7.32	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Total Dissolved Solids Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.21. The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 83416 will be retired. Decision 42771 will be changed to "Do Not List" due to insufficient information. These changes are in process at this time.	LOE 83416 has been retired. Decision 42771 has been changed to "delist" due to insufficient information. Because the previous listing cycle decision was “delist” the decision remains “delist.”
7.33	Waterbody segment: **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Chlorpyrifos Justification: • Data does not appear to be from a station in Reach 12.	A review of the Calleguas Creek Reach 12 decisions are in process at this time. This requested change may require a change to the CalWQA underlying map, which is maintained by State Board. It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues where they exist, and reassess the LOEs and decisions for these reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or prior to the next Listing	The Chlorpyrifos LOE was moved to Calleguas Creek Reach 10. The decision for Calleguas Creek Reach 10/chlorpyrifos has been updated to “do not delist.” Calleguas Creek Reach 12 is no longer recommended for a Chlorpyrifos listing.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		Cycle that includes the Los Angeles Region.	
7.34	**Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Diazinon Justification: • Data does not appear to be from a station in Reach 12.	See response to comment 7.33.	The diazinon LOE was moved to Calleguas Creek Reach 10. The decision for Calleguas Creek Reach 10/diazinon has been updated to "do not delist." Calleguas Creek Reach 12 is no longer recommended for a diazinon listing.
7.35	**Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Malathion Justification: • Data does not appear to be from a station in Reach 12.	See response to comment 7.33.	The Malathion LOE was moved to Calleguas Creek Reach 10. The decision for Calleguas Creek Reach 10/ Malathion has been updated to "list." Calleguas Creek Reach 12 is no longer recommended for a Malathion listing.
7.36	**Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Temperature, water Justification: • Inappropriately applied beneficial use criteria (see temperature comment below)	LOE 83538 was based on the correct criteria/objective, which states "For waters designated WARM, water temperature shall not be altered by more than 5 deg. F above the natural temperature. At no time shall these WARM-designated waters be raised above 80 deg. F as a result of waste discharges." The decision (#61523) does not require revision. See, also, response to comment 17.4.	See response to comment 29.58.
7.37	Waterbody segment: **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Nitrogen, Nitrate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not	Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2 are tributaries to Mugu Lagoon; therefore, they will be assessed for the same beneficial uses and objectives as the downstream Mugu Lagoon.	The Nitrogen, Nitrate decision, 62626, has been retired.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	applicable to waterbody.	The MUN beneficial use does not apply and a review of the decision is in process at this time.	
7.38	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Nitrogen Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.37.	Nitrogen was listed prior to 2006 and is being addressed by the Calleguas Creek Nitrogen TMDL.
7.39	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Sulfate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.37.	The Sulfate decision has been retired.
7.40	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Specific Conductivity Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.37.	The Specific Conductivity decision has been retired.
7.41	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Total Dissolved Solids Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.37.	The Total Dissolved Solids decision has been retired.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
7.42	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Toxaphene Justification: • J-flagged data incorrectly used in assessment.	J-flagged data was incorrectly used in the assessment. LOE 84178, LOE 84179 and LOE 84180, which include J-flagged data will be modified. Additionally, see response to comment 7.37. A review of the decision is in process at this time. Decision 33913, however, will remain as "Do Not Delist from 303(d) list (being addressed with USEPA approved TMDL)" as LOE 2030, which was established in 2006, supports the listing decision.	LOEs will be reassessed during the State Board public comment period.
7.43	Waterbody segment: **Ellsworth Barranca** Pollutant: DDE Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • J-flagged data incorrectly used in assessment.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. The "Beneficial Use Assessed" will be changed to "Warm Freshwater Habitat" and the evaluation guideline for Freshwater Aquatic Life Protection Continuous Concentration of 0.001 ug/L will be used. LOE 84304 will be modified. These changes are in process at this time. Additionally, staff is reviewing the data to ensure that J-flagged data were not incorrectly used in the original assessment.	LOEs will be reassessed during the State Board public comment period.
7.44	Waterbody segment: **Fox Barranca** Pollutant: DDE Justification: • Incorrectly listed using guideline for MUN beneficial use that is not	A review of the decision is in process at this time. The "Beneficial Use Assessed" will be changed to "Warm Freshwater Habitat" and the evaluation guideline for Freshwater Aquatic Life Protection	LOEs will be reassessed during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	applicable to waterbody.	Continuous Concentration of 0.001 ug/L will be used. LOE 84487 will be modified.	
7.45	Waterbody segment: **Honda Barranca** Pollutant: DDD Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	A review of the decision is in process at this time. The "Beneficial Use Assessed" will be changed to "Warm Freshwater Habitat" and the evaluation guideline for Freshwater Aquatic Life Protection Continuous Concentration of 0.001 ug/L will be used. LOE84752 will be modified.	The LOE has been revised. The DDD(p,p) criterion for the protection of human health from the fish consumption component of the water contact recreation (REC-1) use is 0.00084 ug/L and the listing decision recommended for Honda Barranca/DDD is "list."
7.46	**Honda Barranca** Pollutant: DDE Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	A review of the decision is in process at this time. The "Beneficial Use Assessed" will be changed to "Warm Freshwater Habitat" and the evaluation guideline for Freshwater Aquatic Life Protection Continuous Concentration of 0.001 ug/L will be used. LOE 84758 will be modified.	The Honda Barranca listing decisions have been modified and do not reference a MUN use.
7.47	Waterbody segment: **Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Nitrogen, Nitrate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	A review of the decision is in process at this time. Rio De Santa Clara/Oxnard Drain No. 3 is tributary to Mugu Lagoon and the MUN beneficial use does not apply. It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues and reassess the LOEs and decisions for these reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or prior to the next Listing Cycle that includes the Los Angeles Region.	The Nitrogen, Nitrate decision has been retired.
7.48	**Rio De Santa Clara/Oxnard Drain No. 3**	See response to comment 7.47.	Nitrogen was listed prior to 2006 and is being

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Pollutant: Nitrogen Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.		addressed by the Calleguas Creek Nitrogen TMDL.
7.49	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Sulfate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	A review of the decision is in process at this time. Rio De Santa Clara/Oxnard Drain No. 3 is tributary to Mugu Lagoon and the MUN beneficial use does not apply.	The Sulfate decision has been retired.
7.50	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Specific Conductivity Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	A review of the decision is in process at this time. Rio De Santa Clara/Oxnard Drain No. 3 is tributary to Mugu Lagoon and the MUN beneficial use does not apply.	The Specific Conductivity decision has been retired.
7.51	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Total Dissolved Solids Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	A review of the decision is in process at this time. Rio De Santa Clara/Oxnard Drain No. 3 is tributary to Mugu Lagoon and the MUN beneficial use does not apply..	The Total Dissolved Solids decision has been retired.
7.52	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Toxicity Justification: • Insufficient exceedances to warrant listing.	The “DO NOT DELIST” decision was based on LOE 4382, which is a ‘placeholder’ LOE to support a 303(d) listing decision made prior to 2006. There is insufficient information to support	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		a delisting decision.	
7.53	Waterbody segment: **La Vista Drain (Ventura County)** Pollutant: Chlordane Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • J-flagged data incorrectly used in assessment.	The decision for this waterbody-pollutant combination has been changed to "do not list," due to insufficient information at this time to determine whether the La Vista Drain should be included in the region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act. Once such a determination is made by the Los Angeles Water Board, necessary changes, if any, will be transmitted to the State Water Board, so that the GIS mapping component of CalWQA can be updated. Additionally, the Los Angeles Water Board will re-evaluate the LOE(s), as appropriate. This notwithstanding, as noted by the commenter, should La Vista Drain (Ventura County) be included in the region's water quality assessment, the LOE would be reassessed to remove J-flagged data.	
7.54	**La Vista Drain (Ventura County)** Pollutant: Chlorpyrifos Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.53.	
7.55	**La Vista Drain (Ventura County)**	See response to comment 7.53.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Pollutant: Copper Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.		
7.56	**La Vista Drain (Ventura County)** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.53. This notwithstanding, as noted by the commenter, should La Vista Drain (Ventura County) be included in the region's water quality assessment, the LOE would be reassessed to not reference the MUN beneficial use.	
7.57	**La Vista Drain (Ventura County)** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.53. This notwithstanding, as noted by the commenter, should La Vista Drain (Ventura County) be included in the region's water quality assessment, the LOE would be reassessed to not reference the MUN beneficial use.	
7.58	**La Vista Drain (Ventura County)** Pollutant: DDT Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.53.	

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7.59	**La Vista Drain (Ventura County)** Pollutant: Indicator Bacteria Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.53.	
7.60	**La Vista Drain (Ventura County)** Pollutant: Mercury Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	See response to comment 7.53. This notwithstanding, should La Vista Drain (Ventura County) be included in the region's water quality assessment, the LOE 85332 would be modified.	
7.61	Waterbody segment: **Santa Clara Drain** Pollutant: Chlordane Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	The decision for this waterbody-pollutant combination has been changed to "do not list," due to insufficient information at this time to determine whether the Santa Clara Drain should be included in the region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act. Once such a determination is made by the Los Angeles Water Board, necessary changes, if any, will be transmitted to the State Water Board, so that the GIS mapping component of CalWQA can be updated. Additionally, the Los Angeles Water Board will re-evaluate the LOE(s), as appropriate.	
7.62	**Santa Clara Drain** Pollutant: Chlorpyrifos	See response to comment 7.61.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.		
7.63	**Santa Clara Drain** Pollutant: Cypermethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.61.	
7.64	**Santa Clara Drain** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates.	See response to comment 7.61. This notwithstanding, should Santa Clara Drain be included in the region's water quality assessment, the LOE would be reassessed to not reference the COMM beneficial use. Santa Clara Drain drains to Calleguas Creek Reach 4 and COMM is not a beneficial use for Calleguas Creek Reach 4. Beneficial Use Assessed would be changed to "Warm Freshwater Habitat" for LOE 88067.	
7.65	**Santa Clara Drain** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates.	See response to comment 7.61 and 7.64.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
7.66	**Santa Clara Drain** Pollutant: DDT Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates.	See response to comment 7.61 and 7.64.	
7.67	**Santa Clara Drain** Pollutant: Nitrogen, Nitrate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.61. This notwithstanding, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. Should Santa Clara Drain be included in the region's water quality assessment, the LOE would be reassessed to not reference the MUN beneficial use.	
7.68	**Santa Clara Drain** Pollutant: Specific Conductivity Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.61. This notwithstanding, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. Should Santa Clara Drain be included in the region's water quality assessment, the LOE would be reassessed to not reference the MUN beneficial use.	
7.69	**Santa Clara Drain** Pollutant: Sulfate Justification:	See response to comment 7.61.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Data from agricultural drain rather than waterbody used as basis for listing decision.		
7.70	**Santa Clara Drain** Pollutant: Total Dissolved Solids Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.61. This notwithstanding, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. Should Santa Clara Drain be included in the region's water quality assessment, the LOE would be reassessed to not reference the MUN beneficial use.	
7.71	**Santa Clara Drain** Pollutant: Toxaphene Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.61.	
7.72	Waterbody segment: **Santa Clara River Reach 3** Pollutant: Chlordane Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	The decisions for Santa Clara River Reach 3 have been revised to not use the data from the Ventura County Agriculture Irrigated Lands Group (VCAILG) monitoring site S03D_BARDS or from the Ventura County Stormwater Monitoring Program site, 11th Street Drain. These sites are not located in Santa Clara River Reach 3. If the Los Angeles Water Board determines that these monitoring sites should be included in the region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act, staff will work with the State Water Board to modify	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		the GIS mapping component of CalWQA and re-evaluate the LOE(s).	
7.73	**Santa Clara River Reach 3** Pollutant: Chlorpyrifos Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.72.	
7.74	**Santa Clara River Reach 3** Pollutant: Cyfluthrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Criterion listed is for 2,4,5-TP, not cyfluthrin.	See response to comment 7.72. This notwithstanding, should a waterbody including the monitoring sites be included in the region's water quality assessment, LOE 88712 will be modified to reflect the correct evaluation guideline - "UC Davis Aquatic Life Criteria: Aquatic life should not be affected unacceptably if the 4-day average concentration of cyfluthrin does not exceed 0.00005 ug/L and if the 1-h average concentration does not exceed 0.0003 ug/L. For this assessment, the 4-day average concentration was used. Mixtures of cyfluthrin and other pyrethroids should be considered in an additive manner. (Fojut et al. 2012) ". These changes are in process at this time.	
7.75	**Santa Clara River Reach 3** Pollutant: Cypermethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.72.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
7.76	**Santa Clara River Reach 3** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.72. This notwithstanding, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. These changes are in process at this time.	
7.77	**Santa Clara River Reach 3** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.72. The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 88736 will be modified. These changes are in process at this time.	
7.78	**Santa Clara River Reach 3** Pollutant: DDT Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.72.	
7.79	**Santa Clara River Reach 3** Pollutant: Mercury Justification: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	See response to comment 7.72. This notwithstanding, the data did not exceed the objectives. LOE 88761 will be modified. These changes are in process at this time.	LOEs will be reassessed during the State Board public comment period.

Revised Response to Comments on the Draft 2016 303(d) List
Comment Deadline: March 30, 2017

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
7.80	Waterbody segment: **Tapo Canyon** Pollutant: Chlordane Justification: • Includes LOE for toxicity to support the chlordane listing. This LOE should be removed since there is a separate LOE specifically for toxicity.	Toxicity LOE 89343 will be removed from Decision 64350. The listing decision for Decision 64350, however, will not be affected and will remain the same. These changes are in process at this time.	Toxicity LOE 89343 has been removed from Decision 64350. The listing decision remains "list."
7.81	**Tapo Canyon** Pollutant: DDD Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • Includes LOE for toxicity to support the DDD listing. This LOE should be removed since there is a separate LOE specifically for toxicity.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. In LOE 89233, the "Beneficial Use Assessed" will be changed to "Warm Freshwater Habitat" and the evaluation guideline for Freshwater Aquatic Life Protection Continuous Concentration of 0.001 ug/L will be used. Decision 64445 however, will not be affected and will remain the same. Additionally, the Toxicity LOE 89343 will be removed from Decision 64445, since it is already associated with Decision 64544 for Toxicity. The listing decision for Decision 64445, however, will not be affected and will remain the same. These changes are in process at this time.	The LOE has been revised. The DDD(p,p) criterion for the protection of human health from the fish consumption component of the water contact recreation (REC-1) use is 0.00084 ug/L and the listing decision recommended for Tapo Canyon/DDD is "list." The Toxicity LOE has been removed from the decision.
7.82	**Tapo Canyon** Pollutant: DDE Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. In LOE 89247, the "Beneficial Use Assessed" will be changed to "Warm Freshwater Habitat" and the evaluation	LOEs will be reassessed during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Includes LOE for toxicity to support the DDE listing. This LOE should be removed since there is a separate LOE specifically for toxicity.	guideline for Freshwater Aquatic Life Protection Continuous Concentration of 0.001 ug/L will be used. LOE 89247 will be modified. Decision 64446 however, will not be affected and will remain the same. Additionally, the Toxicity LOE 89343 will be removed from Decision 64446, since it is already associated with Decision 64544 for Toxicity. The listing decision for Decision 64446, however, will not be affected and will remain the same. These changes are in process at this time.	
7.83	**Tapo Canyon** Pollutant: Nitrogen, Nitrate Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 89235 and Decision 67273 will be retired. These changes are in process at this time.	LOE 89235 and Decision 67273 have been retired.
7.84	**Tapo Canyon** Pollutant: Specific Conductivity Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 88296 and Decision 64538 will be retired. These changes are in process at this time.	LOE 89296 and Decision 64538 have been retired.
7.85	Waterbody segment: **Wheeler Canyon/Todd Barranca** Pollutant: Chlordane Justification: • J-flagged data incorrectly used in assessment.	The LOEs for this waterbody pollutant combination will be modified to remove J-flagged data. However, chlordane data is a sum of cis- and trans- chlordane, cis- and trans- nonachlor,	LOEs will be reassessed during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Includes LOE for toxicity to support the chlordane listing. This LOE should be removed since there is a separate LOE specifically for toxicity.	and oxychlordane. Disregarding the j-flagged data, the remaining valid data still show chlordane having 2 of 2 exceedances for the beneficial use of Commercial or Recreational Collection of Fish, Shellfish or Organisms. This meets the requirements for listing. The listing decision for Decision 63509, therefore will remain the same. Toxicity LOE 90290 will be removed from Decision 63509. The listing decision for Decision 63509, however, will not be affected and will remain the same. These changes are in process at this time.	
7.86	**Wheeler Canyon/Todd Barranca** Pollutant: Specific Conductivity Justification: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	The Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. LOE 90237 and Decision 63585 will be retired. These changes are in process at this time.	The Specific Conductivity decision has been retired.
7.87	Waterbody segment: **Ventura River Reach 3** Pollutant: Mercury Justification: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	Data did not exceed the objectives. LOE 89901 will be modified. Decision 63958 will be changed to "Do Not List". Use rating will be changed to "Fully Supporting". These changes are in process at this time.	LOE 89901 has been modified. Decision 63958 has been changed to "Do Not List".
7.88	**1. *Agricultural Drain monitoring data incorrectly used as basis for listing***	See response to comments 7.9, 7.14, 7.21, 7.53,	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	***decisions*.** There are multiple instances where VCAILG monitoring data from agricultural drains that discharge to waterbody reaches were used to list these waterbody reaches. The drains are not listed tributaries or waterbodies in the Basin Plan and are not located within the waterbody that is being listed. As a result, the data should not be used for the listing decisions for these waterbodies. Calleguas Creek Reach 2 and Reach 4 were listed using data from the VCAILG monitoring sites 02D_BROOM (Reach 2) and 04D_ETTG and 04D_LAS (Reach 4), which are the locations of agricultural drains which drain to Reach 2 and 4. Santa Clara River Reach 3 was listed using data from the VCAILG sampling location S03D_BARDS, which is located on an agricultural drain that ultimately discharges into Santa Clara River Reach 3. These agricultural monitoring sites were selected to be representative of agricultural discharges to Calleguas Creek Reaches 2 and 4 and Santa Clara River Reach 3, and are not representative of receiving water conditions. Therefore, data collected from these sites cannot be used to list the downstream Calleguas Creek or Santa Clara River Reaches. All listings should be evaluated to ensure that the monitoring locations were in receiving waters rather than agricultural drains. In addition, La Vista Drain and Santa Clara Drain were listed as new waterbodies never before included in the previous 303(d) list, even though data has been collected on both agricultural drains by the MS4 program since the early 1990s. These waterbodies are not designated in the Basin Plan or listed as tributaries in the Basin plan appendices. The La Vista Drain is an agricultural drain designed to convey excess agricultural irrigation water from agricultural lands, and as such, it is predominantly an open ditch that flows alongside W. Los Angeles Avenue and then along Santa Clara Avenue where it becomes the Santa Clara Drain. Additionally, inclusion of the COMM beneficial use for the Santa Clara Drain is inappropriate, as public access is prohibited because of fencing and locked gates	7.61, and 7.72.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	maintained by the Ventura County Watershed Protection District. It is inappropriate to apply the MAR and EST beneficial uses to the Santa Clara Drain because the drain is located upstream of Highway 101 and is not tidally influenced. The monitoring location on each drain was selected to represent agricultural discharges for the Agricultural Waiver and was not designed to characterize receiving waters. Because these are agricultural drains and not tributaries, they should be removed from the Draft Category 5 list. McGrath Lake Agricultural Drain is also an agricultural drain comprised of a small open ditch that conveys water from surrounding agricultural lands. A monitoring site was selected on this drain for VCAILG Conditional Waiver monitoring to represent agricultural discharges and was not designed to characterize receiving waters. Moreover, discharges from this drain are already being addressed under the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL, which has identified this drain as the "Central Ditch" (the Monitoring Program for the Conditional Waiver also identifies this monitoring site as the Central Ditch). Implementation activities that reduce loadings of chlorinated pesticides and PCBs will also reduce loadings of toxaphene, bifenthrin and chlorpyrifos. For the foregoing reasons, McGrath Lake Agricultural Drain should be removed from the Draft Category 5 list. **Requested Action:** **• Remove all listings shown in Table 1 that were based on VCAILG Conditional Waiver monitoring data from agricultural drains not representative of the listed waterbody, and evaluate remaining listings to ensure no other listings are based on agricultural drain monitoring rather than receiving water monitoring.** **• Remove La Vista Drain and Santa Clara drain from the list as they are agricultural drains and not waterbodies that fall under the jurisdiction of the 303(d) list.** **• Remove the McGrath Lake Agricultural Drain because it is not a waterbody**		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	that falls under the jurisdiction of the 303(d) list, and because there is an effective TMDL that addresses discharges from this agricultural drain ("Central Ditch") to McGrath Lake.		
7.89	2. ***Remove any pollutant listing based on municipal drinking water objectives where the MUN beneficial use does not apply***. Numerous listings were based on water quality objectives for the protection of municipal drinking water for waterbodies that do not have applicable municipal drinking water beneficial uses. Many of the waterbodies listed are brackish waterbodies for which no beneficial uses are designated, or waterbodies designated for the municipal beneficial use with an asterisk (i.e., P*) in the Basin Plan. The asterisked MUN beneficial use should not be used to propose new 303(d) listings. Fact sheets for previous 303(d) listing cycles have clearly noted that the asterisked MUN beneficial uses should not be used for 303(d) listing purposes. State Board Resolution No. 88-63 (Sources of Drinking Water) and Regional Board Resolution 89-03 Incorporation of Sources of Drinking Water Policy into the Water Quality Control Plans) state, "All surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic waters supply and should be so designated by Regional Boards… (with certain exceptions which must be adopted by the Regional Board)." The Regional Board adopted a Water Quality Control Plan for the Los Angeles Region (Basin Plan) on June 4, 1994, that included provisions to implement State Water Board Resolution 88-63. On May 26, 2000, the USEPA approved the revised Basin Plan, except for the implementation plan for potential MUN-designated water bodies. On August 22, 2000, the City of Los Angeles, City of Burbank, City of Simi Valley, and the County Sanitation Districts of Los Angeles County challenged USEPA's water	As stated in previous responses, the Los Angeles Water Board will not assess any water body or pollutant on the basis of a P* MUN beneficial use designation. See response to comments 7.5- 7.7, 7.14 - 7.19, 7.28, 7.30-7.32, 7.37-7.41, 7.43-7.51, 7.56, 7.57, 7.67, 7.68, 7.70, 7.76, 7.77, 7.81-7.84, and 7.86.	

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	quality standards action in the U.S. District Court. On December 18, 2001, the court issued an order remanding the matter to USEPA to take further action on the 1994 Basin Plan consistent with the court's decision. On February 15, 2002, USEPA revised its decision and approved the 1994 Basin Plan in whole. In its February 15, 2002 letter, USEPA stated: *"EPA bases its approval on the court's finding that the Regional Board's identification of waters with an asterisk ("*") in conjunction with the implementation language at page 2-4 of the 1994 Basin Plan, was intended "to only conditionally designate and not finally designate as MUN those water bodies identified by an ('*') for the MUN use in Table 2-1 of the Basin Plan, without further action." Court Order 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 quality standard subject to EPA review under section 303(c)(3) of the Clean Water Act ("CWA"). 33 U.S.C. § 1313(c)(3)."* In addition to the above decision, the Basin Plan states that until the additional study is undertaken and the Basin Plan is modified, "no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations". The Regional Board has also determined that water quality objectives applicable to the MUN beneficial use will not be used to assess impairments under the 303(d) listing programs. For constituents that only have objectives that are applicable to the MUN beneficial use, the decision fact sheets for the 303(d) listing process state that there are no applicable water quality objectives in waterbodies designated with an asterisk ("*"). In the 2010 listing cycle, a number of 303(d) listings were actually removed based on this determination. Below is an example of the language from a listing decision for Los Angeles River Reach 1:		

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	"The listing for aluminum in this water body was originally based on data assessed using the MCL for aluminum. Since MUN is a "potential" beneficial use, it is not appropriate to use the MCL to evaluate aluminum data from this reach. Thus, there is no aluminum objective for this reach and the original listing is faulty." Based on this evidence, it is clear that for waterbodies with a MUN designation that includes an asterisk ("*"), water quality objectives specific to the MUN beneficial use are not applicable. As such, water quality data collected in these receiving waters should not be compared to water quality objectives applicable to the MUN beneficial use. The listings of total dissolved solids, sulfates, and conductivity are all based on secondary maximum contaminant levels applied to protect the MUN beneficial use. In addition, Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 and Rio De Santa Clara/Oxnard Drain No. 3 are maintained as fresh/brackish water via tide gates on both drains and do not have designated MUN beneficial uses. Therefore, the listing of TDS, sulfate, and specific conductivity is inappropriate, as naturally occurring levels of these three constituents in groundwater entering both drains within the footprint of Naval Base Ventura County far exceed the secondary MCLs upon which these listings are based. USEPA validated this reasoning in its "TMDLs for Pesticides, PCBs and Sediment Toxicity for Oxnard Drain 3", where the MUN beneficial use was not considered to be "relevant to the impairments" addressed by the TMDL and so was not included in the TMDL. Additionally, Calleguas Creek Reach 2 and Reach 4 are considered brackish waterbodies according to the California Toxics Rule thresholds and are designated with an asterisked MUN beneficial use. Due to the brackish nature of these waterbodies, other Basin Plan objectives for TDS and sulfate are not considered to be applicable to Reach 2 or Reach 4 below Laguna Road. For all of these reasons, these proposed listings summarized in Table 1		

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	should be removed. The proposed Calleguas Creek Reach 2 dimethoate listing was based on three lines of evidence, which the Fact Sheet states all show no exceedances (this appears to be a typo). However, it appears that the only line of evidence that shows an exceedance is based on the potential (P*) MUN, which, as described above, cannot be used to justify a listing. Furthermore, the fact sheet cites a guideline from the California Department of Health Services Notification Levels (1 µg/L) which has not yet gone through the formal MCL regulatory process, and it is not clear that this threshold would meet the Listing Policy requirements. **Requested Action:** **• Revise all of the new listings in the fact sheets to ensure that none are based on municipal drinking water objectives when the MUN beneficial use does not apply.** **• Remove the segment-pollutant combinations for total dissolved solids, specific conductivity, sulfates, nitrogen, nitrate, dimethoate, and other MUN-based pollutants listed in Table 1 above from the 303(d) list.**		
7.90	**3. *Reassess mercury listings using correct objective and correct units*.** The data used to assess mercury for Calleguas Creek Reach 3, Reach 4, La Vista Drain, Santa Clara Reach 3, and Ventura River Reach 3 are in ng/L and the objective is in µg/L. The data have to be converted to the same units as the objective before an exceedance can be determined. Our consultants believe that after this calculation has been performed, the waterbodies will no longer meet the listing guidelines for mercury. Additionally, although a California Toxics Rule objective exists for mercury, an EPA nationally recommended criterion was used for the assessment. Regional Board staff should explain why they used a recommended criterion instead of an established water quality objective.	As indicated in previous responses, the corrections are in process at this time. . See response to comments 7.20, 7.27, 7.60, 7.79, and 7.87.	

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	Requested Action: **• Repeat the mercury analysis after correcting the units error.**		
7.91	**4. *Remove toxicity Lines of Evidence (LOE) from pollutant fact sheets when an LOE specifically for toxicity already exists.*** Numerous pollutants listed for Calleguas Creek Reach 3, Tapo Canyon and Wheeler Canyon/Todd Barranca include an LOE to support the pollutant listing, when a toxicity LOE already exists for the waterbody. These pollutant-specific toxicity LOEs include no scientific evidence that the specific pollutant was the cause of observed toxicity and so should be removed from the fact sheet. The toxicity LOE listed for the waterbody is sufficient as it is intended to identify the cause of observed toxicity through established and accepted methodologies.	As indicated in previous responses, Toxicity LOEs are being removed as LOEs from pollutant specific factsheets where a Decision for Toxicity already exists (and those LOEs are associated with that decision). See response to comments 7.80, 7.81, 7.82, and 7.85.	
7.92	**5. Incorrect location and data were used for listings in Reach 12.** The name of the monitoring site presented in the fact sheet for chlorpyrifos, diazinon and malathion listings in Calleguas Creek Reach 12 is unclear. The University site is in Reach 3, not 12, and TO1 is an MS4 discharge characterization site, not a receiving water monitoring location. Therefore, TO1 should not be used for a 303(d) listing decision, and University data are not from Reach 12. A review of the datasets provided in the link on the fact sheet only show data from University (ME-CC) and the number of samples appears to match up with the sample numbers shown in the fact sheet. As a result, it appears that the chlorpyrifos, diazinon and malathion listings do not apply to Reach 12. In addition, FBVC requests that only data collected after applicable pesticide-use restrictions were in place for these pesticides be considered in the listing decisions. Data from the Calleguas Creek TMDL watershed monitoring program that were not used in the assessment (see Comment II) demonstrate a marked reduction in these pesticides in receiving water since the use restrictions were implemented	See response to comments 7.33, 7.34, and 7.35. In addition, for a discussion of the readily available data assessed in this listing cycle see response to comment 32.3. The next listing cycle which includes the Los Angeles Region will assess more recent data and, should the information on pesticide use restrictions and the data support not considering data collected before a use restriction, a decision to assess only data collected after the use restriction may be appropriate.	

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	(approximately 2009 to present), particularly for receiving waters downstream of urban areas (e.g., Reach 12). Given the changed condition resulting from the pesticide-use restrictions, monitoring data collected prior to 2009 are not representative of current waterbody conditions for these constituents. Therefore, these constituents should not be listed unless data collected after the use restrictions were implemented demonstrates continued impairment. **Requested Action:** **• Remove listings for Reach 12 that are not based on receiving water data from that reach.** **• Remove listings for chlorpyrifos, diazinon, and malathion based on historic data that are not representative of conditions after implementation of pesticide-use restrictions.**		
7.93	**6. *Ensure no J-flagged data were used in the assessment*.** The listing policy specifically prohibits the use of J-flagged ("estimated") data that fall below the quantitation limit but above the water quality standard. Section 6.1.5.5 of the Listing Policy specifically states: "*When the sample value is less than the quantitation limit and the quantitation limit is greater than the water quality standard, objective, criterion, or evaluation guideline, the result shall not be used in the analysis. The quantitation limit includes the minimum level, practical quantitation level, or reporting limit*." All listings based on the use of J-flagged data should therefore be removed from the draft 303(d) list. Specific instances are included in Table 1 and further explained in Table 2 below, but this list is by no means inclusive; this significant error will have to be addressed by a thorough review of all listing data to confirm that no J-flagged data were used to justify listings.	For J-flagged data, see response to comments 7.5, and 7.42, 7.43, 7.53, and 7.85. For Boulder Creek, chlordane, see response to comment 7.5. For Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2, toxaphene, see response to comment 7.42. For La Vista Drain, chlordane, see response to comment 7.53. In regards to chlordane in the Rio de Santa Clara, chlordane data are a sum of cis- and trans-chlordane, cis- and trans- nonachlor, and oxychlordane. Disregarding the j-flagged data, the	In regards to chlordane in the Rio de Santa Clara, LOEs will be reassessed during the State Board public comment period.

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No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Table 2. Incorrect use of J-flagged data • Waterbody segment: **Boulder Creek (Ventura County)** Pollutant: Chlordane Comment: The LOE for Chlordane erroneously states that three out of five samples exceed the objectives. A review of the data shows that only 1 out of 5 samples exceed indicated criteria. The remaining 4 results were (1) not detected and (2) "estimated" (J-flagged) by the laboratory because results were below the reporting limit. Because only 1 sample showed an exceedance, this listing should be removed as it does not meet the binomial test limits set forth in the Listing Policy. • Waterbody segment: **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2** Pollutant: Toxaphene Comment: The Lines of Evidence (LOE) for Toxaphene lists the number of exceedances incorrectly at two. However, only one of six samples exceeded the indicated criterion. The other sample was reported by the laboratory as "estimated" (J-flagged). Because only one of six samples showed an exceedance, this listing should be removed as it does not meet the binomial test limits set forth in the Listing Policy. • Waterbody segment: **Rio de Santa Clara/Oxnard Drain No. 3** Pollutant: Chlordane Comment: The LOE for Chlordane erroneously states that four out of five samples exceed the objectives. A review of the data shows that only 3 out of 5 samples exceed indicated criteria. The remaining 2 results were (1) not detected and (2) "estimated" (J-flagged) by the laboratory because results were below the reporting limit. • Waterbody segment: **La Vista Drain** Pollutant: Chlordane	reaming valid data still shows Chlordane having 4 of 5 exceedances for the beneficial use of Commercial or Recreational Collection of Fish, Shellfish or Organisms. This meets the requirements for listing. The listing decision (Decision 33192), therefore, will remain the same. These changes are in process at this time.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Comment: The LOE for chlordane shows that one of the samples used to justify the listing is based solely on estimated (J-flagged) data because results were below the reporting limit. Because Chlordane has only one detected value for two sampling events, more monitoring data are needed to justify the listing and the proposed listing should be removed. Additionally, refer to comment 1 regarding the inappropriateness of this drain being a listed waterbody. **Requested Action:** **• Review all fact sheets and LOEs for the use of J-flagged data and remove any instances where J-flagged data were used.** **• Delist toxaphene for Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No. 2, chlordane for La Vista Drain (though we also disagree with the listing of this as a waterbody to begin with), and any other pollutants listed in Tables 1 and 2 that lack the minimum number of exceedances required to justify a listing.**		
7.94	**7. *Remove listings where a waterbody assessment does not meet listing thresholds based on data provided.*** Finally, the toxicity listing for Rio De Santa Clara/Oxnard Drain No. 3 does not meet the minimum requirements to be listed according to the Listing Policy (pg. 9). According to the Listing Policy, a waterbody can be listed only when the number of exceedances meets the binomial test; in the case of this waterbody, four samples were collected and only one sample showed an exceedance. However, two exceedances would be required for the waterbody to be added to the 303(d) list. Therefore, toxicity was incorrectly listed for this waterbody and should be removed entirely from the 303(d) list. **Requested Action:** **• Remove the toxicity listing for Rio De Santa Clara/Oxnard Drain No. 3, based on failure to meet listing threshold requirements in the Listing Policy.**	See response to comment 7.52.	

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7.95	**II. REQUESTED REASSESSMENTS USING COMPLETE DATA SET** As manager of the VCAILG program, FBVC is a stakeholder in the Calleguas Creek Watershed TMDL monitoring program and represents the agricultural responsible parties listed in the TMDLs. As such, FBVC supports the comments made by the Stakeholders Implementing TMDLs in the Calleguas Creek Watershed regarding the use of all appropriate monitoring data for the 303(d) listing process. The assessments for the Calleguas Creek watershed do not appear to include any of the submitted Calleguas Creek Watershed TMDL monitoring data, monitoring data from the Camarillo Sanitary District, or monitoring data from the Simi Valley Wastewater Treatment Plant. All of this monitoring data has been provided to the Regional Board in annual monitoring reports and all data were collected using approved QAPPs. As a result, there is no reason why this data should not be included in the 303(d) listing process. Please refer to the letter submitted by the Calleguas Creek Watershed Stakeholders for details regarding the waterbody/pollutant combinations eligible for delisting. While this comment is specific to knowledge regarding monitoring programs in the Calleguas Creek Watershed, it should be applied to the other watersheds in Ventura County. **Requested Action:** **• Reassess all Ventura County waterbodies using all available data.**	See response to comment 32.3.	
7.96	III. **REQUESTED CATEGORY ASSIGNMENT CHANGES** ***8. Correct pollutants listed as Category 5A that should be 5B based on coverage by an existing TMDL.*** There are number of proposed new listings for pollutants that are already covered	For the McGrath Lake Agricultural Drain toxaphene, see response to comment 7.13. For the La Vista Drain and Santa Clara Drain, see responses to comments 7.53- 7.71.	

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	by an existing TMDL and are incorrectly categorized as 5A. Although we contend that all of these listings should be removed entirely because of the issues detailed in Comment I, if they are not removed they should, at a minimum, be changed from 5A to 5B as applicable. Because discharges from the McGrath Lake Agricultural Drain (i.e., "Central Ditch") are already being addressed by the McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL (effective June 30, 2011), toxaphene should be changed from Category 5A to Category 5B. A Calleguas Creek nutrient TMDL addressing nitrogen has been in effect since 2003, including for Reach 9A where a new 5A listing for nitrite is proposed. In 2006, the Toxicity and OC Pesticide and PCBs TMDLs for the Calleguas Creek watershed were established to address chlordane, chlorpyrifos, DDT, DDE, DDD, dieldrin, PCBs, sediment toxicity, and toxaphene. The La Vista Drain and Santa Clara Drain ultimately flow into Calleguas Creek Reach 4 (was Revolon Slough Main Branch), and although we oppose the inclusion of these listings on the grounds that they are not waterbodies, the actual receiving waters are already addressed by an OC Pesticides and PCBs TMDL, the Toxicity TMDL, the Salts TMDL, the Nitrogen TMDL, and the Metals TMDL, and therefore all of these proposed listings should be Category 5B. Furthermore, two other segments were listed for chlorpyrifos – Honda Barranca and Duck Pond Agricultural Drains – but were correctly listed as Category 5B, citing the 2006 Toxicity TMDL. The nitrogen, nitrate listings on Boulder Creek and Tapo Canyon are being addressed under the Santa Clara River TMDL, in effect since 2004. • We request that any listings in Table 3 and Table 4 that are maintained after addressing the issues in Comment I also be corrected to be designated in Category 5B.	The list and the factsheets have been updated to reflect the nitrogen, nitrate listings on Boulder Creek and Tapo Canyon are being addressed by the Santa Clara River Nitrogen TMDL. The Calleguas Creek Toxicity TMDL specifically addresses the organophosphate pesticides, chlorpyrifos and diazinon, and does not apply to pyrethroids. The Toxicity TMDL would need to be revised to identify pyrethroid targets, and include the other required elements of a TMDL for pyrethroids specifically. For Calleguas Creek Reach 2 listings see response to comments 7.18 and 7.19 The list and the factsheets have been updated to reflect the Calleguas Creek Reach 3 mercury listing is being addressed by a TMDL. The list and the factsheets have been updated to reflect the Calleguas Creek Reach 4 mercury has been updated to being addressed by a TMDL. Also see responses to comments 7.30, 7.31, and 7.32. The list and the factsheets have been updated to reflect the Calleguas Creek Reach 9A nitrate listing is being addressed by a TMDL The list and the factsheets have been updated to	

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	Table 3. 303(d) Category 5A listings which should be changed to 5B listings (see comment letter) In addition, we believe the Calleguas Creek Watershed Toxicity TMDL should cover all new listings in the watershed for pyrethroids and organophosphate pesticides (e.g., malathion), if they are not removed as requested in the first comment. The Toxicity TMDL includes a trigger for additional investigation if ongoing toxicity is identified in the watershed. The toxicity trigger has resulted in the identification of pyrethroids as a potential cause of toxicity, and the Conditional Waiver includes a bifenthrin water quality benchmark triggering management practice implementation in response to exceedances, in addition to the organophosphate pesticides included in the TMDL. Additionally, the structure of the TMDL is designed to proactively prevent toxicity and therefore it is not necessary to develop another TMDL for these constituents. As a result, if the waterbodies are placed on the 303(d) list as new listings, we request that the waterbodies in Table 4 be moved from 5A to 5B. Table 4. Pyrethroid and Organophosphate listings covered by the existing Toxicity TMDL (see comment letter) **Requested Action:** **• Change all pollutant-waterbody segment combinations in Table 3 and Table 4 from 5A to 5B or 4A based on coverage by an existing USEPA approved TMDL.**	reflect the Calleguas Creek Reach 12 Chlorpyrifos and diazinon listing are being addressed by a TMDL. The list and the factsheets have been updated to reflect the Honda Barranca DDT listing is being addressed by a TMDL. The list and the factsheets have been updated to reflect the Fox Barranca DDE listing is being addressed by a TMDL. The list and the factsheets have been updated to reflect the La Vista Drain and Santa Clara Drain listings which are being addressed.	
7.97	***9. Remove waterbody-pollutant combinations for agricultural drains listed as Category 2.*** Two new agricultural drains were included inappropriately on the Category 2 list (i.e., assessed for listing) and should be removed: Drain Along Gerry Road to Calleguas Creek Reach 9, and Oxnard Drain.	The decisions for the waterbody-pollutant combinations associated with “Drain along Gerry Road” and “Oxnard Drain” have been changed to ”do not list” due to insufficient information at this time to determine whether the Drain along Gerry Road and Oxnard Drain should be included in the	

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	The Gerry Road agricultural drain is a small drainage ditch with intermittent flows that exists solely to collect non-potable water from the adjacent agricultural lands before it drains into Calleguas Creek Reach 9; it is not a tributary to Calleguas Creek Reach 9. A VCAILG monitoring site was selected on this drain to be representative of agricultural discharges to Calleguas Creek Reach 9 and is not representative of receiving water conditions. Accordingly, neither the MUN beneficial use nor the MAR beneficial uses apply to this agricultural drain. The new listing for Oxnard Drain also should be removed from the Draft Category 2 list. The monitoring site indicated for this drain is located in the Ormond Beach Wetlands area where flows from the Hueneme Drain, the J St. Drain (now "Chumash Creek"), and the Oxnard Industrial Drain (formerly known as the Oxnard Drain but now known as the "Ormond Lagoon Waterway") commingle. In order to list the "Ormond Lagoon Waterway" (formerly the Oxnard Industrial Drain), a monitoring station would have to be established on that channel upstream of the wetlands area to ascertain water quality in that waterbody.	region's water quality assessment pursuant to sections 305(b) and 303(d) of the Clean Water Act. Once such a determination is made by the Los Angeles Water Board, necessary changes, if any, will be transmitted to the State Water Board, so that the GIS mapping component of CalWQA can be updated. Additionally, the Los Angeles Water Board will re-evaluate the LOE(s), as appropriate.	
7.98	**IV. ADDRESS ALL OTHER INCONSISTENCIES AND ERRORS IN LIST** FBVC's staff and consultants have identified a large number of inconsistencies and issues in the list that should all be addressed prior to adoption. The summary below provides examples of issues identified. The list is not comprehensive, because in many cases the information provided made it difficult or impossible to conduct a proper analysis. **10.** ***Correct Appendix G fact sheets.*** The Appendix G fact sheets often include incorrect information and discussion. While most of the identified issues do not appear to impact the listing decisions, they make the review of information difficult. Examples of errors found include:	Los Angeles Water Board staff intends to make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval later this year or prior to the next Listing Cycle that includes the Los Angeles Region.	

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	• Incorrect Evaluation Guideline and Guideline Reference. For example, the Evaluation Guideline (i.e., criterion) provided for cyfluthrin (a pyrethroid) in LOEs 84065, 83200 and 88712 actually is for the chlorinated herbicide 2,4,5-TP. The stated criterion (29 mg/L) was not found in the cited Guideline Reference. Many additional instances were noted in LOEs for phorate, dimethoate, disulfoton, endosulfan sulfate, and many other LOEs. Because the numeric guidelines (and reference documents from which these are obtained) form the basis for any listing, it is critical that these be carefully reviewed and verified prior to issuing the final fact sheets and 303(d) list. • Incorrect beneficial uses assigned to objectives. For example, MUN beneficial uses listed when aquatic life objectives are presented in the fact sheet. • Incorrect beneficial uses assigned to a waterbody. For example, MUN beneficial uses assigned to a tidally influenced waterbody (e.g., Duck Ponds Agricultural Drain), and MAR and EST beneficial uses assigned to a waterbody that is too far upstream to be tidally influenced (e.g., Wheeler Canyon/Todd Barranca). • Incorrect TMDLs assigned to a pollutant. For example, for chlordane in Calleguas Creek Reach 2, the applicable TMDL is listed as the Calleguas Creek Metals TMDL. It should be the Organochlorine Pesticides, PCBs, and Siltation TMDL. • Incorrect QAPPs identified. For example, the VCAILG QAPP is often referenced for the Ventura County MS4 monitoring data set. • Incorrect number of samples evaluated and incorrect number of criteria exceedances. For example, the number of samples evaluated for toxaphene on the Rio de Santa Clara/Oxnard Drain No. 3 and on Wheeler Canyon/Todd Barranca is identified as 2 samples, whereas data files obtained from the Regional Board website contain 5 samples for the date range indicated in fact sheets, including 3 samples with results of "ND". Stating in fact sheets that a pollutant exceeds criteria in 100% of samples, instead of the true figure of 40%, conveys an inflated impression of the degree of impairment by that pollutant in a waterbody. The inclusion of J-flagged data when enumerating exceedances (e.g., for chlordane in the same waterbodies) further exacerbates these numbering inaccuracies.		

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	Requested Action: **• Correct the Appendix G fact sheets for errors such as incorrectly assigned beneficial uses, existing TMDLs, QAPPs, and number of samples / number of exceedances.**		
7.99	**11. *Correct the Appendices and Fact Sheet Categories*.** Appendix A, Appendix B, Appendix C, and Appendix G are inconsistent, which makes the analysis of new additions very difficult since it is unclear which segment-pollutant combinations actually are new listings. Following are examples of a number of identified issues that need to be corrected to allow FBVC to fully vet and understand the proposed listings. A number of proposed "name changes" in Appendix A are not shown in Appendix B and there are no associated fact sheets describing the name change (e.g., Reach 4 listings for chlorpyrifos and total DDT). This makes it very challenging to assess the validity or basis for the name change. In other instances, listed name changes are found in Appendix B or C but not supported by an explanation for the name change in Appendix G. The fact sheets for the following name changes should provide justification or explanation for the name change, as many appear to be switching tissue or sediment listings to water listings. If this is in fact the change being made, justification for the water listing needs to be provided in the fact sheet. It is not appropriate to characterize changing the medium that is the basis for the listing as a name change. Table 5. Listed as Name Changes in Appendix A (see comment letter) There are a number of inconsistencies where Appendix A does not include all of the new 2014 listings found in Appendix B. Below are a few examples of such inconsistencies.	Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data. The 303(d) list is being revised to no longer include separate listings for different environmental media, that is, water, sediment and tissue may be considered in one assessment for waterbodies that have data for all three environmental media.	

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	Table 6. Incorrectly listed waterbody segment-pollutant combinations (see comment letter) There are also a number of instances where existing waterbody-pollutant listings from the 2010 303(d) list were not stated as delisted in Appendix A and do not appear in Appendix B, C, or G under the waterbodies to delist. We request clarification as to whether these waterbody-pollutant combinations are, in fact, being delisted, as some align with the assessment provided by the Stakeholders Implementing TMDLs in the Calleguas Creek Watershed. Table 7. Not described as delisted in Appendix A but not found Appendix B or C (see comment letter) **Requested Action:** **• Correct the numerous inconsistencies described above in Table 5, Table 6, and Table 7 and ensure that all of the proposed 303(d) list appendices are internally consistent.**		
7.100	12. ***Correct the waterbody assigned Hydrologic Unit (HUCs) and Calwater numbers to reflect those listed in the Basin Plan*.** There are multiple instances of what appear to be incorrect Hydrologic Unit numbers (HUCs) and Calwater numbers assigned to the various waterways. For instance, a comparison of the 8 digit HUCs listed in Appendix B of the 303(d) list to the 12 digit HUCs listed in Appendix I of the Basin Plan indicate a number of inconsistencies such that waterbodies present in the Santa Clara River Watershed (e.g., Santa Clara River Reach 1, 2, and 3) are listed with a Calleguas watershed HUC (18070103) while the same reaches are listed as 18070102 in the Basin Plan. This makes identifying the location of unknown waterbodies not previously listed or described in the Basin Plan to assess if they are receiving waters that should be	It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues including HUCs for those reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or at the next Listing Cycle that includes the Los Angeles Region.	

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	assessed especially difficult. A full review of the 303(d) List HUCs should be completed to correct all errors. **Requested Action:** **• Perform a full review of HUCs and Calwater numbers listed in Appendix B through F and correct any inconsistencies with the Basin Plan.**		
7.101	**13. *Correct or clarify inconsistencies in the staff report*.** There is inconsistent discussion about some proposed listings in the staff report, which should be clarified to avoid confusion. For instance, on page 10 of the Staff Report there is a discussion about existing TMDLs covering newly proposed pollutants: "*For example, the proposed new listings for DDE and DDD in Calleguas Creek Reach 3 … are being addressed by the Calleguas Creek Organochlorine Pesticides, PCBs and Siltation TMDL … and would then be in Category 4A.*" However, we could find no listings of DDE and DDD for Reach 3 in any Appendix of the report including Appendix C – Category 4A Waterbody Segments. Furthermore, the Fact Sheets in Appendix G state that DDE and DDD should not be listed for Reach 3. We ask the RWQCB to either clarify or remove the above referenced statement, and clarify any other inconsistencies between the staff report and the list. **Requested Action:** **• Correct or remove language cited on page 10 of the staff report regarding DDE and DDD listing of Calleguas Creek Reach 3 and clarify any other identified inconsistencies within the staff report.**	The Staff Report has been corrected.	
7.102	**14. *Ensure that all thresholds being used for assessment are consistent and valid under the Listing Policy*.** In many cases, the same pollutant is assessed using different thresholds without	As the State Water Board staff and Los Angeles Water Board staff review waterbody pollutant data for this and future listing cycles, they will continue to review the appropriateness of the	

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	any explanation for the basis of the threshold. Additionally, in several cases, an LC50 or threshold for individual species were used for the assessment. This is inconsistent with the Listing Policy, which states that it must be demonstrated that an evaluation guideline is "applicable to the beneficial use, protective of the beneficial use, scientifically based and peer reviewed, and well described." Because it has not been demonstrated that the individual species' response to these pollutants is applicable and protective of the beneficial use, these guidelines should not be used to make a listing. The Regional Board should review all assessments for consistency, especially for the pesticides (bifenthrin, cyfluthrin, cypermethrin, malathion, permethrin), as well as applicability to the beneficial use as described in the listing policy. Table 8. 303(d) Pollutants Using Thresholds for Interpreting Narrative Objectives (See comment letter) The 303(d) list includes new listings for bifenthrin, cyfluthrin, cypermethrin, malathion, and permethrin in Ventura County watersheds. Currently no water quality objectives have been promulgated by USEPA or the State of California for these pollutants and so the criteria listed are from a variety of studies. Some issues with these criteria include the following (this list is by no means inclusive; a thorough review of all listings for these pollutants should be undertaken): • The criterion used for listing bifenthrin on Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 is 0.00397 µg/L based on the CDFG criteria. The selective use of a saltwater genus mean acute value is inappropriate when the CDFG study clearly states in the "Conclusions and Recommendations" section that "insufficient freshwater and saltwater acute toxicity data were available to calculate CMC values for bifenthrin." The same use of a criterion unsupported by the study author(s) applies to cypermethrin on the Santa Clara Drain. • Use of LC50 for listing of cyfluthrin for CCW Reach 4 and Santa Clara River Reach 3 is inappropriate. LC50s do not meet the standard set forth in the listing policy as stated on page 20: *" the evaluation guideline… identifies a range above*	guidelines and thresholds.	

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	which impacts occur and below which no or few impacts are predicted." By definition an LC50 is simply the concentration at which half of the population of the tested species has died. The LC50 should not be used as the evaluation guideline. • The criterion used for listing permethrin for Calleguas Creek Reach 4 is 0.0002µg/L based on the UC Davis criteria. However, upon reviewing the UC Davis source, we found the listed chronic standard for permethrin is 2 ng/L (page 92), which is 0.002µg/L not 0.0002µg/L as listed in the 303(d) list. **Requested Action:** **• Review the guidelines used for interpreting narrative objectives and ensure that they are consistently applied and use correct unit conversions.** **• Remove all guidelines that do not comply with the stated listing policy as described above.**		
8.	Castaic Lake Water Agency, March 30, 2017		
8.1	One of the subject proposed revisions would add polychlorinated biphenyls (PCBs) to the 303(d) listing for Castaic Lake and Lagoon. The data referenced in the proposed PCB listing is from a relatively small number of fish tissue samples analyzed in 2007. The Agency samples and analyzes water from the lake prior to treatment. Our data does not indicate that PCBs are present in the lake water. Because of this, and the limited data described above, we believe additional study should be conducted to look at longer term trends in PCB concentrations in fish tissue, and PCB source determination.	As indicated by the commenter, Castaic Lake is proposed for inclusion on 303(d) list for PCBs. This listing decision is based on 3 LOEs and supported by LOE 94733. In LOE 94733, a total of 4 fish tissue composites were generated from largemouth bass (1 composite - 5 fish per composite) and common carp (1 composite - 5 fish per composite) from 2 sampling locations (20 fish, total). All four composite samples were found in exceedance of the criterion for PCB. The commenter is encouraged to submit the additional PCB water column data into CEDEN so that it can be assessed during future listing cycles.	

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		The longer-term trends in PCB concentrations in fish tissue, and PCB source determination are important determinations, which would take place if a TMDL or other regulatory program is developed to address PCBs in the Lake.	
9.	City of Azusa, March 30, 2017		
9.1	**Summary** Of the 22 metals reported for all San Gabriel River water quality segments, 19 (84.3%) of them fall under the "de-list" and "do not list" categories. The City believes that 3 additional metals (15.7%) should be de-listed, which would raise the total to 22 (100%), for reasons more particularly described below. Based on the de-listing of these metals, the City contends that the Regional Board should remove the San Gabriel Metals TMDL from the Los Angeles Basin Plan. **I. San Gabriel River: Estuary** As the table below illustrates, copper for the estuary is listed on the 2010 303(d) list but was not carried over to the 2016 303(d) list. It must be assumed that the Regional Board did not intend to place copper on this list. Whether or not this was an oversight on the part of the Regional Board, there is ample justification for not listing copper for the estuary. As is the case with most metals and toxics referenced in TMDLs and in the MS4 Permit, the Regional Board did not comply with the federal California Toxic Rule (CTR) to the following extent: 1. The Regional Board did not calculate the numeric limitation for lead properly. CTR establishes water quality standards (including TMDLs), based only on ambient (dry) weather sampling and analysis. However, the Regional Board calculated a wet weather numeric limitation for lead based on stormwater sampled from receiving waters. Further, CTR requires a "real time" hardness parameter	Specific comments on the 303(d) list are addressed below; comments on the San Gabriel Metals and Selenium TMDL are outside the scope of this action. Adjustments to the 303(d) list do not alter TMDLs. The revision of a TMDL, when warranted, is a separate Board action. The listing for copper in the San Gabriel River Estuary is carried over to the 2016 303(d) list. See Appendix A as well as Appendix G. The decision to “do not delist” copper is supported by data in CalWQA. Copper was first listed for the San Gabriel River Estuary in 2006 and has remained on the list in 2010, 2012 and 2016. For the 2016 303(d) list, the copper listing was “carried over” and new LOEs were added with new data for this listing cycle. The LOEs in the factsheet for the San Gabriel River Estuary copper listing do not support delisting copper.	

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	(using calcium carbonate) as an adjustment factor in establishing water quality standards for metals and toxics. The Regional Board apparently used a default hardness factor of 100 mg/l. CTR states clearly that the 100 mg/I for hardness is only intended to be an example in calculating CTR water quality standards. It is important that the actual hardness value be applied (which must be sampled and analyzed as the same toxics and metals are sampled). Too low of a hardness value will set a lower numeric limit. The higher the limit is, the less difficult it is to meet it. 2. Regional Board also did not follow the Water Quality Control Policy for California's Clean Water Act Section 303(d) List (Listing Policy). The Listing Policy requires a binomial distribution based on a null hypothesis) to determine if the number of the samples that resulted in exceedances (of CTR) are statistically sufficient to warrant placement on lead on the 303(d) list. There is no evidence that this task was completed. It is possible that it was not completed because the Listing Policy was not adopted until 2004. The copper was added to the 303(d) list in 1998 and carried over to the 2000 303(d) list. Based on the San Gabriel River Metals TMDL, it appears that the copper data was based on water quality samples conducted in 1998. 3. The Regional Board's Surface Water Ambient Monitoring Program (SWAMP) performed water quality samples for metals in the estuary in June of 2005. Copper, after properly adjusted for hardness, resulted in 3.23 micrograms per liter (ug/1). The limit is 9.4 ug/1. In other words, no exceedance was detected. Table I. San Gabriel River: Estuary **[See the comment letter for Table I]** Placing copper on the 2016 303(d) list "do not list" category should effectively eliminate the need for impacted MS4 Permittees to comply with the estuary's copper limitation of 3.7 ug/1 (see Table I(a) below).	The decisions to "do not list" lead, selenium and zinc are supported by the data in CalWQA. The commenter may be assuming that a default hardness value was used, but the factsheet states, "***If no hardness data were available***, a value of 100 mg/L was used" (emphasis added). In this case, site-specific hardness data were available and were used as indicated in the data set "Data for Various Pollutants in Various Water Bodies in Sanitation Districts of Los Angeles County, 2005-2010." See response to comment 3.3 for the use of listing decisions made prior to the adoption of the Listing Policy. Comments on TMDL and the Los Angeles County MS4 Permit and the provisions therein are outside the scope of this action.	

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	Table I(a) from Attachment P of the Los Angeles MS4 Permit **[See the comment letter for Table I(a)]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list lead, selenium, and zinc for the estuary; (2) grant the City's request to de-list copper for the estuary; and (3) use the de-list and do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.		
9.2	**II. San Gabriel River: Reach 1 (Estuary to Firestone)** Metals for San Gabriel River, Reach 1 from the Estuary to Firestone were not placed on the 2010 303(d) List and not placed on the "do not list" category of the 2016 303(d) List. It is unclear, however, why the MS4 Permit requires compliance with the copper limitation of 18 ug/1 (shown above in Table I(a), despite the fact that copper was not listed on the 2010 303(d) list in the first place. Table II. San Gabriel River: Reach 1 (Estuary to Firestone) **[See the comment letter for Table II]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list copper, lead, selenium, and zinc for Reach 1; and (2) use the do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	The decisions to "do not list" copper, lead, selenium and zinc are supported by the data in CalWQA. Comments on MS4 permit requirements and the San Gabriel River Metals and Selenium TMDL are outside the scope of this action.	
9.3	**III. San Gabriel River: Reach 2 (Firestone to Whitter Narrows Dam)** As shown on Table III below, the 2016 303(d) list rolls-over lead from the 2010 303(d) list. Lead, however, should be de-listed for the following reasons: 1. Lead is a legacy pollutant (lead content in fuels have been significantly reduced).	The decisions to "do not delist" lead is supported by the data in CalWQA. Lead is not a "legacy" pollutant; there are current uses and sources of lead in the watershed.	

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	2. The 303(d) lists for 1998 and 2000 placed lead on the "list" category, but failed to comply with the California Toxic Rule (CTR) as explained above. 3. The Regional Board did not follow the State's 303(d) Listing Policy. More specifically, according to the San Gabriel River Metals TMDL (Table 2-7), Reach 2 was sampled during dry weather (ambient) for dissolved lead by the Los Angeles County Department of Public Works (LACDPW), in accordance with CTR using the correct hardness adjustment. The 10 samples taken resulted in zero exceedances. If this result were applied to the 303(d) Listing Policy, it would not be sufficient to place lead on the 303(d) List. For a sample size between 2 and 24, 2 exceedances are required for 303(d) list placement. 4. Regional Board's Surface Water Ambient Monitoring Program (SWAMP) performed water quality samples for metals in the estuary in June of 2005. Lead, after properly adjusted for hardness, resulted in 0.81 micrograms per liter (ug/1). The limit is 3.8 ug/1. In other words, no exceedance was detected. Table III. San Gabriel River: Reach 2 (Firestone to Whittier Narrows Dam) **[See the comment letter for Table III]** **Recommendation to Regional Board**: (1) do not approve staff's recommendation not to de-list lead; and (2) use the do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	Comments on the TMDLs and the MS4 permits are outside the scope of this action. There are three LOEs for lead in the San Gabriel River Estuary Reach 2 including data collected under the MS4 permit and a County of Sanitation District of Los Angeles County permit.	
9.4	**IV. San Gabriel River: Reach 3 (Whittier Narrows Dam to Ramona)** As shown on Table IV below, San Gabriel River Reach 3 was not placed on the 2010 303(d) list and, therefore, it is easy to see why it is placed on the 2016 303(d)	The decisions to “do not list” copper, lead, and zinc are supported by the data in CalWQA. Comments on TMDLs and MS4 permits are	

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	"do not list" category. What is difficult to understand is why the Los Angeles MS4 Permit requires compliance with copper, lead, and zinc. The answer lies on MS4 Permit Attachment P: TMDLs in San Gabriel River Watershed Management Area. It states: *Permittees shall comply with grouped wet WLAs ... expressed as total recoverable metals discharged to all upstream reaches and tributaries of the San Gabriel River Reach 2 and Coyote Creek* (see Table l(b) below). In other words, even though San Gabriel River Reach 3 is not on the 2010 303(d) list for metals, the MS4 Permit requires compliance with them nevertheless. It does this by applying TMDL numeric targets for copper, lead, and zinc because: (1) San Gabriel River Reach 2 lists a lead TMDL number target of 81.34 ug/1; and (2) Coyote Creek lists copper target of 24. 71 ug/1 and zinc at 144.57 ug/1. The rationale for applying downstream numeric targets for copper, lead, and zinc is at best murky. How can metals as pollutants associated with downstream reaches be applied to upstream Reach 3 of the San Gabriel River? Pollutants cannot travel upstream against gravity. Table IV. San Gabriel River: Reach 3 (Whittier Narrows to Ramona) **[See the comment letter for Table IV]** Table I(b) from Attachment P of the Los Angeles MS4 Permit **[See the comment letter for Table I(b)]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list copper, lead, and zinc; and (2) use the de-list for these metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	outside the scope of this action.	
9.5	**V. San Gabriel River: Coyote Creek** The 2016 303(d) List correctly de-lists lead and zinc but does not de-list copper. Copper should be de-listed for the following reasons:	The decision to “do not delist” for copper is supported by data in CalWQA.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	1. The San Gabriel River Metals TMDL contains ambient sample data for Coyote Creek correctly applying CTR. Under Table 2-7, 8 samples are listed with 0 exceedances. If this result were applied to the 303(d) listing policy, it would not qualify for 303(d) placement. A sample size between 2 and 24 would require exceedances equal to and greater than 2. 2. Wet weather water quality data was used to justify placing copper on the 303(d) list. Listing support information cites that CTR relative to copper was applied to wet weather. As mentioned above, wet weather and CTR requirements are mutually exclusive. Wet weather limitations for San Gabriel River and other receiving water bodies in Los Angeles County are intended to be applied - incorrectly -- to MS4s and other NPDES permittees. Table V. Coyote Creek **[See the comment letter for Table V]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list lead and zinc; (2) approve the City's request to de-list copper; and (3) use the de-list and do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	Comments on the TMDLs and the MS4 permits are outside the scope of this action. The Listing Policy does not indicate that data from wet and dry weather must be assessed separately, CTR criteria apply to water quality in both dry and wet weather.	
9.6	**VI. San Jose Creek Reach 1 (SG Confluence to Temple St.)** Regional Board staff recommends that: (1) selenium be de-listed; and (2) copper, lead, and zinc not be listed (see Table VI below). Table VI: San Jose Creek Reach 1 **[See the comment letter for Table VI]** **Recommendation to Regional Board**: (1) approve staff's recommendation to de-list selenium and not list copper, lead, and zinc; and (2) use the de-list and do not	Comments on the TMDLs and the MS4 permits are outside the scope of this action.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	list justification for these and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.		
9.7	**VII. South San Jose Creek (Los Angeles County)** This is Reach is a new listing under the 2016 303(d) List. VII. South San Jose Creek (Los Angeles County) **[See the posted letter for Table VII]** **Recommendation to Regional Board**: (1) approve staff's recommendation not list to selenium copper, lead, and zinc; and (2) use the de-list and do not list justification for these and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	Comments on the TMDLs and the MS4 permits are outside the scope of this action.	
10.	City of Gardena, March 30, 2017		
10.1	The City of Gardena (City) appreciates the opportunity to comment on the revised 2016 303(d) Integrated Report for the Dominguez Channel. The City also welcomes the proposed "de-list" and "do not list" of pollutants, particularly metals and toxics. These pollutants are the basis for the Dominguez Channel Harbor Toxics TMDL (DCHT-TMDL), which is derived from the 2010 303(d) list. The elimination of these pollutants should effectively eliminate the need for the DCHT-TMDL, which the Dominguez Channel Watershed Management Program was created to comply with. **I. 2010 303(d)/2016 303(d) List Dominguez Channel, Reaches 1 and 2** This list, on which the DCHT-TMDL was developed, contains the following toxics for Reach 1 and 2 as shown in the tables presented below. The tables also show the status of toxic pollutants, including metals, which the 2016 303(d) list revises in terms of the following categories: (1) list; (2) de-list; and (3) don't de-	Adjustments to the 303(d) list do not alter TMDLs. The revision of a TMDL, when warranted, is a separate Board action. In regards to PAHs, while PAHs is delisted, the data in CalWQA support the listing of the individual PAHs of Pyrene, Phenanthrene, Chrysene, and Benzo (a) pyrene. The fact sheet for the PAH delisting states: *Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of removing the PAH sediment-pollutant combination and replacing this general PAH*	

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	list. II. Reach 1 Dominguez Channel (unlined portion below Vermont) **[See the posted letter for Table]** In sum, the 2016 303(d) list for toxics and metals proposes to de-list PAHs and zinc (in sediment) and not list Methylnaphthalene 2. However, because PAHs are to be de-listed, Chryslene, Phenanthrene, and Pyrene must also be de-listed because they are specific types of PAHs. Thus, the total number of toxics to be eliminated from the 2016 303(d) list is 8. Copper should be delisted as well because: (1) it was not listed on the 2010 303(d) Integrated Report for toxics and metals for Reach 1 of the Dominguez Channel; (2) the 2012 303(d) list recommended that copper not be listed;" and (4) SWAMP data (2003) for all reaches of the Dominguez Channel resulted in only a few slight exceedances for dissolved copper (but not for total recoverable copper, which is the California Toxics Rule (CTR) compliance standard). Should the Regional Board insist on retaining copper on the 2016 303(d) list, it should provide sampling data based on the CTR for establishing ambient water quality standards. Excluding the aforementioned metals and toxics from the 2016 303(d) list eliminates 9 of them - 56% of the total. On this basis alone, the DCHT-TMDL should be voided.	*listing with the individually listings of Pyrene, Phenanthrene, Chrysene, and Benzo (a) pyrene on the section 303(d) list in the Water Quality Limited Segments category.* The decision to "do not list" Naphthalene is based on one LOE in the CalWQA database that shows no exceedances of 15 samples. The decision to "de-list" zinc is based on three LOEs in the CalWQA database that show no exceedances. In regards to copper, the decision to "list' copper is supported by the data in CalWQA. This is a new "list" decision based on data added to the CalWQA database this listing cycle from both water and sediment. Both dissolved and total water column data (and sediment data) are used for metals assessments. See response to 3.3 regarding assessments based on readily available data.	
10.2	As discussed below the metals and toxics on the proposed 2016 303(d) list that have not been de-listed for Reach 1 of the Dominguez Channel should be de-listed.	Chlordane was listed for the Dominguez Channel Estuary in 1998 or prior; data assessed prior to 2006 is not in the CalWQA database.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	1. *Chlordane* This toxic should be de-listed for the following reasons: (1) no justification to list chlordane was provided in Decision ID 20199 of the proposed 2016 303(d) Integrated Report in keeping with 303(d) Listing Policy; (2) the 2016 303(d) list proposes that chlordane be de-listed for Reach 2 of the Dominguez Channel (); and (3) SWAMP data (2003), based on multiple grab samples for both reaches, resulted in non-detects for chlordane.	There is insufficient data in the CalWQA database to justify a decision to "delist." Los Angeles Water Board staff encourages the commenter to enter all the relevant data into CEDEN in preparation for the next listing cycle that includes the Los Angeles Region.	
10.3	**2. *DDT (tissue/sediment)*** This toxic should be de-listed for the following reasons: (1) no justification was provided in Decision ID 19790 of the proposed 2016 303(d) list to list DDT in keeping with 303(d) Listing Policy; (2) DDT is de-listed for Reach 2 of the Dominguez Channel; (3) SWAMP data (2003), based on multiple grab samples for both reaches, resulted in non-detects for DDT; and (4) DDT is a legacy pollutant that has been banned for several decades.	Decision ID 19790 is the reference to the 2012 303(d) list which did not consider new data for the Los Angeles Region (the 2012 303(d) list considered data from Regions 1, 6 and 7); the decision simply "carried over" a previous decision. Decision ID 34076 is the relevant 2016 decision. Decision ID 34076 includes six LOEs and supports a decision to "do not delist." The decision for Reach 1 of the Dominguez Channel is based, appropriately, on data from that reach. Whether or not another reach is listed is not a consideration in the data analysis. Reaches may be influenced by different sources. In regards to "legacy" pollutants, see response to comment 17.7.	
10.4	**3. *Dieldrin (tissue)***	Dieldrin was listed for the Dominguez Channel	

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	Dieldrin (tissue) should be de-listed for the following reasons: (1) no 303(d) listing policy justification for was provided in Decision ID 34645 of the proposed 2016 303(d) list to list dieldrin; (2) the proposed 2016 303(d) list recommends that dieldrin be de-listed for Reach 2 of the Dominguez Channel (despite the fact that the two reaches are connected); (3) dieldrin is a legacy pollutant; and (4) SWAMP data (2003) based on multiple grab samples for both Dominguez Channel reaches resulted in non-detects for dieldrin.	Estuary in 1998 or prior; data assessed prior to 2006 is not in the CalWQA database. There is insufficient data in the CalWQA database to justify a decision to "delist." The decision for Reach 1 of the Dominguez Channel is based, appropriately, on data from that reach. Whether or not another reach is listed is not a consideration in the data analysis. The reaches may be influenced by different sources. In regards to "legacy" pollutants, see response to comment 17.7. Los Angeles Water Board staff encourages the commenter to enter all the relevant data into CEDEN in preparation for the next listing cycle that includes the Los Angeles Region.	
10.5	**4. *Lead (including tissue)*** Lead (tissue) should be de-listed for the following reasons: (1) no justification to list lead was provided in Decision ID 34645 of the proposed 2016 303(d) Integrated Report in keeping with 303(d) Listing Policy; (2) SWAMP data (2003), based on multiple grab samples for both reaches, resulted in no exceedances for dissolved lead in Reach 1 of the Dominguez Channel; (3) according to the DCHT-TMDL, the samples taken for lead do not comply with the federal California Toxic Rule (CTR), in that they were not based exclusively on ambient samples and incorrectly used a hardness default value of 49 mg/13); and (4) lead as legacy	It is clear from the context of the comment that commenter is actually referring to Decision ID 34613 for lead and not Decision ID 34645 which is for dieldrin. Decision ID 34613 includes six LOEs and supports a decision to "do not delist." Comments on the Dominguez Channel and Greater Harbor Waters Toxic Pollutants TMDL	

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	pollutant has been significantly reduced in the environment as a result of de-leaded fuels).	are outside the scope of this action. Lead is not a "legacy" pollutant; there are current uses and sources of lead in the watershed.	
10.6	**5. *Polychlorinated Bi-phenyls (PCBs)*** PCBs should be de-listed for the following reasons: (1) no justification to list was provided in Decision ID 33063 of the proposed 2016 303(d) Integrated Report in keeping with 303(d) Listing Policy (does not conform to the binomial distribution requirement contained in Section 3.1 of the policy); (2) PCBs are de-listed for Reach 2 of the Dominguez Channel; (3) PCBs are legacy pollutants that have been banned for decades; and (4) SWAMP data (2003) based on multiple grab samples for both reaches resulted in non-detects for PCBs.	Decision ID 33063 includes five LOEs, which were all analyzed with respect to the binomial distribution per the Listing Policy. The decision for Reach 1 of the Dominguez Channel is based, appropriately, on data from that reach. Whether or not another reach is listed is not a consideration in the data analysis. The reaches may be influenced by different sources. In regards to "legacy" pollutants, see response to comment 17.7. Los Angeles Water Board staff encourages the commenter to enter all the relevant data into CEDEN in preparation for the next listing cycle that includes the Los Angeles Region.	
10.7	**6. *Toxicity*** Toxicity should be de-listed for the following reasons: (1) no justification to list was provided in Decision ID 43000 of the proposed 2016 303(d) Integrated Report in keeping with 303(d) Listing Policy (does not conform to the binomial distribution requirement contained in Section 3.1 of the policy)4 ; (2) SWAMP data (2003) based on multiple grab samples for both reaches resulted in nondetects	Decision ID 43000 includes two LOEs both of which assessed data using the binomial distribution per the Listing Policy. Decision ID 43000 refers to Dominguez Channel (lined portion above Vermont). Los Angeles Water Board staff encourages the	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	for most toxics (both Dominguez Channel reaches); and a few detects but no exceedances; and a very few exceedances for metals; and (3) the 2016 303(d) list proposes to de-list toxics affecting Dominguez Channel R1 and R2 that contribute to toxicity5 (there can be no toxicity if many of the toxics are to be de-listed).	commenter to enter all the relevant data into CEDEN in preparation for the next listing cycle that includes the Los Angeles Region. There can be toxicity even when the cause of the toxicity is undetermined. Section 3.6 of the Listing Policy states, *"Waters may also be placed on the section 303(d) list for toxicity alone."*	
10.8	**7. *Sediment Toxicity*** Sediment toxicity cannot be commented on because it is not addressed in the 2016 303(d) listing report, although it is listed in both the 2010 and 2012 303(d) reports. It is not certain if the Regional Board intended to de-list sediment toxicity or to carry it over. Against this background it is recommended the all of following toxics and metals be eliminated from the proposed 2016 303(d) Integrated Report for Reach 1 of the Dominguez Channel: 1. Benzo(a)pyrene (PAH) 2. Benzo(a)anthracene (PAH) 3. Chlordane (tissue) 4. Chryslene (PAH) 5. Copper 6. DDT(tissue and sediment) 7. Dieldrin (tissue) 8. Lead (tissue) 9. Methylnaphthlene 2 10. Polychlorinated Bi-phenyls (PCBs) 11. Polyaromatic-Hydrocarbons (PAHs)	Sediment toxicity data for Dominguez Channel Estuary (unlined portion below Vermont) is included as part of the toxicity listing. The decision to "do not delist" toxicity include two LOEs. For PAHs, see response to comment 10.1. For chlordane, see response to comment 10.2. For copper, see response to comment 10.1. For DDT, see response to comment 10.3. For Dieldrin, see response to comment 10.4. For lead, see response to comment 10.5. For Methylnaphthlene 2, see response to comment 10.1. For PCBs, see response to comment 10.6. For toxicity, also see response to comment 10.6 and 10.7. For zinc, see response to comment 10.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	12. Phenanthrene (PAH) 13. Pyrene (PAH) 14. Sediment Toxicity 15. Toxicity 16.Zinc (sediment) Eliminating all of these toxics/metals should be sufficient justification for eliminating or significantly revising the DCHT-TMDL.		
10.9	**III. Reach 2 Dominguez Channel (lined portion above Vermont)** **[See the posted letter for Table]** The 2016 303(d) list proposes to carry-over from the 2010 303(d) all of the toxics except diazinon, which is de-listed. Copper, lead, zinc, and toxicity should be de-listed for the same reasons for de-listing Dominguez Channel R1 metals and toxics. The 2016 (303d) list also adds "Benthic-Macroinvertebrate Bioassessment" (8MB), which should not be listed for the following reasons: • BMB is not a pollutant. • BMB is used to evaluate the health of wadeable streams using a scoring system. Reach 1 of the Dominguez Channel is not wadeable. The Los Angeles County Flood Control District forbids entry into this and other flood control channels. • The Index of Biotic Integrity (IBI) score of 40, on which the BMB is justified, is considered to be on the edge of "poor" to "fair." But it was based only on 3 samples, taken in 2006, 2007, and 2008. Not only is the sample size not statistically significant, and therefore not in keeping with the 303(d) Listing	See response to comment 10.1 to 10.7 regarding to metals and toxics listings. The Benthic Community Effects listings are associated with other pollutant listings so waterbodies with Benthic Community Effects listings are appropriately in Category 5 or 4a. See response to comment 11.19. Benthic Community Listings for channels that are lined entirely with concrete, which includes Dominguez Channel (above Vermont), have been reassigned to Category 3 (insufficient information to assess beneficial use support but some uses may be threatened) until such time as benthic community condition scores have been more specifically calibrated for concrete-lined channels. See response to comment 11.24. For sample size, see response to comment 11.24.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Policy, but the data is not current. • BMB decision ID, 83960, also uses as lines of evidence toxicity, which is associated with copper, lead, zinc, and diazinon. However, copper, lead, zinc, and toxicity should not be listed on the proposed 2016 303(d) list for the same reasons they should not be listed for Reach 2 of the Dominguez Channel. Further, the 2016 303(d) list proposes to de-list diazinon, a toxic. • According to the Southern California Coastal Water Research Project (SCCWRP), Technical Report 88, which is a bioassessment study concluded in 2015, metals, toxicity, and pyrethroids were only weakly or rarely associated with poor stream health in the Southern region. • Biota, including fish, located in Reach 1 or Reach 2 of the Dominguez Channel has not been specifically identified as being impaired by metals or toxics. The Regional Board has not been able to demonstrate that fish and other wildlife have been impaired. Admittedly, this would be difficult given that Dominguez Channel is a non-perennial stream; it only flows when it rains. There are no studies that have identified the number and species of fish in the Dominguez Channel during storm events. If there were any fish in the channel traveling from up-stream they would probably perish when moving from a freshwater to a saltwater environment.	For copper, lead and zinc see response to comment 10.3, 10.5 and 10.1. Commenter may mean Technical Report 844 *"Bioassessment of Perennial Streams in Southern California: A Report on the First Five Years of the Stormwater Monitoring Coalition's Regional Stream Survey."* Dominguez Channel was not assessed in this Report. Fish are not part of a Benthic Macroinvertebrate bioassessment.	
10.10	**III. Conclusions** In the final analysis, each of the metals and toxic pollutants on the proposed 2016 303(d) list for Reaches 1 and 2 of the Dominguez Channel should be de-listed. The bases for the delistings are, in the aggregate, defective because: 1. The data supporting the listings are out-dated (in some cases by almost 15 years). It is unclear why more current water quality data is not available,	For a discussion of readily available data, see response to comment 32.3. The Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxics TMDL was based on a thorough review of data that confirmed impairments for the pollutants addressed by the TMDL; it did not solely rely on	See also response to comment 3.2.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	especially given that each MS4 in the State is required to pay an annual SWAMP surcharge along with its regular annual MS4 Permit fee to the State. Unlike most non-SWAMP monitoring (sampling and analysis), the Regional Board's SWAMP unit conducts monitoring in accordance with USEPA guidance and State policy. The data SWAMP generates is accurate, objective, and extremely useful. Had SWAMP been allowed to conduct monitoring on a regular basis, the DCHT-TMDL may not have been necessary. 2. Over the past two decades, water quality undoubtedly has improved. Many toxic pollutants are no longer in the environment (e.g., DDT, various pesticides, cleaning solvents, lead in gasoline, etc.). Substantial credit should also be given to municipalities. Since the Los Angeles County MS4 program began in the nineties, cities have dutifully implemented best management practices (BMPs) that have been effective in source-controlling pollutants and reducing them from outfalls through post-construction runoff pollution mitigation controls. Community sensitivity to mitigating runoff pollution is another factor attributable to MS4 public education and outreach programs. 3. The pollutant listings claim to be based on water quality standards developed in conformance with CTR, but they are not. CTR standards for metals and toxics are intended to be ambient standards, derived from dry weather sampling and analysis from receiving water. Instead, they were derived from wet weather conditions. Further, CTR requires an actual hardness value to calculate water quality standards. Many of the 303(d) pollutants were CTR calculated using average hardness values or in some cases the hardness factor of 100 mg/L. According to CTR, this factor was intended only to be used for illustrative purposes when calculating ambient standards for metals and toxics. 4. The pollutant listings, with the exception of those based on the Regional Board's Surface Water Ambient Monitoring Program (SWAMP), do not comply with the State's 303(d) Listing Policy's requirement of meeting the statistical	past 303(d) listings. As noted earlier, adjustments to the 303(d) list do not alter TMDLs. The revision of a TMDL, when warranted, is a separate Board action. Additionally, while the Los Angeles Water Board acknowledges the efforts of MS4 permittees, comments on MS4 permits are outside the scope of this action. The Listing Policy does not indicate that data from wet and dry weather must be assessed separately; additionally, CTR criteria apply to water quality in both dry and wet weather. For these data assessments, when hardness data was available, the hardness was used in the calculation of the criterion, per CTR. When hardness was not available, the default value of 100 mg/L was used, per CTR. In regards to the binomial distribution see response to comments 10.6 and 10.7.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	frequency test using a binomial distribution in accordance with a null hypothesis. It should be noted that the DCHT-TMDL was based on faulty 303(d) metals and toxic pollutant listings. What is regrettable is that the costly Dominguez Channel EWMP is based on the DCHT-TMDL.		
11.	City of Los Angeles, Bureau of Sanitation (LASAN), March 30, 2017		
11.1	It is crucial that the 303(d) List be revised based on sound science and methodologies following the requirements of the State's Listing Policy. Revisions to the 303(d) List may result in changes to our Enhanced Watershed Management Programs, Coordinated Integrated Monitoring Programs, as well as affecting requirements for the four Water Reclamation Plants operated by LASAN. As such, we feel it is imperative that the listings reflect our understanding of the watersheds to the best of our abilities given the available data.	Comment noted.	
11.2	Attachment 1: Detailed Technical Comments on the 2016 Revisions to the Los Angeles Region 303(d) List **Water Body / Pollutant**: Wilmington Drain / Zinc **Technical Comment:** The Fact Sheet for Decision ID 63330 states that one line of evidence is available to assess zinc in Wilmington Drain (90159). LOE 90159 includes data collected by Heal the Bay's, "Compton Creek Monitoring Program" where 3 of 5 samples exceeded the evaluation guideline (i.e., the CTR). However, data collected by Heal the Bay's, "Compton Creek Monitoring Program", were collected from Compton Creek in the Los Angeles River watershed, not in Wilmington Drain. It appears as if the source of confusion is that the samples were collected from a site located at Cressy Street Drain—Williamington Drain (note the difference between Williamington and Wilmington). As such, LOE 90159 consists of data that should not be included when assessing whether or not a zinc impairment exists in	Los Angeles Water Board staff intends to correct the LOEs and the decision, as appropriate, as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval. These changes are in process at this time.	The data from Compton Creek has been removed from the Wilmington Drain assessments. LOE 90159 and Decision 63330 have been retired. Compton Creek remains listed for zinc.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Wilmington Drain. Excluding LOE 90159 results in no data available to assess the waterbody pollutant combination. ***Requested Action: Remove Decision ID 63330 for the zinc listing for Wilmington Drain as there are no data to assess the waterbody pollutant combination.***		
11.3	Wilmington Drain / Copper Although the Fact Sheet for Decision ID 44676 states that only two lines of evidence are available in the administrative record to assess the pollutant, Appendix G shows three distinct lines of evidence (4280, 90131, and 90473). LOE 4280 is a placeholder LOE to support a 303(d) listing decision made prior to 2006. As such, no data are included within this LOE. LOE 90131 includes data collected by the City of Los Angeles where 2 of 33 samples exceeded the evaluation guideline (i.e., the CTR). LOE 90473 includes data collected by Heal the Bay's, "Compton Creek Monitoring Program" where 2 of 5 samples exceeded the evaluation guideline (i.e., the CTR). The Fact Sheet for Decision ID 44676 combines these three LOEs to state that 4 of 38 samples exceed the CRITERIA and this exceeds the allowable frequency listed in Table 4.1 of the Listing Policy. However, as previously noted, the third LOE includes data collected by Heal the Bay's, "Compton Creek Monitoring Program", which was focused on Compton Creek in the Los Angeles River watershed, not in Wilmington Drain. It appears as if the source of confusion is that the samples were collected from a site located at Cressy Street Drain—Williamington Drain (note the difference between Williamington and Wilmington). As such, LOE 90473 consists of data that should not be included when assessing whether or not a copper impairment exists in Wilmington Drain. Excluding LOE 90473 results in the sample exceedance frequency being 2 of 33 samples, which meets the allowable frequency listed in Table 4.1 of the Listing Policy. ***Requested Action: Revise Decision ID 44676 for the copper listing for***	Los Angeles Water Board staff intends to correct the LOEs and the decision, as appropriate, as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval. These changes are in process at this time.	The data from Compton Creek has been removed from the Wilmington Drain assessments. LOE 90473 has been retired and Decision 44676 has been revised to "delist." Compton Creek remains listed for copper.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Wilmington Drain to Delist from 303(d) list and remove from Category 5 (Appendix B) because the total number of exceedances is equal to or less than the number of exceedances allowed to delist per the Listing Policy.		
11.4	Los Angeles River Estuary (Queensway Bay) / Copper The Fact Sheet for Decision ID 64264 presents one line of evidence related to copper in the Los Angeles River Estuary (85965). LOE 85965 presents information from a State of California program that sampled marinas throughout California and assess the data provided as follows: *"A total of six grab samples were collected during each sampling event. Four separate grab samples were collected from inside the marina basin (Sites 1, 2, 3, & 4) and two separate grab samples were collected from outside the marina basin (Sites 5 & 6). Sample results for sites inside the marina basin and sites outside the marina basin were averaged per sample event, resulting in two sample results per sampling event."* Per the LOE, the Regional Board utilized data collected from inside the Downtown Shoreline Marina (Sites 1, 2, 3, & 4) and data collected outside the marina basin (Sites 5 & 6) to make a determination that 3 of 6 samples exceeded the copper criterion. No site location information is provided specific to these sites (GPS locations are provided in the associated documents, but no sites are specifically named Sites 1, 2, 3, 4, 5, & 6) so it is not possible to verify the locations. Regardless, data from inside the Marina should not be combined with data from the Estuary to assess the Estuary. These are two distinct bodies of water with differing inputs and water quality conditions. Dissolved copper data collected inside the Marina shows an average concentration of 7 ug/L and represents three of the three exceedances identified in the Fact Sheet. Dissolved copper data collected outside of the Marina (presumably in the Estuary) shows an average	Site locations in longitude, latitude are given in the "LocationsSamplesDetails" file included in the Data Reference link on the factsheet *"Data for Various Pollutants in California Marinas, 2006."* However, the sites 1, 2, 3, and 4 are within the Marina and should be included with the "San Pedro Bay Near/Off Shore Zones." Los Angeles Water Board staff intend to correct the LOEs and the decision, as appropriate, as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval. These changes are in process at this time.	LOE 85965 has been revised to remove the data from the marina and Decision 64264 has been revised to "do not list." In addition, Downtown Shoreline Marina (part of San Pedro Bay Near/Off Shore Zones) is now recommended for listing for copper.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	concentration of 0.72 ug/L and represents zero of three exceedances. The dissolved copper data collected from inside and outside of the Marina are significantly different from one another, as is to be expected, given that they are separate waterbodies and one is a marina and the other is an estuary. ***Requested Action: Either 1) remove Decision ID 64264 and the corresponding 303(d) listing in Attachment B or 2) revise Decision ID 64264 to reflect the waterbody is the Downtown Shoreline Marina rather than the Los Angeles River Estuary and remove the copper listing for the Los Angeles River Estuary from the 303(d) list (Attachment B).***		
11.5	Ballona Creek / Toxicity The Fact Sheet for Decision ID 34253 presents two lines of evidence that indicate the presence of sediment toxicity (83019 and 83020). LOE 83019 references a Statewide Stream Pollution Trends Study 2008 and LOE 83020 references Statewide Project Urban Pyrethroid Status Monitoring. When reviewing the station locations (404SUP093 and 404BLNAxx) associated with these two LOEs in an August 2012 Surface Water Ambient Monitoring (SWAMP) report titled "Toxicity in California Waters: Los Angeles Region", the sampling locations are identified as (page 11) "approximately one kilometer downstream from the confluence with Sepulveda Channel." In a 2014 SWAMP report titled "Trends in Chemical Contamination, Toxicity and Land Use in California Watersheds: Stream Pollution Trends (SPoT) Monitoring Program Third Report - Five-Year Trends 2008-2012", the site 404BLNAxx is identified as Ballona Creek Downstream of Centinela (33.986 -118.417). In the Ballona Creek Toxics TMDL Staff Report, Ballona Creek Reach 2 and Estuary are defined as follows (page 5): Ballona Creek to Estuary (Reach 2) is the longest segment of the creek (approximately 4 miles) continuing on from National Boulevard and ending at Centinela Avenue where the Estuary begins. As such, the sites identified in LOEs 83019 and 83020 are in the Ballona Creek Estuary rather than in Ballona Creek	The Ballona Creek Estuary Toxics TMDL Staff Report identifies the downstream end of Ballona Creek Reach 2 correctly when it states, *"Centinela Creek drains directly to "Ballona Creek Estuary" just below the boundary with Reach 2"*; however, Ballona Creek Reach 2 does not end at Centinela Ave., as stated. Ballona Creek Reach 2 ends just above the confluence with Centinela Creek as shown in the Los Angeles Region Basin Plan. However, a review of the sampling location is in process at this time.	The sampling location will be reassessed during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	and the Estuary already has a toxics TMDL. ***Requested Action: Remove Decision ID 34253 for toxicity for Ballona Creek as there are no data to assess the waterbody pollutant combination.***		
11.6	Dominguez Channel (lined portion above Vermont Ave) / Ammonia The Fact Sheet for Decision ID 35134 states that two lines of evidence are available in the administrative record to assess pollutant (4098 and 83962). LOE 4098 is a placeholder to support a 303(d) listing decision made prior to 2006. As such, no data are included within this LOE. LOE 83962 includes data collected by the City of Los Angeles (City) and states that samples were collected at 3 locations: Artesia Blvd. @ Western Ave., Manhattan Beach Blvd., and El Segundo Blvd. where 2 of the 21 samples exceeded the Water Quality Objective/Criterion. However, the data included within the Data Reference for LOE 83962 includes eight additional results that did not exceed the Water Quality Objective/Criterion (including samples collected at Vermont Ave., which was not identified within the LOE Spatial Representation). Given that the Basin Plan indicates that Vermont Ave. represents the reach break between Dominguez Channel and the Dominguez Channel Estuary, samples collected at Vermont Ave. are representative of the upstream water body (i.e., Dominguez Channel lined portion above Vermont Ave). Including all of the applicable data included within the Data Reference for LOE 83962 results in the sample exceedance frequency being 2 of 29 samples, which meets the allowable frequency listed in Table 4.1 of the Listing Policy. ***Requested Action: Revise Decision ID 35134 for the ammonia listing for Dominguez Channel to Delist from 303(d) list and remove from Category 5 (Appendix B) because the total number of exceedances is equal to or less than the number of exceedances allowed to delist per the Listing Policy.***	The sample collected at Vermont Ave. was collected just downstream of the Vermont Ave. reach break, so it was not included in the listing decision. That sampling location represents water quality of the downstream reach.	The LOE has been revised to include the data from the Vermont Ave sampling site. The recommended decision has been revised to "delist."
11.7	Dominguez Channel Estuary (unlined portion below Vermont Ave) / Ammonia	The decision has been updated to "DELIST."	

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>As presented in LOE 83995, ammonia, pH, and temperature data were collected by the City of Los Angeles at four stations in Dominguez Channel Estuary during July 2009 and August 2009. The following table summarizes the number of samples and exceedances.

Summary of data for Dominguez Channel Estuary (unlined portion below Vermont Ave)

<table>
<tr><th>Waterbody</th><th># of Samples</th><th># of Exceedances of 4-Day Criteria</th><th>Delist if the # of exceedances equal or is less than[1]</th></tr>
<tr><td>Dominguez Channel Estuary (unlined portion below Vermont Ave)</td><td>28</td><td>0</td><td>2</td></tr>
</table>

1 For toxicants, the maximum number of exceedances allowed for delisting is shown in Table 4.1 (Page 14) of the Listing Policy.

COMPARISON OF EXCEEDANCES TO LISTING POLICY

As shown in the table above, the total number of exceedances is below the maximum number of exceedances allowed to delist per the Listing Policy. As a result, the available data demonstrates that Dominguez Channel Estuary meets the water quality objectives for ammonia (un-ionized) and should be delisted from the 303(d) list. This decision would be consistent with Decision ID 62240 (which treated the listing as a new listing despite an existing listing being present), which finds that ammonia in the Dominguez Channel Estuary should not be listed and states the following (emphasis added): “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 CWA 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 quality requirements of section 6.1.5 of the Policy.</td><td></td><td></td></tr>
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No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	3. 0 of 28 samples exceeded the CRITERIA 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. **Regional Board Staff Decision 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." ***Requested Action: Revise Decision ID 34669 for the ammonia listing for Dominguez Channel Estuary to Delist from 303(d) list and remove from Category 5 (Appendix B) based on Decision ID 62240 (for the ammonia [un-ionized] listing for Dominguez Channel Estuary) and the data reference provided in LOE 83995.***		
11.8	Compton Creek / Iron The Fact Sheet for Decision ID 62052 states that one LOE (83798) is available in the administrative record to assess iron in Compton Creek. LOE 83798 lists the following as the Evaluation Guideline used as the basis for the listing: "National Recommended Water Quality Criteria Continuous Concentrations are intended to protect freshwater aquatic organisms from chronic exposures and are expressed as 4-day average concentrations. The City has several concerns with this listing: • The only two exceedances are associated with wet-weather samples collected on October 13, 2009. The Evaluation Guideline used as the basis is **Criteria Continuous Concentrations** (i.e., chronic criterion). It is inappropriate to use a chronic criterion as it is meant to protect aquatic life against chronic exposure and the samples were taken during a wet-weather event not representative of chronic conditions. USEPA does not recommend	The review of the decision for Compton Creek iron is in process at this time.	The decision will be reassessed during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	a Criteria Maximum Concentration (acute criterion) for iron within its National Recommended Water Quality Criteria. • The National Recommended Water Quality Criteria Continuous Concentration for iron does not specify whether the criterion applies to the total recoverable or dissolved fraction. None of the dissolved iron results associated with the samples used to assess the water body exceeded the criterion. • Section 6.1.5.3 of the Listing Policy states that "Samples used in the assessment must be temporally independent. If the majority of samples were collected on a single day or during a single short-term natural event (e.g., a storm, flood, or wildfire), the data shall not be used as the primary data set supporting the listing decision." However, multiple samples were collected on the same day during the same storms and each was considered separately. Samples collected on the same day during the same storm (as was the case with the two exceedances) should not be considered independently from one another as they are clearly not temporally independent and do not meet the Listing Policy requirements. Averaging samples collected on the same day results in 1 of 5 exceedances, which does not meet the requirements of the Listing Policy for placing a water body segment on the 303(d) list. ***Requested Action: Revise the decision for Decision ID 62052 for the iron listing for Compton Creek to Do Not List on 303(d) list (TMDL required list) and remove from Category 5 (Appendix B) due to an inappropriate evaluation guideline being used as the basis for the listing, the observed exceedances were not temporally independent, and none of the dissolved results exceeded the evaluation guideline.***		
11.9	Ballona Creek Estuary / Silver The Fact Sheet for Decision ID 34520 states "Silver has not been specifically listed on the 303(d) list." Furthermore, the single Line of Evidence (LOE) does	During the development of the Ballona Creek Estuary Toxics TMDL, USEPA and the Los Angeles Region found that the Ballona Creek listings for sediments (cadmium, copper, lead and silver) were made in error and should be applied	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	not indicate that any data were analyzed (i.e., the number of samples listed is zero). As such, the listing should be removed. ***Requested Action: Revise Decision ID 34520 for the silver listing for Ballona Creek Estuary to Delist from 303(d) list and remove from Category 4 (Appendix C) to be consistent with the Fact Sheet.***	to the Estuary. The original listing (for Ballona Creek) was made in 1998 or prior; LOE 2408 is a "placeholder" to support a previous listing decision. Data for these "placeholder" LOEs are not included in the CalWQA database. The factsheet has been revised for clarity.	
11.10	Dominguez Channel Estuary (unlined portion below Vermont Ave) / Copper The Fact Sheet for Decision ID 33751 states that five LOEs are available to assess copper in the Dominguez Channel Estuary, four of which correspond to sediment and one of which corresponds to water. The sole LOE that presents water data states that 3 of 3 samples exceeded the dissolved California Toxics Rule (CTR) saltwater chronic criterion. However, these sample results were all collected on the same day and appear to be for total copper associated with a wet-weather event. When using the total copper CTR acute criterion (rather than the dissolved CTR chronic criterion), the samples do not exceed. As such, all LOEs that support a listing correspond to the sediment matrix. ***Requested Action: Revise the pollutant for Decision ID 33751 for the copper listing for Dominguez Channel Estuary to "Copper (sediment)" given that the LOEs supporting a listing correspond to the sediment matrix and move the listing to Category 4a (Appendix C).***	The review of the decision for Dominguez Channel Estuary (unlined portion below Vermont Ave) Copper is in process at this time. In addition, copper is included on the list as "being addressed by a TMDL," the Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxics TMDL.	The decision will be reassessed during the State Board public comment period.
11.11	Various waterbodies / Various pollutants For a number of existing listings, it appears as if a significant number of readily	See response to comment 32.3 for a discussion of the "readily available" data considered for this Integrated Report and 303(d) list.	

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<tr><td></td><td>available data were not considered when making the Final Listing Decision. These data are from NPDES Permit monitoring programs (both wastewater and stormwater). When these data are considered, the number of measured exceedances supports rejection of the null hypothesis as presented in Table 4.1 of the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy). As such, these listings should be removed from the section 303(d) list.

Furthermore, with regards to the cyanide listing for Ballona Creek, it appears as if Los Angeles (LA) Regional Water Quality Control Board (Regional Board or LARWQCB) staff applied the chronic CTR criterion to the entire dataset instead of applying the chronic CTR criterion during dry-weather and the acute CTR criterion during wet-weather.
<table>
<tr><th rowspan="2">Water Body</th><th rowspan="2">Pollutant</th><th rowspan="2">Listing Category</th><th colspan="2">Date Range</th><th rowspan="2"># of Samples</th><th rowspan="2"># of Exceedances</th><th rowspan="2">Max # of Exceedances to Delist</th></tr>
<tr><th>Start</th><th>End</th></tr>
<tr><td>Ballona Creek</td><td>Cyanide</td><td>5</td><td>10/2000</td><td>12/2010</td><td>66</td><td>5</td><td>5</td></tr>
<tr><td>Burbank Western Channel</td><td>Selenium</td><td>5</td><td>10/2003</td><td>12/2010</td><td>201</td><td>15</td><td>17</td></tr>
<tr><td rowspan="2">Los Angeles River Reach 1 (Estuary to Carson Street)</td><td>Diazinon</td><td>5</td><td>10/2002</td><td>12/2010</td><td>56</td><td>1</td><td>4</td></tr>
<tr><td>Lead</td><td>5</td><td>02/2001</td><td>12/2010</td><td>173</td><td>4</td><td>14</td></tr>
<tr><td>Los Angeles River Reach 2 (Carson to Figueroa Street)</td><td>Lead</td><td>5</td><td>01/2001</td><td>12/2010</td><td>241</td><td>4</td><td>20</td></tr>
<tr><td>Los Angeles River Reach 5 (within Sepulveda Basin)</td><td>Lead</td><td>5</td><td>02/2002</td><td>11/2010</td><td>78</td><td>0</td><td>6</td></tr>
<tr><td rowspan="2">Sepulveda Canyon</td><td>Lead</td><td>4</td><td>10/2004</td><td>12/2010</td><td>98</td><td>4</td><td>8</td></tr>
<tr><td>Selenium</td><td>4</td><td>10/2004</td><td>12/2010</td><td>98</td><td>4</td><td>8</td></tr>
</table>

Requested Action: Revise the decision for the segments listed in the preceding table to Delist from 303(d) list and remove from Category 5 (Appendix B) or Category 4 (Appendix C), whichever is applicable.</td><td>While, in TMDLs, targets and allocations may be developed separately for dry weather and wet weather and may apply chronic criteria to dry weather and acute criteria to wet weather, that is not the procedure used in 303(d) listing decisions. The Listing Policy does not indicate that data from wet and dry weather must be assessed separately, and the more conservative chronic criteria from CTR applies, appropriately, to water quality assessments.</td><td></td></tr>
<tr><td>11.12</td><td>Burbank Western Channel / Lead</td><td>USEPA added lead to the 303(d) list (on the</td><td></td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The Fact Sheet for Decision ID 32882 finds that lead in the Burbank Western Channel should not be listed and states (emphasis added): "One line of evidence is available in the administrative record to assess this pollutant. None 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 placing this water segment-pollutant combination on the section 303(d) list in the Water Quality Limited Segments category*." In addition, the analysis conducted as part of the Upper Los Angeles River (ULAR) Enhanced Watershed Management Program (EWMP) did not identify any exceedances from October 2003 through December 2010. ***Requested Action: Revise Decision ID 32882 for the lead listing for Burbank Western Channel to Delist from 303(d) list and remove from Category 5 (Appendix B) to be consistent with the Fact Sheet and because there have not been any observed exceedances since 2003.***	"being addressed by a TMDL" portion of the list) in 2006 because of the data review and the targets and allocations for lead included in the Los Angeles River metals TMDL. The factsheet has been revised for clarity.	
11.13	Los Angeles River Reach 1 (Estuary to Carson Street) / Cadmium The Fact Sheet for Decision ID 32639 finds that cadmium in the Los Angeles River Reach 1 should not be listed and states (emphasis added): "Three lines of evidence are available in the administrative record to assess this pollutant. The CTR criterion for cadmium for the protection of aquatic life was exceeded three out of forty-two samples from data collected between 1996 and 2002 and no samples exceeded CCR Title 22 MCL guidelines for the protection of MUN beneficial uses in data collected between 2000 and 2003. 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.*" In addition, the analysis conducted as part of the ULAR EWMP did not identify any exceedances from February 2001 through December 2010.	In the 2002 303(d) list, a cadmium listing was added for Reach 1 of the Los Angeles River based on stormwater data. Data for listings prior to 2006 are not included in the CalWQA database. In addition, the USEPA final decision for the 2006 303(d) list added this listing to the 'being addressed by USEPA approved TMDL' portion of the 303(d) List on this basis of the data review and the targets and allocations for cadmium included in the Los Angeles River Metals TMDL. The factsheet has been revised for clarity.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Requested Action: Revise Decision ID 32639 for the cadmium listing for Los Angeles River Reach 1 to Delist from 303(d) list and remove from Category 5 (Appendix B) to be consistent with the Fact Sheet and because there have not been any observed exceedances since 2001.		
11.14	Echo Park Lake / Ammonia Decision ID 34696 proposes to change the ammonia listing for Echo Park Lake from List on 303(d) list (TMDL required list) to list on the 303(d) list (being addressed by United States Environmental Protection Agency [USEPA] approved TMDL). However, the TMDL report made a finding of nonimpairment for ammonia, as outlined in the following excerpt from Section 6.2.3.2 of the TMDL report (emphasis added): "Echo Park Lake was listed as impaired for ammonia in 1996 based on an assessment in the Regional Board's Water Quality Assessment and Documentation Report (LARWQCB, 1996). Consistent with project plan recommendations provided in California's Impaired Waters Guidance (SWRCB, 2005), EPA and local agencies collected 35 additional samples (7 wet-weather) between May 2003 and February 2010 to evaluate current water quality conditions. There was one ammonia exceedance in 35 samples (Appendix G, Monitoring Data). Therefore, Echo Park Lake meets ammonia water quality standards and USEPA concludes that preparing a TMDL for ammonia is unwarranted at this time. *USEPA recommends that Echo Park Lake not be identified as impaired for ammonia in California's next 303(d) listing*."[1] ***Requested Action: Revise Decision ID 34696 for the ammonia listing for Echo Park Lake to Delist from 303(d) list and remove from Category 4 (Appendix C) based on USEPA's recommendation.*** [1] U.S. Environmental Protection Agency, Los Angeles Area Lakes TMDLs, Section 6.2.3.2 Summary of Ammonia Non-Impairment, March 2012, p.6-13.	The 303(d) list and the factsheet has been updated to "DELIST."	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
11.15	Lincoln Park Lake / Lead Decision ID 34817 proposes to change the lead listing for Lincoln Park Lake from List on 303(d) list (TMDL-required list) to list on the 303(d) list (being addressed by USEPA approved TMDL). However, the TMDL report made a finding of nonimpairment for lead, as outlined in the following excerpt from Section 5.3 of the TMDL report (emphasis added): "Lincoln Park Lake was listed as impaired for lead in 1996 based on an assessment in the Regional Board's Water Quality Assessment and Documentation Report (LARWQCB, 1996). Consistent with project plan recommendations provided in California's Impaired Waters Guidance (SWRCB, 2005), EPA and local agencies collected 40 additional samples (11 wet-weather) between October 2008 and December 2010 to evaluate current water quality conditions. There were zero dissolved lead exceedances in 40 samples (Appendix G, Monitoring Data). USEPA also collected one sediment sample in September 2010 to further evaluate lake conditions. There were zero sediment lead exceedances of the 128 ppm freshwater (Probable Effect Concentrations) sediment target (Appendix G, Monitoring Data). Therefore, Lincoln Park Lake meets lead water quality standards and USEPA concludes that preparing a TMDL for lead is unwarranted at this time. *USEPA recommends that Lincoln Park Lake not be identified as impaired by lead in California's next 303(d) list*." ***Requested Action: Revise Decision ID 34817 for the lead listing for Lincoln Park Lake to Delist from 303(d) list and remove from Category 5 (Appendix B) based on USEPA's recommendation.*** U.S. Environmental Protection Agency, Los Angeles Area Lakes TMDLs, Section 5.3 Lead Impairment, March 2012, p.5-18	The 303(d) list and the factsheet has been updated to "DELIST."	
11.16	Lincoln Park Lake / Ammonia	The Water Quality Assessment Report (LARWQCB, 1996) includes ammonia as not	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The data utilized to develop the original listing in 1998 are not available (these data were requested from USEPA and the Regional Board during development of the TMDL in 2010. Based on USEPA's TMDL report, data collected prior to 2009 were reported as ammonium, without corresponding ammonia, pH, or temperature measurements making it impossible to compare these data to ammonia criteria. Only ammonia data collected with corresponding pH and temperature data can be used to determine if criteria were exceeded. In 2008, the Regional Board collected eight ammonia samples all of which were below the reporting limit of 0.1 mg/L and chronic criterion. In 2009, the City of Los Angeles and USEPA/Regional Board conducted monitoring and collected 15 and three samples, respectively, all of which were below the chronic criterion. As stated in the TMDL report (pg. 5-10): *"There were no exceedances of the acute or chronic ammonia criteria during any recent sampling events with associated pH and temperature measurements."* In summary, there are no ammonia data with corresponding pH and temperature measurements available to support the original listing and all available recent data demonstrate there are no exceedances. ***Requested Action: Revise Decision ID 35004 for the ammonia listing for Lincoln Park Lake to Delist from 303(d) list and remove from Category 5 (Appendix B).***	supporting beneficial uses. Twenty-eight ammonium samples were reported ranging from non-detect to 1.14 mg-N /L which is less than the acute target, but greater than the chronic target for total ammonia N (assuming the analytical method converted all ammonia to ammonium). Data from lines of evidence developed prior to 2006 are not included in the CalWQA database. While the EPA TMDL for the Los Angeles Area Lakes did review data from 2008 and 2009, which did not exceed criteria, unlike for lead, the EPA TMDL for the Los Angeles Area Lakes did not make a finding of non-impairment for ammonia and instead established targets.	
11.17	Los Angeles River Reach 2 (Carson to Figueroa Street) and Los Angeles River Reach 5 (within Sepulveda Basin) / Oil The source of oil seeping into the River was found to be naturally-occurring crude oil. This conclusion is supported by the results of investigations completed by various agencies, which are summarized as follows:	The State and Regional Water Boards are currently exploring options to address pollutants that may be naturally elevated in water bodies. Until the natural sources of pollutants are addressed by either an exclusion policy as adopted by the State Water Board or a natural sources exclusion (or other site-specific objective) is	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	An investigation was conducted following seeps of petroleum hydrocarbons into the LA River in June 2001. Based on lab results and borings, it was concluded that the source of the LA River channel oil seeps is naturally-occurring crude oil from Puente formation sands. Oil was visible in Puente formation seams, partings and fractures, as well as sand lenses, and appeared to have migrated upward into sandy alluvial soils. Gasses encountered included hydrogen sulfide, commonly sources from crude oil reservoirs. The hydrocarbon seeps appeared to be concentrated where the Puente formation contacts with younger, less permeable units or layers. The USEPA On-Scene Coordinator (OSC) conducted subsurface investigations of the oil seeps in the LA River during August and September 2001. The OSC found that the oil did not discharge as a result of a spill, leak, or discharge from any facility and that the oil has been discharging to the river since at least 1943 and there is no practical means of preventing this oil seep from discharging to the River. On April 19, 2002, an email was sent to Steven Pedersen of City of Los Angeles /Watershed Protection Division (WPD) by Steven Poole of the US Coast Guard/National Pollution Funds Center (USGC/NPFC). Mr. Poole stated that City of Los Angeles cannot submit to USGC/NPFC a claim for reimbursement for cost incurred by the City associated with May 2001 oil clean-up efforts in the LA River because Title 1 of the Oil Pollution Act does not allow for reimbursement for **naturally-occurring oil** (natural seepage). In summary, the reports and correspondence discussed herein, indicate that multiple agencies believe that the oil found in the listed reaches of the LA River is associated with naturally-occurring seepage suggesting that a 303(d) listing is not warranted. **Studies Used in the Analysis** The following studies/correspondences were used in the analysis:	developed by the Los Angeles Water Board, oil in the Los Angeles River is an impairment and appropriately on the 303(d) list. There is no alternative regulatory program identified that will reduce oil in the Los Angeles River so the category cannot be 4b. However, the factsheet has been updated to include “natural sources” as the source.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Pollution Report (2002), USEPA Region IX • Correspondence (2002) from Michael P. Brown, Manager, Geotechnical Engineering Division, Bureau of Engineering, City of Los Angeles • Correspondence (2002) from Steven Poole, Claims Manager, USGC/NPFC Despite repeated efforts by WPD to obtain the historical information utilized to develop the original listing, the Regional Board has not provided the information for inclusion in the analysis. Therefore, the analysis is based solely on recent information available to WPD. **Summary of Findings** The source of oil seeping into the River was found to be naturally-occurring crude oil. This conclusion is supported by the results of investigations completed by various agencies, which are summarized below. **Investigations of the Geotechnical Engineering Division, Bureau of Engineering, City of Los Angeles – June 2001** An investigation was conducted following seeps of petroleum hydrocarbons into the engineered channel of the LA River across from the Piper Technical Center in June 2001. This study concluded that the source of the LA River channel oil seeps is naturally-occurring crude oil from Puente formation sands, based on lab results and borings. The samples of the oil seeps and associated bacterial-growth scums revealed that the seeps were predominantly in the oil or heavy-hydrocarbon range. This supports the conclusion that the LA River oil seeps are natural crude oil as opposed to fuel leaks. Drilling of wells along Mission St. (east of the river channel) confirmed that oil-		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	bearing Puente formation sands and fractures are the source of crude oil and gases that migrate into the shallow alluvial soils. The hydrocarbons, visible oil and PID readings generally increased with depth toward the Puente formation. Oil was visible in Puente formation seams, partings, and fractures, as well as sand lenses, and appeared to have migrated upward into sandy alluvial soils. Gasses encountered included hydrogen sulfide, commonly sources from crude oil reservoirs. The hydrocarbon seeps appeared to be concentrated where the Puente formation contacts younger, less permeable units or layers. **Pollution Report, EPA – January 2002** The USEPA OSC conducted extensive subsurface investigations of the oil seeps in the LA River during August and September 2001. The OSC found that the oil did not discharge to the River as a result of a spill, leak, or discharge from any facility based on the investigation. The oil has been discharging to the river since the least 1943 and there is no practical means of preventing this oil seep from discharging to the LA River. The OSC also evaluated the use of epoxy or urethane sealants on the seeps to reduce the flow of oil. However, it was concluded that the use of sealants on the seeps would cause the oil to get into the subdrain system and eventually enter the LA River. In summary, WPD attempted to evaluate the original listing information in light of the currently available information. Although the Regional Board did not provide the information, the reports and correspondence discussed herein, and attached to this letter, indicate that multiple agencies believe that the oil found in the listed reaches of the Los Angeles River is associated with naturally-occurring seepage. ***Requested Action: Revise Decision IDs 34118 and 34203 for the oil listings for Los Angeles River Reaches 2 and 5 to Delist from 303(d) list and remove from Category 5 (Appendix B) given that the oil found in the listed reaches of the Los***		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Angeles River is associated with naturally-occurring seepage. Alternatively, move the listing to Category 4b as other regulatory programs are reasonably expected to result in attainment of the water quality standard.		
11.18	Various waterbodies Various / pollutants Section 2 of the *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List* (Listing Policy) states (pg. 3): "At a minimum, the California section 303(d) list shall identify waters where standards are not met, **pollutants or toxicity** contributing to standards exceedance, and the TMDL completion schedule." In addition, Section 2.1 of the Listing Policy titled "Water Quality Limited Segments" states (pg. 3): "Waters shall be placed in this category of the section 303(d) list if it is determined, in accordance with the California Listing Factors that the water quality standard is not attained; **the standards nonattainment is due to toxicity, a pollutant, or pollutants**; and remediation of the standards attainment problem requires one or more TMDLs." As such, all listings that do not identify either toxicity or a pollutant as the impairment do not meet the requirements for being placed in the water quality-limited segments category. This is supported by current listing decisions made by the Los Angeles Regional Water Quality Control Board (Regional Board) in Burbank Western Channel for excess algal growth, scum/foam-unnatural, and taste and odor and Calleguas Creek Reach 13 for excess algal growth that state the following (emphasis added): "Based on the readily available data and 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 following table presents water body segments and listings that correspond to instances where there is not a pollutant.	The Benthic Community Effects listings are associated with other pollutant or toxicity listings and, therefore, will require a TMDL (or other regulatory program) to attain standards. The Ballona Creek Wetlands listings were addressed by the Ballona Creek Wetlands TMDL for Sediment and Invasive Exotic Vegetation. The impairments identified are associated with sedimentation in addition to metals, trash and other pollutants. The hydromodification listing has been deleted. While pH exceedances may be associated with algae impairment, excessively high pH is a conventional pollutant with an objective defined in the Los Angeles Basin Plan, "*The pH of all inland surface waters shall not be depressed below 6.5 or raised above 8.5…"* Algae, Eutrophic, Odor, Organic Enrichment, Nutrients (Algae) are discussed in the Listing Policy section 3.7.1: *An acceptable nutrient-related evaluation guideline is exceeded using the binomial distribution as described in section 3.1 for excessive algae growth, unnatural foam, odor, and taste. Waters may also be placed on the*	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		section 303(d) list when a significant nuisance condition exists as compared to reference conditions, or when nutrient concentrations cause or contribute to excessive algae growth. The Los Angeles Area Lakes TMDL for Nitrogen, Phosphorus, Mercury, Trash, OC Pesticides and PCBs addresses the Algae, Eutrophic, Odor and Organic Enrichment impairments in both Echo Park Lake and Lincoln Park Lake by developing TMDL targets for ammonia, chlorophyll *a*, dissolved oxygen, pH, Total Nitrogen and Total Phosphorus. The Los Angeles River Nutrients (Algae) listings are being addressed by the Los Angeles River Nitrogen Compounds and Related Effects TMDL. Attaining the nitrogen compound objectives is intended to address impairments caused by pH, scum/foam, and algae as these effects are related to the presence of nitrogen in the waterbody. While temperature exceedances may be associated with "pollution" such as hydromodification or lack of riparian cover, excessively high temperature is a conventional pollutant with an objective defined in the Los Angeles Basin Plan, "*At no time shall these WARM designated waters be raised above 80 degrees F…"* See also response to comment 17.4 for additional discussion of temperature as a pollutant.	

Decision ID	Water Body Segment	Listing
44553	Arroyo Seco Reach 1 (LA River to West Holly Ave.)	Benthic Community Effects
65656	Ballona Creek	Benthic Community Effects
44746	Ballona Creek Wetlands	Exotic Vegetation
34697	Ballona Creek Wetlands	Habitat alterations
34699	Ballona Creek Wetlands	Hydromodification
44747	Ballona Creek Wetlands	Reduced Tidal Flushing
44498	Compton Creek	Benthic Community Effects
32967	Compton Creek	pH
66165	Dominguez Channel (lined portion above Vermont Ave)	Benthic Community Effects
38511	Dominguez Channel Estuary (unlined portion below Vermont Ave)	Benthic Community Effects
34030	Echo Park Lake	Algae
34698	Echo Park Lake	Eutrophic
34756	Echo Park Lake	Odor
44748	Echo Park Lake	pH
35180	Lincoln Park Lake	Eutrophic
44641	Lincoln Park Lake	Odor

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	35223 Lincoln Park Lake — Organic Enrichment/Low Dissolved Oxygen 35168 Los Angeles Harbor - Consolidated Slip — Benthic Community Effects 33456 Los Angeles River Reach 1 (Estuary to Carson Street) — Nutrients (Algae) 32959 Los Angeles River Reach 2 (Carson to Figueroa Street) — Nutrients (Algae) 66229 Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) — Benthic Community Effects 34204 Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) — Nutrients (Algae) 64386 Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) — Temperature, water 66232 Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) — Benthic Community Effects 44326 Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) — Nutrients (Algae) 35160 Los Angeles River Reach 5 (within Sepulveda Basin) — Nutrients (Algae) 34207 Los Angeles/Long Beach — Beach Closures	The Beach Closures listing for the Los Angeles/Long Beach Inner Harbor is being addressed by the Los Angeles Harbor, Inner Cabrillo Beach and Main Ship Channel Bacteria TMDL, which established targets and allocations for bacterial indicators. The Machado Lake Algae, Eutrophic, and Odor listings are being addressed by the Machado Lake Nutrients TMDL, which sets targets and allocations for phosphorus, nitrogen and chlorophyll *a*. While Dissolved Oxygen exceedances may be associated with other factors such as algae, depressed dissolved oxygen is a conventional pollutant with an objective defined in the Los Angeles Basin Plan, "*At a minimum (see specifics below), the mean annual dissolved oxygen concentration of all waters shall be greater than 7 mg/L, and no single determination shall be less than 5.0 m g/L…"* Burbank Western Channel listings for excess algal growth, scum/foam-unnatural, and taste and odor and the Calleguas Creek Reach 13 listing for excess algal growth were delisted in 2010. Benthic Macroinvertebrate listings are discussed also in response to comment 11.19 and 11.24.	

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>
<table>
<tr><td></td><td>Inner Harbor</td><td></td></tr>
<tr><td>34208</td><td>Los Angeles/Long Beach Inner Harbor</td><td>Benthic Community Effects</td></tr>
<tr><td>34305</td><td>Machado Lake (Harbor Park Lake)</td><td>Algae</td></tr>
<tr><td>42417</td><td>Machado Lake (Harbor Park Lake)</td><td>Eutrophic</td></tr>
<tr><td>42262</td><td>Machado Lake (Harbor Park Lake)</td><td>Odor</td></tr>
<tr><td>61605</td><td>Marina del Rey Harbor - Back Basins</td><td>Oxygen, Dissolved</td></tr>
</table>

Requested Action: Revise the decision for the segments listed in the preceding table to Delist from 303(d) list or Do Not List on 303(d) list, whichever is applicable, and remove from Category 5 (Appendix B) or Category 4 (Appendix C).</td><td></td><td></td></tr>
<tr><td>11.19</td><td>Various waterbodies / Various pollutants

There are numerous listings that include waterbody segments which are in nonattainment due to pollution that is not caused by a pollutant. The 2016 Clean Water Act Sections 305(b) and 303(d) Integrated Report for the Los Angeles Region Staff Report states the following (pg. 9): “Impaired waters are placed in Category 4c if the impairment is not caused by a pollutant, but rather caused by pollution, such as flow alteration or habitat alteration.” Impairments for benthic community effects, exotic vegetation, habitat alterations, hydromodification, reduced tidal flushing, and temperature are caused by either flow and/or habitat alteration (not by a pollutant or combination of pollutants) and; therefore,</td><td>The Benthic Community Effects listings are associated by with other pollutant listings, so waterbodies with Benthic Community Effects listings are appropriately in Category 5 or 4a.

The Ballona Creek Wetlands listings are addressed by the Ballona Creek Wetlands TMDL for Sediment and Invasive Exotic Vegetation; therefore, the appropriate waterbody category is 4a, “A TMDL has been developed and approved by U.S.EPA for any waterbody-pollutant combination and the approved</td><td>Los Angeles River Reach 3 has been reassessed for temperature to use the Basin Plan objective for the WARM Beneficial Use instead of a guideline for trout. The recommended decision for Los Angeles River Reach 3/temperature is now “do not list.”</td></tr>
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<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>waterbody segments under these listings should instead be moved to Category 4c.
<table>
<tr><th>Decision ID</th><th>Water Body Segment</th><th>Listing</th></tr>
<tr><td>44553</td><td>Arroyo Seco Reach 1 (LA River to West Holly Ave.)</td><td>Benthic Community Effects</td></tr>
<tr><td>65656</td><td>Ballona Creek</td><td>Benthic Community Effects</td></tr>
<tr><td>44746</td><td>Ballona Creek Wetlands</td><td>Exotic Vegetation</td></tr>
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<tr><td>44747</td><td>Ballona Creek Wetlands</td><td>Reduced Tidal Flushing</td></tr>
<tr><td>44498</td><td>Compton Creek</td><td>Benthic Community Effects</td></tr>
<tr><td>66165</td><td>Dominguez Channel (lined portion above Vermont Ave)</td><td>Benthic Community Effects</td></tr>
<tr><td>38511</td><td>Dominguez Channel Estuary (unlined portion below Vermont Ave)</td><td>Benthic Community Effects</td></tr>
<tr><td>35168</td><td>Los Angeles Harbor - Consolidated Slip</td><td>Benthic Community Effects</td></tr>
<tr><td>66229</td><td>Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.)</td><td>Benthic Community Effects</td></tr>
<tr><td>64386</td><td>Los Angeles River Reach 3</td><td>Temperature, water</td></tr>
</table></td><td>implementation plan is expected to result in full attainment of the water quality standard within a specified time frame.”

Temperature, in some cases, may be because of pollution, e.g. habitat alteration, but may also be caused by discharges of waste, i.e. pollutants; therefore, Category 5 is the appropriate category. Temperature is a conventional pollutant with an objective defined in the Los Angeles Basin Plan, “At no time shall these WARM designated waters be raised above 80 degrees F…” See also response to comment 17.4 for additional discussion of temperature as a pollutant.</td><td></td></tr>
</table>

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<table>
<tr><td></td><td>(Figueroa St. to Riverside Dr.)</td><td></td></tr>
<tr><td>66232</td><td>Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam)</td><td>Benthic Community Effects</td></tr>
<tr><td>34207</td><td>Los Angeles/Long Beach Inner Harbor</td><td>Benthic Community Effects</td></tr>
</table>

Requested Action: Notwithstanding the previous comment that supports revising the decision for the segments listed in the preceding table to Delist from 303(d) list or Do Not List on 303(d) list, whichever is applicable, move all segments listed in the preceding table with impairments caused by pollution to Category 4c and revise Appendix B or C as appropriate.
</td><td></td><td></td></tr>
<tr><td>11.20</td><td>Lincoln Park Lake / PCBs

Decision ID 64083 proposes to list PCBs in fish tissue for Lincoln Lake Park. However, this Lake is annually stocked with fish and therefore the lake population does not spend its lifespan in Lincoln Park Lake and may have accumulated PCBs from another waterbody. A number of studies have indicated that farmed salmon accumulate PCBs from the fish meal they are fed. In order to determine the source of the exceedance, fish from the State's stocking system need to be tested prior to introduction and the duration of time they spend in the Lake needs to be determined by a tagging program. The current analysis makes the assumption that fish are introduced to the Lake free of PCBs and subsequently bioaccumulate PCBs from Lake sediments. In addition, the Lake is restocked every year in April which suggests that all fish stocked are immediately removed and consumed. Both of these assumptions need to be fully evaluated prior to determining the source of the exceedance and therefore Lincoln Park Lake does not meet the</td><td>The minimum requirement to justify a listing is exceedances of the relevant criteria or guideline per the Listing Policy. Fish in Lincoln Park Lake exceeded the relevant guideline, the OEHHA fish contaminant goal for PCBs. The identification of fish exceeding the OEHHA fish contaminant goals is important for the protection of human health and it is appropriate to identify the impairment on the 303(d) list.

The analysis did not make the assumption that fish are introduced to the Lake free of PCBs and subsequently bioaccumulate PCBs from Lake sediments, because a source analysis has not been completed.</td><td></td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	minimum requirements to justify a listing. ***Requested Action: Remove Decision ID 64083 from Category 5 (Appendix B) or revise from Category 5 to Category 3 so that further evaluation of whether or not the lake itself is actually impaired.***		
11.21	Santa Monica Bay Offshore/ Nearshore / Arsenic The Fact Sheet for Decision ID 67208 presents two lines of evidence related to arsenic in Santa Monica Bay (88949 and 88950). LOE 88949 presents information related to sediment and found that 0 of 32 samples exceeded the sediment goals utilized in the assessment. LOE 88950 presents information related to fish tissue and indicates that 19 of 19 samples collected as part of Hyperion Water Reclamation Plan NPDES Permit during August of 2006, and August, September, October, and November of 2007 exceeded the evaluation guideline with the presumption that results were reported on a wet-weight basis and 10% of the total arsenic result represented the amount of inorganic arsenic in the sample for comparison to the guideline. In reviewing LOE 88950, no information/citation can be found supporting the assumption that 10% of the total arsenic result represented the amount of inorganic arsenic in the sample. It is appropriate to utilize inorganic arsenic in assessing potential risk; however, either measured inorganic arsenic or a conversion factor developed from actual measured ratios from Santa Monica Bay should be utilized. In USEPA's 2000 Guidance for Assessing Chemical Contaminant Data for Use in Fish Advisories Volume 1 Fish Sampling and Analysis Third Edition (EPA 823-B-00-007), USEPA recommends that, in both screening and intensive studies, total inorganic arsenic tissue concentrations be determined for comparison with the recommended screening value for chronic oral exposure. Scientific literature demonstrates that a range of total to inorganic arsenic ratios exist. For example, a 2008 study specifically looking at arsenic speciation in 383 samples of marine fish and shellfish, showed that the inorganic fraction of arsenic is typically <0.5% with a few of the highest samples ranging	A review of the decision to list arsenic is in process at this time in order to re-examine the assumption of the ratio of organic to inorganic arsenic. 10% is a conservative assumption for amount of inorganic arsenic in the sample, though a locally developed conversion factor could be better and could be used in future assessment. Note, the San Diego listing only used 2 samples of shellfish leading to greater uncertainty than this assessment which used 19 samples and all 19 samples exceeded the guideline by a wide margin. The data were collected on several different days in several different zones. Data from different species cannot be aggregated from different species. Composites of different species will have different age profiles, different species occupy different trophic levels and will accumulate pollutants at different rates. These samples are independent and cannot be combined and considered as a single data point. In addition, while the Listing Policy requires that samples be spatially and temporally independent, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue	The arsenic decision has been reviewed. The listing has been corrected to the finfish guideline (0.0034 ppm instead of 0.0052 ppm for shellfish) and the applicable reference added. The guideline, 0.0034 ppm, is the screening guideline from "Guidance for Assessing Chemical Contaminant Data for Use In Fish Advisories Volume 1: Fish Sampling and Analysis," 2000, (CalWQA ref 3756) and assumes an average body weight of 70 kg and a consumption rate of 32 g/day for a 30 year exposure over a 70-year lifetime. The assessment used an assumption that 10% of the arsenic would be inorganic. Even if a 0.05% inorganic to total ratio was used in the assessment, the number of exceedances would be 14 out of 19 and sufficient to list.

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	from 1-5% The City's concern with the approach has been expressed in other regions of California as well. The Port of San Diego in an August 11, 2016 comment letter to the San Diego Regional Water Quality Control Board regarding a 303(d) arsenic listing, noted the high level of variability of the proportion of inorganic arsenic across species (typically <10%) as measured in a number of other studies, as well as a methodology that could be used to ground truth the applied proportion through actual sample data. In response to the Port of San Diego's comment the San Diego Regional Board removed an arsenic listing from their draft 303(d) list and stated: *"… there is a high level of uncertainty in the levels of inorganic arsenic in shellfish tissue. The assumption regarding the percent of total arsenic in shellfish tissue is likely conservative, and the San Diego Water Board agrees that a listing based on those assumptions has a high probability of mischaracterizing the results as an impairment. The San Diego Water Board supports the Port's suggestion that future monitoring of shellfish incorporate a measurement of both total and inorganic arsenic."* The City also has concerns with the approach to utilizing the data in comparison to the guidelines. Section 6.1.5.3 of the Listing Policy states that "Samples used in the assessment must be temporally independent." However, each individual sample was considered on its own without consideration for temporal representation. Samples collected on the same day (i.e., October 2007, November 2007, and September 2008) should not be considered independently from one another as they are clearly not temporally independent. Furthermore, given tissue concentrations represent the accumulation of pollutants over a time period of years and the risk endpoint relates to a carcinogenic effect over a 30-year period, considering samples collected within months of each other (October and November 2007 and August and September 2008) also does not provide the required temporal independence. Data should be aggregated across appropriate temporal timeframes, which should be assessed on a case-by-case basis, but	over time. Therefore, the data are, by their nature, spatially and temporally independent.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	should be no less than annually. Lastly, in assessing tissue data, consideration should be given to the fact that multiple samples and species are collected and the range of concentrations within those samples and across species represents exposure and potential risk. Considering each individual sample separately from one another or across species results in an assumption that an individual sample is representative of the exposure condition. Data should not only be aggregated on an appropriate temporal scale, but also across species, potentially weighted based on likely consumption patterns. In summary, the lack of inorganic arsenic data and use of an unsupported conversion factor in combination with the approach to comparing tissue data that does not appropriately meet the requirements of temporal independence or reflect actual exposure conditions does support listing arsenic in Santa Monica Bay. The City welcomes the opportunity to discuss approaches to develop inorganic arsenic data for use in future evaluations, as well as an approach to consider tissue data to properly evaluate arsenic in Santa Monica Bay. ***Requested Action: Remove Decision ID 67208 from the 303(d) list. However, if the Regional Board feels it is necessary to categorize the information within the Integrated Report, place the waterbody pollutant combination in Category 3 as there is insufficient data and information to make a beneficial use support determination, but information and/or data indicates beneficial uses may be potentially threatened.*** [3]Peshut, P.J. et al., 2008. Arsenic speciation in marine fish and shellfish from American Samoa. Chemosphere 71 488-492. doi:10.1016/j.chemosphere.2007.10.014 [4]Port of San Diego comment letter to California Water Quality Control Board – San Diego Region. "*Comment – CWA Section 305(b)/303(d) Integrated Report.*" Letter Dated August 11, 2016. [5]Page 47 of San Diego Region Response to Comment on 2014 303(d) list. http://www.swrcb.ca.gov/sandiego/water_issues/programs/303d_list/docs/Response_To_C		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	omments.pdf		
11.22	Santa Monica Bay Offshore/ Nearshore / Mercury The Fact Sheet for Decision ID 67209 presents three lines of evidence related to mercury in Santa Monica Bay (4165, 88894, and 88891). LOE 4165 and 88891 presents information related to sediment toxicity and sediment chemistry, respectively. LOE 88894 presents information related to fish tissue and indicates that 2 of 19 samples collected as part of Hyperion Water Reclamation Plan NPDES Permit during August of 2006, and August, September, October, and November of 2007 exceeded the evaluation guideline with the presumption that results were reported on a wet-weight basis. Section 6.1.5.3 of the Listing Policy states that "Samples used in the assessment must be temporally independent." However, each individual sample was considered on its own without consideration for temporal representation. Samples collected on the same day (i.e., October 2007, November 2007, and September 2008) should not be considered independently from one another as they are clearly not temporally independent. Furthermore, given tissue concentrations represent the accumulation of pollutants over a time period of years, considering samples collected within months of each other (October and November 2007 and August and September 2008) also does not provide the required temporal independence. Data should be aggregated across appropriate temporal timeframes that should be assessed on a case-by-case basis, but should be no less than annually. Lastly, in assessing tissue data, consideration should be given to the fact that multiple samples and species are collected and the range of concentrations within those samples and across species represents exposure and potential risk. Considering each individual sample separately from one another or across species results in an assumption that an individual sample is representative of the exposure condition. Data should not only be aggregated on an appropriate temporal scale, but also across species, potentially weighted based on likely consumption patterns.	Fish collected on the same day, in the same zone, and of the same species, could be aggregated, but this data set represents fish collected on different days or in different zones or they are different species and therefore cannot be aggregated.. In addition, the fact that tissue concentrations represent the accumulation of pollutants over a time period of years, and each fish is a different age and will have moved differently through the environment, provides independence of the tissue sample. However, a review of this decision is in process at this time to confirm the number of exceedances.	The mercury data has been re-assessed and the appropriate data was used and the decision remains "list."

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The City welcomes the opportunity to discuss an approach to appropriately consider tissue data to properly evaluate mercury in Santa Monica Bay. ***Requested Action: Remove Decision ID 67209 from the 303(d) list. However, if the Regional Board feels it is necessary to categorize the information within the Integrated Report, place the waterbody pollutant combination in Category 3 as there is insufficient data and information to make a beneficial use support determination, but information and/or data indicates beneficial uses may be potentially threatened.***		
11.23	Echo Park Lake and Machado Lake (Harbor Park Lake) / Various pollutants Echo Park Lake and Machado Lake (Harbor Park Lake) are two waterbodies located in Los Angeles County which have both been included on the 303(d) impaired waters list since 2006. Because of their water quality impairments, the City invested significant resources to rehabilitate the water quality of the lakes. The $45 million Echo Park Lake Rehabilitation Project was completed in 2015 and included extensive changes to the lake hydrology (e.g., storm drain upgrades, inlet and outlet upgrades, removal of contaminated lake sediments, and installation of lake aeration system) and immediately surrounding areas, including best management practices (BMPs) to reduce the loads of targeted pollutants including trash, metals, coliform, pesticides, and nutrients. The Machado Lake Ecosystem Rehabilitation Project involved dredging and capping the lake bottom, constructing an oxygenation system, adding new storm drain systems, as well as a number of other BMPs to improve water quality. These award-winning projects have been very successful and produced significant water quality improvements; however, these improvements are not reflected in the Regional Board's proposed 303(d) list. The proposed changes for Echo Park Lake includes two delistings for copper and	Echo Park Lake: Chlordane and Dieldrin in Echo Park Lake are addressed by the Los Angeles Area Lakes TMDL for Nitrogen, Phosphorus, Mercury, Trash, OC Pesticides and PCBs. The Los Angeles Area Lakes TMDL included chlordane and reviewed chlordane data from several sources. The Chlordane data included as the LOE in the CalWQA database is from a SWAMP study, *"Contaminants in Fish from California Lakes and Reservoirs: Technical Report on Year One of a Two-Year Screening Study"* (SWAMP, 2009). Inclusion of this listing is in accordance with the Listing Policy. The Los Angeles Area Lakes TMDL included dieldrin and reviewed dieldrin data from an organics study by UCLA. The dieldrin data included as the LOE in the CalWQA database is	

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	lead, which the City supports; however, two new listings were added for chlordane (tissue) and dieldrin. The other legacy listings for Echo Park Lake and Machado Lakes remain on the proposed 303(d) list (see following table). The City maintains that these legacy listings are inappropriately categorized and should instead be listed as Category 3 based on the significant restoration efforts conducted since the last update to the 303(d) list. The USEPA 2010 Integrated Report Guidance uses the following definition for Category 3 listings: *"The existing and readily available data and information is not representative of current conditions of the water body. This rationale might include a determination that: significant land use changes have occurred in the watershed changing the hydrology and nonpoint source loadings; point source discharges were removed; new discharges are now operating; or the locations of sampling stations did not reflect the character of the segment (e.g., limited to locations near discharge outfalls)."* The extensive restoration projects have entirely changed not only the chemical and physical conditions of the lakes themselves, but have also completely transformed the nonpoint source loadings, and hydrology of the system. Any data collected prior to the restoration efforts (i.e., all of the data used for the current listings) are not representative of the current condition of the lakes; therefore, both of these waterbodies are excellent candidates for a Category 3 listing and should be categorized as such until enough data exists to establish their current condition. It is likely that as a result of both of these restoration efforts, the lakes could be entirely delisted. However, until that time, a Category 3 listing would represent the most conservative listing on the part of the Regional Board. The City appreciates the time and effort that goes into maintaining the 303(d) list and notes that these award-winning restoration projects were facilitated in part by the Regional Board's historical listing actions. The City hopes that the extensive resources put into restoring the beneficial use of these waterbodies can be recognized by assigning the proper Category 3 listing to Echo Park and Machado Lake pollutants.	from a SWAMP study, "*Contaminants in Fish from California Lakes and Reservoirs: Technical Report on Year One of a Two-Year Screening Study"* (SWAMP, 2009). Inclusion of this listing is in accordance with the Listing Policy. The data available supports listing chlordane and dieldrin for Echo Park Lake in Category 4a per the Listing Policy. A conclusion that new data would support delisting or even be significantly different from existing data is speculative. See response to comment 32.3 for a discussion of "readily available" data for this listing cycle. Machado Park Lake: The Machado Park Lake impairments due to Algae, Ammonia, Eutrophic Conditions and Odor are being addressed by the Machado Lake Nutrient TMDL. The Machado Lake impairments due to Chem A, DDT, Chlordane and Dieldrin are being addressed by the Machado Lake Toxics TMDL. The data available supports listing all these listings in Category 4a per the Listing Policy. A conclusion that new data would support delisting or even be significantly different from existing data (and a movement to Category 3) is speculative. The inconsistences noted by the commenter for Echo Park Lake and Machado Lake in the 303(d)	

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>
<table>
<tr><th>Decision ID</th><th>Water Body Segment</th><th>Listing</th></tr>
<tr><td>34030</td><td>Echo Park Lake</td><td>Algae</td></tr>
<tr><td>34696</td><td>Echo Park Lake</td><td>Ammonia</td></tr>
<tr><td>62679</td><td>Echo Park Lake</td><td>Chlordane</td></tr>
<tr><td>62680</td><td>Echo Park Lake</td><td>Dieldrin</td></tr>
<tr><td>34698</td><td>Echo Park Lake</td><td>Eutrophic</td></tr>
<tr><td>34756</td><td>Echo Park Lake</td><td>Odor</td></tr>
<tr><td>33999</td><td>Echo Park Lake</td><td>PCBs (Polychlorinated biphenyls)</td></tr>
<tr><td>44748</td><td>Echo Park Lake</td><td>pH</td></tr>
<tr><td>32435</td><td>Echo Park Lake</td><td>Trash</td></tr>
<tr><td>34305</td><td>Machado Lake (Harbor Park Lake)</td><td>Algae</td></tr>
<tr><td>42416</td><td>Machado Lake (Harbor Park Lake)</td><td>Ammonia</td></tr>
<tr><td>34362</td><td>Machado Lake (Harbor Park Lake)</td><td>ChemA (tissue)</td></tr>
<tr><td>42417</td><td>Machado Lake (Harbor Park Lake)</td><td>Eutrophic</td></tr>
<tr><td>42262</td><td>Machado Lake (Harbor Park Lake)</td><td>Odor</td></tr>
<tr><td>35181</td><td>Machado Lake (Harbor Park</td><td>Trash</td></tr>
</table>
</td><td>list have been addressed and all the listings are in category 4a.

The significant restoration efforts are expected to be reflected in new data collected after the restoration efforts and submitted to CEDEN to support the next listing cycle for the Los Angeles Region. The Los Angeles Water Board looks forward to the review of that data.</td><td></td></tr>
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No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Lake) In reviewing the proposed listings for the 303(d) list for Echo Park and Machado Lakes a number of inconsistencies were noted. They have been identified below: • Echo Park Lake PCB (tissue) (Decision ID 33999) is listed as a new 4A listing in Appendix C, but the change is not noted in Appendix A. • Machado Lake Chlordane (tissue) (Decision ID 33013), Dieldrin (tissue) (Decision ID 33643), and PCBs (tissue) (Decision ID 33285) are not listed as changes in Appendix A, do not appear in Appendix B or C, but are listed in Appendix G. • Machado Lake DDT (tissue) (Decision ID 33211) is not listed as a change in Appendix A and does not appear in Appendix B or C, but is listed in Appendix G, although incorrectly, as requiring a TMDL despite the fact that DDT is covered by an existing TMDL. • Machado Lake algae, ammonia, ChemA (tissue), eutrophication, odor and trash are included in Appendix G Fact Sheets as already being addressed by a USEPA-approved TMDL, which is expected to result in attainment of the standard; however, they are all listed as Category 5B in Appendix B and as unchanged in Appendix A in the proposed 303(d) List. The Regional Board should clarify if these omissions and inconsistencies equate to a delisting of the pollutants. As explained above, the City supports the delisting of the pollutants due to the extensive restoration projects that have been completed. If, for some reason, these listing were omitted in error and the RWQCB disagrees with the City's comment to include them as Category 3, then all of the listings should, at a minimum, be included as Category 4A. Category 4A is defined as "*A TMDL has been developed and approved by USEPA and the approved implementation plan is expected to result in full attainment of the water quality standard within a specified time frame.*" Category 4A is supported by the approved TMDLs covering Echo Lake Chlordane and PCB listings, as well as the		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Machado Lake Chlordane, DDT, Dieldrin, PCB, algae, ammonia, ChemA(tissue), eutrophication, odor, and trash listings. ***Requested Actions:*** ***(1) Move all segments listed in the preceding table to Category 3 based on the completion of extensive restoration projects, and include the following text to explain the category change: "Due to recent extensive restoration efforts, data from 2010 and prior is not representative of current conditions of the water body. Available data are insufficient to determine attainment status."*** ***(2) If Category 3 listing of suggested pollutants does not occur, ensure that all pollutants listed in the preceding table are correctly categorized as Category 4A based on the existence of USEPA approved TMDLs.*** ***(3) Correct and/or clarify inconsistent listings in Appendices for consistency throughout the entire proposed 303(d) document.***		
11.24	Various waterbodies / Benthic Community Effects Notwithstanding the City's comments related to removing all listings that do not identify either toxicity or a pollutant as the impairment, the City identified the following listings for Benthic Community Effects (summarized in the following table) that are inappropriate: • Ballona Creek: Decision ID 65656 • Dominguez Channel (lined portion above Vermont Ave): Decision ID 66165 • LA River Reach 3 (Figueroa St. to Riverside Dr.): Decision ID 66229 • LA River Reach 4 (Sepulveda Dr. to Sepulveda Dam): Decision ID 66232	Listings based on both the SCIBI and CSCI scores are consistent with State policy and have been assessed relative to appropriate reference sites. See response to comment 26.4 for a discussion of the appropriate metrics for benthic community condition. See response to comment 26.5 for a discussion of the established water quality criteria. Benthic Community Listings for waterbodies that	The Benthic Community decision for Arroyo Seco Reach 2 has been changed to "do not list" as the sampling site with the exceedances in the soft bottom section is actually in Arroyo Seco Reach 1. That data is now attributed to Arroyo Seco Reach 1. The Benthic Community decision for Arroyo Seco Reach 1 has been revised to include the data from the soft bottom section and the listing decision remains "do not delist." In addition, the factsheet has been updated to say that the additional data

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Arroyo Seco Reach 1 (LA River to West Holly Ave.): Decision ID 44553 • Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam): Decision ID 65548 • Compton Creek: Decision ID 44498 The City believes the listings are inappropriate, based on the following issues that are described in more detail below: • <u>Impairment of the reaches was not demonstrated using an appropriate metric for benthic community condition.</u> The listing decisions were based on Southern California Coastal Index of Biotic Integrity (SCIBI). The State Water Board has rejected use of the SCIBI in favor of the California Stream Condition Index (CSCI). The Regional Board Staff Conclusions (Staff Conclusions) for the listing decisions do not acknowledge that the data used to support the decisions were SCIBI scores, not CSCI scores. Instead, the Staff Conclusions imply that the decisions are based on CSCI scores. • <u>There is no established water quality criteria for benthic community condition.</u> Use of a SCIBI score of 40 (or other "cutoffs" promulgated by the authors of the SCIBI) as a listing threshold is not consistent with the State Board's current approach for identifying impairment thresholds for benthic community data. The Regional Board use of a CSCI score of 0.79 in other listing decisions (and implied to be appropriate for Ballona Creek) is also not consistent with the State Board's current approach for identifying impairment thresholds for benthic community data. • <u>Listings for concrete-lined channels using current metrics are inappropriate.</u> Reference reaches for concrete-lined channels in highly urbanized catchments are lacking. Physical habitat conditions were apparently not considered during data evaluation. The State Board is planning to develop expectations for benthic community condition for developed landscapes using the CSCI and a new Algal Stream Condition	are lined entirely with concrete have been assessed as "insufficient information" until such time as benthic community condition scores have been more specifically calibrated for concrete-lined channels. The **Ballona Creek** samples were taken from a fully concrete-lined section and now Ballona Creek benthic community condition has been assessed as "insufficient information". The **Dominguez Channel above Vermont** samples were taken from a fully concrete-lined section and now Dominguez Channel above Vermont benthic community condition has been assessed as "insufficient information". **LA River Reach 3** samples were taken from a fully concrete-lined section and now LA River Reach 3 benthic community condition has been assessed as "insufficient information". Benthic Community Listings which were based on samples taken from un-lined sections of reaches were appropriately assessed. **Arroyo Seco Reach 1** was listed in 2010 for benthic macroinvertebrate assessment (2 out of 2 samples not meeting the standard) in an *unlined* section of the channel. The additional assessment added this listing cycle appears to be from a lined section of the Arroyo Seco and that LOE is classified as "insufficient information." **Compton Creek** was listed in 2010 for benthic macroinvertebrate assessment in an *unlined*	added for the 2016 list was taken from a short soft-bottom section of the channel at the upstream end of the Reach and that both upstream and downstream of that section is fully concrete-lined.

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Index (ASCI). TMDL development for benthic community effects in concrete-lined channels based on unofficial IBI thresholds is premature.

- <u>Insufficient data are available to meet the listing requirements.</u> Notwithstanding the previous issues, several of the listings rely on a single site for data as a basis of the listing inconsistent with the Listing Policy.

<table>
<tr><th rowspan="2">Type of Decision</th><th rowspan="2">Segment / Station</th><th colspan="6">Cited Benthic Community Data</th></tr>
<tr><th>Line of Evidence (LOE) ID</th><th>Data Source</th><th>Metric used in Data Source</th><th>Time Frame</th><th>Scores[a]</th></tr>
<tr><td>New Listing</td><td>Ballona Creek (Station 14)</td><td>82971</td><td rowspan="5">Bioassessment Monitoring Report in LA County, 2006-2008</td><td>SCIBI</td><td>2006, 07, 08</td><td>3/3 scores were below 40</td></tr>
<tr><td>New Listing</td><td>Dominguez Channel (Station 19)</td><td>83960</td><td>SCIBI</td><td>2006, 07, 08</td><td>3/3 scores were below 40</td></tr>
<tr><td>New Listing</td><td>LA River Reach 3 (Stations 11 and 12)</td><td>85994</td><td>SCIBI</td><td>2006, 07</td><td>4/4 scores were below 40</td></tr>
<tr><td>New Listing</td><td>LA River Reach 4 (Station 13)</td><td>86097</td><td>SCIBI</td><td>2006, 07</td><td>2/2 scores were below 40</td></tr>
<tr><td rowspan="3">Do Not Delist</td><td rowspan="3">Compton Creek (Station 8)</td><td>83829</td><td>SCIBI</td><td>2006, 07, 08</td><td>3/3 scores were below 40</td></tr>
<tr><td>30224</td><td rowspan="2">LA County 1994-2005 Integrated Receiving Water Impacts Report. Section 5, LA River Watershed Management Area, pp 5.1 - 5.40</td><td>SCIBI</td><td>2003, 04</td><td>2/2 scores were "very poor"</td></tr>
<tr><td>82895</td><td rowspan="2">Bioassessment Monitoring Report in LA County, 2006-2008</td><td>SCIBI</td><td>2008</td><td>1/1 score was below 40</td></tr>
<tr><td>Previous Listing</td><td>Arroyo Seco Reach 1 (Station LALT501)</td><td>30223</td><td>SCIBI</td><td>2003, 04</td><td>2/2 scores were below 13</td></tr>
<tr><td>New Listing</td><td>Arroyo Seco Reach (Station 7)</td><td>82896</td><td>SCIBI</td><td>2006, 07, 08</td><td>3/3 scores were below 40</td></tr>
</table>

[a] Per Staff Conclusions, SCIBI scores were binned as very good (80-56), good (41-55), fair (27-40), poor (14-26) and very poor (0-13) habitat conditions; sites with scores below 26 are considered to have impaired conditions.

Impairment of the reaches was not demonstrated using an appropriate metric for benthic community condition.

SCIBI-based datasets should not be considered for listing decisions. Section 3.9 of the Listing Policy states:

> *"A water segment shall be placed on the section 303(d) list if the water segment exhibits significant degradation in biological populations and/or communities* ***as compared to reference site(s)*** *and is associated with water or sediment concentrations of pollutants including, but not limited to chemical*

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section of Compton Creek. Additional assessments were added for this listing cycle also in the unlined section of Compton Creek. **Arroyo Seco Reach 2** is not fully lined; three out of three IBI scores from 2006, 2007 and 2008 exceeded the standard.

The Benthic Macroinvertebrate data included in the CalWQA database for LA River Reach 4 should be associated with Reach 5. Additionally, this section is not fully-lined. Los Angeles Water Board staff's intention will be to correct the reach in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval or prior to the next Listing Cycle that includes the Los Angeles Region.

There are sufficient data in the waterbody segments listed to be representative of the water body segment in accordance with the Listing Policy Section 6.1.5.2 and 6.1.5.3. When single stations were re-sampled, they were sampled on different years.

See response to comments 26.4, 26.13 and 26.14 for a discussion of low elevation segments and the benthic community scores.

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	concentrations, temperature, dissolved oxygen, and trash." [Emphasis added.] While it is commonly assumed that the SCIBI inherently accounted for reference conditions, the reference conditions used to develop the SCIBI were not representative of the low-elevation/low-gradient streams commonly found in the alluvial plains of the Los Angeles Region. It was developed using data from 275 sites, ranging from Monterey County to the Mexican border, but not a single reference location represented low-elevation and low-gradient streams. The reaches listed in the table above are extremely low gradient, low-elevation water bodies, and thus the SCIBI does not adequately define relevant reference conditions. Furthermore, the reference conditions used in the SCIBI represent a less restrictive definition of the reference condition than that which was deemed adequate as part of the State's Reference Condition Management Program[15]. The lead scientist for development of the SCIBI, Dr. Peter Ode, has acknowledged the limitations on application of the SCIBI. In a recently published paper regarding a study examining the SCIBI relative to other benthic macroinvertebrate bioassessments, he concluded that the SCIBI did not adequately address reference conditions in low-elevation sites, stating that the SCIBI was "not completely effective at controlling for an elevation gradient." Dr. Ode was also the coauthor of a March 2009 report on recommendations for development and maintenance of a network of reference sites to support biological assessment of California's wadeable streams. This report describes recommendations made by a technical panel of experts on bioassessment, including experts from the California Department of Fish and Wildlife, Southern California Coastal Water Research Project (SCCWRP), US EPA Region 9, and various universities. The technical panel laid out a number of steps that would be necessary to develop a network of adequate reference sites for implementation of criteria for bioassessments. They note that adequate reference sites have not been identified in southern California, stating, "human-dominated landscapes can be so pervasive in locations such as urban southern California and the agriculturally dominated Central Valley that no		

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	undisturbed reference sites may currently exist in these regions. A statewide framework for consistent selection of reference sites must account for this complexity." In 2010, as part of its project to develop a statewide Biointegrity Policy, the State Board abandoned use of the SCIBI and other regional IBIs, and funded development of the statewide CSCI (Mazor et al., 2016). The CSCI addressed at least some of the problems with the SCIBI through its use of a modeled reference condition as opposed to a regional reference pool. Starting in late 2016, the State Board began funding the development of a "companion" Algal Stream Condition Index (ASCI). The State Board is developing expectations for benthic community condition using both the CSCI and the ASCI which will be incorporated in a statewide Biointegrity Assessment Implementation Plan. The Staff Conclusions associated with the new listings in the preceding table do not acknowledge that the data used to support the new listings were SCIBI scores. Further, the Staff Conclusions for all of the new listings imply that Regional Board staff based the listing decision on CSCI scores. The source of the BMI data for each of the new listings, and the new LOE for Compton Creek, ("Bioassessment Monitoring Report in Los Angeles County, 2006-2008") were appendices (Appendix H) of the Los Angeles County Stormwater Monitoring Reports for 2006, 2007, and 2008. *In these reports, BMI data were scored using the SCIBI (Ode et al. 2005), not the CSCI*. In two cases (Ballona Creek and Arroyo Seco Reach 2), the Staff Conclusions explicitly, but erroneously, state that the underlying BMI data were CSCI scores. In the other cases, the ambiguous acronym "IBI" is used where scores are cited, and then the narrative ends with a passage implying that the "IBI" scores were CSCI scores. The misleading information in the Staff Conclusion for each new listing recommendation is provided below. • Ballona Creek: "Based on the readily available data and information, the weight of evidence indicates that there is sufficient justification in favor of placing Benthic Community Effects on the CWA section 303(d) List.		

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	"**3 of 3 samples were below the California Stream Condition Index (CSCI) score of 0.79**, indicating poor water quality and that pollutant concentration and toxic effects are impacting aquatic life in this waterbody segment" ... "**The CSCI** is available statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. **The CSCI** will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity." (Regional Board Staff Conclusion for Decision ID 65656, emphasis added) • Dominguez Channel (lined portion above Vermont Ave.): "Three of the three samples collected had IBI scores below 40 there are several other pollutants in this water body that are listed for impairment including ammonia, copper, diazinon, nitrogen, toxicity, and zinc." ... "**The CSCI** is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. **The CSCI** will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs)." (Regional Board Staff Conclusion for Decision ID 66165, emphasis added) • Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.): "Four of the four samples collected had IBI scores below 40." ... "**The CSCI** is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. **The CSCI** will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs)." (Regional Board Staff Conclusion for Decision ID 66299, emphasis added) • Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam): "Both of the two samples collected had IBI scores below 40.... Two of the two samples collected had IBI scores below 40. ... "**The CSCI** is applicable statewide, accounts for a much wider range of natural variability, and		

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	provides equivalent scoring thresholds in all regions of the state. **The CSCI** will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs)." (Regional Board Staff Conclusion for Decision ID 66232, emphasis added) • Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam): "3 of 3 samples exceeded the GUIDELINE... **3 of 3 samples were below the California Stream Condition Index (CSCI) score of 0.79**. ... "**The CSCI** is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. **The CSCI** will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs)." (Regional Board Staff Conclusion for Decision ID 65548, emphasis added) ***There is no established water quality criteria.*** Regional Board staff utilized a SCIBI score of 40 as a listing threshold. However, this value is not an established water quality criteria, nor does it represent the type of threshold the State Board intends to use to identify community condition or levels of impairment in its Biointegrity Assessment Implementation Plan. A SCIBI score of 39 was originally promulgated by the authors of the SCIBI (Ode et al. 2005) as an "impairment threshold" because it was equal to an arbitrary statistical criterion (two standard deviations below the mean reference site score). Although it was not used for the listings in the table above, Regional Board staff have also used a CSCI score of 0.79 as a listing threshold for other reaches (see also the statement regarding this threshold in the Staff Conclusions excerpt for Ballona Creek above). However, a CSCI threshold of 0.79 is also based on an arbitrary statistical criterion (10th percentile of the reference calibration site scores; Mazor et al. 2016), and is not an adopted water quality criteria. The State Board is not pursuing use of arbitrary statistical cutoffs, such as reference population percentiles, to identify benthic community impairment going forward. As outlined in the November 2016 Work Plan, the State Board is using a		

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	Biological Condition Gradient Expert Synthesis approach to relate ranges of biological condition scores to community condition. Using this approach, a team of experts uses taxonomic metrics to assign degrees of biological condition to test sites while being blind to the degree of anthropogenic stressors present at the sites. In addition, the analysis is blind to the relationship between site scores and statistical distributions of overall datasets or reference datasets. **Listings for concrete-lined channels using currently available metrics are inappropriate.** Application of the SCIBI to concrete-lined channels is especially inappropriate given the lack of a reference population for low-gradient streams in coastal southern California, in general, much less for modified channels, in specific. Section 6.1.5.8 of the listing policy states: *"When evaluating biological data and information, RWQCBs shall evaluate all readily available data and information and shall evaluate bioassessment data from other sites, and compare to reference condition. Evaluate physical habitat data and other water quality data, when available, to support conclusions about the status of the water segment."* EPA's causal assessment manual cites physical habitat as a leading cause of impairment in streams on 303(d) lists and recommends that, in all cases where physical habitat is evaluated, stream size and channel dimensions, channel gradient, channel substrate size and type, habitat complexity and cover, vegetation cover and structure, and channel-riparian interactions should all be considered before making a decision.[19] Physical habitat conditions are not referenced in the Lines of Evidence for the benthic community effects listings in the preceding table, although physical habitat data collection is a standard part of bioassessment monitoring and reporting. Ultimately, benthic community impairments in concrete-lined channels should be evaluated for potential listing in Category 4c of the 305(b) integrated		

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	report, instead of on the 303(d) list of segments requiring a TMDL. The USEPA Guidance for 2006 Assessment, Listing and Reporting Requirements Pursuant to Sections 303(d), 305(b) and 314 of the Clean Water Act (IRG) states: *"Circumstances where an impaired segment may be placed in Category 4c include segments impaired solely due to lack of adequate flow or to stream channelization."* As part of its statewide Biostimulatory-Biointegrity Project, in recognition that it may not be appropriate or productive to apply a single set of benthic community condition expectations to streams in pristine and developed landscapes, the State Board is currently employing SCCWRP and CDFW to developing expectations for benthic community condition for developed landscapes using the CSCI and the Algal Stream Condition Index (ASCI).[20] The probability that concrete-lined channels in highly urbanized settings will be candidates for alternative benthic community endpoints is illustrated by language from the Work Plan: *"**In some streams, direct channel modifications (e.g., bank armoring) may also limit opportunities to sustain high-quality ecological conditions for aquatic life**. In these highly developed settings, the large number of linked stressors may prevent a stream from supporting its beneficial uses or attaining high scores on indices of biological condition. **Often, these stressors are difficult to mitigate or remove under the traditional mechanisms available to the Water Boards**. In these circumstances, the range of CSCI and/or ASCI scores may be constrained, but targeted restoration could improve conditions. Key technical questions underpinning the range of options and prioritization of management actions for wadeable streams along the continuum from undeveloped to highly developed landscapes found within California are: For which streams is biological integrity constrained by development in the catchment? How can they be identified and mapped? What are the ranges of biological conditions these developed landscapes can support?" (Mazor et al. 2017; emphasis added)*		

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	Triggering TMDL development for benthic community effects in concrete-lined channels using unofficial impairment thresholds derived from statistical distributions of IBIs from unarmored reference reaches is unwarranted. **Insufficient data are available to meet the listing requirements** Notwithstanding the previous issues, several of the listings rely on a single site for bioassessment data, which is inconsistent with the Listing Policy. Per section 3.9 (Degradation of Biological Populations and Communities) of the Listing Policy, "The analysis should rely on measurements from at least two stations." Only one site is referenced in the Fact Sheets for the following listing decisions: • Ballona Creek • Dominguez Channel (lined portion above Vermont Ave) • Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) [Also, note that the data associated with Los Angeles River Reach 4 was actually collected in Los Angeles River Reach 5.] • Arroyo Seco Reach 1 (LA River to West Holly Ave.) • Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam) • Compton Creek Because data were only collected at one site within these waterbodies, the requirements of the Listing Policy are not met. ***Summary*** As described in detail above, the approach utilized to establish benthic community effects impairments are not demonstrated using an appropriate metric for benthic community condition. The listings rely on an unestablished water quality criteria based on metrics that are not appropriate for concrete-lined channels. Lastly, in all but one listing, there are not sufficient data to meet the listing requirements per the Listing Policy as the data were only collected at a single site within a waterbody. ***Requested Action: Remove the following Decision IDs from the 303(d) list:*** • ***Ballona Creek: Decision ID 65656***		

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	• ***Dominguez Channel (lined portion above Vermont Ave): Decision ID 66165*** • ***LA River Reach 3 (Figueroa St. to Riverside Dr.): Decision ID 66229*** • ***LA River Reach 4 (Sepulveda Dr. to Sepulveda Dam): Decision ID 66232*** • ***Arroyo Seco Reach 1 (LA River to West Holly Ave.): Decision ID 44553*** • ***Arroyo Seco Reach 2 (West Holly Ave to Devils Gate Dam): Decision ID 65548*** • ***Compton Creek: Decision ID 44498***		
11.25	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) / Temperature, water The temperature listing for Los Angeles River Reach 3 uses an evaluation guideline of 13-21°C as the optimum growth range for rainbow trout. However, the beneficial use listed for Los Angeles River Reach 3 is WARM. Only the COLD beneficial use uses the rainbow trout growth range as a listing criteria. This guideline should be removed and the number of exceedances recalculated based on the Basin Plan criteria for WARM. Notwithstanding that the evaluation guideline of 13-21°C is inappropriate for Los Angeles River Reach 3 given the water body's beneficial uses, the manner in which the evaluation guideline is applied is also inappropriate. Line of Evidence (LOE) 85933 references Moyle 1976 as the source of the evaluation guideline. Moyle 1976 was revised and expanded by Moyle 2002. Moyle 2002 states: "Rainbows are found where daytime temperatures range from nearly 0°C in winter to 26-27°C in summer, although extremely low (<4°C) or extremely high (>23°C) temperatures can be lethal if the fish have not previously been gradually acclimated. Even when acclimation temperatures are high, temperatures of 24-27°C are invariably lethal to trout, except for very short exposures." As such, while temperatures above 21°C may not be optimal according to Moyle 1976, Moyle 2002 clearly states that lethal temperatures are those greater than 23°C	A review of the Los Angeles River Reach 3 temperature decision is in process at this time.	The temperature data for the Los Angeles River Reach 3 has been re-evaluated and compared to the Basin Plan standard of not to exceed 80° and the decision has been revised to "do not list."

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	which indicates that the evaluation guideline of 21°C is more appropriately applied as a chronic guideline (necessitating the establishment of an averaging period) and 23°C is the more appropriate "not-to-exceed" guideline as used in the proposed listing. When utilizing 23°C, only 40 of the 542 samples exceed the guideline, which does not meet the *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List* (Listing Policy) minimum number of measured exceedances needed to place a water segment on the Section 303(d) list for conventional or other pollutants (a minimum of 90 exceedances would be required). As such, even if the Los Angeles River Reach 3 was designated with a COLD beneficial use, applying the appropriate "not-to-exceed" guideline of 23°C results in a finding of nonimpairment for temperature in Los Angeles River Reach 3. Lastly, notwithstanding that the evaluation guideline of 13-21°C is inappropriate for Los Angeles River Reach 3 given the water body's beneficial uses and that 23°C is the more appropriate "not-to-exceed" guideline, when the average water temperature across Los Angeles River Reach 3 was above 21°C (69.8°F), with only one exception out of 33, the air temperature was also above 21°C (69.8°F). As such, ambient air temperature above 21°C is most likely cause of exceedances of the 21°C evaluation guideline. ***Requested Action: Revise Decision ID 64386 for the temperature water listing for Los Angeles River Reach 3 to Do Not List on 303(d) list and remove from Category 5 (Appendix B) because the beneficial use protected by the evaluation guideline is not an existing or potential beneficial use within Los Angeles River Reach 3; the number of measured exceedances does not meet the minimum number of measured exceedances needed to place a water segment on the Section 303(d) list for conventional or other pollutants if an appropriate evaluation guideline is applied; and ambient air temperature is the most likely cause of exceedances of the evaluation guideline.***		
11.26	Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.), Los Angeles River	Los Angeles River Reach 3 includes three LOEs	

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	Reach 5 (within Sepulveda Basin), Bull Creek, Wildlife Lake, and Balboa Lake / Ammonia The Fact Sheet for Decision ID 32974 corresponds to the ammonia listing for Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) and states that two lines of evidence are available in the administrative record to assess the pollutant, although there are three lines of evidence present (85894, 86019, and 2507). LOE 2507 is a placeholder to support a 303(d) listing decision made prior to 2006. LOEs 85894 and 86019 each state that all of the exceedances in each dataset occurred prior to and in 2007. The City found that the last exceedance was July 2007, which is to be expected given that 2007 was the year that the nitrification/denitrification (NDN) treatment process as completed at both the Los Angeles-Glendale Water Reclamation Plant (LAGWRP) and Donald C. Tillman Water Reclamation Plant (DCTWRP). Both the LAGWRP and DCTWRP discharges travel through Los Angeles River Reach 3, and since the NDN processes to remove ammonia were completed in July 2007, no exceedances in this waterbody have been observed. The Fact Sheet for Decision ID 32567 corresponds to the ammonia listing for Los Angeles River Reach 5 (within Sepulveda Basin) and states that two lines of evidence are available in the administrative record to assess the pollutant, although there are three lines of evidence present (86205, 86204, and 2520). LOE 2520 is a placeholder to support a 303(d) listing decision made prior to 2006. LOEs 86205 and 86204 each state that all of the exceedances in each dataset occurred prior to March and August 2007, respectively. The DCTWRP discharge flows through part of Reach 5 and the NDN processes to remove ammonia were completed in 2007. The Fact Sheet for Decision ID 60597 corresponds to the ammonia listing for Bull Creek and states that two lines of evidence are available in the administrative record to assess the pollutant (83158 and 83154). LOE 83154 presents one data point collected in May 2008 that does not show an exceedance. LOE 83158 states that all of the exceedances occurred prior to August 2007. The DCTWRP discharge flows through Bull Creek and the NDN processes to remove ammonia	(85894, 86019, and 2507); 85894 and 86019 were grouped to make the assessment that there were 33 exceedances out of 111 samples total. Los Angeles River Reach 3 and Los Angeles River Reach 5 are being addressed by the Los Angeles River Nutrient TMDL. Bull Creek, Wildlife Lake, and Balboa Lake have been updated in the CalWQA database to reflect that they are being addressed by the Los Angeles River Nutrient TMDL. Los Angeles River Reach 4 is meeting the criteria based on the available data. Data collected after the NDN processes were put in place may show that the water quality in these reaches has improved; this update to the 303(d) list is only considering data submitted by August 30, 2010. For a discussion of readily available data see response to comment 32.3. Los Angeles Water Board staff encourages the commenter to enter all the relevant data into CEDEN in preparation for the next listing cycle that includes the Los Angeles Region.	

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	were completed in 2007. The Fact Sheet for Decision ID 66374 corresponds to the ammonia listing for Wildlife Lake and states that one line of evidence is available in the administrative record to assess the pollutant (90174). LOE 90174 states that all of the exceedances occurred prior to August 2007. The DCTWRP discharge flows through Wildlife Lake and the NDN processes to remove ammonia were completed in 2007. The Fact Sheet for Decision ID 60378 corresponds to the ammonia listing for Balboa Lake and states that one line of evidence is available in the administrative record to assess the pollutant (82930). LOE 82930 states that all of the exceedances occurred prior to August 2007. The DCTWRP discharge flows through Balboa Lake and the NDN processes to remove ammonia were completed in 2007. Furthermore, the Fact Sheet for Decision ID 32913 corresponds to the ammonia listing for Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) and includes the decision to Delist from 303(d) list (being addressed by USEPA approved TMDL) based on the following Regional Board Staff Decision Recommendation: "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." This decision is based on two LOEs (2513 and 86136). LOE 2513 states "A TMDL and implementation plan have 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." LOE 86136 finds that 0 of 152 samples exceeded the site-specific basin plan objective for total ammonia as nitrogen and only includes samples collected from 2008 to 2010 (which is after the date when the WRPs added the NDN treatment process and is inconsistent with the dates used in the assessments conducted for Los Angeles River Reaches 3 and 5, Bull Creek, and Wildlife Lake).		

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	Through the installation and implementation of NDN treatment facilities and process optimization by the City of Los Angeles (and City of Burbank), which has spent approximately $75 million to construct advanced treatment facilities to address ammonia, and approximately $6 million per year to operate those facilities, the quality of the water in the Los Angeles River watershed has been demonstrated to be fully attaining the applicable water quality objectives for ammonia. The message from the City and the Regional Board should be that the cooperative process worked, and that the applicable water quality standards are now being attained. Instead, the 303(d) list does not reflect the water quality improvement. Given that the addition of the NDN treatment process to the WRPs has eliminated exceedances, the timeframe used to evaluate impairments due to ammonia should be made consistent with the timeframe used in Los Angeles River Reach 4 which would result in the same listing decision for each water body (i.e., Delist from 303(d) list [being addressed by USEPA approved TMDL]). ***Requested Action: Revise the following Decision IDs to a finding of nonimpairment and remove listings for ammonia from Category 5 (Appendix B) because the data used to conclude that the applicable water quality standards for the pollutant were exceeded are no longer representative of ammonia concentrations observed within the water bodies due to the installation and operation of NDN:*** - ***Los Angeles River Reach 3 Decision ID 32947*** - ***Los Angeles River Reach 5 Decision ID 32567*** - ***Bull Creek Decision ID 60597*** - ***Wildlife Lake Decision ID 66374*** - ***Balboa Lake Decision ID 60378*** -		
11.27	Los Angeles River Reach 1 (Estuary to Carson Street) and Los Angeles River Reach 2 (Carson to Figueroa Street) / Ammonia The Fact Sheet for Decision ID 32973 corresponds to the ammonia listing for Los	Each of those LOEs are "placeholder" LOEs to show a finding of impairment made prior to 2006. The CalWQA database does not include data from decisions made prior to 2006.	

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	Angeles River Reach 1 (Estuary to Carson Street) and is based on one LOE (2319), which does not contain any data. As such, the decision previously approved by the State Water Resources Control Board and the USEPA has not changed. The Fact Sheet for Decision ID 32911 corresponds to the ammonia listing for Los Angeles River Reach 2 (Carson to Figueroa Street) and is based on one LOE (2465) which does not contain any data. As such, the decision previously approved by the State Water Resources Control Board and the USEPA has not changed. In light of the information presented in the previous comment, it can be expected that conditions in Los Angeles River Reaches 1 and 2 since NDN was fully implemented (mid-2007) are consistent with what has been observed in Los Angeles River Reaches 3, 4, and 5 (i.e., no exceedances). A review of the ammonia data analyzed as part of the Upper Los Angeles River (ULAR) Enhanced Watershed Management Program (EWMP) do not show any exceedances. ***Requested Action: Revise the following Decision IDs to a finding of nonimpairment and remove listings for ammonia from Category 5 (Appendix B) because the data used to conclude that the applicable water quality standards for the pollutant were exceeded are no longer representative of ammonia concentrations observed within the water bodies due to the installation and operation of NDN:*** - ***Los Angeles River Reach 1 Decision ID 32973*** - ***Los Angeles River Reach 2 Decision ID 3291*** -	There is no additional data in the CalWQA database that would support delisting. Los Angeles Water Board staff encourages the commenter to enter into CEDEN the ammonia data analyzed as part of the Upper Los Angeles River (ULAR) Enhanced Watershed Management Program (EWMP) development prior to the next Listing Cycle that includes the Los Angeles Region.	
11.28	Tujunga Wash (LA River to Hansen Dam) / Ammonia The Fact Sheet for Decision ID 32873 corresponds to the ammonia listing for Tujunga Wash (LA River to Hansen Dam) and is based on one LOE (2554) which does not contain any data. Rather, the Fact Sheet states that "One line of evidence	This LOEs is a "placeholder" LOE to show a finding of impairment made prior to 2006. The CalWQA database does not include data from decisions made prior to 2006.	

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	is available in the administrative record to assess this pollutant. A TMDL has been developed and approved by USEPA and an approved implementation plan is expected to result in attainment of the standard. The Los Angeles River Nitrogen TMDL was approved by RWQCB on August 19, 2003 and subsequently approved by USEPA on March 18, 2004. This listing will substitute for the previous listings for foam, floc, scum, and taste and odor." As there are no data to support the listing, the ammonia listing for Tujunga Wash should be removed. Also, substituting the listing for foam, scum, and taste and odor is not necessary because the Regional Board removed those listings from the section 303(d) list because they are not pollutants or toxicity. ***Requested Action: Revise Decision ID 32873 for the ammonia listing for Tujunga Wash to Delist from 303(d) list and remove from Category 5 (Appendix B).***	There is no additional data in the CalWQA database that would support delisting. The listings for foam, scum, and taste and odor were removed even though they showed impairment of beneficial uses because the listing for ammonia could "substitute" or stand in for those non-pollutant impairments and the Los Angeles River Nitrogen TMDL addresses those impairments.	
11.29	Bull Creek, Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.), Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam), Los Angeles River Reach 5 (within Sepulveda Basin), Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin), and Los Angeles/Long Beach Outer Harbor (inside breakwater) / Toxicity The Fact Sheets for the following Decision IDs relate to toxicity in the water column: - Decision ID 39159 Bull Creek - Decision ID 64389 Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) - Decision ID 64465 Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) - Decision ID 64489 Los Angeles River Reach 5 (within Sepulveda Basin)	Decision ID 39159 Bull Creek is DO NOT LIST for toxicity because Bull Creek is meeting the criteria based on the available data. Bull Creek, the waterbody, is on the list under 4a due to the indicator bacteria listing, which is being addressed by a TMDL. Decision ID 64389 Los Angeles River Reach 3 (Figueroa St. to Riverside Dr.) is a decision to LIST for toxicity with 29 out of 75 samples exceeding. Decision ID 64465 Los Angeles River Reach 4 (Sepulveda Dr. to Sepulveda Dam) is a decision to LIST for toxicity with 21 out of 48 samples exceeding.	

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	- Decision ID 64536 Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin) - Decision ID 33930 Los Angeles/Long Beach Outer Harbor (inside breakwater) The City has several concerns with the proposed listings: 1. Section 6.1.5.3 of the Listing Policy states that "Samples used in the assessment must be temporally independent." However, data collected on the same day within the same waterbody are considered as independent samples without consideration of the fact they represent the same condition. These samples should be evaluated as representative of a single day. 2. In developing the number of samples analyzed and exceeded, the Regional Board appears to count a sample collected as one sample, but count acute and chronic results separately. In certain situations the result is two exceedances for the same sample. However, the Regional Board does not consider it conversely when there are no exceedances of acute or chronic end points there is only one sample that is identified as not exceeded. One sample should result in only one nonexceedance or one exceedance. 3. For Decision IDs associated with the Los Angeles River watershed, data are included that do not represent current conditions. As described previously, the LAGWRP and DCTWRP upgraded their treatment processes to remove ammonia. Since the NDN processes to remove ammonia were completed, no exceedances for ammonia have been observed since August 2007. All toxicity data prior to August 2007 should be removed from the analysis. 4. A number of the results are based on testing with *Ceriodaphnia dubia* (*C. dubia*). As discussed in the Stormwater Monitoring Coalition: Toxicity Testing Laboratory Guidance Document (SCCWRP Technical Report 956 December 2016), the report states (page 18) that during the	Decision ID 64489 Los Angeles River Reach 5 (within Sepulveda Basin) is a decision to LIST for toxicity with 21 out of 53 samples exceeding. Decision ID 64536 Los Angeles River Reach 6 (Above Sepulveda Flood Control Basin) is a decision to LIST for toxicity with 13 out of 19 samples exceeding. Decision ID 33930 Los Angeles/Long Beach Outer Harbor (inside breakwater) is a decision to LIST for toxicity with two LOEs, 9 out of 37 and 32 out of 112 samples exceeding. 1. It is in accordance with the Listing Policy to collect samples on the same day if the samples are from different locations although the Listing Policy does require consideration if the samples represent an unusual condition (see Listing Policy 6.1.5.3 "*If the majority of the samples were collected on a single day or during a short-term natural event (e.g. a storm, flood, or wildfire), the data should not be used as the primary data set*.") These samples were collected over several years. 2. The commenter states: *In certain situations the result is two exceedances for the same sample. However, the Regional Board does not consider it conversely when there are no exceedances of acute or chronic end points there is only one*	

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	intercalibration study, multiple laboratories observed *C. dubia* toxicity in laboratory dilution water (which should be non-toxic). Additionally, the report (page 16) found testing variability observed during the intercalibration study for *C. dubia* which had a response that ranged from 16 to 27% effect, and a standard deviation of 19 to 27% effect. The report further indicated that this large variability is not uncharacteristic of the variability observed by others. 5. Toxicity testing results were developed with a statistical approach that is no longer utilized in the NPDES monitoring programs. The LAGWRP, DCTWRP, HWRP and TIWRP NPDES permits require that toxicity endpoints be calculated using the Test of Significant Toxicity (TST) statistical approach. Future data will not be comparable to the listing data. As such, data used for listings should be assessed in a manner consistent with current regulations prior to making a determination of impairment. Given the issues associated with the data analysis and testing methods used as well as the implications of the listings, the City believes that additional efforts are needed to validate and assess whether or not an impairment exists. The City welcomes the opportunity to discuss an approach to properly evaluate toxicity in the affected waterbodies. ***Requested Action: Revise Decision IDs 39159, 64389, 64465, 64489, 64536, and 33930 for toxicity listings from Category 5 to Category 3.***	*sample that is identified as not exceeded.* Los Angeles Water Board staff do not find where this happened. 3. See response to comment 32.6, and for a discussion of readily available data see response to comment 32.3. 4. See response to comment 17.3 5. Future data using the different method will be considered in separate LOEs. Water Board staff are open to discussions on approaches to properly evaluate toxicity in the affected waterbodies in order to ensure the most appropriate data is entered into CEDEN prior to the next Listing Cycle that includes the Los Angeles Region.	
12.	City of Manhattan Beach, March 30, 2017		
12.1	The City of Manhattan Beach is gratified that its beaches meet the criteria for delisting for indicator bacteria. However, the staff report states that even though the delisting is being proposed, "it is important to note that the Santa Monica Bay Bacteria TMDL remains in effect for those beaches even if the delistings are fully approved." Appendix A indicated that the beach will be removed entirely from listing rather than changing the status to *Category 4a - TMDL has been developed*	The beach meets the requirements for delisting per the Listing Policy. No provision of the Listing Policy allows for decisions to “list” or to “do not delist” based on funding considerations. However, as noted, the TMDL and the requirements of the TMDL contained in the Los Angeles County MS4	

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	and the approved implementation plan is expected to result in full attainment of the water quality standard within a specified time frame. The City is concerned that delisting during all weather conditions may adversely affect our ability to compete for grant funding for multi-benefit regional and green street projects identified in the Beach Cities EWMP to address the Santa Monica Bay Beaches Bacteria TMDL (SMBBB TMDL) during wet weather within the high priority 28th Street Storm Drain System. Since the SMBBB TMDL targets are set differently for wet and dry weather, it would seem logical for the Regional Board to distinguish these conditions in the 303d listing and we ask that the Board revise the proposed delisting Manhattan Beach for indicator bacteria to be specific to dry weather since final compliance is now in effect and the TMDL objectives are being met for dry weather at all three sites, and that the beach at the SMB 5-2 28th Street monitoring location remain on the list in Category 4a for wet weather conditions. This will enable the City to be more competitive when applying for grant funding to complete its implementation of the wet weather SMBBB TMDL. The Regional Board Notice of Extension of Comment Deadline notes that Regional Board staff are aware that "in several instances, Appendix A, the Proposed Updates to the 303(d) List has not fully captured all of the new listing and delisting decisions that are detailed in Appendix G, the Fact Sheets due to system and clerical errors". This has made review of the proposed listing changes quite challenging but we have done our best given the limited time available. The City of Manhattan Beach respectfully provides the attached comments on the proposed revisions to the 2016 Section 303(d) and 305(b) Integrated Report.	Permit remain in effect. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a “Y” or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.2	City of Manhattan Beach Comments on Proposed Revisions to 303(d) List **Water Body/Pollutant: Manhattan Beach/Indicator Bacteria** **Comment**: The staff report states that even though Manhattan Beach is being proposed for delisting for indicator bacteria, the Santa Monica Bay Bacteria	See response to comment 12.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	TMDL remains in effect. Likewise, Appendix A indicated that the beach will be removed entirely from listing rather than changing the status to Category 4a (A TMDL has been developed and the approved implementation plan is expected to result in full attainment of the water quality standard within a specified time frame.) The City is concerned that delisting may adversely impact our ability to compete for grant funding for multi-benefit regional and green street projects to address the Santa Monica Bay Beaches Bacteria TMDL during wet weather. **Recommendation**: Consider delisting of Manhattan Beach for indicator bacteria only during dry weather since final compliance is now in effect and the TMDL objectives are being met for dry weather at all three sites, and that the SMB 5-2 28th Street beach remain on the list in Category 4a Street beach remain on the list in Category 4a Manhattan Beach for wet weather indicator bacteria should be considered once the final wet weather SMBBB TMDL compliance deadline has passed.		
12.3	**Santa Monica Bay Offshore - Nearshore/Arsenic and Mercury** **Comment**: Santa Monica Bay Offshore-Nearshore areas are being proposed for listing for Arsenic and Mercury based on sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit. Samples were collected during August 2006, October and November 2007, and August through September of 2007. This data predates the last listing cycle and no data collected within the past decade is presented to support the listing. The SWRCB Listing Policy Section 1.1.2.1 states that "data and information previously submitted to the Regional Water Boards, such as Discharge Monitoring Reports, need not be solicited if the data and information remain available to the Regional Boards." **Recommendation**: Before making such important new listings Regional Board staff should review all readily available data including data collected within the	See response to comment 32.3 for a discussion of readily available data. See also response to comments 11.21 and 11.22.	See response to comment 11.21.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	past decade from the Hyperion Wastewater Treatment Plant NPDES Permit.		
12.4	**Santa Monica Bay Offshore - Nearshore/ Sediment Toxicity** **Comment**: On March 26, 2012 USEPA issued a final TMDL for Santa Monica Bay DDT and PCBs which found that "Our evaluation of the data showed only 3 out of 116 samples exhibited toxicity. Following the California listing policy, Santa Monica Bay is meeting the toxicity objective and there is sufficient evidence to delist sediment toxicity. We therefore make a finding that there is no significant toxicity in Santa Monica Bay and recommend that Santa Monica Bay not be identified as impaired by toxicity in the California's next 303(d) list." Contrary to this recommendation the Regional Board has not proposed delisting sediment in Santa Monica Bay for toxicity. **Recommendation**: Appendix G Decision ID 34120 should be revised to delist Santa Monica Bay for sediment toxicity based on the review and recommendation by USEPA in developing the Santa Monica Bay DDT and PCBs TMDL. Appendix A should be revised to place a "Y" in the New Delistings column and the "Y" eliminated from the Pollutant Name Change column since there does not appear to be any name change being proposed.	The 303(d) list and the factsheet has been updated to “DELIST.”	
12.5	**Santa Monica Bay Offshore - Nearshore/ DDT and PCBs** **Comment**: The listing for Santa Monica Bay Offshore- Nearshore/DDT and PCBs is included in Attachment B Category 5 (a water segment where standards are not met and a TMDL is required but not yet completed) however this listing is being addressed by the USEPA developed and approved TMDL. This change is explained in Attachment A summary under "other revisions". **Recommendation**: The listings for DDT and PCBs should be moved to Category	The 303(d) list has been updated to show the listing is “being addressed by a TMDL.”	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	4a in Attachment C.		
12.6	**Santa Monica Bay Offshore - Nearshore/ Chlordane** **Comment**: The revised Appendix G Fact Sheet associated with Decision ID 37492 recommending delisting Santa Monica Bay Offshore-Nearshore waters for chlordane is not reflected in the Appendix A summary of recommended changes. **Recommendation**: Revise Attachment A to place a "Y" in the New Delisting column for Santa Monica Bay Offshore/Nearshore line for Chlordane.	Los Angles Water Board staff has found several inconsistencies with Appendix A as released for public comment. Appendix G is correct and Appendix A has been revised.	
12.7	**Santa Monica Bay Offshore - Nearshore/ Polycyclic Aromatic Hydrocarbons (PAHs)** **Comment**: The revised Appendix G Fact Sheet associated with Decision ID 32656 recommending delisting Santa Monica Bay Offshore-Nearshore waters for PAHs is not reflected in the Appendix A summary of recommended changes. **Recommendation**: Revise Attachment A to place a "Y" in the New Delisting column for Santa Monica Bay Offshore/Nearshore line for PAHs.	Los Angles Water Board staff has found several inconsistencies with Appendix A as released for public comment. Appendix G is correct and Appendix A has been revised.	
12.8	**Dominguez Channel (lined portion above Vermont)/Benthic Community Effects** **Comment**: Appendix G Decision ID 66165 is proposing to list the Dominguez Channel concrete-lined section above Vermont Avenue due to degradation of biological populations and communities (Benthic Community Effects) as evidenced by IBI scores below 40, however use of IBI scoring methodologies does not provide a reference that takes into account that concrete lined channels do not typically provide benthic habitat that will support biological populations and communities. The listing policy states that to make this determination the water body must "exhibit significant degradation in biological populations and/or	See response to comment 11.19 and 11.24 for Benthic Macroinvertebrate listings.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	communities as compared to reference sites" .... "This condition requires diminished numbers of species or individuals of a single species or other metrics when compared to reference sites." Additionally the listing policy states that "The analysis should rely on measurements from at least two stations." Whereas the data presented to support Decision ID 66165 came from a single station. **Recommendation**: Do not list Dominguez Channel lined portion above Vermont for Benthic Community Effects because the analysis is not supported by data consistent with the SWRCB listing policy.		
12.9	**Dominguez Channel (lined portion above Vermont)/Lead** **Comment**: The quality of the data set used to support the original listing does not meet the data quality standards of the SWRCB's listing policy. The listing policy states that "when the sample value is less than the quantitation limit and the quantitation limit is greater than the water quality standard, objective, criterion, or evaluation guideline, the result shall not be used in the analysis." This listing was based on a data set more than a decade old with no actual detections of lead but where exceedances were presumed to have potentially occurred because the quantitation limit of 5 ug/L was not in all instances sufficiently low to determine compliance with the CTR dissolved lead criterion for continuous concentration in water (where the CTR value ranged from 0.23 to 7.27 ug/L, depending on the associated hardness of the water sample). The data set reviewed was for samples collected between January 2002 and April 2007 at the LACFCD Mass Emission Station S28 where Artesia Boulevard crosses Dominguez Channel and between 2000 and 2001 at S23 near LAX. Lead was not apparently detected in any of the samples above the quantitation limits, rather the identified exceedances of the lead standard were nondetections where the positive quantification limits 5 ug/L were too high to determine compliance with the standard when hardness caused depression of the standard below 5 ug/L. No measured exceedances of the standard were observed in the data set which is more than a decade old and for	A review of the Dominguez Channel (lined portion above Vermont) lead decision is in process at this time.	The lead decision will be reassessed during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	which more recent data sets exist. **Recommendation**: Decision Recommendation ID 37347 should be revised to state that the water body should be delisted due to inadequate data and because the data reviewed did not demonstrate that applicable water quality standards are being exceeded. Alternatively, Regional Board staff could review the more recent readily available data collected at these same Mass Emission stations as part of the LA County MS4 NPDES Permit monitoring program Cl 6948 NPDES No. CAS004001 and the listing decision revised based on data of quality consistent with the SWRCB's listing policy.		
12.10	**Dominguez Channel (lined portion above Vermont)/ Copper and Zinc** **Comment**: Are listed in Appendix B as Category 5 needing a TMDL, when the Dominguez Channel Toxics TMDL is in affect and is addressing these pollutants. **Recommendation**: Recategorize Copper and Zinc as Category 4a being addressed by a TMDL and move to Appendix C.	The 303(d) list has been updated to show that copper and zinc are “being addressed by a TMDL.”	
12.11	**Dominguez Channel (lined portion above Vermont)/ Diazinon** **Comment**: We are supportive of the proposed delisting for Diazinon. **Recommendation**: Consider eliminating the statement in Attachment A under Other Revisions which states "TMDL status changed from TMDL still required to Being Addressed by Completed TMDL" since this pollutant is being proposed for delisting.	Appendix A wording is automatically generated by the CalWQA database. We are exploring ways to better display this data.	
12.12	**Dominguez Channel (lined portion above Vermont)/ Nitrogen, ammonia (Total Ammonia)**	See response to comment 32.3 for a discussion of readily available data.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Comment: The Appendix G Fact Sheet Decision ID 35134 continues to support a listing for ammonia. This listing does not appear to be based on all readily available data since Los Angeles County Mass Emissions Station Data on the Dominguez Channel is not included in the data set. Monitoring data from 55 samples collected between November 2006 and July 2013 at LACFCD mass emission station S28 located where the Dominguez Channel crosses Artesia Boulevard in the City of Torrance, show that all 55 samples met the freshwater Basin Plan objective for ammonia. An additional 24 samples collected at LACFCD mass emission station TS19 between November 2008 and April 2011 also met the freshwater Basin Plan objective in every instance. These data were readily available to Regional Board staff since they were reported as part of the LA County MS4 NPDES Permit monitoring program Cl 6948 NPDES No. CAS004001. **Recommendation**: Delist Dominguez Channel lined portion above Vermont for ammonia and include readily available data reported as part of the LA County MS4 NPDES Permit monitoring program Cl 6948 NPDES No. CAS004001 into Decision ID 35134 to support this delisting.		
12.13	**Dominguez Channel (lined portion above Vermont)/ Aldrin** **Comment**: Appendix G Fact Sheet Decision ID 34620 for Aldrin recommends delisting due to flaws in the original listing. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for Aldrin.	Aldrin was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.14	**Dominguez Channel (lined portion above Vermont)/ ChemA**	ChemA was delisted in 2010. Appendix A includes proposed changes to the 303(d) list	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Comment: Appendix G Fact Sheet Decision ID 34426 for ChemA recommends delisting due to flaws in the original listing because the data used for the original listing was not from this water body. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for ChemA.	including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.15	**Dominguez Channel (lined portion above Vermont)/ Chlordane** **Comment**: Appendix G Fact Sheet Decision ID 34427 for Chlordane recommends delisting due to flaws in the original listing because the data used for the original listing was not from this water body. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for Chlordane.	Chlordane was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.16	**Dominguez Channel (lined portion above Vermont)/ Chromium** **Comment**: Appendix G Fact Sheet Decision ID 34430 for Chromium recommends delisting due to flaws in the original listing because the data used for the original listing was not from this water body. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for Chromium and remove the "Y" from the Pollutant Name Change column.	Chromium was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.17	**Dominguez Channel (lined portion above Vermont)/ DDT** **Comment**: Appendix G Fact Sheet Decision ID 36720 for DDT recommends delisting due to flaws in the original listing because the data used for the original	DDT was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	listing was not from this water body. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for DDT.	status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.18	**Dominguez Channel (lined portion above Vermont)/ Dieldrin** Comment: Appendix G Fact Sheet Decision ID 42330 for Dieldrin recommends delisting due to flaws in the original listing because the data used for the original listing was from fish tissue collected in the soft-bottom estuary below Vermont and was incorrectly applied to the lined portion of Dominguez Channel above Vermont. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for Dieldrin and remove the "Y" from the Pollutant Name Change column.	Dieldrin was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.19	**Dominguez Channel (lined portion above Vermont)/ Polycyclic Aromatic Hydrocarbons (PAHs)** **Comment**: Appendix G Fact Sheet Decision ID 34431 for PAHs recommends delisting due to flaws in the original listing because the data used for the original listing was not from this water body. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for PAHs.	PAHs was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
12.20	**Dominguez Channel (lined portion above Vermont)/ Polychlorinated Biphenyls (PCBs)**	PCBs was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Comment: Appendix G Fact Sheet Decision ID 34429 for PCBs recommends delisting due to flaws in the original listing because the data used for the original listing was not from this water body. **Recommendation**: Attachment A should be updated for Dominguez Channel lined portion above Vermont Avenue to include a "Y" in New Delistings column for PCBs.	listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
13.	City of Palos Verdes Estates, March 30, 2017		
13.1	Please see the City of Palos Verdes Estates' specific comments on the proposed revisions to the 2016 Section 303(d) and 305(b) Integrated Report, included herewith as Attachment A. Appendix A – City of Palos Verdes Estates Comments on Proposed Revisions to 303(d) List **Water Body/Pollutant: Santa Monica Bay Offshore/Nearshore (Arsenic)** **Comment**: Decision No. 67208 (located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) proposes that the Santa Monica Bay Offshore/Nearshore areas be placed on the section 303(d) list because sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit in areas of Santa Monica Bay north of Redondo Beach Pier influenced by the Hyperion WWTP outfall revealed the presence of arsenic. These samples were collected during August 2006, October and November 2007, and August through September of 2007 from nearfield and from Zones 4 & 5. **Recommendation**: While the Santa Monica Bay Offshore/Nearshore areas include the waters of the Palos Verdes Peninsula, this listing should be defined in geographic scope to exclude the Offshore/Nearshore waters of the Palos Verdes Peninsula. The data supporting Decision No. 67208 is not spatially representative of the Palos Verdes Peninsula waters; therefore this listing should be revised to	See response to comment 2.13.	See response to comment 11.21.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	clearly exclude areas of Santa Monica Bay south of Redondo Beach Pier from the listing.		
13.2	**Water Body/Pollutant: Santa Monica Bay Offshore/Nearshore (Mercury)** **Comment**: Decision No. 67209(located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) proposes that the Santa Monica Bay Offshore/Nearshore areas be placed on the section 303(d) list because sampling conducted for the City of Los Angeles Hyperion Wastewater Treatment Plant NPDES Permit in areas of Santa Monica Bay north of Redondo Beach Pier influenced by the Hyperion WWTP outfall revealed the presence of mercury. These samples were collected during August 2006, October and November 2007, and August through September of 2007 from nearfield and from Zones 4 & 5. **Recommendation**: While the Santa Monica Bay Offshore/Nearshore areas include the waters of the Palos Verdes Peninsula, this listing should be defined in geographic scope to exclude the Offshore/Nearshore waters of the Palos Verdes Peninsula. The data supporting Decision No. 67209 is not spatially representative of the Palos Verdes Peninsula waters; therefore this listing should be revised to clearly exclude areas of Santa Monica Bay south of Redondo Beach Pier from the listing.	See response to comment 2.14.	See response to comment 2.14.
13.3	**Water Body/Pollutant: Malaga Cove Beach/Indicator Bacteria** **Comment**: Decision No. 32565 (located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) proposes delisting Malaga Cove Beach from the section 303(d) list for indicator bacteria due to the fact that applicable water quality standards for this pollutant are not being exceeded. The City agrees with the Regional Board Staff Decision Recommendation in Decision No. 32565. However, while Decision No. 32565 has been modified since the last listing cycle in order to make the recommendation to delist, it continues to appear in the list of "original fact sheets" in Appendix G of the February 2017 integrated staff report for the Los Angeles region. Additionally, it is unclear why there is a "Y" in the Pollutant Name Change column in Appendix A since the original fact	The CalWQA database has been corrected to show the decision as "revised" and not to show that the name has been revised.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	sheet relating to Decision No. 32565 shows the pollutant name as "indicator bacteria". **Recommendation**: Modify the Revision Status entry in Fact Sheet 32565 from "original" to "revised" and move the fact sheet into the revised fact sheet group.		
13.4	**Water Body/Pollutant: Lunada Bay Beach (Indicator Bacteria and Beach Closures)** **Comment**: The fact sheet for Decision No. 34394 (located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) recommends that the original "beach closures" listing for Lunada Bay Beach should be revised to an "indicator bacteria" listing. No data is available to support a listing at this location as this is not an accessible beach but is in fact a rocky cove with steep bluff faces that cannot be safely accessed for monitoring. The original listing was for beach closures and Decision ID 34394 changed the pollutant name to indicator bacteria without any providing indicator bacteria data for evidence. **Recommendation**: Like the rest of the shoreline areas on the Palos Verdes Peninsula, Lunada Bay should be delisted for indicator bacteria and beach closures due to faulty listing by revising the recommendation in the Fact Sheet for Decision No. 34394 and place a "Y" in the New Delistings column of Appendix A to the February 2017 integrated staff report for the Los Angeles region. Also please eliminate the word "beach" from the waterbody because this is not an accessible beach, but rather a rocky cove with a steep bluff face that is not readily accessible to the public.	All indicator bacteria-related listings in the State of California's 303(d) list including "beach closures," "coliform," "pathogens," have or will be revised to "indicator bacteria" for statewide consistency. Lunada Bay Beach was listed in 1996 and data from prior to 2006 are not included in the CalWQA database and staff have no information that the original listing was faulty.	
13.5	**Water Body/Pollutant: Flat Rock Point Beach Area (Indicator Bacteria and Beach Closures)** **Comment**: Flat Rock Point forms the northern point of Bluff Cove and is part of the same "beach" as Bluff Cove. The fact sheet for Decision ID No. 34628 (located in Appendix G to the February integrated staff report for the Los Angeles Region) is proposing to revise the listing for Flat Rock Point from "beach closures" to "indicator bacteria" however no data to support the listing is provided. Since there is no separate monitoring data set for Flat Rock Point and Flat Rock	All indicator bacteria-related listings in the State of California's 303(d) list including "beach closures," "coliform," "pathogens," have or will be revised to "indicator bacteria" for statewide consistency. Flat Rock Point Beach was listed in 1996 and data from prior to 2006 are not included in the	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Point is contiguous with Bluff Cove, Decision ID 32848 and supporting lines of evidence for Bluff Cove should also be applied to Flat Rock Point. **Recommendation**: Flat Rock Point Beach Area should be included with Bluff Cove Beach in the fact sheet for Decision ID No. 32848 and delisted along with Bluff Cove Beach. Also please eliminate the word "beach" from the waterbody because this is not an accessible beach, but rather a rocky point that is not safely accessible for monitoring.	CalWQA database and staff have no information that the original listing was faulty. The requested change to combine Flat Rock Point with the adjacent Bluff Cove requires a change to the CalWQA underlying map, which is maintained by State Board. It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues and reassess the LOEs and decisions for these reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or prior to the next Listing Cycle that includes the Los Angeles Region.	
13.6	**Water Body/Pollutant: Malaga Cove Beach (DDT and PCBs)** **Comment**: Appendix C to the February 2017 integrated staff report for the Los Angeles region states that Malaga Cove Beach is included on the 303d list for DDT and PCBs with "Source Unknown". The source of the DDT and PCB listings are known to be associated with the Palos Verdes Shelf Superfund Site because this source is well documented in the USEPA TMDL for these pollutants in Santa Monica Bay. **Recommendation**: Change "source unknown" to "source – Palos Verdes Shelf Superfund Site" for both DDT and PCBs.	The sources for DDT and PCBs have been changed to "See TMDL documentation." The Santa Monica Bay Total Maximum Daily Loads for DDTs and PCBs was established by EPA in March 2012 and, as noted by the commenter, the TMDL has a complete discussion of sources.	
13.7	**Water Body/Pollutant: Bluff Cove Beach (DDT and PCBs)** **Comment**: Appendix C to the February 2017 integrated staff report for the Los Angeles region states that Bluff Cove Beach is included on the 303d list for DDT and PCBs with "Source Unknown". The source of the DDT and PCB listings are known to be associated with the Palos Verdes Shelf Superfund Site because this source is well documented in the USEPA TMDL for these pollutants in Santa Monica Bay.	The sources for DDT and PCBs have been changed to "See TMDL documentation." The Santa Monica Bay Total Maximum Daily Loads for DDTs and PCBs was established by EPA in March 2012 and, as noted by the commenter, the TMDL has a complete discussion of sources.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Recommendation: Change "source unknown" to "source – Palos Verdes Shelf Superfund Site Palos Verdes Shelf Superfund Site" for DDT and PCBs.		
13.8	**Water Body/Pollutant: Santa Monica Bay Offshore/Nearshore (DDT and PCBs)** **Comment**: Category 5 of Appendix B to the February 2017 integrated staff report for the Los Angeles region includes DDT and PCBs in the listing for Santa Monica Bay Offshore/Nearshore (a water segment where standards are not met and a TMDL is required but not yet completed); however this listing is being addressed by the USEPA developed and approved TMDL. This change is explained in the "other revisions" summary in Appendix A to the February 2017 integrated staff report for the Los Angeles region. **Recommendation**: The listings for DDT and PCBs should be moved to Category 4a in Appendix C since there is a USEPA approved TMDL in effect addressing the listings.	The Santa Monica Bay Offshore/Nearshore listing for DDT and PCBs have been revised to show "being addressed by a TMDL."	
13.9	**Water Body/Pollutant: Santa Monica Bay Offshore/Nearshore (Chlordane)** **Comment**: Decision No. 37492(located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) has been revised to recommend delisting Santa Monica Bay Offshore/Nearshore waters for chlordane; this revision is not reflected in the summary of recommended changes in Appendix A of the February 2017 integrated staff report for the Los Angeles region. **Recommendation**: Revise Appendix A to place a "Y" in the New Delisting column for Santa Monica Bay Offshore/Nearshore row for Chlordane.	Santa Monica Bay Offshore/Nearshore Chlordane was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
13.10	**Water Body/Pollutant: Santa Monica Bay Offshore/Nearshore(Polycyclic Aromatic Hydrocarbons (PAHs))** **Comment**: Decision No. 32656 (located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) has been revised to recommend delisting Santa Monica Bay Offshore/Nearshore waters for PAHs; this revision is	Santa Monica Bay Offshore/Nearshore Chlordane was delisted in 2010. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	not reflected in the summary of recommended changes in Appendix A of the February 2017 integrated staff report for the Los Angeles region. **Recommendation**: Revise Appendix A to place a "Y" in the New Delisting column for Santa Monica Bay Offshore/Nearshore row for PAHs.	"Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
13.11	**Water Body/Pollutant: Wilmington Drain (Lead)** **Comment**: Decision No. 35085 (located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) recommends delisting the Wilmington Drain for lead based on the weight of evidence. The City agrees with this recommendation due to the fact that LOE No. 90133 describes data collected in Compton Creek, which is unrelated to the Wilmington Drain. **Recommendation**: Remove LOE No. 90133 from the Fact Sheet for Decision No. 35085, and revise the supporting evidence statement to the Regional Board Staff Conclusion to state that: "0 of 33 samples exceeded the CRITERIA."	Los Angeles Water Board staff intends to make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval or prior to the next Listing Cycle that includes the Los Angeles Region.	The data from Compton Creek has been removed from the Wilmington Drain assessments. LOE 90133 has been retired and Decision 35085 has been revised to "delist." Compton Creek remains listed for lead.
13.12	**Water Body/Pollutant: Wilmington Drain/Copper** **Comment**: Decision ID 44676 (located in Appendix G of the February 2017 integrated staff report for the Los Angeles region) for copper in Wilmington Drain includes a data set that should not have been included: LOE ID 90473 describes data collected in Compton Creek which is unrelated to Wilmington Drain. Removal of this data set from Decision ID 44676 would still leave LOE ID 90131 which is described as 33 samples, only two (2) of which exceeded the criteria for copper. This revised data set now meets the SWRCB Delisting criteria because the number of exceedances is 2 or less in a data set size of 28-36 samples. **Recommendation**: Remove LOE No. 90473 from the Fact Sheet for Decision ID 44676 and revise the supporting evidence statement "2 of 33 samples exceeded the CRITERIA." Also revise the recommendation to Delist from 303(d) List.	Los Angeles Water Board staff intends to make the necessary corrections in the CalWQA database and make the appropriate listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval or prior to the next Listing Cycle that includes the Los Angeles Region.	See response to comment 11.3.
13.13	**Water Body/Pollutant: Machado Lake (Algae, Ammonia, ChemA, Eutrophic, Odor, Trash)**	Machado Lake listings for Algae, Ammonia Eutrophic, Odor, and Trash were assessed as	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Comment: Category 5 of Appendix B to the February 2017 integrated staff report for the Los Angeles region includes listings for algae, ammonia, ChemA, eutrophic, odor and trash for Machado Lake (a water segment where standards are not met and a TMDL is required but not yet completed); however all of these pollutant listings are being addressed by USEPA-approved TMDLs. **Recommendation**: These listings should be moved to Category 4a in Appendix C to the February 2017 integrated staff report for the Los Angeles region. Additionally, Appendix A should include language under the column for "Other Revisions" for each of these pollutants explaining that: "TMDL status changed from TMDL still required to Being Addressed by Completed TMDL."	"being addressed by a TMDL" in 2010. The Machado Lake listings for**,** ChemA, Chlordane, DDT, Dieldrin, and PCBs were assessed as "being addressed by a TMDL" in this listing cycle. Appendix A includes proposed changes to the 303(d) list including new listings, delistings, name changes and TMDL status changes. Each of these is marked with a "Y" or an explanation. Appendix A also includes waterbody pollutant combinations which were previously listed or delisted. We are exploring ways to better display this data.	
14.	City of Pomona , March 30, 2017		
14.1	**Summary** The 2016 303(d) revisions for the several reaches (water quality segments) of the San Gabriel River propose to de-list, do not de-list, and do not list metals-related pollutants including copper, lead, selenium and zinc. These pollutants are the subject of the Total Maximum Daily Loads for Metals and Selenium for the San Gabriel River and Impaired Tributaries (San Gabriel Metals TMDL) adopted by USEPA Region IX (USEPA) and the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) in 2007. This TMDL has been incorporated into the current Los Angeles County MS4 Permit (MS4 Permit). The MS4 Permit enables compliance with its waste load allocations (WLAs) -- also referred to as numeric targets. The numeric targets are translated into water quality based effluent limitations (WQBELs) which are applied to MS4 outfall discharges and to receiving waters. To comply with both, the MS4 Permit coercively encourages compliance through Watershed Management Programs (E/WMPs). The City is appreciative of the several metals pollutants that Regional Board is	Comments on the San Gabriel Metals and Selenium TMDL and the LA County MS4 Permit are outside the scope of this action. See response to comments 14.2 as well as 9.2 – 9.7 for detailed responses regarding individual listing decisions raised by the commenter.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	proposing to de-list and not to list. A total of 22 metals are reported for all San Gabriel River water quality segments. 19 (84.3%) of them fall under the "de-list" and "do not list" categories. This result should be sufficient to void the San Gabriel River Metals TMDL. 3 additional metals (15.7%) should be de-listed, which would raise the total to 22 (100%), for reasons more particularly described below. The data here strongly demonstrates that that the San Gabriel Metals TMDL should be removed from the Los Angeles Basin Plan.		
14.2	**I. San Gabriel River: Estuary** As the table below illustrates, copper for the estuary is listed on the 2010 303(d) list but was not carried over to the 2016 303(d) list. It must be assumed that the Regional Board did not intend to place copper on this list. If this is an oversight on the part of the Regional Board there is, nevertheless, ample justification for not listing copper for the estuary. As is the case with most metals and toxics referenced in TMDLs and in the MS4 Permit, the Regional Board did not comply with the federal California Toxic Rule (CTR) to the following extent: 1. The Regional Board did not calculate the numeric limitation for lead properly. CTR establishes water quality standards (including TMDLs), based only on ambient (dry) weather sampling and analysis. However, the Regional Board calculated a wet weather numeric limitation for lead based on stormwater sampled from receiving waters. Further, CTR requires a "real time" hardness parameter (using calcium carbonate) as an adjustment factor in establishing water quality standards for metals and toxics. The Regional Board apparently used a default hardness factor of 100 mg/l. CTR states clearly that the 100 mg/l for hardness is only intended be an example in calculating CTR water quality standards. It is important that the actual hardness value be applied (which must be sampled and analyzed as the same toxics and metals are sampled). Too low of a hardness value	See response to comment 9.1 for the history of copper on the 303(d) list in the San Gabriel River Estuary as well as for a discussion of the CTR and the use of “real time” hardness in calculating limitations. Comments on the San Gabriel River Metals and Selenium TMDL and the provisions of the LA County MS4 Permit are outside the scope of this proposed action. See response to comment 3.3 for the use of listing decisions made prior to the adoption of the Listing Policy. Los Angeles Water Board staff encourages the commenter to enter all the relevant data into CEDEN in preparation for the next listing cycle that includes the Los Angeles Region.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	will set a lower numeric limit. The higher the limit is, the less difficult it is to meet it. 2. Regional Board also did not follow the Water Quality Control Policy for California's Clean Water Act Section 303{d) List (Listing Policy). The Listing Policy requires a binomial distribution based on a null hypothesis) to determine if the number of the samples that resulted in exceedances (of CTR) are statistically sufficient to warrant placement on lead on the 303(d) list. There is no evidence that this task was completed. It is possible that it was not completed because the Listing Policy was not adopted until 2004. The copper was added to the 303(d) list in 1998 and carried-over to the 2000 303(d) list. Based on the San Gabriel River Metals TMDL, it appears that the copper data was based on water quality samples conducted in 1998. 3. The Regional Board's Surface Water Ambient Monitoring Program (SWAMP) performed water quality samples for metals in the estuary in June of 2005. Copper, after properly adjusted for hardness, resulted in 3.23 micrograms per liter (ug/1). The limit is 9.4 ug/1. In other words, no exceedance was detected. Table I. San Gabriel River: Estuary **[See the posted letter for Table I]** Placing copper on the 2016 303(d) list "do not list" category should effectively eliminate the need for impacted MS4 Permittees to comply with the estuary's copper limitation of 3. 7 ug/1 (see Table I(a) below). Table I(a) from Attachment P of the Los Angeles MS4 Permit **[See the posted letter for Table I(a)]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list lead, selenium, and zinc for the estuary; (2) grant the City's request to de-list copper for the estuary; and (3) use the de-list and do not list justification for this		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.		
14.3	**II. San Gabriel River: Estuary to Firestone** Metals for San Gabriel River from the Estuary to Reach 1 were not placed on the 2010 303(d) List and not placed on the "do not list" category of the 2016 303(d) List. It is unclear, however, why the MS4 Permit requires compliance with the copper limitation of 18 ug/1 (shown above in Table 1 (a), despite the fact that copper was not listed on the 2010 303(d) list in the first place. Table II. San Gabriel River: Estuary to Reach 1 **[See the posted letter for Table II]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list copper, lead, selenium, and zinc for Reach 1; and (2) use the do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	See response to comment 9.2.	
14.4	**III. San Gabriel River: Reach 2 (Firestone to Whitter Narrows Dam)** As shown on Table III below, the 2016 303(d) list rolls-over lead from the 2010 303(d) list. Lead, however, should be de-listed for the following reasons: 1. Lead is a legacy pollutant (lead content in fuels have been significantly reduced). 2. The 303(d) lists for 1998 and 2000 placed lead on the "list" category, but failed to comply with the California Toxic Rule (CTR) as explained above. 3. The Regional Board did not follow the State's 303(d) Listing Policy. More	See response to comment 9.3.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	specifically, according to the San Gabriel River Metals TMDL (Table 2-7), Reach 2 was sampled during dry weather (ambient) for dissolved lead by the Los Angeles County Department of Public Works (LACDPW), in accordance with CTR using the correct hardness adjustment. The 10 samples taken resulted in no exceedances. If this result were applied to the 303(d) Listing Policy, it would not be sufficient to place lead on the 303(d) List. For a sample size between 2 and 24, 2 exceedances are required for 303(d) list placement. 4. Regional Board's Surface Water Ambient Monitoring Program (SWAMP) performed water quality samples for metals in the estuary in June of 2005. Lead, after properly adjusted for hardness, resulted in 0.81 micrograms per liter (ug/1). The limit is 3.8 ug/1. In other words, no exceedance was detected. Table III. San Gabriel River: Reach 2 (Firestone to Whittier Narrows Dam) **[See the posted letter for Table III]** **Recommendation to Regional Board**: (1) do not approve staff's recommendation not to de-list lead; and (2) use the do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.		
14.5	**IV. San Gabriel River: Reach 3 (Whittier Narrows Dam to Ramona)** As shown on Table IV below, San Gabriel River Reach 3 was not placed on the 2010 303(d) list and, therefore, it is easy to see why it is placed on the 2016 303(d) "do not list" category. What is difficult to understand is why the Los Angeles MS4 Permit requires compliance with copper, lead, and zinc. The answer lies on MS4 Permit *Attachment P: TMDLs in San Gabriel River Watershed Management Area*. It states: *Permittees shall comply with grouped wet WLAs ... expressed as total recoverable metals discharged to all upstream reaches and tributaries of the San Gabriel River Reach 2 and Coyote Creek* (see Table I(b) below). In other words, even though San Gabriel River Reach 3 is not on the 2010 303(d) list for metals,	See response to comment 9.4.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	the MS4 Permit requires compliance with them nevertheless. It does this by applying TMDL numeric targets for copper, lead, and zinc because: (1) San Gabriel River Reach 2 lists a lead TMDL number target of 81 /34 ug/1; and (2) Coyote Creek lists copper target of 24.71 ug/1 and zinc at 144.57 ug/1. The rationale for applying downstream numeric targets for copper, lead, and zinc is at best murky. How can metals as pollutants associated with downstream reaches be applied to upstream Reach 3 of the San Gabriel River? Pollutants cannot travel upstream against gravity. Table IV. San Gabriel River: Reach 3 (Whittier Narrows to Ramona) **[See the posted letter for Table IV]** Table I(b) from Attachment P of the Los Angeles MS4 Permit **[See the posted letter for Table I(b)]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list copper, lead, and zinc; and (2) use the de-list for these metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.		
14.6	**V. San Gabriel River: Coyote Creek** The 2016 303(d) List correctly de-lists lead and zinc but does not de-list copper. Copper should be de-listed for the following reasons: 1. The San Gabriel River Metals TMDL contains ambient sample data for Coyote Creek correctly applying CTR. Under Table 2-7, 8 samples are listed with 0 exceedances. If this result were applied to the 303(d) listing policy, it would not qualify for 303(d) placement. A sample size between 2 and 24 would require exceedances equal to and greater than 2. 2. Wet weather water quality data was used to justify placing copper on the	See response to comment 9.5.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	303(d) list. Listing support information cites that CTR relative to copper was applied to wet weather. As mentioned above, wet weather and CTR requirements are mutually exclusive. Wet weather limitations for San Gabriel River and other receiving water bodies in Los Angeles County are intended to be applied - incorrectly -- to MS4s and other NPDES permittees. Table V. Coyote Creek**[See the posted letter for Table V]** **Recommendation to Regional Board**: (1) approve staff's recommendation not to list lead and zinc; (2) approve the City's request to de-list copper; and (3) use the de-list and do not list justification for this and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.		
14.7	**VI. San Jose Creek Reach 1 (SG Confluence to Temple St.)** Regional Board staff recommends that: (1) selenium be de-listed; and (2) copper, lead, and zinc not be listed (see Table VI below). Table VI: San Jose Creek Reach 1 **[See the posted letter for Table VI]** **Recommendation to Regional Board**: (1) approve staff's recommendation to de-list selenium and not list copper, lead, and zinc; and (2) use the de-list and do not list justification for these and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.	See response to comment 9.6.	
14.8	VII. South San Jose Creek (Los Angeles County) This is Reach is a new listing under the 2016 303(d) List.	See response to comment 9.7.	

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>
<table>
<tr><th colspan="2">2010 303 (d) List</th><th colspan="5">2016 303 (d) List</th><th>MS4 Permit Requirement</th></tr>
<tr><th>Poliutant</th><th>List</th><th>List</th><th>De-List</th><th>Don't List</th><th>Don't De-list</th><th>Should De-List</th><th>Yes/No</th></tr>
<tr><td>Copper</td><td>-</td><td></td><td></td><td>x</td><td></td><td></td><td>Yes</td></tr>
<tr><td>Lead</td><td>-</td><td></td><td></td><td>x</td><td></td><td></td><td>Yes</td></tr>
<tr><td>Selenium</td><td>-</td><td></td><td></td><td>x</td><td></td><td></td><td>Yes</td></tr>
<tr><td>Zinc</td><td>-</td><td></td><td></td><td>x</td><td></td><td></td><td>Yes</td></tr>
</table>

Recommendation to Regional Board: (1) approve staff's recommendation not list to selenium copper, lead, and zinc; and (2) use the de-list and do not list justification for these and other metals to remove the San Gabriel River Metals TMDL from the Los Angeles Basin Plan.</td><td></td><td></td></tr>
<tr><td>15.</td><td>City of San Fernando, March 30, 2017</td><td></td><td></td></tr>
<tr><td>15.1</td><td>I. Summary

The 2016 303(d) revisions for the several reaches (water quality segments) of the Los Angeles River and tributaries propose to de-list, do not de-list, and do not list metals-related pollutants including copper, lead, selenium and zinc. These pollutants are the subject of the Total Maximum Daily Loads for Metals for the Los Angeles River (LAR-MTMDL) adopted by Regional Board in 2007. This TMDL has been incorporated into the current Los Angeles County MS4 Permit MS4 Permit (MS4 Permit). The MS4 Permit enables compliance with TMDL waste load allocations (WLAs) -- also referred to as numeric targets. The numeric targets are translated into water quality based effluent limitations (WQBELs) which are applied to MS4 outfall discharges and to receiving waters as limitations. To comply with both, the MS4 Permit coercively encourages compliance through Watershed Management Programs (E/WMPs).

Although many metals have either been placed on the "de-list" or "do not list" categories for Los Angeles River water quality segments, many also have been placed on the "list" and do not de-list categories. These listings should be voided because:</td><td>See response to comment 3.1, 3.2 and 3.3.</td><td></td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	1. although the LAR-MTMDL claims to have developed water quality standards (includes TMDLs) in accordance with the federal California Toxic Rule (CTR) adopted in 2000, it actually has not; and 2. the LAR-MTMDL is based on water quality samples that were conducted before the Water Quality Control Policy for California's Clean Water Act Section 303(d) List (Listing Policy), which was adopted in 2004.		
15.2	• **California Toxic Rule** CTR was adopted to provide a mathematical method for establishing ambient (dry weather) water quality standards for toxics necessary to protect beneficial uses of receiving waters. The LAR-MTMDL, however, along with other TMDLs, does not comply with CTR in two significant respects. First, the TMDL calculates numeric water quality standards/TMDLs for both wet weather and ambient receiving water conditions instead of only on ambient. The LAR-TMDL misinterprets CTR by claiming EPA did not differentiate between wet and dry weather conditions when establishing metals and toxics limitations. There is nothing in CTR that supports that view. CTR makes it clear that its purpose is to establish ambient water quality standards: *This final rule establishes ambient water quality for priority toxic pollutants*. USEPA defines ambient as: *Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact to human health.* In other words, ambient is the normal reference condition of a receiving water. This is also the clear understanding of the Regional Board's Surface Water Ambient Monitoring Program (SWAMP). MS4 and other point source stormwater	See response to comment 3.2.	See response to comment 3.2.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	(wet weather) outfall discharges, using sampling and analysis results, are measured against the ambient target for a pollutant established by CTR. For example, suppose a copper limitation is set at 37 micrograms per liter for a given water body. This limit is required to protect fish. Persistent exceedances of the limit based on outfall monitoring would necessitate a revision to the MS4 Permittee's stormwater management program. Second, CTR requires a hardness parameter (calcium carbonate) to make chemical water quality analysis of toxics more accurate. Generally, the higher the hardness value the higher the toxic pollutant expressed as a numeric limit. The LAR-MTMDL calculates CTR for metals/toxics using a hardness value of 100 milligrams per liter (mg/l). It contends that this is the hardness value required by CTR. This is false. CTR requires actual hardness to be determined by water quality sampling and analysis at the same time a toxic pollutant is sampled. The Regional Board's SWAMP abides by this requirement. Therefore, the LAR-MTMDL establishes limitations for metals and toxics that are more stringent than necessary. This provides another reason for voiding the LAR-MTMDL and revising it with a recalculated limitation for each metal by using an actual hardness value based on future ambient water quality sampling and analysis.		
15.3	• **California 303(d) Listing Policy (Listing Policy)** The Listing Policy was adopted to provide a statistical method to determine how many water quality samples that exceed a water quality standard are required to place a pollutant on the 303(d) list. That method is a binomial distribution based on the rejection of a null hypothesis measured against sample sizes (see attachment #1). A review of the 2016 303(d) list fact sheets reveals that the metals placed on previous 303(d) lists did not conform to the Listing Policy. In fact, the LAR-MTMDL is based on water quality data that was developed prior to the adoption of the Listing Policy in 2004. According to the LAR-MTMDL, the metals numeric targets were based on data that was limited to 2002. Based on this	See response to comment 3.3.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	fact alone the LAR-MTMDL should be voided.		
15.4	II. Los Angeles River Reach/Tributary Specific Comments Presented below are specific justifications for removing metals that fall under either the "list" or "do not list" categories because they do not conform to CTR or the Listing Policy. Almost all of them fall into these categories. **1. Los Angeles River Reach 4** Copper and lead are placed on the "do not de-list" category. Selenium and zinc are placed on the "do not list." As noted on the table below there are no listing issues here. Table I. LAR Reach 4 **[See the posted letter for Table I]**	For comments related to the CTR, see response to comment 3.2, for those pertaining to the Listing Policy see response to comment 3.3. For Los Angeles River Reach 4, comment noted. Copper and lead, in fact, are on the on the "de-list" category.	
15.5	**2. Los Angeles River Reach 5** Selenium and zinc are recommended for placement on the "do not list" category. Copper and lead, on the other hand, are recommended for placement on the "list" category. However, they should not. The justification reported on the fact sheet for both copper and lead is that *0 of the 12 samples and exceeded the criteria*. This must be in error. How can zero or "none" of the 12 samples have exceeded the criteria? Based on this information, copper and lead should be on the do not list category. Table II. LAR Reach 5 **[See the posted letter for Table II]**	The copper "DO NOT DELIST" decision was based on LOE 2527, which is a 'placeholder' LOE to support a 303(d) listing decision made prior to 2006. The additional LOE 86184 (0 out of 12 sediment samples exceeding) is insufficient to make a decision of "DELIST." Section 4.1 of the Listing Policy requires a minimum of 28 samples (and fewer exceedances than listed in Table 4.1) to delist. The lead "DO NOT DELIST" decision was based on LOE 2528, which is a 'placeholder' LOE to support a 303(d) listing decision made prior to 2006. The additional LOE 86197 (0 out of 12 sediment samples exceeding) is insufficient to	

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		make a decision of "DELIST." Section 4.1 of the Listing Policy requires a minimum of 28 samples (and fewer exceedances than listed in Table 4.1) to delist.	
15.6	**3. Tujunga Wash (Los Angeles River to Hansen Dam)** The Tujunga Wash is only listed (in the "do not list" category) for copper, carried-over from the previous 303(d) list (2010). According to the 303(d) list fact sheet, no samples were taken to justify placement (viz., 0 of the 12 samples exceeded the criteria). Based on this information copper should be de-listed. Table III. Tujunga Wash **[See the posted letter for Table III]**	The copper "LIST" decision is a "carryover" decision (no new data was assessed) and was based on LOE 2558, which is a 'placeholder' LOE to support a 303(d) listing decision made prior to 2006. Section 4.1 of the Listing Policy requires a minimum of 28 samples (and fewer exceedances than listed in Table 4.1) to delist. There is no additional information to support a delisting decision.	
16.	City of Ventura, March 30, 2017		
16.1	The City has several concerns regarding the Regional Board's proposed 303(d) list and feels that it requires significant review and modifications before adoption. The City requests that the issues identified in this letter be addressed and the revised, proposed 303(d) list be released for another 60-day comment period prior to adoption. Several of the issues identified herein have resulted in the inability of the proposed 303(d) list to be fully vetted and reviewed by the affected parties. The requested modifications fall into two general categories: 1. New Category 5 listings that should not be listed due to incorrect thresholds being applied for the beneficial use and/or incorrect interpretation of the data (e.g., lack of temporal representation). 2. Errors in the listing information that make it difficult to fully evaluate the listings. Examples include challenges in identifying the data sets and analysis methods used, inconsistencies between the Category 5 list (Appendix B) and the	It is the intent of Los Angeles Water Board staff to work to resolve issues identified by commenters, as appropriate, as the State Water Board staff prepares to bring the 2016 Integrated Report to the State Water Board for its consideration later this year. See response to comment 16.2-16.20 for specific responses.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Proposed updates to the 303(d) list (Appendix A), incorrect HUC/Calwater designations, incorrect beneficial uses listed for the applicable water quality objectives, and inconsistent use of thresholds for interpreting narrative objectives. The remaining sections of this letter provide the detailed list of requested changes to the proposed 303(d) list and the rationale for the requests. In summary, the City requests that all waterbody pollutant combinations in Table 1 below not be listed on the 303(d) list and the errors and inconsistencies identified in the other letters cited above be addressed.		
16.2	l. REQUESTED MODIFICATIONS TO THE LISTING STATUS Based on a review of the proposed Category 5 waterbody pollutant combinations, the City has identified several waterbodies that should either be delisted based on available data or proposed listings that should not be listed based on errors in the evaluation. The requested modifications are shown in Table 1, below, with a summary of the justifications for the requested change. A detailed discussion of each of the justifications follows the table. Table 1. Waterbody-pollutant combinations that should not be listed **Waterbody Segment: Santa Clara River Estuary** **Pollutant**: pH **Justification**: "No demonstration high pH is a result of waste discharge. A listing is not warranted in light of reference conditions for pH within estuaries.	The 303(d) list appropriately identifies the pH impairments. Analysis of sources and causes or identification of implementation measures to resolve or correct the impairment are not completed as part of the Integrated Report or 303(d) listing process. LOE88249 was developed using 493 samples collected at dozens of sampling stations over a time period of a decade. As the data support a listing decision, the waterbody pollutant combination should be listed until more data supporting a delisting decision become available or information suggests the environmental conditions have changed. See, also, response to comment 32.5.	
16.3	**Waterbody Segment: Santa Clara River Estuary** **Pollutant**: Ammonia **Justification**: Appropriate data not considered and current data does not meet	LOE 88237 shows 4 of the 42 samples exceeded the one-hour average contraction of un-ionized ammonia. Even though 18 of the 42 samples were	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Listing Policy criteria.	reported as non-detects, there is enough evidence that supports a listing decision. See, also, response to comment 32.4.	
16.4	**Waterbody Segment: Santa Clara River Estuary** **Pollutant**: Nitrogen, Nitrate **Justification**: Appropriate data not considered and current data does not meet Listing Policy criteria.	The "Nitrogen, Nitrate" "LIST" decision is a "carryover" decision (no new data was assessed) and was based on LOE 7819, which is a 'placeholder' LOE to support a 303(d) listing decision made prior to 2006. Section 4.1 of the Listing Policy requires a minimum of 28 samples (and fewer exceedances than listed in Table 4.1) to delist. There is no additional information to support a delisting decision. See, also, response to comment 23.6.	
16.5	**Waterbody Segment: Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)** **Pollutant**: pH **Justification**: No demonstration high pH is a result of waste discharge.	The 303(d) list appropriately identifies the pH impairments. Analysis of sources and causes or identification of implementation measures to resolve or correct the impairment are not completed as part of the Integrated Report or 303(d) listing process. LOE88328 was developed using 60 samples collected at three sampling stations over a time period of a decade. As the data support a listing decision, the waterbody pollutant combination should be listed until more data supporting a delisting decision become available or information suggests the environmental conditions have changed.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
16.6	**Waterbody Segment: Ventura Harbor: Ventura Keys Bridge)** **Pollutant**: Arsenic **Justification**: Data does not include proper temporal representation.	Fish were collected from three sub-locations from two sites. The three samples per site were averaged prior to assessment. Because the data collected is spatially independent, it is still appropriate to assess the data as individual samples even though they were collected on the same date. As the data support a listing decision, the waterbody pollutant combination should be listed until more data supporting a delisting decision become available. In addition, fish are not static and move throughout a waterbody, accumulating pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent. However, a review of the decision to list arsenic is in process at this time in order to re-examine the assumption of the ratio of organic to inorganic arsenic and the applicable evaluation guideline. See, also, response to comment 11.21.	The listing has been corrected to the shellfish guideline (0.0052 ppm instead of 0.0034 ppm for finfish) and the applicable reference added. The guideline, 0.0052 ppm, is the screening guidelines from "Guidance for Assessing Chemical Contaminant Data for Use In Fish Advisories Volume 1: Fish Sampling and Analysis," 2000, (CalWQA ref 3756) and assumes an average body weight of 70 kg and a consumption rate of 21 g/day for a 30 year exposure over a 70-year lifetime. The assessment used an assumption that 10% of the arsenic would be inorganic. We note that even if a 0.05% inorganic to total ratio was used in the assessment, the number of exceedances would be 2 out of 2 and sufficient to list.
16.7	**Waterbody Segment: Ventura Harbor: Ventura Keys Bridge)** **Pollutant**: Cadmium **Justification**: Data does not include proper temporal representation.	See response to comment 16.6.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
16.8	**Waterbody Segment: Ventura Harbor: Ventura Keys Bridge)** **Pollutant**: Chlordane **Justification**: Data does not include proper temporal representation.	See response to comment 16.6.	
16.9	**Waterbody Segment: Ventura Harbor: Ventura Keys** **Pollutant**: DDT **Justification**: Data does not include proper temporal representation.	See response to comment 16.6.	
16.10	**Waterbody Segment: Ventura Harbor: Ventura Keys** **Pollutant**: Dieldrin **Justification**: Data does not include proper temporal representation.	See response to comment 16.6.	
16.11	**Waterbody Segment: S Ventura Harbor: Ventura Keys** **Pollutant**: PCBs (Polychlorinated biphenyls) **Justification**: Data does not include proper temporal representation.	See response to comment 16.6.	
16.12	**Waterbody Segment: Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)** **Pollutant**: Benthic Community Effects **Justification**: • Benthic Community Effects listing is based on flawed analyses. • Data does not include proper temporal representation.	The CSCI is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. See, also, response to comment 16.17.	
16.13	**Waterbody Segment: Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)** **Pollutant**: Temperature, water **Justification**: Analysis does not demonstrate temperature is above natural temperature.	The designated beneficial use supports cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates. As stated by Moyle, 1976, the	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		optimum range for Rainbow Trout's growth and completion of most life stages is 13-21 degrees Celsius. Therefore, it is appropriate to use this information as Evaluation Guideline, which does not conflict with the water quality objective for Cold Freshwater Habitat.	
16.14	**Waterbody Segment: Ventura Harbor: Ventura Keys** **Pollutant**: Indicator Bacteria **Justification**: Data from mouth of Arundell Barranca used in listing assessment.	It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve this mapping issue and reassess the LOEs and decisions, as appropriate, prior to the State Board approval of the 2016 303(d) list, or at the next Listing Cycle that includes the Los Angeles Region.	The data has been reassessed not including the data from Arundell Barranca; the recommended decision remains "list." The data has been added into the decision for Arundell Barranca and the decision remains "list."
16.15	***1. There is no demonstration that high pH is a result of waste discharge.*** The waterbodies listed for high pH do not appropriately demonstrate that the high pH was a result of waste discharge as required in the Los Angeles Region Basin Plan (Basin Plan).[3] The Santa Clara River Estuary and Santa Clara River Reach 1 are both listed for high pH. As stated in the Fact Sheets and according to the Basin Plan, "*The pH of inland surface waters shall not be depressed below 6.5 or raised above 8.5* ***as a result of waste discharges***."[4] However, it was not demonstrated for either of these waterbodies that the elevated pH levels were a result of waste discharge as opposed to natural causes. Therefore, the Regional Board should either provide evidence that the elevated pH was a result of waste discharge and detail that in the Fact Sheets or, if no such evidence exists, the Regional Board should remove this proposed listing.[5] **Requested Action:** **Remove the pH listings for Santa Clara River Estuary and Santa Clara River**	See response to comment 16.2 and 16.5. Also see response to comment 32.5.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Reach 1 as these high pH values are not the· result of waste discharge.		
16.16	***2. Listing data lacks proper temporal representation.*** There are many instances where the data to support the listed pollutant lacks proper temporal representation. Section 6.1.5 .3 of the Listing Policy states that: *"Samples should be representative of the critical timing that the pollutant is expected to impact the water body. Samples used in the assessment must be temporally independent. If the majority of samples were collected on a single day or during a single short-term natural event (e.g., a storm, flood, or wildfire), the data shall not be used as the primary data set supporting the listing decision."* Many of the pollutants listed in Table 1 included data collected from a single sampling date, which violates the Listing Policy. For instance, all of the newly proposed pollutants for the Ventura Harbor: Ventura Keys (i.e., arsenic, cadmium, chlordane, DDT, dieldrin, and PCBs) were collected on a single day - February 28, 2007. These pollutants should not be listed because there is no temporal resolution provided. **Requested Action:** **Remove all listings shown in Table 1 that were based on a single sample collection date.**	See response to comment 16.6-16.11.	
16.17	***3. Benthic Community Effects listing is based on flawed analyses and should be removed.*** The benthic community effects listing is based on a metric which has since been deemed arbitrary and inappropriate. The Index of Biotic Integrity (IBI) stream assessment was a commonly used metric to determine benthic community effects	Listings based on both the SCIBI and CSCI scores are consistent with State policy and have been assessed relative to appropriate reference sites. See response to comment 26.4 for a discussion of the appropriate metrics for benthic community	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	where the threshold used to distinguish an impaired reach was identified as a value of 39 and below. However, this threshold value was arbitrarily assigned as a statistical cut-off value in the originating study. The State has since endorsed the use of the California Stream Condition Index (CSCI), as stated in the Appendix G Fact Sheets for numerous other benthic community effects listings (e.g., Decision ID 66264)v, "*The CSCI is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. The CSCI will be used in the fi1ture for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs).*" Despite this, the newly listed benthic community effects for Ventura River Reach 1 and 2 (Estuary to Weldon Canyon) utilizes the IBI to assess the waterbody. Therefore, the City requests that this flawed listing be removed until the waterbody can be assessed with a more representative metric such as the CSCI. In addition to use of an arbitrary metric, the proposed listing for benthic community effects for the Ventura River Reach 1 and 2 lacks proper spatial representation since only two samples were collected from the same sample site ("Station O Main Street Bridge, Mainstem Ventura River" according to the Fact Sheets). In addition, temperature is used as a line of evidence to support the benthic community effects listing, however, the temperature listing for this same waterbody segment is also flawed and should be removed as discussed in the comment below. **Requested Action:** **Remove the benthic community effects listing for Ventura River Reach 1 and 2 (Estuary to Weldon Canyon) due to use of an outdated metric, lack of spatial resolution, and lack of supporting evidence from the temperature listing.**	condition. See response to comment 26.5 for a discussion of the established water quality criteria. Because the data collected is temporally independent, it is still appropriate to assess the data as individual samples even though they were collected at the same site. See, also, response to comment 16.13 for temperature.	
16.18	***4. Correct the proposed temperature listings which are based on incorrect criteria.***	See response to comment 16.13.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The temperature listing for Ventura River Reach 1 and 2 (Estuary to Weldon Canyon) uses an evaluation guideline of 13-21 °C as the optimum growth range for rainbow trout. However, the applicable Basin Plan objective for waterbodies designated as COLD is, "*For waters designated COLD, water temperature shall not be altered by more than 5°F above the natural temperature."* The fact sheets provide no discussion of natural temperatures or a demonstration that the temperature was raised above natural temperatures in order to exceed the objectives. Notwithstanding that a deviation from natural temperatures has not been demonstrated, the way the evaluation guideline is applied is also inappropriate. Moyle 1976 is referenced as the source of the evaluation guideline. Moyle 1976 was revised and expanded by Moyle 2002.[7] Moyle 2002 states: "Rainbows are found where daytime temperatures range from nearly 0°C in winter to 26-27°C in summer, although extremely low (<4°C) or extremely high (>23°C) temperatures can be lethal if the fish have not previously been gradually acclimated. Even when acclimation temperatures are high, temperatures of 24-27°C are invariably lethal to trout, except for very short exposures."[8] As such, while temperatures above 21 °C may not be optimal according to Moyle 1976, Moyle 2002 clearly states that lethal temperatures are those greater than 23°C, which indicates that the evaluation guideline of 21 °C is more appropriately applied as a chronic guideline (necessitating the establishment of an averaging period) and 23°C is the more appropriate "not-to-exceed" guideline if used for listing. Using the threshold of 23°C, only 2 samples would exceed the threshold in Ventura River Reach 1 and 2, which would not be enough to meet the listing threshold. **Requested Action:** **Remove the temperature listing for Ventura River Reach 1 and 2 based on**		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	lack of exceedances.		
16.19	***5. Data from Arundell Barranca mouth is inappropriate to assess Ventura Harbor.*** Based on a review of the data provided in the spreadsheet entitled: Peninsula Beach, Ventura Harbor-Keys, and Arundell Barranca Data, site K5 appears to have been included in the analysis of the Ventura Harbor: Ventura Keys assessment. Site K5 is located in the mouth of the Arundell Barranca and is not within Ventura Harbor. A review of the data shows that the indicator bacteria concentrations at this site are much more similar to Arundell Barranca and not representative of the data for the rest of Ventura Harbor. In 2009, as part of the review of the proposed Harbor Cove TMDL, the City conducted an analysis of indicator bacteria data from Ventura Harbor using what appears to be the same dataset as used in the Regional Board's assessment. While the dataset appears to be the same, the number of samples and exceedances did not match completely (e.g., 103 exceedances of the enterococcus geomean with 510 samples in the City's analysis as compared to 104 exceedances and 537 samples in the Regional Board's analysis). The City could not easily determine what the differences in the calculations were and requests that the Regional Board review the exceedance calculations to ensure that all geomeans were calculated using a minimum of 5 samples and that duplicate samples in the dataset were correctly handled in accordance with the Listing Policy. Regardless of the potential differences in the calculations, the clear majority of the exceedances are from site K5 (64 of the 103 exceedances in the City's analysis). If site KS is removed from the Ventura Harbor analysis (and added to the Arundell Barranca analysis so it is in the correct waterbody), based on the City's calculations, insufficient samples exist to list Ventura Harbor: Ventura Keys for fecal coliform or enterococcus. A summary of the City's analysis is shown in	It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve this mapping issue and reassess the LOEs and decisions, as appropriate, prior to the State Board approval of the 2016 303(d) list, or at the next Listing Cycle that includes the Los Angeles Region.	See response to comment 16.14.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Table 2. Table 2. Summary of City's Analysis Ventura Harbor Indicator Bacteria **[See the posted letter for Table 2]** **Requested Action:** **Revise the calculations for Ventura Harbor: Ventura Keys by removing site K-5 which is not located in the Harbor. Revise any Lines of Evidence that no longer support a listing for indicator bacteria and remove the listing if appropriate.**		
16.20	**II. CORRECT OTHER ERRORS AND INCONSISTENCIES IN APPENDICES AND FACT SHEETS** Appendix A, Appendix B, Appendix C, and Appendix G have many inconsistencies which make the analysis of new additions very difficult since it is unclear which segment-pollutant combinations are new listings. Additionally, in many cases, data and Quality Assurance Project Plan (QAPP) references in the fact sheets are inconsistent with the data provided for review and it is not always clear what data were used in the analysis presented in the fact sheets. Examples of these inconsistencies and errors are detailed in the Calleguas Creek Watershed Stakeholders, VCAILG, and County of Ventura comment letter. The City requests that the Regional Board do a thorough review of all appendices to ensure that the proposed 303(d) list is internally consistent, the correct data were used for the assessment, and the errors identified in the other comment letters are addressed. **Requested Action:** **Correct the numerous errors and inconsistencies in the report and ensure that all the proposed 303(d) list appendices are internally consistent.**	See response to comment 7.98 and 7.99.	
17.	County of Los Angeles (LAC) and Los Angeles County Flood Control District (LACFCD) , March 30, 2017		

Revised Response to Comments on the Draft 2016 303(d) List
Comment Deadline: March 30, 2017

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
17.1	**I. Waterbodies With Water Quality Attainment Should Be Delisted As Requested By The Los Angeles County Flood Control District During The 2010 Data Solicitation Period And Pursuant to the 303d Listing Policy** In August 2010 in response to the State Water Resources Control Board's (State Water Board's) data solicitation for the 2012 Integrated Report for Clean Water Act Sections 303(d) and 305(b), the Los Angeles County Flood Control District (LACFCD) submitted all the data and information that it collected since the State's previous data solicitation in 2007. As part of the 2010 data submission, the LACFCD conducted a detailed analysis of the new data and found 15 listed waterbody-pollutant combinations that had attained their water quality standards and met the delisting criteria set forth in Section 4 of the *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List* (303(d) Listing Policy). To this end, LACFCD provided a detailed analysis of this data and identified those waterbodies that should be delisted pursuant to the *State's 303(d) Listing Policy*. Those waterbody-pollutant combinations are listed below.	The post-2007 data and analysis submitted by the LACFCD by the August 2010 deadline was not entered into the CalWQA database for use in the Integrated Report. Los Angeles Water Board staff will enter the data, as appropriate, into the CalWQA database and make the listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval.	Staff has analyzed the post-2007 data and analysis submitted by the LACFCD by the August 2010 deadline, in addition to other data generated by the County. Six new lines of evidence (LOEs) were generated and three existing lines of evidence were revised to incorporate the newer data and analysis. Six different decisions were revised based on these new LOEs with five of those decisions being revised to a recommendation of delist. Due to resource constraints coupled with challenges identifying QA/QC documents which were not included in data submittals, staff did not address the other eight water body pollutant combinations for the lakes listed in comment 17.1. However, Regional Board staff and State Board staff are committed to considering and addressing those water body pollutant combinations during the next solicitation period. The recommended decision for Coyote Creek/Diazinon has been revised from "do not delist" to "delist." The recommended decision for Los Angeles River Reach 1/Diazinon has been revised from "list" (a continuation of a previous decision to list with no new data) to "delist." The recommended decision for Santa Clara Reach 6/Diazinon has been revised from "do not delist" to "delist."

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>
<table>
<tr><th>WATERBODY</th><th>POLLUTANT</th><th>Addressed in Current Proposed Revisions?</th></tr>
<tr><td>Coyote Creek</td><td>Diazinon</td><td>No</td></tr>
<tr><td>Dominguez Channel (lined portion)</td><td>Diazinon</td><td>Yes</td></tr>
<tr><td>Legg Lake</td><td>Ammonia
Copper
Lead</td><td>No</td></tr>
<tr><td>Los Angeles River Reach 1</td><td>Diazinon</td><td>No</td></tr>
<tr><td>Peck Road Park Lake</td><td>Lead
Dissolved Oxygen</td><td>No</td></tr>
<tr><td>Santa Clara River Reach 6</td><td>Chlorphyrifos
Diazinon
Copper
Iron</td><td>No</td></tr>
<tr><td>Santa Fe Dam Park Lake</td><td>Copper
Lead
pH</td><td>No</td></tr>
</table>

As set forth in the above table, none of the identified waterbody-pollutant combinations are currently proposed for delisting as part of the 2016 303(d) list, except for the Dominguez Channel Diazinon, despite meeting the delisting criteria under the *State's Listing Policy*. Based on a review of the fact sheets for these waterbodies in Appendix G, it appears that the post-2007 data and analysis submitted by the LACFCD was not taken into consideration by the Los Angeles Regional Water Quality Control Board (Regional Board).

The County and the LACFCD request that the Regional Board consider the data set forth in the LACFCD's 2010 submission. Attached is a copy of the LACFCD comment letter and technical report from the 2010 data solicitation for your review and consideration. The County and the LACFCD further request that the Regional Board delist these waterbodies as requested.
</td><td></td><td>The recommended decision for Santa Clara Reach 6/Chlorpyrifos has not been revised. There was additional data assessed but the assessment found that that the method detection limit from the samples is greater than numeric translator recommended in the evaluation guideline (J-Flagged).

The recommended decision for Santa Clara Reach 6/Iron has been revised from “do not delist” to “delist.”

The recommended decision for Santa Clara Reach 6/ copper has been revised from “do not delist” to “delist.”</td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
17.2	**II. The Regional Board Should Wait For The Completion Of The State's Biointegrity Policy Development Before Listing Waterbodies For Benthic Community Effects** Currently, there is no officially established California water quality objective or guideline for listing waterbodies for benthic community effects. As such, the State Water Board is currently developing statewide biological objectives to assist in addressing this gap. The 2010 State Water Board's initial notice letter[1] for development of these biological objectives states the following: *"State and Regional Water Board plans and policies do not contain numeric objectives or guidance for using biological data in regulatory decision-making. Therefore, biological objectives are needed to provide the narrative or numeric benchmarks that describe conditions necessary to protect aquatic life beneficial uses. The initial effort will focus on wadeable perennial streams and rivers."* Similarly, the CEQA public scoping document[2] released in 2012 for this project states the following: *"Benchmarks for identifying biological impairments and interpreting narrative water quality objectives are not formally adopted in Water Board plans or policies and, therefore, not readily used as enforceable requirements …" [Page 6 of the scoping document] "The State Water Board will develop [biological objectives and] program of implementation that describes how biological objectives will be incorporated into permits and other regulatory actions, such as assessing attainment of aquatic life beneficial uses for 303(d) listing." [Page 8 of the scoping document]* Thus, there is no established objective in California for assessing biological data,	There are established California water quality guidelines for listing waterbodies for benthic community effects, the SCIBI and the CSCI, which are both appropriate for 303(d) listing. These evaluation guidelines meet the requirements in Section 6.1.3 of the Listing Policy and both are in use throughout the State. Use of the guidelines is not premature; per the Listing Policy, the guidelines are "scientifically based and peer reviewed" and have been used in previous Integrated Reports. With respect to the use of IBI and CSCI for 303(d) listing, see response to comment 26.4 for a discussion of the appropriate metrics for benthic community condition and response to comment 26.5 for a discussion of the established water quality criteria. At this time, the CSCI and IBI are the best measure of biologic integrity in California streams and it is appropriate to use IBI and CSCI in 303(d) listing decisions. As the State Board continues the development of the science and policy, new methods may supplant older methods and the 303(d) list will be updated, as appropriate, as that occurs. As with any water quality objective, new science or policy may make necessary revisions to the 303(d) list, but this possibility is not a justification to delay making 303(d) listing decisions when appropriate guidelines are available.	

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<tr><td></td><td>such as benthic macroinvertebrate data, for regulatory decision-making. This includes 303(d) listings.

The State Water Board is currently making progress on compiling available information and conducting necessary scientific studies to develop applicable objectives and implementation policy (also known as Biointegrity Policy). The State Water Board has hired the Southern California Coastal Water Research Project (SCCWRP) and the California Department of Fish and Wildlife to develop technical information to aid development of the policy. To ensure that a range of public interests are represented during the development process, the State Water Board has reached out to interested stakeholders. The County and LACFCD is actively participating in these meetings.

Although the State Water Board is currently developing biological objectives for benthic communities, the Regional Board has listed multiple waterbodies for benthic community impairment prior to the development of those objectives and its implementation guideline. The following table summarizes the waterbodies being proposed for benthic community listings by the Regional Board in the County.
<table>
<tr><th>WATERSHED</th><th>WATERBODY SEGMENT</th><th>CONCRETE CHANNEL?</th></tr>
<tr><td>Ballona Creek</td><td>Ballona Creek</td><td>Yes</td></tr>
<tr><td>Dominguez Channel</td><td>Dominguez Channel</td><td>Yes</td></tr>
<tr><td rowspan="4">Los Angeles River</td><td>Alhambra Wash</td><td>Yes</td></tr>
<tr><td>Arroyo Seco Reach 3</td><td>No</td></tr>
<tr><td>Los Angeles River Reach 3</td><td>Yes</td></tr>
<tr><td>Los Angeles River Reach 4</td><td>Yes</td></tr>
<tr><td>Malibu Creek</td><td>Medea Creek Reach 1</td><td>No</td></tr>
</table></td><td>Benthic Community Listings for waterbodies that are lined entirely with concrete have been reassigned to Category 3 (insufficient information to assess beneficial use support but some uses may be threatened) until such time as benthic community condition scores have been more specifically calibrated for concrete-lined channels. See response to comment 11.24, for more detail.</td><td></td></tr>
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<tr><td></td><td>
<table>
<tr><td></td><td>Triunfo Creek Reach 1</td><td>No</td></tr>
<tr><td>San Gabriel River</td><td>San Gabriel River – East Fork</td><td>No</td></tr>
<tr><td>Santa Clara River</td><td>Santa Clara River Reach 5</td><td>No</td></tr>
</table>

Adopting these benthic community impairment listings without first awaiting the State Water Board's development of water quality objectives and implementation guidance is premature. First, in assessing biological data and justifying the proposed listings, the Regional Board used the Index of Biological Integrity (IBI) and the California Stream Condition Index (CSCI). The benchmarks/thresholds used are 40 for IBI and 0.79 for CSCI. While IBI and CSCI are available tools for evaluating the relative biological condition of perennial wadeable streams, the associated benchmarks/thresholds used by Regional Board staff for justifying the listings have not been officially adopted by the State Water Board or the Regional Board for purposes of determining 303(d) listings. Thus, to ensure statewide consistency, the appropriate benchmarks should be set by the Biointegrity Policy being developed by the State Water Board.

Second, the CSCI was developed to replace the IBI and is expected to be used in the Biointegrity Policy. Thus, the IBI and its associated benchmark should not be used for assessing stream conditions for purposes of regulatory decisions, such as 303(d) listing.

Third, many of the listings set forth in the table above are for concrete/modified channels, which are being treated the same as natural channels. This is inconsistent with the approach that the State Water Board has been taking in developing the Biointegrity Policy, which provides that in highly altered conditions, the standard should be based on "best attainable conditions". In this regard, the State Water Board's 2012 CEQA Scoping document[3] for biological objectives states the following:
</td><td></td><td></td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	"One of the difficulties of defining reference conditions in California is that many waterbodies in the State have been severely altered from their natural condition. Some of these alterations are not a result of the controllable environmental factors…. In highly altered systems where biological conditions are limited by uncontrollable factors, the focus is on expectations for the 'best attainable' conditions." Concrete/engineered flood control channels in urban environments are among the systems that the State Water Board considers highly altered. For those systems, the State's goal is to establish standards that are reasonably expected to be attainable, which is different than standards for natural channels. The State Water Board is using a gradient approach where the biological expectations for altered stream channels are based on the level of alteration. Since altered stream channels have limited habitat, it is improbable to expect a thriving benthic community in these channels the same way as in natural stream channels. This conclusion is well demonstrated in the stream survey report published in 2016 by the Southern California Stormwater Monitoring Coalition (SMC) – the *2015 Report on the SMC Regional Stream Survey4, with Special Study on Engineered Channels.* For the reasons described above, the Regional Board should not list waterbodies, and particularly those with concrete or engineered channels, for benthic impairments until the State Biointegrity Policy is developed and adopted. However, if the Regional Board lists any waterbody for benthic impairment, then the listings should be listed under Category 4c, and not under Category 5, since it is uncertain that these impairments are caused by pollutants.		
17.3	**III. Toxicity Listings Are Based On Unreliable Data and Should Be Removed** Ten County waterbodies are newly listed for toxicity, nine of which are streams or rivers, and one is an estuary. The majority of toxicity data used in the listings are from water toxicity tests conducted using the *Ceriodaphnia dubia* or other species.	All the toxicity data assessed met the required quality assurance. The SMC Toxicity Testing Laboratory Guidance study, 2016, conducted a laboratory	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)

WATERSHED	WATERBODY SEGMENT	TEST SPECIES
Los Angeles River	Bull Creek	C. dubia, Fathead
	LA River Reach 4	
	LA River Reach 5	
	LA River Reach 6	C. dubia, Fathead, Hyalella
San Gabriel River	SG River Estuary	Topsmelt, Fathead
	SG River Reach 3	C. dubia, Fathead
	San Jose Creek Reach 2	
	South San Jose Creek	
Santa Clara River	Piru Creek	C. dubia
	SC River Reach 5	C. dubia

These toxicity tests, however, have recently been found to be unreliable by a laboratory intercalibration study conducted by SMC[5]. The study utilized 10 laboratories in Southern California that are certified by the State of California for toxicity testing. (Almost all toxicity tests in Southern California are conducted by these laboratories.) Although standard methods and protocols were followed by all the laboratories, the test results for the same sample varied significantly between laboratories.

The below chart summarizes the results of the study. Each symbol in the chart represents the result from a single laboratory. **[See the posted letter for chart]**

As can be seen from the chart, there is high variability in the toxicity results between different laboratories for all the test species despite the fact that analytical procedures were performed on identical samples. For example, the results for *Ceriodaphnia survival* vary between 0 percent and 100 percent for the same

intercalibration study focusing on four species *C. dubia*, *Hyalella*, *Strongylocentrus* and *Mytilus*. Fathead and topsmelt were not a part of the study. The study did not conclude or recommend that previously analyzed data should be disregarded. The study authors recommended all four species for future use as part of the Stormwater Monitoring Coalition monitoring programs. The authors also provided specific guidance for stormwater testing for potential variability-inducing steps including hardness of dilution water, feeding, sample handling and water renewals, and aging of organisms. The authors further concluded:

> *"Based on the scoring system developed for this study, the participating laboratories were comparable for most of the test endpoints (Table 10). Virtually all laboratories were able to meet test acceptability requirements, including internal positive and negative controls. Most laboratories tended to produce internally consistent results when given blind duplicate samples. Finally, most laboratories produced data consistent with non - toxic samples when exposed to laboratory dilution water."*

WATERBODY SEGMENT	Source of data	Number of exceedances/ number of samples

<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td>sample depending on the laboratory used. Also, a sample of lab dilution water, which is expected to be non-toxic was found to be toxic by many labs. Such high magnitudes of inconsistency and incomparability between the labs makes the existing toxicity data invalid or not useful. It is thus very probable that the proposed 303(d) listings for toxicity are the result of false positive toxicity tests, resulting in unimpaired waterbodies being wrongly listed for toxicity.

It is incumbent upon the State to ensure that the laboratories it certifies produce consistent and accurate toxicity test results. The uncertainties and variability reflected in testing results between laboratories, as shown in the SMC study, can have a profound effect on the regulatory actions placed on a waterbody.

For these reasons the proposed water toxicity listings are not supported by reliable data. The County and the LACFCD therefore request that all toxicity listing based off of water toxicity testing be removed from the list. We also request that the State continue to re-evaluate its laboratory certification protocols and address the problems identified by SMC.</td><td>
<table>
<tr><td>Bull Creek</td><td>Tillman WRP, NPDES permit CA0056227.</td><td>12 / 29</td></tr>
<tr><td>LA River Reach 4</td><td>Tillman WRP, NPDES permit CA0056227.</td><td>21 / 48</td></tr>
<tr><td>LA River Reach 5</td><td>Tillman WRP, NPDES permit CA0056227</td><td>21 / 53</td></tr>
<tr><td>LA River Reach 6</td><td>Tillman WRP, NPDES permit CA0056227</td><td>13 / 19</td></tr>
<tr><td>SG River Estuary</td><td>Los Angeles Sanitation District NPDES permits</td><td>14 / 113</td></tr>
<tr><td>SG River Reach 3</td><td>Los Angeles Sanitation District NPDES permits</td><td>13 / 75</td></tr>
<tr><td>San Jose Creek Reach 2</td><td>Los Angeles Sanitation District NPDES permits</td><td>8 / 24</td></tr>
<tr><td>South San Jose Creek</td><td>Los Angeles Sanitation District NPDES permits</td><td>5 / 18</td></tr>
<tr><td>Piru Creek</td><td>Stormwater Monitoring Council, recorded in SWAMP</td><td>2 / 3</td></tr>
</table>
</td><td></td></tr>
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<table>
<tr><th>No.</th><th>Comment</th><th>Response</th><th>Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td></td><td>database</td><td></td></tr>
<tr><td>SC River Reach 5</td><td>Stormwater Monitoring Council, recorded in SWAMP database</td><td>2 / 2</td></tr>
</table>
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<tr><td>17.4</td><td>IV. The Proposed Temperature Listings Are Based On An Inapplicable Standard And Therefore Should Be Removed

The following four waterbodies in the County are proposed listings for temperature-related impairment: Los Angeles River Reach 3, San Gabriel River Reaches 1 and 2, and Santa Clara River Reach 6. These listings should not be adopted for the following reasons:

First, natural temperatures for waterbodies in the Los Angeles Region are not known. Chapter 3 of the Los Angeles Region Basin Plan states the following for temperature:

“For waters designated WARM, water temperature shall not be altered by more than 5°F above the natural temperature. At no time shall these WARM-designated waters be raised above 80°F as a result of waste discharges.”

“For waters designated as COLD, water temperature shall not be altered by more than 5°F above the natural temperature.”

The current Basin Plan does not have an established "natural temperature" baseline for waterbodies, nor does it have guidance for estimating natural temperatures. This precludes the use of alteration of natural temperature as a basis</td><td>The 303(d) list appropriately identifies the temperature impairments. Analysis of sources and causes are not completed as part of the Integrated Report or 303(d) listing process.

The 80°F temperature objective protects the aquatic life beneficial use of WARM in surface waters regardless of the ultimate source of the water in that reach of the river. The Los Angeles Water Board does not have different objectives for different seasons.

The 2014-2016 Triennial Review includes a review of temperature as a Basin Planning Priority Project. Los Angles Water Board staff may consider the development of numeric temperature objectives for various waterbody classes and aquatic life beneficial uses in the future.

Temperature is also discussed in response to comment 11.18.</td><td>For Los Angeles River Reach 3 and temperature, see response to comment 11.25.</td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	for assessing waterbodies in the region. The Regional Board therefore appears to have used the 80°F objective as the basis for the proposed temperature listings. This standard, however, is not appropriate for two reasons: (1) Under the Basin Plan, the 80°F threshold is to be used only when there is evidence that the temperature rise was "as a result of waste discharges." The Regional Board did not provide evidence that any of the temperatures above 80°F were caused by waste discharges. (2) The 80°F threshold was applied to all waterbodies without considering the physical attributes or the historical ambient air temperatures of the waterbodies, which are uncontrollable. In the Los Angeles Region, ambient air temperatures can vary drastically, which would easily alter or raise the temperature above 80°F, especially in concrete channels during warmer months. Concrete channels are very susceptible to fluctuations in temperature due the material's ability to absorb heat. Even if the water is at a reasonable temperature when it enters a concrete channel, the water temperature may naturally rise as it travels through the channel, and not as the result of waste discharges. Second, Basin Plans of other Southern California Regions, which have similar habitats as in the Los Angeles Region, do not use 80°F as a water quality objective for WARM-designated waters. For example, the Santa Ana Region Basin Plan[6] uses 90˚F during warmer months of the year (June through October) and 78˚F during the rest of the year. The San Diego Region does not have any temperature water quality objectives for WARM-designated waters. Therefore, the use of 80˚F for purposes of assessing temperature-related impairments and listing waterbodies is unreasonable and unsupported, especially in concrete channels during dry seasons. The Regional Board should not list waterbodies for temperature until applicable standards are established for the Region.		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
17.5	**V. Alondra Park Lake Is Not A Water of the United States And Therefore Should Be Removed From The Proposed 303(d) List** Alondra Park Lake is a man-made lake that was created in the late 1940s as part of County's plan to establish Alondra Park. The lake does not receive any runoff discharge from areas outside of the park and is not connected to the Dominguez Channel or any other surface waterbody. The lake's source of water is entirely groundwater that is pumped from the West Coast Groundwater Basin. This water is used to irrigate the park and the nearby golf course. In addition, Alondra Lake is not identified in the Basin Plan and, thus, does not have any beneficial use designation assigned to it. This confirms that the lake is not a receiving waterbody. The Section 303(d) list applies only to waters of the United States. Alondra Park Lake is a man-made enclosed lake not connected to any other waterbody. Any listings associated with Alondra Park Lake should therefore be removed from the proposed 2016 303(d) list.	Alondra Park Lake is an approximately 7.3 acre lake. Waterbodies not explicitly identified in the Basin Plan Chapter 2 may still be subject to the "tributary rule." The Los Angeles Basin Plan, Chapter 2, states: *Under federal law, all surface waters must have water quality standards designated in the Basin Plans. Most of the inland surface waters in the Region have beneficial uses specifically designated for them. Those waters not specifically listed (generally smaller tributaries) are designated with the same beneficial uses as the streams, lakes, or reservoirs to which they are tributary. This is commonly referred to as the "tributary rule."* Alondra Park Lake overflows to the Dominguez Channel in large storm events. Therefore, a hydrologic connection exists between Alondra Park Lake and the Dominguez Channel, a water of the United States. In addition, because such intermittent flow is capable of moving pollutants from the Alondra Park Lake to Dominguez Channel, a significant nexus exists between Alondra Park Lake and the Dominguez Channel. The Dominguez Channel travels through a number of municipalities in Los Angeles County before emptying into the Los Angeles Harbor. In addition, fishing takes place at Alondra Lake.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		The California Department of Fish and Wildlife plants trout at the Lake. Tissue mercury data from fish from Alondra Lake are part of the Statewide dataset used in the OEHHA statewide advisory, *Statewide Health Advisory and Guidelines for Eating Fish from California's Lakes and Reservoirs, July 2013*. The identification of fish exceeding the OEHHA fish contaminant goals is important for the protection of human health and it is appropriate to identify the impairment on the 303(d) list.	
17.6	**VI. Data Being Used For Legacy Pollutant Listings Do Not Satisfy The Temporal Representativeness Requirements of The State's Listing Policy** The data being used to support proposed listings of waterbody-pollutant combinations for legacy pollutants does not satisfy the temporal requirements of the State's 303(d) Listing Policy as described below. Thus, these proposed listings should be removed. Section 6.1.5.3 of the State's 303(d) Listing Policy states: *"Samples used in the assessment must be temporally independent. If the majority of samples were collected on a single day or during a single short-term natural event (e.g., a storm, flood, or wildfire), the data shall not be used as the primary data set supporting the listing decision. Samples should be available from two or more seasons or from two or more events . . ."* Section 6.1.5.6 of the Listing Policy states:	The data used to support the listings identified by the commenter were collected on a single day but from two species per waterbody. Multiple composites from each unique species were averaged, but it would be inappropriate to average composites from different species. Composites of different species will have different age profiles and different species occupy different trophic levels and will accumulate pollutants at different rates. These samples are independent and cannot be combined and considered as a single data point. Most of the averaged composite samples supporting theses listings represent 10 individual fish. In addition, fish are not static; they move throughout a lake or stream and accumulate pollutants in tissue over time. Therefore, the data	

<table>
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"To be considered temporally independent, samples collected during the averaging period shall be combined and considered one sampling event. For data that is not temporally independent (e.g., when multiple samples are collected at a single location on the same day), the measurements shall be combined and represented by a single resultant value."

Section 3.1 of the Listing Policy requires a minimum of two exceedances to place a waterbody on the 303(d) list for toxic pollutants.

The data used to support some of the new listings was collected only on a single day. Therefore, pursuant to Sections 6.1.5.3 and 6.1.5.6 of the Listing Policy, these samples are not temporally independent and should be combined and considered as a single data point. Moreover, under Section 3.1 of the Listing Policy, a minimum of two exceedances are needed to place a waterbody on a 303(d) list. Thus, the following listings do not meet these Listing Policy guidelines:

<table>
<tr><th>WATERSHED</th><th>WATERBODY SEGMENT</th><th>POLLUTANT(S)</th></tr>
<tr><td>Dominguez Channel</td><td>Alondra Park Lake</td><td>PCBs</td></tr>
<tr><td>Malibu Creek</td><td>Malibou Lake</td><td>Dieldrin</td></tr>
<tr><td rowspan="2">Los Angeles River</td><td>Echo Park Lake</td><td>Chlordane, Dieldrin</td></tr>
<tr><td>Lincoln Park Lake</td><td>PCBs</td></tr>
<tr><td rowspan="2">San Gabriel River</td><td>Legg Lakes</td><td>DDT, PCBs</td></tr>
<tr><td>Santa Fe Dam Park Lake</td><td>PCBs</td></tr>
<tr><td rowspan="4">Santa Clara River</td><td>Castaic Lagoon</td><td>PCBs</td></tr>
<tr><td>Castaic Lake</td><td>PCBs</td></tr>
<tr><td>Elderberry Forebay</td><td>Dieldrin, PCBs</td></tr>
<tr><td>Pyramid Lake</td><td>Chlordane, DDT, Dieldrin, PCBs</td></tr>
</table>

</td><td>

are, by their nature, spatially and temporally independent even though they were collected at the same site on the same day.

<table>
<tr><th>WATER BODY SEGMENT</th><th>POLLUTANT</th><th>Number of fish in composites</th></tr>
<tr><td>Alondra Park Lake</td><td>PCBs</td><td>Composites were largemouth bass (2 composites - 5 fish per composite) and common carp (2 composites - 5 fish per composite). Composites were averaged by species.</td></tr>
<tr><td>Malibou Lake</td><td>Dieldrin</td><td>Composites were largemouth bass (2 composites - 5 fish per composite) and common carp (2 composites - 5 fish per composite). Composites were averaged by species.</td></tr>
<tr><td>Echo Park Lake</td><td>Chlordane, Dieldrin</td><td>Composites were largemouth bass (2 composites - 5 fish per composite) and common carp (2 composites - 5 fish per composite). Composites were averaged by species.</td></tr>
<tr><td>Lincoln Park Lake</td><td>PCBs</td><td>Composites were largemouth bass (2 composites - 5 fish per composite) and common carp (2 composites - 5 fish per composite). Composites were averaged by species</td></tr>
</table>

</td><td></td></tr>
</table>

No.	Comment	Response			Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The County and the LACFCD request that these listings be removed until more samples are collected to satisfy the temporal representativeness of data of the State's Listing Policy.	Legg Lakes	DDT, PCBs	Composites were largemouth bass (2 composites - 5 fish per composite) and common carp (2 composites - 5 fish per composite). Composites were averaged by species.	
		Santa Fe Dam Park Lake	PCBs	Composites were largemouth bass (2 composites - 5 fish per composite) and common carp (2 composites - 5 fish per composite). Composites were averaged by species.	
		Castaic Lagoon	PCBs	Composites were largemouth bass (2 composites - 5 fish per composite), rainbow trout (1 composite - 5 fish per composite) and redear sunfish (2 composites - 5 fish per composite). Composites were averaged by species.	
		Castaic Lake	PCBs	Composites were largemouth bass (1 composite - 5 fish per composite) and common carp (1 composite - 5 fish per composite) for 2 locations for a total of 4 composites. Composites were averaged by species.	
		Elderberry Forebay	Dieldrin, PCBs	Composites were largemouth bass (2 composites - 5 fish per composite) and channel catfish (2 composites - 5 fish per	

<table>
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<tr><td></td><td></td><td>
<table>
<tr><td></td><td></td><td>composite). Composites were averaged by species.</td></tr>
<tr><td>Pyramid Lake</td><td>Chlordane, DDT,
Dieldrin, PCBs</td><td>Chlordane and DDT - Composites were largemouth bass (1 composite - 5 fish per composite) and brown bullhead (1 composite - 5 fish per composite) for 2 locations for a total of 4 composites.
Dieldrin- A composite was generated from largemouth bass (5 fish per composite) for 2 locations. A composite was generated from brown bullhead (5 fish per composite) for 1 location.
PCBs - Composites were generated from largemouth bass (1 composite - 5 fish per composite) and brown bullhead (1 composite - 5 fish per composite) for 2 locations for a total of 4 composites.</td></tr>
</table>
</td><td></td></tr>
<tr><td>17.7</td><td>VII. Legacy Pollutants (PCBs, DDT, Dieldrin, Chlordane) Should be Listed As a Category 4b, Not as Category 5

Many of the pollutants that are being considered for incorporation into the 303(d) list are legacy pollutants that have been banned by the U.S. Environmental Protection Agency (EPA) decades ago and are no longer manufactured or used in</td><td>The definition of 4b is “Evidence shows at least one use is not supported, but a TMDL is not needed as an existing regulatory program is reasonably expected to result in the attainment of the water quality standard within a reasonable, specified time frame.”</td><td></td></tr>
</table>

<table>
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<tr><td></td><td>the United States. These pollutants include PCBs, DDT, Dieldrin, and Chlordane. PCBs were banned in 1979, DDT in 1980, Dieldrin in 1987, and Chlordane in 1988.

The newly proposed listing includes several waterbodies in the County that are listed for impairments associated with these pollutants:

<table>
<tr><th>WATERSHED</th><th>WATERBODY SEGMENT</th><th>POLLUTANT(S)</th></tr>
<tr><td>Dominguez Channel</td><td>Alondra Park Lake</td><td>PCBs</td></tr>
<tr><td>Malibu Creek</td><td>Malibou Lake</td><td>Dieldrin</td></tr>
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<tr><td>Castaic Lake</td><td>PCBs</td></tr>
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</table>

The complete ban on these pollutants three decades ago, which is the strongest regulatory action an agency can take, has effectively addressed the true sources of these pollutants in the environment. Since these chemicals are no longer manufactured or used, the regulatory program already in place by the U.S. EPA is reasonably expected to result in the attainment of the water quality standard for these pollutants over time.

As indicated in comment VI, waterbodies that contain legacy pollutants should not be listed because the data used for their listing does not satisfy the Listing Policy.</td><td>A ban, in and of itself, is not a regulatory program and no time frame has been specified by any authority for waterbodies impaired by DDT, PCBs, Chlordane, or Dieldrin to attain the water quality standard under the ban, therefore the appropriate category for these waterbodies is 4a or 5.

Several TMDLs address these legacy pollutants; these TMDLs have timeframes for attainment of the standard and identify potential implementation actions such as non-structural and structural BMPs, and/or diversion and treatment to reduce sediment transport from the watershed to the waterbody. Implementation may, in some cases, require the removal of ‘hotspots’ of high sediment contamination. When an approved TMDL is in place the waterbody may be placed in category 4a (or may remain in category 5 if there are additional pollutants that are not yet addressed by a TMDL or other regulatory program).

The Echo Park Lake waterbody pollutant combinations are already addressed by a TMDL, the Los Angeles Area Lakes Nitrogen, Phosphorus, Mercury, Trash, Organochlorine Pesticides and PCBs TMDL.

Other TMDL for legacy pollutants include: Dominguez Channel and the Greater Los Angeles</td><td></td></tr>
</table>

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	However, if the Regional Board does list these waterbodies, we request that they be listed as Category 4b, not Category 5, because a regulatory program is already in place to address them.	and Long Beach Harbor Waters Toxics TMDL; Colorado Lagoon Organochlorine Pesticides, PCBs, sediment toxicity, PAHs and metals TMDL; McGrath Lake PCBs, Pesticides and Sediment Toxicity TMDL; Ballona Creek Estuary Toxic Pollutants TMDL (including Chlordane, DDT and PCBs); Machado Lake Pesticides and PCBs TMDL; Marina del Rey Harbor Toxics TMDL (including Chlordane and PCBs); and Calleguas Creek OC Pesticides and PCBs TMDL.	
17.8	**VIII. The State Should Rely On The Most Updated Guideline to List Waterbodies Based On Fish Tissue Contamination** In assessing waterbodies for fish tissue contamination, the Regional Board used the following two guidelines: a. The 2008 Office of Environmental Health Hazard Assessment (OEHHA) fish contaminant goal, and b. The 1972 National Academy of Sciences (NAS) guidelines. The OEHHA guideline, developed in 2008 is not only up-to-date but also specific to California and, thus, reasonable to use for this particular assessment. On the other hand, the NAS guideline is half a century old and out of date. In the absence of an up-to-date NAS guideline, the assessment should be based exclusively on the OEHHA standard's line of evidence. Based on the OEHHA guideline, the following waterbodies meet water quality standards and, therefore, should be removed from the proposed listing:	The use of both guidelines is appropriate, each supports a different beneficial use. Two or three lines of evidence were developed for the evaluation of the data for each of these waterbody pollutant pairs. One or two LOEs were developed for each of these waterbody pollutant pairs in support of an aquatic life beneficial use (WARM, COLD or both), which compared the data to the NAS evaluation guideline developed to protect aquatic life from the accumulation of toxic substances. In only one case this guideline was exceeded. One LOE was developed for each of these waterbody pollutant pairs in support of the fishing beneficial use, COMM, which compared the data to the OEHHA guideline developed to protect human health from consumption of toxic	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Castaic Lagoon for PCBs • Elderberry Forebay for Dieldrin • Pyramid Lake for Chlordane, DDT, Dieldrin, PCBs • Alondra Park Lake for PCBs Echo Park Lake for Chlordane and Dieldrin • Legg Lakes for DDT and PCBs.	substances. For all of these waterbody pollutant pairs, this guideline was exceeded frequently enough to place the waterbody pollutant pair on the 303(d) list.	
17.9	**IX. ADDITIONAL COMMENTS** **A. Wilmington Drain-Copper should be delisted** Per Appendix G fact sheets, two lines of evidences (LOE) were used to support the listing for copper in Wilmington Drain. However, the information used for the second LOE is data collected in Compton Creek, which is a different waterbody. This data should not be used to evaluate Wilmington Drain. Removal of this LOE would lead to only 2 exceedances out of 33 data points. This would satisfy the delisting criteria of the State's Listing Policy. Therefore, copper should be delisted for Wilmington Drain.	Los Angeles Water Board staff will correct the LOEs and the decision, as appropriate, as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval.	See response to comment 11.3.
17.10	**B. The listings in Appendix A should be corrected to reflect the listing and delisting decisions in Appendix G** As already acknowledged in the February 24 Regional Board notice letter, Appendix A does not accurately capture all the listing and delisting decisions detailed in the fact sheets in Appendix G. For example, for Ballona Creek, Chlordane, DDT, Dieldrin, and PCBs were delisted during the previous listing cycle. However, these listings continue to be identified in Appendix A as part of the 2016 303(d) list. This is true for many of the waterbodies summarized in Appendix A. This error should be corrected to avoid any confusion and misinterpretation of the information by the general public.	Los Angeles Water Board staff is aware of the inconsistencies and Appendix A has been revised.	
17.11	**C. Waterbodies that are on the 303(d) list and being addressed by a USEPA approved TMDL should be moved to Category 4a from Category 5**	Each of these waterbody pollutant pairs are included in the 303(d) list as “being addressed by	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Many of 303(d)-listed waterbodies from the previous listing cycle now have TMDLs. This requires a change in their status from Category 5 (TMDL required list) to Category 4a (being addressed by US EPA approved TMDL). Some of these status changes are not reflected in the revised list and need correction. Similarly, some of the newly proposed listings are already being addressed by an existing TMDL for that watershed. In those cases, it is appropriate to put them also under Category 4a as opposed to Category 5. Examples, include: • LA River Reach 3 and Rio Hondo Reach 2 for Indicator Bacteria, which are being addressed by the Los Angeles River Watershed Bacteria TMDL • LA River Reach 6 for Copper and Compton Creek for Zinc, which are being addressed by the Los Angeles River Metals TMDL.	USEPA approved TMDL." However, each of these waterbodies remains on the list in Category 5 because there are other pollutants impairing those waterbodies that have yet to be addressed by a TMDL or other regulatory program. For example, Rio Hondo Reach 2 has a TMDL for indicator bacteria (the Los Angeles River Watershed Bacteria TMDL); however, Rio Hondo Reach 2 also is listed for dissolved oxygen and toxicity, which are not being addressed by a TMDL. Therefore, the water body, as a whole, is in Category 5. Nonetheless, in the Appendix for Category 5, waterbody pollutant combinations for which a TMDL is complete are shown as 5B and waterbody pollutant combinations for which there is no TMDL are shown as 5A.	
18.	County of Ventura Public Works Agency, March 30, 2017		
18.1	The County has a number of concerns regarding the draft 2016 Los Angeles Water Board's proposed revisions to the 303(d) list of impaired waterbodies and believes that it requires significant review and modification before adoption. The County requests that the issues identified in this letter be addressed and the proposed 303(d) list be released for another 60-day comment period prior to adoption. Several of the issues identified herein have resulted in the inability of the proposed 303(d) list to be fully vetted and reviewed.	See response to comment 32.1 for additional discussion of additional comment periods.	
18.2	Requested modifications fall into three broad categories:	See response to comment 18.3-18.61 for specific responses.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	1. New Category 5 listings should not be listed due to incorrect thresholds applied to the beneficial use, incorrect sample locations, and incorrect interpretation of the data (e.g., mismatched units or lack of temporal representation). 2. Delistings requested previously by the County that have not been incorporated. 3. Errors in the listing information that make it difficult to fully evaluate the listings. Examples include inconsistencies between the Category 5 list (Appendix B) and the proposed updates to the 303(d) list (Appendix A), incorrect HUC/Calwater designations, incorrect beneficial uses listed for the applicable water quality objectives <WQOs), and inconsistent use of thresholds for interpreting narrative objectives. The remaining sections of this letter provide a detailed summary of requested changes to the 303(d) list and the rationale for the requested actions. In summary, the County requests that all waterbody pollutant combinations in Table 1 not be listed on the 303(d) list, nitrogen compounds in Santa Clara River Reach 3 be delisted, and the errors and inconsistencies identified in the CCW TMDL Stakeholders Letter be addressed.		
18.3	**I. REQUESTED MODIFICATIONS TO THE LISTING STATUS** Based on a review of the proposed Category 5 waterbody segment-pollutant combinations, the County has identified a number of waterbodies that should be either delisted based on available data or for which proposed new listings should not be listed based on errors in the data evaluation. The requested modifications are shown in Table 1, below, with a summary of the justifications for the requested changes. A detailed discussion of each of the justifications follows the table. **Table 1. Waterbody-pollutant combinations that should not be listed**	See response to comment 7.5.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Waterbody Segment: **Boulder Creek (Ventura County)** Pollutant: Chlordane Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • J-flagged data incorrectly used in assessment (WARM).		
18.4	**Boulder Creek (Ventura County)** Pollutant: Nitrogen, Nitrate Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.6.	
18.5	**Boulder Creek (Ventura County)** Pollutant: Specific Conductivity Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.7.	
18.6	**Boulder Creek (Ventura County)** Pollutant: Toxicity Justification for Not Listing: • Data does not include proper temporal representation.	See response to comment 7.8.	
18.7	Waterbody Segment: **Ellsworth Barranca** Pollutant: DDE Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • J-flagged data incorrectly used in assessment.	See response to comment 7.43.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
18.8	Waterbody Segment: **Javon Canyon** Pollutant: Benthic Community Effects Justification for Not Listing: • Data does not include proper temporal representation. • Benthic Community Effects listing is based on flawed analyses.	Listings based on both the SCIBI and CSCI scores are consistent with State policy and have been assessed relative to appropriate reference sites. See response to comment 26.4 for a discussion of the appropriate metrics for benthic community condition. See response to comment 26.5 for a discussion of the established water quality criteria. Because the data collected are temporally independent, it is appropriate to assess the data as individual samples even though they were collected at the same site.	
18.9	Waterbody Segment: **Javon Canyon** Pollutant: Selenium Justification for Not Listing: • Data does not include proper temporal representation.	Fish were collected from two sites on a single day. Because the data collected is spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same date. As the data support a listing decision, the waterbody pollutant combination should be listed until more data supporting a delisting decision become available. In addition, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
18.10	Waterbody Segment: **Los Sauces Creek** Pollutant: Selenium Justification for Not Listing: • Data does not include proper temporal representation.	Fish were collected from two sites on a single day. Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same date. As the data support a listing decision, the waterbody pollutant combination should be listed until more data supporting a delisting decision become available. In addition, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent.	
18.11	Waterbody Segment: **Madranio Canyon** Pollutant: Benthic Community Effects Justification for Not Listing: • Data does not include proper temporal representation. • Benthic Community Effects listing is based on flawed analyses.	Listings based on both the SCIBI and CSCI scores are consistent with State policy and have been assessed relative to appropriate reference sites. See response to comment 26.4 for a discussion of the appropriate metrics for benthic community condition. See response to comment 26.5 for a discussion of the established water quality criteria. Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
18.12	Waterbody Segment: **Madranio Canyon** Pollutant: Copper Justification: • Data does not include proper temporal representation.	Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day.	
18.13	Waterbody Segment: **Madranio Canyon** Pollutant: Selenium Justification for Not Listing: • Data does not include proper temporal representation.	Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day.	
18.14	Waterbody Segment: **Medea Creek Reach 1 (Lake to Confl. with Lindero)** Pollutant: Benthic Community Effects Justification for Not Listing: • Benthic Community Effects listing is based on flawed analyses. • Data does not include proper temporal representation.	See response to comments 26.4 and 26.15.	
18.15	Waterbody Segment: **Padre Juan Canyon** Pollutant: Benthic Community Effects Justification for Not Listing: • Benthic Community Effects listing is based on flawed analyses. • Benthic Community Effects data do not support listing. • Data does not include proper temporal representation.	See response to comments 26.4 and 26.15. Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day.	
18.16	Waterbody Segment: **Padre Juan Canyon** Pollutant: Selenium Justification for Not Listing: • Data does not include proper temporal representation.	Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day.	
18.17	Waterbody Segment: **Port Hueneme Harbor (Back Basins)**	Because the data collected are spatially	An additional reference has been linked to the

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Pollutant: Arsenic Justification for Not Listing: • Data does not include proper temporal representation.	independent, it is appropriate to assess the data as individual samples even though they were collected on the same day. In addition, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent.	decision. The guideline, 0.0052 ppm, is the screening guideline from "Guidance for Assessing Chemical Contaminant Data for Use In Fish Advisories Volume 1: Fish Sampling and Analysis," 2000, (CalWQA ref 3756) and assumes an average body weight of 70 kg and a consumption rate of 21 g/day for a 30 year exposure over a 70-year lifetime.
18.18	Waterbody Segment: **Port Hueneme Harbor (Back Basins)** Pollutant: Cadmium Justification for Not Listing: • Data does not include proper temporal representation.	Samples were collected from three sub-locations from two sites. The three samples per site were averaged prior to assessment. Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day. In addition, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent.	
18.19	Waterbody Segment: **Port Hueneme Harbor (Back Basins)** Pollutant: Dieldrin Justification for Not Listing: • Data does not include proper temporal representation.	Samples were collected from three sub-locations from two sites. The three samples per site were averaged prior to assessment. Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day. In addition, fish are not static; they move	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent.	
18.20	Waterbody Segment: **Port Hueneme Harbor (Back Basins)** Pollutant: PAHs (Polycyclic Aromatic Hydrocarbons) Justification for Not Listing: • Data does not include proper temporal representation.	Samples were collected from three sub-locations from two sites. The three samples per site were averaged prior to assessment. Because the data collected are spatially independent, it is appropriate to assess the data as individual samples even though they were collected on the same day. In addition, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent.	
18.21	Water Segment: **Santa Clara River Estuary** Pollutant: pH Justification for Not Listing: • No demonstration high pH is a result of waste discharge.	See response to comments 16.2 and 32.5.	
18.22	Water Segment: **Santa Clara River Reach 1 (Estuary to Hwy 101 Bridge)** Pollutant: pH Justification for Not Listing: • No demonstration high pH is a result of waste discharge.	The 303(d) list appropriately identifies the pH impairments. Analysis of sources and causes or identification of implementation measures to resolve or correct the impairment are not completed as part of the Integrated Report or 303(d) listing process. There are multiple sources of water to Santa Clara River Reach 1 including “waste discharge” from	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		sources such as wastewater treatment plants and the MS4. Exceedances in pH may be caused in part by waste discharge. The relative contribution of the causes of pH exceedances is largely speculative, at this time. See, also, response to comment 16.5.	
18.23	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: Chlordane Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.72.	
18.24	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: Chlorpyrifos Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.73.	
18.25	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: Cyfluthrin Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.74.	
18.26	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: Cypermethrin Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.75.	

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18.27	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: DDD Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.76.	
18.28	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: DDE Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.77.	
18.29	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: DDT Justification for Not Listing: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.78.	
18.30	Water Segment: **Santa Clara River Reach 3 (Freeman Diversion to A Street)** Pollutant: Mercury Justification for Not Listing: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	See response to comment 7.79.	
18.31	Waterbody Segment: **Tapo Canyon** Pollutant: DDD	See response to comment 7.81.	

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	Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • Includes LOE for toxicity to support the DDD listing. This LOE should be removed since there is a separate LOE specifically for toxicity.		
18.32	Waterbody Segment: **Tapo Canyon** Pollutant: DDE Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody. • Includes LOE for toxicity to support the DDE listing. This LOE should be removed since there is a separate LOE specifically for toxicity.	See response to comment 7.82.	
18.33	Waterbody Segment: **Tapo Canyon** Pollutant: Nitrogen, Nitrate Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.83.	
18.34	Waterbody Segment: **Tapo Canyon** Pollutant: Specific Conductivity Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.84.	
18.35	Waterbody Segment: **Triunfo Canyon Creek Reach 1** Pollutant: Benthic Community Effects Justification for Not Listing: • Benthic Community Effects listing is based on flawed analyses.	Two LOEs with five bioassessment scores supported a listing decision. Though IBI scores will be replaced by CSCI in the future for water quality assessment purposes, it remains appropriate to use data on IBI scores for listing	

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		purposes. The waterbody pollutant combination should be listed until more data supporting a delisting decision become available or information suggests the environmental conditions have changed. See response to comments 26.4 and 26.15.	
18.36	Waterbody Segment: **Ventura Harbor: Ventura Keys** Pollutant: Arsenic Justification for Not Listing: • Data does not include proper temporal representation.	See response to comment 16.6	
18.37	Waterbody Segment: **Ventura Harbor: Ventura Keys** Pollutant: Cadmium Justification for Not Listing: • Data does not include proper temporal representation.	See response to comment 16.6	
18.38	Waterbody Segment: **Ventura Harbor: Ventura Keys** Pollutant: Chlordane Justification for Not Listing: • Data does not include proper temporal representation.	See response to comment 16.6	
18.39	Waterbody Segment: **Ventura Harbor: Ventura Keys** Pollutant: DDT Justification for Not Listing: • Data does not include proper temporal representation.	See response to comment 16.6	
18.40	Waterbody Segment: **Ventura Harbor: Ventura Keys** Pollutant: Dieldrin Justification for Not Listing:	See response to comment 16.6	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Data does not include proper temporal representation.		
18.41	Waterbody Segment: **Ventura Harbor: Ventura Keys** Pollutant: PCBs (Polychlorinated biphenyls) Justification for Not Listing: • Data does not include proper temporal representation.	See response to comment 16.6	
18.42	Waterbody Segment: **Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)** Pollutant: Benthic Community Effects Justification for Not Listing: • Benthic Community Effects listing is based on flawed analyses.	See response to comment 16.12.	
18.43	Waterbody Segment: **Ventura River Reach 1 and 2 (Estuary to Weldon Canyon)** Pollutant: Temperature, water Justification for Not Listing: • Analysis does not demonstrate water temperature is above natural temperature.	See response to comment 16.13.	
18.44	Waterbody Segment: **Ventura River Reach 3 (Weldon Canyon to Confl. w/Coyote Cr)** Pollutant: Benthic Community Effects Justification for Not Listing: • Benthic Community Effects listing is based on flawed analyses.	See response to comment 16.12.	
18.45	Waterbody Segment: **Ventura River Reach 3 (Weldon Canyon to Confl. w/Coyote Cr)** Pollutant: Mercury Justification for Not Listing: • Data and objectives have different units (ng/L vs. µg/L); data do not	See response to comment 7.87.	

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	exceed objectives.		
18.46	Waterbody Segment: **Ventura River Reach 3 (Weldon Canyon to Confl. w/Coyote Cr)** Pollutant: Toxicity Justification for Not Listing: • Toxicity data from prior to pesticide use restrictions used for listings. More recent data does not show toxicity.	Of the 43 samples evaluated, eight samples were in exceedance, which supported a listing decision. The waterbody pollutant combination should be listed until more data supporting a delisting decision become available. Staff encourages commenter to submit data to CEDEN in preparation for the next listing cycle.	
18.47	Waterbody Segment: **Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)** Pollutant: Benthic Community Effects Justification for Not Listing: • Benthic Community Effects listing is based on flawed analyses. • Data does not include proper temporal representation.	See response to comment 26.4 for a discussion of the appropriate metrics for benthic community condition. See response to comment 26.5 for a discussion of the established water quality criteria. Because the data collected are temporally independent, it is appropriate to assess the data as individual samples even though they were collected at the same site.	
18.48	Waterbody Segment: **Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd)** Pollutant: Temperature, water Justification for Not Listing: • Analysis does not demonstrate water temperature is above natural temperature.	The designated beneficial use supports cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates. As stated by Moyle, 1976, the optimum range for Rainbow Trout's growth and completion of most life stages is 13-21 degrees	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		Celsius. Therefore, it is appropriate to use this information as Evaluation Guideline, which does not conflict with the water quality objective for Cold Freshwater Habitat.	
18.49	Waterbody Segment: **Wheeler Canyon/Todd Barranca** Pollutant: Benthic Specific Conductivity Justification for Not Listing: • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.87.	
18.50	***Listing data lacks proper temporal representation.*** There are many instances where the data to support the listed pollutant lacks proper temporal representation. Section 6.1.5.3 of the State Water Resources Control Board (SWRCB) Listing Policy1 states that: "*Samples should be representative of the critical timing that the pollutant is expected to impact the water body. Samples used in the assessment must be temporally independent. If the majority of samples were collected on a single day or during a single short-term natural event (e.g., a storm, flood, or wildfire), the data shall not be used as the primary data set supporting the listing decision.*" Many of the pollutants listed in **Table 1** included data collected from a single sampling date. This violates the Listing Policy. For instance, all the newly proposed pollutants for the Ventura Harbor: Ventura Keys (i.e., arsenic, cadmium, chlordane, DDT, dieldrin, and PCBs) were collected on a single day- February 28, 2007. Because there is no temporal resolution provided for these pollutants they should not be listed. **Requested Action:**	See response to comment 18.3-18.49 for specific responses.	For arsenic, see response to comment 16.6.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Remove all listings shown in Table 1 that were based on a single sample collection date.		
18.51	***1. Benthic Community Effects Listing are based on flawed analyses and should be removed.*** The benthic community effects listings are based on a metric which has since been deemed arbitrary and inappropriate. The Index of Biotic Integrity (IBI) stream assessment was a commonly used metric to determine benthic community effects. The threshold used to distinguish an impaired reach was a value of 39 and below. However, this threshold value was arbitrarily assigned as a statistical cut-off value. The state has since endorsed the use of the California Stream Condition Index (CSCI), as stated in the Appendix G Fact Sheets, "*The CSCI is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. The CSCI will be used in the future for water quality assessment purposes statewide over the regional indices of biologic integrity (IBIs).”* Despite this, all of the newly listed benthic community effects in Table 1 utilize the IBI to assess the waterbodies. Therefore, the County is requesting that these flawed listings be removed until the waterbodies can be assessed with a more representative metric such as the CSCI. In addition, a number of water segments are listed as an exceedance for benthic community effects citing a low CSCI score, however, the original data shows only IBI scores. The Water Board should clearly note whether a CSCI or IBI assessment was performed. For instance, the Fact Sheets show that Padre Juan Canyon has 2/2 samples which exceed for benthic community effects using a CSCI score of 0.35 and 0.52 which is below the 0. 79 CSCI threshold. However, the raw data shows that an IBI was performed resulting in scores of 40 and 39, which would only represent one exceedance which would not support listing the water body. The Water Board should clearly state where the CSCI scores are that they are referring to. This issue applies to all new benthic community effects listings. More detailed information can be provided upon request.	See response to comment 18.8, 18.11, 18.14, 18.15, 18.35, 18.42, 18.44, and 18.47	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	In addition, many of the benthic community effects listings rely on a single day of sampling which does not provide proper temporal representation as discussed in the previous comment. **Requested Action:** **• Update the Appendix G Fact Sheets to clearly state that an IBI metric was used not the CSCI for all pollutants noted in Table 1.** **• Remove all listings shown in Table 1 for benthic community effect that use the IBI listing.**		
18.52	***2. There is no demonstration that high pH is a result of waste discharge.*** The waterbodies listed for high pH do not appropriately demonstrate that the high pH was a result of waste discharge as required in the Basin Plan. The Santa Clara River Estuary and Santa Clara River Reach 1 are both listed for high pH. As stated in the Fact Sheet and according to the Los Angeles Region Basin Plan "*The pH of inland surface waters shall not be depressed below 6. 5 or raised above 8. 5* ***as a result of waste discharges***" [emphasis added]. However, it was not demonstrated for either of these waterbodies that the elevated pH levels were a result of waste discharge as opposed to natural causes. Therefore, the Los Angeles Water Board should either provide evidence that the elevated pH was a result of waste discharge and detail that in the Fact Sheets, or, if no such evidence exists, the Los Angeles Water Board should remove these proposed listings. **Requested Action:** **Remove the pH listings for Santa Clara River Estuary and Santa Clara River Reach 1 as there is no data provided in the Fact Sheet that demonstrate that these high pH values are the result of waste discharge.**	See response to comment 16.15.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
18.53	***3. Remove any pollutant listing based on municipal drinking water objectives where the MUN beneficial use does not apply.*** Numerous listings were made using WQOs for the protection of the municipal drinking for waterbodies that do not have applicable municipal drinking water beneficial uses. Many of the waterbodies listed are waterbodies for which no beneficial uses are designated or waterbodies designated for the municipal beneficial use with an asterisk (i.e., P*) in the Basin Plan. The asterisked MUN beneficial use should not be used to propose new 303(d) listings. Fact Sheets for previous 303(d) listing cycles have clearly noted that the asterisked MUN beneficial uses should not be used for 303(d) listing purposes. State Board Resolution No. 88-63 (Sources of Drinking Water) and Regional Board Resolution 89-03 (Incorporation of Sources of Drinking Water Policy into the Water Quality Control Plans (Basin Plans)), state that "All surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic waters supply and should be so designated by Regional Boards [with certain exceptions which must be adopted by the Regional Board]." The Regional Board adopted a Water Quality Control Plan for the Los Angeles Region (Basin Plan) on June 4, 1994, that included provisions to implement State Water Board Resolution 88-63. On May 26, 2000, the USEPA approved the revised Basin Plan except for the implementation plan for potential MUN-designated water bodies. On August 22, 2000, the City of Los Angeles, City of Burbank, City of Simi Valley, and the County Sanitation Districts of Los Angeles County challenged USEPA's water quality standards action in the U. S. District Court. On December 18, 2001, the court issued an order remanding the matter to USEPA to take further action on the 1994 Basin Plan consistent with the court's decision. On February 15, 2002, USEPA revised its decision and approved the 1994 Basin Plan in whole. In its February 15, 2002 letter, USEPA stated: *"EPA bases its approval on the court's finding that the Regional Board's identification of waters with an asterisk ("*') in conjunction with the*	See response to comment 7.89, 18.3, 18.4, 18.5, 18.7, 18.27, 18.28, 18.31, 18.32, 18.33, 18.34, and 18.49.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	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 ("CWA"). 33 U.S. C. § 1313(c)(3)."*[3] In addition to the above decision, the Basin Plan states that until the additional study is undertaken and the Basin Plan is modified "no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations". The Regional Board has also determined that WQOs applicable to the MUN beneficial use will not be used to assess impairments under the 303(d) listing programs. For constituents that only have objectives that are applicable to the MUN beneficial use, the decision Fact Sheets for the 303(d) listing process state that there are no applicable WQOs in waterbodies designated with an asterisk("*"). In the 2010 listing cycle, a number of 303(d) listings were actually removed based on this determination. Below is an example of the language from a listing decision for Los Angeles River Reach 1 : *"The listing for aluminum in this water body was originally based on data assessed using the MCL for aluminum. Since MUN is a "potential" beneficial use, it is not appropriate to use the MCL to evaluate aluminum data from this reach. Thus, there is no aluminum objective for this reach and the original listing is faulty. "* Based on this evidence, it is clear that for waterbodies with a MUN designation that includes an asterisk ("*"), WQOs specific to the MUN beneficial use are not		

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	applicable. As such, water quality data collected in these receiving waters should not be compared to WQOs applicable to the MUN beneficial use. **Requested Action:** **Revise all the new listings in the Fact Sheets to ensure none are based on municipal drinking water objectives when the MUN beneficial use does not apply.**		
18.54	***4. Agricultural Drain and MS4 outfall monitoring data incorrectly used as basis for listing decisions.*** There are some instances where listing decisions are based on data from the Agricultural VCAILG Monitoring Program which include monitoring data from agricultural drains. Santa Clara River Reach 3 (Freeman Diversion to A Street) listings (i.e., chlordane, chlorpyrifos, cyfluthrin, cypermethrin, ODD, ODE, and DDT) were based on multiple lines of evidence, but were primarily listed based on exceedances at VCAILG sample site "S03D_Bards" which is an agricultural drain that drains to Santa Clara River Reach 3. This site was selected to be representative of agricultural discharges to Reach 3 and it is not representative of receiving water conditions. Therefore, any data collected from "S03D_Bard" and other agricultural drain sites cannot be used to list the downstream reach. All listings should be evaluated to ensure that the monitoring locations were in receiving waters rather than agricultural drains. In some cases, other lines of evidence cite location "Santa Clara River at Freeman Diversion at 11th Street Drain (tributary to Santa Clara River) at sample location Santa Paula-1" ("Santa Paula-1"). This location is an MS4 outfall location that is designed to characterize urban discharges from City of Santa Paula and is not located in the Santa Clara River's receiving waters. As a result, the data from "Santa Paula-1" location should not be used for listing receiving waters. However, it should be noted that the data linked to the Fact Sheet did not include any data	See response to comments 7.72 and 7.88.	

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	from "Santa Paula-1" so it is unclear what data were evaluated for these listings. Unless receiving water data contain exceedances, none of the constituents for Santa Clara River Reach 3 should be listed. **Requested Action:** **Remove all listings shown in Table 1 that were based on Agricultural and MS4 discharge monitoring data not representative of the listed waterbody and evaluate remaining listings to ensure no other listings are based on agricultural drain or MS4 outfall monitoring rather than receiving water monitoring.**		
18.55	***5. Remove toxicity Lines of Evidence (LOE) from pollutant Fact Sheets when a LOE specifically for toxicity already exists.*** Numerous pollutants listed for Tapo Canyon (chlordane, DDD, and DDE) include a toxicity LOE to support the pollutant listing, when a toxicity LOE already exists for the waterbody. These pollutant-specific toxicity LOEs include no scientific evidence that the specific pollutant was the cause of observed toxicity and so should be removed from the Fact Sheet. **Requested Action:** **Remove the Lines of Evidence for toxicity for Tapo Canyon in Table because no evidence was provided that these constituents were the cause of toxicity.**	See response to comment 18.31 and 18.32.	
18.56	***6. Reassess mercury listings using correct objective and correct units.*** The data used to assess mercury for Santa Clara River Reach 3 and Ventura River Reach 3 are in ng/L (nanograms per liter) and the objective is µg/L (micrograms per liter). The data need to be converted into the same units as the objective before an exceedance can be determined. The County expects that after this calculation has been performed the waterbodies will no longer meet the listing guidelines. Additionally, although a California Toxics Rule objective exists for mercury, an USEPA nationally recommended criteria was used for the assessment. An	See response to comment 7.90.	

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	explanation for the use of a recommended criteria when an established WQO exists should be provided. **Requested Action:** **Repeat the mercury analysis after correcting the unit error and clarify the objective used.**		
18.57	***7. Correct the proposed temperature listings which are based on incorrect criteria.*** The temperature listing for Ventura River Reaches 1 and 2 (Estuary to Weldon Canyon) and Ventura River Reach 4 (Coyote Creek to Camino Cielo Rd) uses an evaluation guideline of 13-21 degrees Celsius (°C) as the optimum growth range for rainbow trout. However, the applicable Basin Plan objective for waterbodies designated as *COLD* is "For waters designated as COLD, water temperature shall not be altered by more than 5 degrees F above the natural temperature." The Fact Sheets provide no discussion of natural temperatures or a demonstration that the temperature was raised above natural temperatures in order to exceed the objectives. Notwithstanding that a deviation from natural temperatures has not been demonstrated, the manner in which the evaluation guideline is applied is also inappropriate. Moyle 1976 is referenced as the source of the evaluation guideline. Moyle 1976 was revised and expanded by Moyle 20024. Moyle 2002 states: "Rainbows are found where daytime temperatures range from nearly 0°C in winter to 26-27°C in summer", although extremely low (<4°C) or extremely high (>23°C) temperatures can be lethal if the fish have not previously been gradually acclimated. Even when acclimation temperatures are high, temperatures of 24-27°C are invariably lethal to trout, except for very short exposures (25, 26). " As such, while temperatures above 21 °C may not be optimal according to Moyle 1976, Moyle 2002 clearly states that lethal temperatures are those greater than 23°C which indicates that the evaluation guideline of 21 °C is more	See response to comment 18.43 and 18.48.	

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	appropriately applied as a chronic guideline (necessitating the establishment of an averaging period) and 23°C is the more appropriate "not-to-exceed" guideline if used for listing. Using the threshold of 23°C, no samples would exceed the threshold in Ventura River Reach 4 and only 2 samples would exceed the threshold in Ventura River Reaches 1 and 2. Neither of these number of exceedances would meet the listing thresholds. **Requested Action:** **Remove the temperature listing for Ventura River Reach 1 and 2 as well as Ventura River Reach 4.**		
18.58	***8. The toxicity listing for Ventura River Reach 3 (Weldon Canyon to Confl. With Coyote Cr) relies on outdated data*** Based on a review of the available data, all the observed toxic samples occurred prior to 2009. Of the 8 exceedances, 3 occurred in 2000/2001 and the rest were in 2006, 2007 and 2008. In the 2006-2008 time period, toxicity was commonly observed due to chlorpyrifos and diazinon which were subsequently restricted. Toxicity in many watersheds has been significantly reduced as a result of these use modifications. The available data shows that no samples exceeded after 2008, indicating that those pesticides or another cause that is no longer present, were the cause of the toxicity. Because of the transient nature of toxicity and the potential that the causes of the toxicity are no longer present, exceedances from prior to the pesticide use bans should not be used as the basis for a listing. The more recent samples since the pesticide use restrictions should be used as a basis for evaluation. **Requested Action:** **Do not list Ventura River Reach 3 for toxicity based on exceedances from**	See response to comment 18.46.	

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	outdated data.		
18.59	***9. Ensure no J-flagged data were used in the assessment.*** The listing policy specifically prohibits the use of J-flagged ("estimated") data that fall below the quantitation limit but above the water quality standard. Section 6.1.5.5 of the Listing Policy specifically states: *"When the sample value is less than the quantitation limit and the quantitation limit is greater than the water quality standard, objective, criterion, or evaluation guideline, the result shall not be used in the analysis. The quantitation limit includes the minimum level, practical quantitation level, or reporting limit. "* All listings based on the use of J-flagged data should, therefore, be removed from the draft 303(d) list. Specific instances are included in Table 1, but this list is by no means inclusive; this significant error will have to be addressed by a thorough review of all listing data to confirm that no J-flagged data were used to justify listings. For example, the line of evidence for the Boulder Creek chlordane listing erroneously states that three out of five samples exceed the objectives. . A review of the data shows that only 1 out of 5 samples exceed indicated criteria. The remaining 4 results were (1) not detected and (2) "estimated" (J-flagged) by the laboratory because results were below the reporting limit. Because only 1 sample showed an exceedance, this listing should be removed as it does not meet the binomial test limits set forth in the Listing Policy. A similar situation also occurred in the Ellsworth Barranca DOE listing. Both the Boulder Creek and Ellsworth Barranca listings should be removed based on the incorrect assignment of the beneficial use MUN (as discussed earlier) in addition to the use of J-flagged data.	See response to comment 7.5.	

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	Requested Action: **• Review all Fact Sheets and Lines of Evidence for the use of J-flagged data and remove any instances where J-flagged data were used.** **• Delist chlordane for Boulder Creek and DDE for Ellsworth Barranca as well as any other pollutants that lack the minimum number of exceedances required to justify a listing.**		
18.60	**II. REQUESTED DELISTINGS** In June 2015, the County and the Cities of Fillmore and Santa Paula submitted a letter with data and analysis that supported delisting of the Santa Clara River for ammonia. In the November 10, 2016 letter, Los Angeles Water Board staff responded with plans to recommend delisting of ammonia from Santa Clara River Reach 3 in the 2016 California Integrated Report. The letter is provided as an attachment to this letter. The County requests that the delistings provided in the attached letter be included in the 303(d) list scheduled for adoption on May 4, 2017. **Requested Action:** **Delist Ammonia in Santa Clara River Reach 3.**	As stated in the November 10, 2016 letter, the Regional Board staff recommended delisting of Santa Clara River Reach 3 Ammonia from the 2016 California Integrated Report. Decision 32846 was revised to "Delist from 303(d) list (being addressed by USEPA approved TMDL)".	
18.61	**III. CORRECT OTHER ERRORS AND INCONSISTENCIES IN APPENDICES AND FACT SHEETS** Appendix A, Appendix B, Appendix C, and Appendix G have many inconsistencies which make the analysis of new additions very difficult since it is unclear which segment-pollutant combinations actually are new listings. As a result, there is concern that not all changes to the 303(d) list that may be considered for adoption were identified in the review. The lack of clarity comes from the following inconsistencies:	See response to comment 7.98 and 7.99.	

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	• Not all new listings are summarized in Appendix A. • Appendix B was found to be missing some new and old listings based on a comparison to Appendix G. • Appendix G has fact sheets for some listings noted as new in Appendix A or B identified as old fact sheets from the last listing cycle (e. g. benthic community listings in Javon Canyon). This indicates they were old listings, but a comparison to the 2010 303(d) list identified that they were in fact new listings and the fact sheets were incorrect or located in the wrong location. Additionally, in many cases, data and Quality Assurance Project Plan references in the Fact Sheets are inconsistent with the data provided for review. Examples of these inconsistencies and errors were detailed in the CCW TMDL Stakeholders' comment letter. The County asks that the Los Angeles Water Board do a thorough review of all appendices to ensure that the Proposed 303(d) List is internally consistent, the correct data were used for the assessment, and the other errors identified in the CCW TMDL Stakeholders' comment letter are addressed. **Requested Action:** **Correct the numerous errors and inconsistencies in the report and ensure that all the proposed 303(d) list appendices are internally consistent.**		
19.	County of Ventura and the Cities of Fillmore and Santa Paula, March 30, 2017		
19.1	The proposed updates to the 303(d) list did not include delisting of the Santa Clara River Reach 3 for ammonia as recommended by the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) in the letter dated November 10, 2016 provided as an attachment to this letter. In June 2015, the County and the Cities submitted a letter with data and analysis that supported delisting of the Santa Clara River Reach 3 for ammonia. In the November 10, 2016 letter, Los Angeles Water Board staff responded:	See response to comment 18.60.	

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	"Based on the findings described above, the requirements for delisting have been met. Therefore, Los Angeles Water Board staff plans to recommend delisting of ammonia from Santa Clara River Reach 3 in the 2016 California Integrated Report." (page 2 of the attached November 10, 2016 letter). The County and the Cities request that the ammonia delistings be included in the 303(d) list scheduled for adoption on May 4, 2017. Requested Action: Delist Ammonia in Santa Clara River Reach 3.		
20.	California Department of Water Resources (DWR), March 30, 2017		
20.1	The updates to the 303(d) list propose to add the following pollutants to the following State Water Project (SWP) affiliated locations: • Dieldrin, chlordane, DDT, and polychlorinated biphenyls (PCB) to Pyramid Lake • PCBs to Castaic Lake and Castaic Lagoon, and • Dieldrin and PCBs to Elderberry Forebay. DWR has the following comments: 1) The proposed pollutant listings lack a clear rationale that supports the recommended listings. A clear rationale, such as recommended food (i.e. fish) exposure levels (Food and Drug Administration for example), Fish Contaminant Goal (FCG), or Advisory Tissue Levels (ATL) for each pollutant should be provided so a clear comparison can be made. Some of the levels for these contaminants are above the FCG, they have not reached the ATL, and in fact, the report labels these contaminants as very low, as compared to the other higher priority contaminants. Absent such comparison, it is difficult to assess the appropriateness for such listings.	The Basin Plans contains narrative objectives for toxics pollutants that bioaccumulate within the biotic and result in adverse impacts to aquatic life or human health. Section 6.1.3 of the Listing Policy states that evaluation guidelines shall be used to interpret those objectives. Each LOE identifies the water quality objective/criterion and the evaluation guideline that was used in the assessment. Depending on the beneficial use being assessed, these evaluation guidelines are the National Academy of Science (NAS) guidelines for protection of aquatic life from bioaccumulation and Fish Contaminant Goals (FCGs). The policy allows for the use of evaluation guidelines published by the Office of Environmental Health Hazard Assessment	

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		(OEHHA) for the purposes of protection of human health from fish consumption. Water Board staff chose to use the FCGs values because they were the most protective values for fish consumption. There is no need to list a comparison of all three values rather than just selecting the most appropriate, protective, value. Furthermore, OEHHA screening values have been used as numeric targets in TMDLs within the Los Angeles region.	
20.2	2) The PCB data in Table 11 (Summary Report) for Elderberry Forebay does not seem to match that of the proposed listing status. Elderberry Forebay is absent from this Table.	Staff assumes the commenter is referring to Staff Report Appendix A: Summary of Regional Board Recommended Changes to the 2012 303(d) List. Elderberry Forebay dieldrin and PCBs are appropriately listed as new listings, which also matches the listing in Appendix B (Category 5).	
20.3	3) Insufficient details are provided for dieldrin, chlordane and DDT. A more comprehensive effort that specifically focuses on these contaminants should be conducted before they are proposed for Pyramid Lake additions to the 303(d) list.	"LIST" is the appropriate recommendation for dieldrin, chlordane and DDT. Listed waterbodies are evaluated and listing decisions are made based on Section 3 of Listing Policy. Based on readily available data and Section 3.5 and Table 3.1 of the Listing Policy and there are sufficient samples to list based on the binomial distribution. Greater detail regarding those listings is provided in Decision 62840, 62841, and 65950 in Appendix G. Also see response to comment 32.3 regarding	

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		readily available data.	
20.4	4) Further analysis, including statistical analysis, should be conducted to support this proposed listing. Given the proposed listing recommendations are based on sample analytical data, a statistical analysis to show that sufficient sample size has been obtained for each lake should be provided. Additional considerations for analysis should also include: • Increasing sampling locations. Were the samples obtained truly representative of the entirety of the lakes, especially those that are the subject of this letter? • Do the composite samples truly represent averages of the fish caught, or are they additive? Can composites identify anomalies? Can a lake-wide composite be skewed, as a result of one very high data point? • One-time study involving one year seems insufficient. Studies with longer duration are more appropriate to accurately determine the pollutant levels.	While the Listing Policy requires that samples be spatially and temporally independent, fish are not static; they move throughout a waterbody and accumulate pollutants in tissue over time. Therefore, the data are, by their nature, spatially and temporally independent. At the time a TMDL is developed, or other regulatory program is developed, a more refined geographic scope can be identified considering collection sites and fish movement. See response to comment 32.3 regarding readily available data.	
21.	Earth Law Center (ELC) , March 30, 2017		
21.1	**<u>1. Full Compliance with Clean Water Act Sections 305(b) and 303(d) Requires Identification of All Hydrologically Impaired Waterways</u>** *a. CWA Section 303(d)* Clean Water Act (CWA) Section 303(d)(1)(A) requires California to "identify those waters within its boundaries for which the effluent limitations … are not stringent enough to implement any water quality standard applicable to such waters." This must be a robust listing, with sufficient details about the waterways (including flow) to allow the state to "establish a priority ranking" for the waterways, also required by Section 303(d)(1)(A). In other words, California's 303(d) list must provide a comprehensive list of all impairments. The state's Listing Policy provides some mixed direction, stating on the one hand that 303(d)	The State Water Board has already addressed similar comments regarding flow-related impairments in their response to comments for their Proposed Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List) Portion of the 2012 California Integrated Report, posted March 3, 2015. The Los Angeles Water Board concurs with State Board's response to *American Rivers*. The State Water Board response is provided below:	In regards to the Ventura River Reaches 3 and 4 pumping and water diversion listings, the recommended decisions have been modified to "delist." While the Ventura River Algae, Eutrophic Conditions and Nutrients TMDL will address water quality impacts, pumping and water diversion are not pollutants and, therefore, are no appropriately placed on the 303(d) list.

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	list only covers impairments by "pollutants" (rather than also by "pollution," such as flow),[2] but on the other hand stating that Regional Water Board Fact Sheets supporting Section 303(d) listings "shall contain...Pollutant or *type of pollution* that appears to be responsible for standards exceedance."[3] The latter path is the appropriate course. No objection, further, can be made to including flow-impaired waterways on the Section 303(d) list on the basis that the state is not required to prepare TMDLs to address "pollution." First, Section 303(d)(1)(A) makes no mention of limiting the 303(d) list to those waterways requiring Total Maximum Daily Loads (TMDLs). In fact, no mention of TMDLs is made until Section 303(d)(1)(C), which sets requirements on how to manage impaired waterways. Moreover, the state itself does not take this position for waterways impaired by pollutants. Instead, the state lists in Category 5 (what it deems its Section 303(d) list) pollutant-impaired waterways that do, and do not, require TMDLs by state evaluation.[4] Accordingly, the state must include hydrologically impaired waterways, including those impaired by altered flow, on its 303(d) list. This is the path the Los Angeles RWQCB correctly took in listing the Ventura River (Reaches 3 & 4) for "pumping" and "water diversion" impairments. However, rather than continuing to follow the clear intent of CWA Section 303(d), the Los Angeles RWQCB instead proposes to delist the Ventura River (Reach 3) for "pumping,"[5] despite this listing having been properly included on the 303(d) list since 1998. The primary reason given is that "[t]he listing is for a non-pollutant and therefore should be delisted."[6] However, as established above, the CWA requires the listing of both pollutants and pollution on the 303(d) list, regardless of whether a TMDL is required. Therefore, we ask that the Ventura River (Reach 3) remain on the 303(d) list.	*Sufficient flow is necessary to protect water quality and beneficial uses of water. "Pollution," such as lack of adequate flow, may cause impairments to water quality standards. Specifically, reduced flows can cause or contribute to impaired water quality conditions, such as elevated water temperatures, increased pollutant concentrations, degraded recreational opportunities, and reduced habitat area and/or volumes.* *State law recognizes the connection between flow and water quality. The Legislature specifically identified its intention to "combine the water rights and water pollution and water quality functions of state government to provide for consideration of water pollution and water quality, and availability of unappropriated water whenever applications for appropriation of water are granted or waste discharge requirements or water quality objectives are established" when it created the State Water Resources Control Board. (Wat. Code, § 174.)* *The State Water Board has broad authority to consider water quality and pollution when it makes water allocation determinations. (Wat. Code, §1258.) The State Water Board has significant experience both setting and implementing flow criteria through water right actions, including its Bay-Delta Program and its*	

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		Policy for Maintaining Instream Flows in Northern California Coastal Streams. The State Water Board also has experience setting flow requirements as part of its responsibility to certify that the operation of hydropower facilities subject to Federal Power Act licensing meet water quality standards. Those actions are always controversial and frequently involve differences of opinion among scientists, who testify under oath, as to appropriate flow criteria in those proceedings. The State Water Board has previously recognized that its major rivers are over-allocated and adversely impacted by flow alterations (see for instance Strategic Plan Update 2008-2012, State Water Resources Control Board, September 2, 2008, p.10). However, the extent of the impact on instream beneficial uses of a stream depends on the unique circumstances of each situation and requires knowledge of other factors impacting the physical and biological integrity of the watercourse, including physical impediments to fish passage and sediment recruitment (dams and culverts, in addition to natural impediments such as waterfalls and landslides), the source of the water accreting to the stream (is it cool groundwater or is it warm runoff from open lands), the location and physical effect of diversions relative to habitat, and other factors that affect pollution.	

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		Pursuant to the above-cited state law, the State Water Board is expressly required to consider water quality and pollution when making water rights determinations. The converse is not true, however, with regard to the federal law directly applicable to developing the Integrated Report. The federal statutory directives pursuant to CWA 303(d) and 305(b) require states to report on the water quality necessary to provide for fish, wildlife, and recreational opportunities and other beneficial uses. In fulfilling its reporting obligations pursuant to CWA 303(d) and 305(b), the federal statutes do not expressly require the states to consider flow, pollution, or allocation of water rights, when reporting on standards attainment. Clean Water Act (CWA) section 305(b), combined with the section 303(d) reporting requirements, comprises the California Integrated Report (Integrated Report). Those reporting requirements establish a process for states to use to develop information on the quality of their state's waters. *CWA section 305(b) is the principle [sic] means by which U.S. EPA and the public assess whether waters meet water quality standards. The report is used by U.S. EPA to inform Congress on the quality of navigable waters and their tributaries nationwide.* *CWA section 305b requires states to report on:*	

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		"[A] description of the water quality of all navigable waters in such State during the preceding year, with appropriate supplemental descriptions as shall be required to take into account seasonal, tidal, and other variations, correlated with the quality of water […]."[A]n analysis of the extent to which all navigable waters of such State provide for the protection and propagation of a balanced population of shellfish, fish, and wildlife, and allow recreational activities in and on the water." *"[A]n analysis of the extent to which the elimination of the discharge of pollutants and a level of water quality which provides for the protection and propagation of a balanced population of shellfish, fish, and wildlife and allows recreations activities in and on the water, have been or will be achieved by the requirements of this chapter, together with recommendations as to additional action necessary to achieve such objectives and for what waters such additional action is necessary."* *(CWA § 305(b)(1)(A)-(C); see id. at § 305(b)(1)(D) & (E) (describing economic and*	

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		environmental reporting requirements).) U.S. EPA describes the section 305(b) reporting goals at: http://water.epa.gov/type/watersheds/monitoring/upload/2003_07_24_monitoring_305bguide_v1ch1.pdf , *and provides 2006 Integrated Report Guidance here:* *http://water.epa.gov/lawsregs/lawsguidance/cwa/tmdl/2006IRG_index.cfm.* *As provided in the above U.S. EPA reference material, the primary purpose of the 305(b) and 303(d) reporting requirements is to determine the extent waters are attaining standards, identify waters that are impaired and need to be added to the 303(d) list and placed in Category 5 for the development of a total maximum daily load (TMDL), and identify waters that can be removed from the list when standards are attained.* *The guidance U.S. EPA developed for states to implement the Integrated Report consistently provides that segments should be placed in Category 4c when "the [S]tates demonstrate[] that the failure to meet an applicable water quality standard is not caused by a pollutant, but instead is caused by other types of pollution" such as lack of adequate flow. (See Guidance for 2006 Assessment, Listing and Reporting Requirements*	

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		Pursuant to Section 303(d), 305(b) and 314 of the Clean Water Act (July 29, 2005). *In making decisions concerning standards assessment, it is imperative that the State Water Board undertakes a structured framework regarding its assessment and listing methodology and also provides information on the content of such methodologies.* *It may be appropriate to assess flow alteration pursuant to section 305(b) to the extent it could be used to support water quality decision-making. However, without a defined methodology for assessing non-pollutant related pollution, Water Board staff does not have a consistent and transparent approach to analyzing the extent to which flow-related alterations cause or impact water quality standards. The decisions made by the State and Regional Water Boards must be based on a methodology that provides all stakeholders with the opportunity to understand exactly how assessment decisions are made. The State Water Board's listing determinations must be supported by documentation that explains the analytical approaches used to infer true segment conditions. (See U.S. EPA's 2006 Guidance for Assessment and Listing, p. 29 (explaining what constitutes an assessment methodology and U.S. EPA's review of a state's methodology for consistency with the CWA and a state's water*	

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		quality standards).) In addition to recognizing U.S. EPA's recommendation that segments be placed in Category 4c when the cause is solely due to pollution, and given the uncertainties associated with determining appropriate flow criteria to be used as a threshold for determining impairment, the State Water Board does not believe that placing segments in Category 4c of the Integrated Report results is warranted. Neither is such a reporting format an appropriate use of its limited resources, particularly considering the State Water Board's broad authority to address flow issues through its other legal authorities, which unlike information provided in the Integrated Report, have the potential to result in flow improvements through voluntary or regulatory action. However, in this 303(d) list, the Los Angeles Water Board has assigned the Ventura watershed pumping and water diversions to "being addressed by a TMDL" (Category 4a). In EPA's approval letter for the Ventura River Algae, Eutrophic Conditions and Nutrients TMDL, EPA stated "Based on EPA's approval of the State' s TMDLs addressing the algae, eutrophic conditions and nutrient impairments, together with other available information regarding Reaches 3 and 4 of the Ventura River, EPA has determined that it is unnecessary at this time to establish separate actions for the pumping and water diversion in	

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		Reaches 3 and 4 of the Ventura River." Decision ID 33817 Ventura Reach 3, water diversion Decision ID 44534 Ventura Reach 4, water diversion Decision ID 34271 Ventura River Reach 3, pumping Decision ID 44793 Ventura Reach 4, pumping	
21.2	*b. CWA Section 305(b)* The state must also include hydrologically impaired waters in its broader, CWA Section 305(b) report. Section 305(b) requires states to submit biennial reports[7] that "shall" describe the "water quality of all navigable waters," including an analysis of the extent to which the waters protect fish and wildlife, for compilation and submission to Congress.[8] Federal regulations describe this requirement and its purpose, stating that **the Section 305(b) report "serves as the primary assessment of State water quality" and the basis of states' water quality management plan elements, which "help direct all subsequent control activities."**[9] States must use the Section 305(b) report to develop their annual work program under Sections 106 and 205(j).[10] California's Integrated Report accordingly must include an adequate Section 305(b) report if the state is to develop meaningful water quality plans that appropriately direct staff and resources to the most important control activities. The Section 305(b) report must particularly include information regarding waterway flows to ensure that the fundamental purpose of Section 305(b) in guiding workplanning is met. The provision of information regarding waterway flow is also called for by CWA Section 101, which sets **the national objective of restoring and maintaining the "chemical, *physical*, and biological integrity of**	The State Water Board has already address similar comments regarding flow-related impairments in their response to comments for their Proposed Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List) Portion of the 2012 California Integrated Report, posted March 3, 2015. The Los Angeles Water Board staff concurs with the State Water Board's response to *American Rivers*. The State Water Board response is provided below: *It is State Water Board staff's interpretation that waterbodies currently listed for pollutant based impairments should not be included for pollution based impairments as well. The pollution based impairments should be addressed via the TMDL or other regulatory process. If all pollutant based impairments are eventually addressed and the*	

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	the Nation's waters." (Emphasis added.) The U.S. Supreme Court itself explicitly affirmed the importance of addressing physical elements of waterway health such as flow, stating **that the distinction between water quality and quantity under the CWA is "artificial."**[11] The Staff Report runs afoul of the CWA by ignoring Category 4C entirely for inclusion in either its 303(d) list or its 305(b) report, reporting that *zero* water bodies in the Los Angeles Region are impaired due to altered hydrology under Category 4C.[12] As with other regional water boards, the Los Angeles RWQCB appears to rely on the Listing Policy for this decision, which states that the 303(d) list only includes those water segments that require the development of a TMDL.[13] Here, again, the Staff Report assumes an illegally narrow definition of its requirements under the CWA. The Integrated Report is supposed to include *both* a robust and legally adequate 303(d) list *as well as* a robust and legally adequate 305(b) report. These requirements are combined; they are not the same (*see also* sec. 8). If the State Water Board and Regional Water Boards take the position that pollution-impaired waterways (including flow-impaired waters) cannot be included in the Section 303(d) list, then the Listing Policy – which by definition applies *only* to the Section 303(d) list – is irrelevant. It cannot be used as an excuse to ignore flow impairments entirely. The state in that case must then turn to its requirements under Section 305(b), which broadly require it to report on water quality, including as impacted by altered flow. Indeed, the Staff Report recognizes that it must consider flow-impaired waterways in its assessment, describing Category 4C as being applicable if "[t]he non-attainment of any applicable water quality standard for the waterbody is the result of pollution and is not caused by a pollutant."[14] No legitimate reason is given for failing to comply with this requirement, however. A legally adequate Section 305(b) report must include waterways impaired by pollution, including hydrologically impaired waterways, whether or not the waterways are also impaired by a pollutant. This information is also critical for the state to set	*pollution impairments still exist, then placement into Category 4c could be appropriate.* In addition, the State Water Board states: *U.S. EPA tried to implement a flow TMDL for the Ventura River listings and abandoned the effort because it lacked authority to address nonpollutant impairments. Consequently, a Nutrient TMDL has been implemented that takes into account the flow impairments as a causative factor.* While these listings are not strictly flow-related, in this 303(d) list, the Los Angeles Water Board has assigned the Malibu Creek and the Matilija Creek fish barriers listing to Category 4c. However, the Los Angeles Water Board recognizes that the issue of Statewide consistency may become more important as the State Water Board approves the Los Angeles Region 303(d) list combined with lists for other Regions. See: Decision ID 34814 Malibu Creek fish barriers Decision ID 35724 Matilija Creek reach 1 Fish Barriers Decision ID 34162 Matilija Creek reach 2 Fish Barriers Decision ID 34241 Matilija Creek reservoir Fish Barriers	

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	waterway protection priorities properly. Proper identification of hydrologically impaired waterways is also important if the state is to fully comply not only with Section 305(b), but with CWA Section 303(d) as well. This section not only calls for identification of impaired and threatened waterways, but also requires the state to prepare a "*priority ranking*" of such waters, "taking into account the severity of the pollution" and waterway uses.[15] Flow and other hydrologic alteration data and information are critical to proper prioritization of impaired waters for further staff and resource attention. Specifically in regards to the Ventura River (Reach 3), in addition to misguidedly delisting this water segment from the 303(d) list for its impairment due to "pumping," the Los Angeles RWQCB staff also fails to reclassify this water segment under Category 4C, finding that "[t]here is no established method for determining impairment due to pollution like pumping so a Category 4C finding is also inappropriate."[16] Once again, this response is misguided, as the state must at minimum include hydrologically impaired waters in its broader, CWA Section 305(b) report, as described above, whether or not there are flow standards or a formal methodology to do so. See Sec. 6, below. Finally, we reiterate that because Section 303(d)(1)(A) broadly requires identification of impairments *regardless* of whether TMDLs are needed, the state's Section 303(d) list should include a robust Category 4C set of listings. State law cannot weaken the requirements of the CWA by artificially limiting the scope of this list.	Also, see response to comment 21.1.	
21.3	**2. U.S. EPA Guidance and Reports, and the State Water Board Itself, Have Called for Identification of Hydrologically Impaired Waterways in Category 4C of the Integrated Report** U.S. EPA issued formal Integrated Report Guidance (i.e., for the combined	There is not clear evidence supporting the fact that beneficial uses are impaired solely due to the lack of or excess of perennial or ephemeral flows.	

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	Sections 303(d) and 305(b) reports) to states and territories in August 2015; in it, EPA specifically addresses the topic of hydrological impairment.[17] The U.S. EPA Guidance clearly states that: > If States have data and/or information that a water is impaired due to pollution not caused by a pollutant (e.g., aquatic life[18] use is not supported due to hydrologic alteration or habitat alteration), those causes should be identified and that water should be assigned to Category 4C.[19] The Guidance specifically references hydrologic alteration as an example of a Category 4C listing.[20] It further references EPA Guidance going back at least to 2006, which similarly said that flow-impaired waters should be identified in the Integrated Report under Category 4C (the 2010 CCKA et al. Letter references this 2006 Guidance in support of flow listings; see attachment 3). U.S. EPA and USGS reinforced this mandate in a joint report in February 2016 on flow, stating in part that "EPA recommends reporting impairments due to hydrologic alteration in Category 4c, which are those impairments due to pollution not requiring a TMDL."[21] Even more specifically, U.S. EPA Region 9 has directly told the State Water Board that the Board is "well aware of [EPA's] interest toward listing selected streams for 'flow impairments' (at least under 305(b)) where lines of evidence are strong."[22] Further, the State Water Board Executive Director himself decided that the state should identify flow-impaired waters in its Integrated Reports, stating that California "would now list for flow alterations" and that "[l]istings would be made under category 4C for impaired [sic] by pollution not a pollutant, and be based on staff's professional judgment as well as the evidence submitted by the data."[23] Again, no reason is given in the Staff Report for ignoring the clear flow	The State Water Board has already address similar comments regarding flow-related impairments in their response to comments for their Proposed Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List) Portion of the 2012 California Integrated Report, posted March 3, 2015. The Los Angeles Water Board concurs with the State Water Board's response to *American Rivers*. The State Water Board response is provided below: *The State Water Board and North Coast Regional Water Board (North Coast Water Board) staff could not clearly determine if the beneficial uses of a water quality segment were impaired solely due to stream flow or lack thereof. In many water segments, flow is seasonal resulting in dry periods during the summer months. If interpretive guidance or a clear methodology was developed to examine flow and other forms on non-pollutant related pollution, Water Board staff would have a transparent and consistent way to characterize beneficial use impairments caused by such pollution.* Also see response to comment to comment 21.1 and 21.2.	

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	impairments throughout the region in light of the CWA, guidance, and state direction.		
21.4	**3. The San Diego RWQCB Has Adopted Numerous Listings for Hydrologic Impairment for Its Current Integrated Report** The SD RWQCB recently adopted an Integrated Report and Staff Report[24] that **identified 30 waterway segments for listing in Category 4C, either with a Category 5 pollutant listing or alone**.[25] Consistent with U.S. EPA Guidance, the SD RWQCB recognized that identifying all pollutant and pollution impairments provides a far more accurate picture of the challenges before the state than ignoring key impairments. For example, the Staff Report found that "over 96 percent of streams that exhibited biological degradation had both an associated pollutant(s) and supporting information showing pollution from in-stream habitat/hydrologic alteration and/or watershed hydrologic alteration (hydromodification, Table 3)." If the Regional Board had ignored such pollution impairments, then virtually all of the impaired streams in the San Diego Region would have been under-assessed, likely resulting in misallocation of limited resources and attention. ELC commented to the San Diego Board in support of these listings; these comments are attached.[26]	As the commenter states and the San Diego Regional Board mentioned in their staff report, "*…streams that exhibited biological degradation had both an **associated pollutant**(s) and supporting information showing pollution from in-stream habitat/hydrologic alteration and/or watershed hydrologic alteration …*"	
21.5	**4. California Has Identified Hydrologically Impaired Waterways in the Past** In California, "pumping" and "water diversion" are currently listed as causes of impairment for Ventura River Reaches 3 and 4, in the Los Angeles Region. Additionally, Ballona Creek Wetlands is currently listed as impaired by "Hydromodification," among other impairments. All three water body segments are currently listed for these specific flow-related impairments in Category 5.[27] California's history of identifying flow-related impairments under Section 303(d) should be considered precedential. And as explained herein and by Santa Barbara Channelkeeper in its comment letter, there is no basis for delisting Reach 3 of the	The State Water Board has already addressed similar comments regarding flow-related impairments in their response to comments for their Proposed Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List) Portion of the 2012 California Integrated Report, posted March 3, 2015. The Los Angeles Water Board concurs with the State Water Board's response to *American Rivers*.	

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	Ventura River.	The State Water Board response is provided below: *The Staff Report (at p. 9-10) states that the Water Boards have not considered the direct assessment of flow data since the adoption of the Listing Policy in 2004. The Staff Report acknowledges, however, that there were 4 listings on the existing 303(d) List related to flow-related alterations in the Ballona Creek and Ventura River watersheds (Region 4) but that those decisions were made prior to the adoption of the Listing Policy.* *The Listing Policy provides listing factors based solely on pollutant impairments. As a result, any section 303(d) listings related to flow alterations are contrary to the Listing Policy and U.S. EPA guidance and would be appropriate for reconsideration. Because the 4 segments were included on the 303(d) list due to pollution-related impairments, and not a pollutant, the Staff Report explains that the 4 listings for flow will likely be proposed for delisting in the next listing cycle.* *However, it is important to note that the 4 segments were also listed on the 303(d) List for pollutant impairments for which TMDLs have been developed: Ventura River Reaches 3 and 4 – are identified as impaired due to pumping and water Diversion. The Regional Water Board and*	

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		U.S. EPA have found that those flow related impairments were addressed via the Ventura River Algae TMDL. Regarding the listings for Ballona Creek Wetlands, identified as impaired due to hydromodification and reduced tidal flushing, the Regional Water Board and U.S. EPA have found that the Ballona Creek Sediment and Exotic Vegetation TMDL are addressing the stressors involved with the hydromodification and reduced tidal flushing. *U.S. EPA tried to implement a flow TMDL for the Ventura River listings and abandoned the effort because it lacked authority to address non-pollutant impairments. Consequently, a Nutrient TMDL has been implemented that takes into account the flow impairments as a causative factor.* However, as noted in response to comment 21.1, the Los Angeles Water Board has assigned the Ventura River watershed pumping and water diversions to "being addressed by a TMDL" (Category 4a).	
21.6	**<u>5. Numerous Other States Have Identified Hydrologically Impaired Waterways in Categories 4C and 5</u>** Many states around the country have followed U.S. EPA Guidance and the CWA by properly identifying flow-impaired waterways in their Integrated Reports.	See response to comment 21.1 and 21.2.	

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	These include, but are not limited to, Western states such as Idaho, Montana, Wyoming, Washington and New Mexico.[28] One listing methodology that may be of particular interest to the Los Angeles is that used by Ohio, which identifies waters impaired by flow alteration by linking biological community degradation with upstream dams. Notably, a number of these states regularly include flow-impaired waterways on their 303(d) list as well as their 305(b) Report. ELC has collected a significant amount of information on other states' hydrologic impairment listings and processes (and provided this to the State Water Board); this can be made readily available to the Los Angeles Board if desired.		
21.7	**6. Flow Standards Are Not Required to Identify Hydrologically Impaired Waterways in Category 4C** Most, if not all, of the states that identify hydrologic (including flow) impairments make those listing decisions based on best professional judgment and the information before them. Flow standards are not required to be developed first. Even the State Water Board has stated that flow listings could be done "based on staff's professional judgment as well as the evidence submitted by the data," and that they "would likely be mostly narrative...unless there are specific numeric targets for flow in place."[29] In other words, the state itself has recognized that flow criteria are not necessary for flow impairment listings. ELC has compiled significant information collected on various states' hydrologic impairment listing strategies and would be pleased to provide this additional information if desired. U.S. EPA addresses the process of identifying hydrologically impaired waters in its 2015 EPA Listing Guidance, stating that: If States have data and/or information that a water is impaired due to pollution not caused by a pollutant (e.g., aquatic life use is not supported due to hydrologic alteration or habitat alteration), those causes should be identified and that water should be assigned to Category 4C. Examples of	See response to comment 21.1 to 21.4.	

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	hydrologic alteration include: a perennial water is dry; no longer has flow; has low flow; has stand-alone pools; has extreme high flows; or has other significant alteration of the frequency, magnitude, duration or rate-of-change of natural flows in a water; or a water is characterized by entrenchment, bank destabilization, or channelization. Where circumstances such as unnatural low flow, no flow or stand-alone pools prevent sampling, it may be appropriate to place that water in Category 4C for impairment due to pollution not caused by a pollutant. In order to simplify and clarify the identification of waters impaired by pollution not caused by a pollutant, States may create further subcategories to distinguish such waters.[30] Note that this description of the process for identifying flow impairments does not require adoption of flow standards as a prerequisite for listing. The SD RWQCB Staff Report also addressed this topic in their just-approved Staff Report and Integrated Report, similarly stating that: where a water segment exhibited significant degradation in biological populations and/or communities as compared to reference site(s) the San Diego Water Board assessed the segment for inclusion in Category 4c using data and information as prescribed in USEPA's 2015 Guidance...Where in-stream data was lacking, stream segments were evaluated using desktop aerial reconnaissance for potential in-stream habitat and hydrologic alteration associated with channel modifications, stream diversion or augmentation, and to evaluate the level of associated development and use of best management practices to mitigate hydromodification.[31]		
21.8	**<u>7. Sound Public Policy Dictates that Flow-Impaired Waterways Must Be Identified</u>**	The Los Angeles Water Board agrees with the value of identifying waterbodies that are impacted	

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	States, including California, have identified and are identifying flow-impaired waterways in their Integrated Reports not only because the Clean Water Act calls for it and U.S. EPA Guidance reinforces it. They also do so because it makes smart policy sense. Why would a state limit the amount of information it releases, information that could help it make better decisions about how to prioritize its resources? If the main problem with a waterway is not temperature or dissolved oxygen but flow, for example, then that information should be available so the best permitting and resource allocation decisions can be made to protect affected waterways. Identification of flow-impaired waterways is also important because those listings help the public exercise their own responsibility to help improve waterway health. U.S. EPA agreed in its Guidance, stating that "a variety of watershed restoration tools and approaches to address the source(s) of the impairment" exist even in the absence of TMDLs, increasing the importance of full and complete identification for impaired waterways.[32] Hydrologic impairment listings also can and should be used in CEQA analyses of proposed projects that could further impact the flow of identified waterways, thus preventing additional damage to already-impacted waterways and fish. ELC has prepared and submitted extensive comments to the state on the numerous policy benefits of properly identifying flow-impaired waterways.[33]	by pollution, including flow alteration, that are not otherwise impaired by other pollutants. Given the complex characteristics of climate and hydrology in the Los Angeles region, determining natural baseline flow conditions that are necessary to support aquatic habitat based on comparable reference conditions that resemble the conditions within our region and finding a defensible methodology for applying that information to determine impairment is a challenging endeavor that may be pursued in subsequent assessments.	
21.9	**<u>8. Water Bodies Can and Should Be Placed in All Relevant Categories of Identification</u>** The Staff Report states that "[t]o meet CWA section 305(b) requirements of reporting on water quality conditions, the Integrated Report places each assessed waterbody segment into one of five non-overlapping categories based on the overall beneficial use support of the water segment…."[34] This statement appears to	The State Water Board has already addressed similar comments regarding flow-related impairments in their response to comments for their Proposed Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List) Portion of the 2012 California Integrated Report, posted March 3, 2015. The Los Angeles	

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	limit the RWQCB to placing water bodies in only one category, an interpretation presumably reflected in the recommendation to include zero listings in Category 4C. This approach is simply incorrect. U.S. EPA has been quite clear that water bodies can be placed into multiple categories, and in fact should be in order to provide the best available information to U.S. EPA and Congress. As explained by the SD RWQCB in its Staff Report: > It is important to note that USEPA recommended in its 2015 guidance that "States assign all of their surface water segments to ***one or more of five reporting categories***"....[35] U.S. EPA reiterated this point in its joint report with USGS, stating that "EPA's guidance has noted that **assessment categories *are not mutually exclusive*, and waters may be placed in more than one category (for example, categories 4C and 5)**."36 Accordingly, flow impairments should be reflected in Category 4C whether or not there is a pollutant present, the approach taken recently by the SD RWQCB. Otherwise, the state is conflating the Section 303(d) and 305(b) reports rather than combining them, ignoring its Section 305(b) responsibilities in the process.[37] Because the state must comply with both Sections 305(b) and 303(d), it must provide information relevant to all categories applicable to a single water body.[38] The Integrated Report does not meet these mandates.	Water Board concurs with the State Water Board's response to *American Rivers*. The State Water Board response is provided below: *The State Water Board has not indicated that it is bound to U.S. EPA's guidance. Additionally, the State Water Board disagrees with the commenter's interpretation of U.S. EPA's Guidance for 2006 Assessment, Listing, and Reporting Requirements Pursuant to Sections 303(d), 305(b), and 314 of the Clean Water Act, which is excerpted in the Staff Report at page 10.* *U.S. EPA's guidance at section V.G.3 (pg. 56) states:* > *Segments should be placed in Category 4c when the [S]tates demonstrate[] that the failure to meet an applicable water quality standard is **not caused by a pollutant**, but instead is caused by other types of pollution. Segments placed in Category 4c do not require the development of a TMDL. Pollution, as defined by the CWA is 'the man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water' (section 502(19)). In some cases, the pollution is caused by the presence of a pollutant and a TMDL is required. In*	

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		other cases, pollution does not result from a pollutant and a TMDL is not required. States should schedule these segments for monitoring to confirm that there continues to be no pollutant associated with the failure to meet the water quality standard and to support water quality management actions necessary to address the cause(s) of the impairment. Examples of circumstances where an impaired segment may be placed in Category 4c include segments impaired ***solely*** *due to lack of adequate flow or to stream channelization.* *(Page 56, emphasis added.) In California waterbody-pollutant combinations are assessed consistent with the Water Quality Control Policy for developing the California's Clean Water Act Section 303(d) List (Listing Policy) to determine the overall use support rating. That overall use support rating is used by the California Water Quality Assessment Database (CalWQA) to determine the overall Integrated Report Category for the waterbody as a whole.* *The State Water Board interprets the U.S.EPA guidance to indicate that a waterbody should not be placed into Category 4c if there is a pollutant based impairment identified to be impairing water quality that requires a TMDL. The waters for which flow information has been submitted for*	

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		inclusion into Category 4c are all identified in the Integrated Report as impaired due to pollutants under Category 5, 4a, or 4b. Waterbodies impaired by pollutants, such as temperature, and also by flow modifications will be addressed by TMDLs for the pollutant. To the extent that the pollutant is affected by flow, the Regional Water Boards will work with the State Water Board through its Division of Water Rights to determine the extent to which a water right action can improve the pollution impairment and the appropriate implementation action. *Additionally, U.S. EPA submitted a comment letter regarding the State Water Board's consideration of the CWA 303(d) List stating:* *"EPA commends the Regional Board and State Board staff for the transparency of the process with respect to data used in the assessment and the applicable standards." U.S. EPA also explained that the purpose behind its substantive listing recommendations to the State Water Board was designed to ensure that U.S. EPA's approval of the CWA 303(d) list could occur without U.S. EPA making changes subsequent to the State Water Board's approval. Notably, while U.S. EPA noted disagreement with certain listings or delistings proposed in the Staff Report, U.S. EPA stated no disagreement with the Staff Report's assessment of flow related data and information.*	

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		U.S. EPA has final review and approval authority of California's CWA 303(d) List before it becomes effective. Also see response to comment 21.1 and 21.4.	
21.10	**<u>9. Readily Available Data Exist and Have Been Provided in Support of the Listing of Waterways as Hydrologically Impaired</u>** As evident based on substantial, readily available information, the lines of evidence for hydrologic impairment are strong for numerous Los Angeles Region waterway segments, including but not limited to Reach 3 of the Ventura River (specifically for "pumping," as currently listed) as well as the Santa Clara River (particularly Reaches 1 and 2).[39] Federal regulations state that states must evaluate "all existing and readily available information" in developing their 303(d) lists and prioritizations.[40] The SWRCB's Executive Director reinforced the breadth of this requirement in a memorandum on the scope of listing regulations at 40 CFR § 130.7(b)(5).41 This information must include flow, a position recently reinforced by U.S. EPA, who stated that the integrated reporting format is key to "acknowledge the important role of flow in contributing to water-body impairments."[42] <u>Data Supporting Listing of the Ventura River (Reaches 3 and 4)</u> Excessive pumping contributes to the severe dewatering of the Ventura River (Reach 3), imperiling endangered steelhead trout and other aquatic species. Therefore, the Los Angeles RWQCB must not delist this waterway for "pumping" as is currently proposed. As support, ELC incorporates by reference those comments prepared by Santa Barbara Channelkeeper on the Los Angeles Region's 2012 Integrated Report[43] and	Also see response to comment 21.1, 21.2, and 32.3 regarding readily available data.	

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	2016 Integrated Report,[44] both of which summarize the extensive body of evidence establishing the link between pumping on Reach 3 (as well as Reach 4) of the Ventura River and resulting negative biological impacts, including to steelhead trout. ELC also incorporates by reference numerous additional documents that highlight the negative effects of excessive pumping on Reach 3 (as well as Reach 4) of the Ventura River, including from U.S. EPA Region 9 (finding in its Draft TMDL for Reaches 3 and 4 of the Ventura River that "low flows due to pumping and diversion activities likely exacerbate the flow and water quality conditions in Reaches 3 and 4"),[45] the National Marine Fisheries Service (NMFS) (finding in a 2007 Draft Biological Opinion that "[w]ater withdrawals from surface diversions and subsurface pumping have affected the timing and magnitude of the Ventura River flows ... and has decreased the quantity and quality of critical habitat for steelhead")[46], and the Los Padres National Forest Ojai Ranger District (describing the historic impacts low flows have upon steelhead trout populations in the Ventura River watershed in a report on steelhead restoration).[47] Together, this data demonstrates that pumping impairs beneficial uses in Reach 3 of the Ventura River, particularly those beneficial uses related to aquatic life and habitat. In accordance with Section 3.11 of the Listing Policy, when information indicates non-attainment of standards by a water body, the appropriate methodology for evaluation is weight of evidence to determine listing under Section 303(d). This recommendation is consistent as well with Section 3.9 of the Listing Policy, which supports listing if the water body exhibits degradation in biological populations and pollutants sufficient to impair, or threaten impairment of, beneficial uses. Reach 3 of the Ventura River has exhibited degradation in populations of fish (including steelhead trout) that rely upon adequate flows for survival.		

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	Based on the readily available data and information, the evidence is sufficient to support the continued listing of Reach 3 of the Ventura River on the 303(d) list due to "pumping." Thus, the proposed delisting of the "pumping" impairment on Reach 3 must not proceed. The Los Angeles RWQCB staff has not provided sufficient information to justify this delisting, nor have they addressed the above evidence that clearly validates the "pumping" listing as it originally occurred. Similarly, this evidence supports the continued listing (as currently proposed) of Reach 3 as impaired due to "water diversion," and of Reach 4 as impaired due to both "water diversion" and "pumping." **<u>Data Supporting Listing of the Santa Clara River</u>** Since at least 2013, ELC and partners have submitted detailed information establishing a clear impairment due to altered flows on the Santa Clara River (in particular Reaches 1 and 2, located downstream of the Vern Freeman Diversion Dam). In May 2013, we submitted a "shortlist" of ten California waterways being drained dry for inclusion on the 303(d) list, along with supporting evidence (see Attachment 2). The Santa Clara River was one of those waterways. As described in the submitted evidence: > The Santa Clara River is Southern California's last major free flowing waterway and is home to 17 species listed as threatened or endangered under the state and federal Endangered Species Acts. At River mile 10.5, United Water Conservation District (United) diverts almost all of the River's flows outside of large storm events. United, USGS, and local agency data show that water diverted at the Vern Freeman Diversion Dam for agricultural usage, groundwater recharge, and other uses, deprive migrating steelhead of sufficient flows and juvenile steelhead of healthy estuary rearing grounds.48 In addition to impacting beneficial uses associated with the provision of adequate steelhead habitat, surface water withdrawals also destroy downstream native riparian and endangered bird		

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	habitat, degrade the ecological integrity of the River's estuary, and impair a plethora of cultural and recreational beneficial uses downstream.[49] Additional readily available information further supports the imperative to list the Santa Clara River as impaired due to altered flows. This includes documents published by NMFS (describing in a Final Biological Opinion the negative biological impacts of the Vern Freeman Diversion Dam, which can deplete the Santa Clara River of all its flows and jeopardizes the existence of endangered Southern California steelhead trout),[50] the Santa Clara River Trustee Council and The Nature Conservancy (describing Santa Clara River flow reductions caused by water diversions and groundwater pumping and the resulting impact on steelhead trout),[51] the Los Angeles RWQCB (describing the historic decline of steelhead trout in the Santa Clara River, as well as flow impacts from water diversions and hydromodification in its "State of the Watershed" report),[52] and others. Together, this data demonstrates that reduced flows impair beneficial uses in the Santa Clara River, particularly those beneficial uses related to aquatic life and habitat. This is most clearly true in Reaches 1 and 2 of the Santa Clara River, where over-diversion and other flow impacts (due in large part to the Vern Freeman Diversion Dam) can cause the waterway to go completely dry. In accordance with Section 3.11 of the Listing Policy, when information indicates non-attainment of standards by a water body, the appropriate methodology for evaluation is weight of evidence to determine listing under Section 303(d). This recommendation is consistent as well with Section 3.9 of the Listing Policy, which supports listing if the water body exhibits degradation in biological populations and pollutants sufficient to impair, or threaten impairment of, beneficial uses. The Santa Clara River has exhibited degradation in populations of fish (including steelhead trout) that rely upon adequate flows for survival. Based		

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	on the readily available data and information, the evidence is sufficient to support the listing of the Santa Clara River (particularly Reaches 1 and 2) on the 303(d) list for impairment caused by altered flow. This evidence also supports including Santa Clara River on the 305(b) report.		
21.11	In sum, we once again urge the Los Angles RWQCB to follow the lead of the SD RWQCB, as well as U.S. EPA and numerous other states, in identifying flow- and otherwise hydrologically-impaired waters in the region's Integrated Report. To do so, the staff report must be revised to support the continued listing of Reach 3 of the Ventura River as impaired due to pumping (as done in previous years), as well as by listing the Santa Clara River (particularly Reaches 1 and 2) as impaired due to altered flows.	See response to comment 21.1, 21.2, and 21.4.	
22.	Heal the Bay (HtB) , March 30, 2017		
22.1	**Data/Information Collection and Timing Delay** In late 2014, Heal the Bay commented on the State Water Resources Control Board's (State Board's) *Proposed Amendment to the Water Quality Control Policy for Developing the Clean Water Act Section 303(d) List*. While we appreciated the chance to comment and the State Board's explanations in their Response to Comments, there are a few concerns that we continue to have regarding the new amendment and its effect on the Revised List. First, we understand that California is an expansive state and that the State Board's resources are limited in comparison. In this sense we understand but are disappointed that California must implement the "Rotating Basin Approach," when coming into compliance with requests for biennial updates for the federal Clean Water Act's Section 303(d). This will effectively reduce regional updates on impaired waters from every two to every six years. Compounded on this is the surprising discovery that the State Board is discussing	The State Water Board established what the commenter calls the "Rotating Basin Approach" in consideration of the large size of the State, the extensive amount of data to evaluate, and the increasing complexity of data analysis. Simply not delisting any waterbody ignores those areas where water quality may have improved albeit only as demonstrated with pre-2010 data. The Los Angeles Water Board anticipates that there may be waterbodies that are listed one listing cycle and delisted the next, perhaps to be re-listed in a later cycle. The Integrated Report and the 303(d) list should remain the State's best assessment based on water quality data evaluated, even as we recognize the limitations to the 303(d) list.	

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	either listing or delisting bodies of water in Region 4 with information and data collected prior to *August 30, 2010* – almost seven years ago. This would be on par with a college admissions officer selecting a prospective student for a university based on their academic performance in 5th Grade. It would have seemed wiser to have at least updated and appended further data and information and possibly re-solicited water quality data from regional stakeholders during the years long interim with respect to whether water bodies are placed on or removed from the Revised List. Considering this discrepancy in timing from data submittal to listing and delisting proposals, we ask that the State Board and Environmental Protection Agency (EPA) not delist any bodies of water that are currently on the *2010 Integrated Report* until more current data is received. This will eliminate the possibility of delisting a water body that is currently impaired, as there is no way to know the condition of the waters in question using data solely from 2010 or before. To err on the side of caution when dealing with our state waters will be in the best interest of our water quality standards and beneficial uses. This seems like a reasonable, precautionary request and is supported by the State Board during the adoption of the policy. Taken from the State Board Hearing Transcript from Sept. 30, 2004, Board Member Nancy H. Sutley states, "If it's on the list . . . then you have to have some information that says that they [fish] are not dying now and the waterbody is not currently impaired . . .." Though Board Member Sutley is referring to listings that were made by mistake, the principle behind it should still hold true. The intent was to say that information and data on waters should currently show that water quality standards are met and that the body of water is not currently impaired before being removed from the list. Board Member Sutley goes further to suggest that boards should affirm a lack of current impairment before delisting bodies of water by stating she was "Okay with not adding [additional] language [to the Listing Policy] as long as we're all in agreement and that's the direction of the	In addition, beginning with the 2018 303(d) list, all data to be evaluated by the Water Boards for the Integrated Report and 303(d) list must be submitted to the California Environmental Data Exchange Database (CEDEN). See, also, response to comment 32.3.	

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	regional boards that you have to look at the current conditions as well [before de-listing]." This very point is represented in the State Board's *Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List* (State Listing Policy)(Adopted Sept. 30, 2004 and Amended February 3, 2015) in Section 4.11, which states, "When making a delisting decision based on the situation-specific weight of evidence, the Regional Water Board must justify its recommendation by [Bullet 1] Providing any data or information including current conditions supporting the decision." We argue that there is no way to demonstrate current conditions with information and data that is aged seven years or more. Because of this it seems in line with State Listing Policy that no waterbodies be delisted for the current 303(d) List. During the next listing/delisting cycle, which will be in 2022, staff will be able to make a more accurate judgement on impairment simply because their information will be more up to date.		
22.2	**It is Misleading to Entitle this Current Edition the "2016" 303(d) List** It seems off-track and misleading to title this 303(d) list the *2016 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters* (Integrated Report) when it only contains information from 2010. Since the State Water Board's original 2010 solicitation for data was intended for the 2012 list we think it would be much more constructive and accurate to have the current list in question labeled exactly as such and be called the *2012 Los Angeles Region Clean Water Act Section 303(d) List of Impaired Waters.* If any individual was filing their income taxes using tax information from a certain year, it would remain labeled as the tax return from the original time period, regardless of how long of an extension the individual received. Considering compliance with state and federal law, we could find no mention within the Federal Clean Water Act or the State Listing Policy of how the Integrated Report	The Los Angeles Water Board is complying with the naming convention as established by the State Water Board. The naming convention facilitates accounting of which Regions have updated listing decisions for that listing year. Also see response to comment 32.3.	

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	should be named, only how often it should submitted. Since the EPA is well aware of the new "rotating basin approach," and due to the fact that California has successfully amended its own State Listing Policy, we believe there to be no compliance issues for the more accurate renaming. In addition, it was made clear in the Integrated Report's "Staff Report" (February 2017) that the 303(d) List for Regions from Group 2 (Regions 3, 5, and 9), which was intended to be passed in 2014, has yet to be approved by the State Board or the EPA. If the State Board were to rename the 2014 Integrated Report the 2012 Integrated Report as well because it has yet to be approved, this would make clear to everyone exactly where the listing's value lies—by titling both lists from Basin Group 2 and 3, the revised 2012 Integrated Report. This would file nicely with California's Basin Group 1 (Regions 1, 6, and 7), which would identically be called the 2012 Integrated Report. This is also consistent with the original notice and request for data, titled "Notice of Public Solicitation of Water Quality Data and Information for 2012 California Integrated Report—Surface Water Quality Assessment and List of Impaired Waters." Further advantages of this titling would be that future inspection researchers unfamiliar with past reports would know that the listings would correspond much closer to the data from 2010. Looking towards the future, this more accurate labeling will help in clarifying reporting methods. It signifies when agencies made a clean break from when small windows of data were analyzed in favor of the current California Environmental Data Exchange Network (CEDEN) system, which uses a constant, up-to-date stream of information and allows for a more thorough and accurate 303(d) list for Region 4 in 2022. This would also make it crystal clear when the State of California "changed over" to the new "Rotating Basin Approach" in regards to fulfilling their obligations to Section 305(b) of the Clean Water Act.		
22.3	**The Optimistic Possibilities of CEDEN in 303(d) Listings**	The Los Angeles Water Board agrees and will	

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	As mentioned above, the State Board does have an opportunity going forward with CEDEN concerning water bodies in California. We are heartened to see that despite the fact that Region 4's 303(d) list will not be updated until 2022, that the list will be based on information up until 2021. This reduced lag time will only work to benefit the waters and beneficial uses of California's bodies of water. Further, as the State Board mentions in its *Comment Summary and Responses for the Proposed Amendment to the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List* from January 26, 2015, "Requiring the use of CEDEN will ensure the data used for the 303(d) listing process is of a high quality and includes the necessary information for efficient assessments." It is true that the use of this database is likely to streamline the process for the staff of the Regional Boards, the State Board, the EPA, and any agency that wants to submit pertinent data. Heal the Bay noticed that the State Board scheduled CEDEN workshops in 2015 to "facilitate greater understanding of the needs of CEDEN users, develop tools to enhance the utility of CEDEN, and provide training on using the CEDEN system." We ask that the State Board provide more workshops now and in the coming years in anticipation of the current and future use of CEDEN by Region 4 Stakeholders. The people and water environment of California only stand to gain from thorough instruction given to invested stakeholders and the data they will provide.	work with State Board to provide workshops or other CEDEN training materials for Los Angeles Region stakeholders.	
22.4	**Concerns with Individual Category 4a Delistings from the 303(d) List** *Delisting Hermosa Beach and Manhattan Beach for Indicator Bacteria* Beyond our concerns mentioned above with any impaired water delistings from the prior 2010 303(d) List, Heal the Bay feels strongly that both Hermosa and Manhattan Beach should remain on the 303(d) List and maintain their current	The delistings of Hermosa Beach and Manhattan Beach for Indicator Bacteria are in compliance with the Listing Policy. Although these beaches are being recommended for delisting, they are still subject to the Santa Monica Bay Beaches Bacteria TMDLs and 303(d)	

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	TMDL for Indicator Bacteria. Looking at our past Beach Report Card data, even data solely from the supposed window ending on August 30, 2010 and before, we find it puzzling that either beach would be in consideration for delisting. In 2010 itself, our Hermosa Beach site by Herondo Street outfall was noted for single sample exceedances for *Enterococcus* for 17.6% of samples taken. Averaging exceedances from 2008 to present 2016, the Herondo storm drain outfall has shown *Enterococcus* exceedances 12% of the time. Concerning Manhattan Beach, their 28th Street outfall has shown *Enterococcus* exceedances 10% of the time since 2008. Both of these beaches are popular swimming and recreation areas and eliminating the TMDL would create the potential for impacts on human health and aquatic life. We would highly recommend waiting to remove both beaches from the 303(d) list until data from the past decade can be assessed. Like we discussed above, where uncertainty exists with regards to delisting bodies of water, decisions should be made in favor of protecting water quality, human health and the environment.	listing decisions do not change or eliminate effective TMDLs. The TMDL allocations that have been assigned to those beaches still apply and are incorporated into various NPDES permits/waste discharge requirements. In fact, both beaches are classified as 'anti-degradation' beaches, which are subject to more stringent requirements compared to the reference beach. Also see response to comment 32.3 regarding readily available data.	
23.	Los Angeles Department of Water and Power (LADWP) , March 30, 2017		
23.1	LADWP's detailed comments can be found below. **1.** Elderberry Forebay should not be listed for dieldrin or PCBs**.** LADWP's largest hydroelectric facility is the Castaic Power Plant, which is critical to the reliability of the electrical grid in the Los Angeles Basin. This facility along with the Elderberry Forebay was built in 1960 as part of a Federal Energy Regulatory Commission (FERC) project with the Department of Water Resources, and is operated under a FERC license. The Elderberry Forebay was built strictly for the operation of the plant as a storage component for the water that passes through the plant to generate electricity. This hydroelectric plant is known as a pass-through facility. Water from Pyramid Lake flows down a gradient through the Los Angeles Tunnel and seven penstocks to turn seven turbines in order to produce electricity. The water enters Elderberry Forebay after the turbines	Elderberry Forebay is surface waterbody which is identified in Table 1 of Chapter 2 in the Los Angeles Region Basin Plan as having the beneficial uses of MUN, IND, PROC, AGR, GWR, FRSH, POW, WARM, COLD, WILD, RARE, and SPWN. Restricted access does not preclude a waterbody from possessing beneficial uses. For the 303(d) list, readily available water quality data are assessed for all beneficial uses that may be impaired by excess amounts of pollutants.	

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	where it is then either discharged to Castaic Lake or pumped back to Pyramid Lake. LADWP has noted that the LARWQCB has proposed to add Elderberry Forebay to the revised 303(d) list for dieldrin and PCBs. However, activities at the plant do not use or add products that would contribute dieldrin or PCBs to its discharges into Elderberry. In fact, Elderberry Forebay is not open to the public and therefore does not have any beneficial uses beyond being an operating body of water for the hydro plant. Its only use is for the pushing of the turbine blades to generate electricity. In 2008 the United States Environmental Protection Agency (USEPA) released its final version of its "National Pollutant Discharge Elimination System (NPDES) Water Transfers Rule" (Water Transfer Rule) codifying (40 CFR 122.3(i)) that water transfers are excluded from the regulation of the Clean Water Act (CWA). The 40 CFR 122.3 (i) expressly states "Water transfers mean an activity that conveys or connects waters of the United States without subjecting the transferred water to intervening industrial, municipal, or commercial use. USEPA's legal interpretation of the CWA concluded that Congress did not intend to subject water transfers where there is "no addition" of pollutants to the NPDES permit process because the pollutants were already in the waters being transferred and are not added. This ruling was put in place precisely for hydroelectric plants like the Castaic Power Plant that are considered pass-through facilities. Since this body of water is isolated from all public recreation and access and the water that passes through the Castaic Power Plant is used only to generate electricity, it seems inappropriate to include the Elderberry Forebay in the new 303(d) listing. With respect to Dieldrin, as stated in LADWP's Castaic Dieldrin Source Control Study sent to the LARWQCB in May 2010, LADWP contends that since the Castaic Power Plant has never used nor ever had a use for dieldrin, it cannot be the source of dieldrin in Elderberry Forebay. The source study points out that many of the tributaries that flow into the State Water Project, specifically those in the San Joaquin Valley, are agricultural areas where for years traditional pesticides	No source analysis has been conducted and the 303(d) list identifies the source as “unknown.” Source analysis, linkage, and allocations are typically determined during TMDL development or during the development of another regulatory program. See response to comment 32.3 regarding readily available data.	

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	(including dieldrin) have been used. Dieldrin was also an ingredient in several types of vector control measures used to mitigate vectors residing subsurface. These components, termed "legacy pesticides," primarily reside in the sediment/soil and are believed to be periodically liberated into the surrounding waterways. *Catskill Mountains Chapter of Trout Unlimited, Inc. v. EPA (Catskill III*) (2nd Cir. 2017), states that a water being transferred through a hydroelectric plant is not a discharge of a pollutant. In addition, as has been mentioned earlier, the Elderberry Forebay is only used for the operations of the plant, and therefore discharges from the Forebay would not be considered a discharge of a pollutant. Additionally, LADWP ceased the use of PCBs in the electrical equipment at Castaic Power Plant in the 1980s, and thus the hydroelectric plant is not a source. Furthermore, the NPDES Annual Monitoring Reports for Castaic Power Plant have shown "non- detect" for all PCB sampling over the last 20 years. Since the Elderberry Forebay is used and was built solely for the operation of the Castaic Power Plant hydroelectric facility, and since it is a pass-through that transfers water without any addition of pollutants, it would seem appropriate to remove the Elderberry Forebay from this 303(d) list. Therefore, LADWP respectfully requests that the Elderberry Forebay be removed from the current 303(d) list.		
23.2	2. The 303(d) listing recommendations should be updated to include current data and information. The LARWQCB Staff Report supporting the current listing recommendations notes that "Due to the volume of data received during the 2010 data solicitation period, the State Water Board determined that no additional data would be solicited or analyzed until all the 2010 data are assessed.[...] Los Angeles Water Board staff estimates that the 2022 303(d) list will include data submitted through 2021." (Staff Report at p. 6)	See response to comment 32.3 regarding readily available data. Per the Listing Policy, waterbody-pollutant combinations are included on the 303(d) list with as few as two samples.	

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	LADWP is concerned that many of the data upon which proposed listings are based are more than ten (10) years old. However, some of the proposed listings are based on only two or three data points. Although LADWP understands and recognizes the resource limitations faced by the LARWQCB, we respectfully suggest that basing listings on datasets that do not include the most recent information, particularly when only a couple of samples are available to describe conditions in the region's water bodies, does not seem to be effective. Such limited data cannot be considered to describe current conditions appropriately.		
23.3	3. The proposed listings for "benthic community effects" are premature at this time, particularly for proposed listings in modified channels. LADWP notes that several of the proposed listings for "benthic community effects" are based upon limited data (2 or 3 samples) that were collected nine or more years ago, and that some of the proposed listings are based upon "index of biotic integrity" (IBI) scores. More importantly, many of the water bodies proposed for listing for benthic community effects are engineered or modified channels, and it is not scientifically or technically appropriate to expect that modified channels will achieve the CSCI or IBI scores that are observed in reference channels. The proposed listings do not consistently or clearly establish a link between the biological condition and the pollutant(s) that may be responsible for the biological condition; in fact, it is not clear that the pollutant measurements (available only for some proposed listings) were collected at the same time as the biological data. Finally, some of the samples upon which the proposed listings are based were collected downstream of and shortly after major wildfires; these data are likely representative of temporary disturbed conditions and may not be representative of typical conditions. State Water Board staff are currently working on developing a statewide policy or plan for biological integrity. This process has moved away from using the 181 and	See response to comment 11.19 and 11.24 regarding Benthic Macroinvertebrate listings.	

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	is now developing metrics for the California Stream Condition Index (CSCI) and an Algae Stream Condition Index (ASCI). This process has not reached consensus on how engineered or modified channels should be assessed, or what appropriate expectations for these channels should be. In fact, the State Water Board is currently convening a Science Advisory Panel to address this issue and many others, and the State Water Board's "Wadeable Stream Biostimulatory and Biointegrity Science Plan," dated February 2017, acknowledges that "Developed landscapes are associated with an increase of many stressors in streams, such as elevated contaminant and nutrient concentrations, altered flow regimes , sedimentation, and habitat degradation. Often, these stressors are difficult to mitigate or remove under the traditional mechanisms available to the Water Boards. In these circumstances, the range of CSCI or ASCI scores may be constrained in channels in developed landscapes." Because the State's policy is in development, no longer uses the IBI, has not clearly established a link between the presence of pollutant(s) and the biological condition, and has not produced direction regarding how benthic integrity should be assessed in modified streams, LADWP respectfully suggests that it is premature to list the region's water bodies for "benthic community effects". LADWP therefore requests that the LARWQCB decline to list the region's water bodies for benthic community effects at this time.		
24.	Lower Los Angeles River (LLAR) Watershed Committee, March 30, 2017		
24.1	The LLAR Watershed Committee requests the Regional Board suspend the recommendation on Iron because of the following: • Reliance on data gathered during 2006-2010 is not appropriate when more recent data collected as part of the extensive monitor programs of the CIMPs is now available. • Dissolved concentrations of iron do not exceed the narrative objectives.	Under the Listing Policy, waterbodies are included on the 303(d) list where standards or guidelines are exceeded. The Los Angeles Region Basin Plan contains a narrative objective for "…chemical constituents in amounts that adversely affect any designated beneficial use…," which may be used in assessments by relying upon numerical guidelines.	The iron decision will be reassessed during the State Board public comment period.

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		However, review of the decision for Coyote Creek iron is in process at this time. Also see response to comment 32.3 regarding readily available data.	
25.	Lower San Gabriel River (LSGR) Watershed Committee , March 30, 2017		
25.1	The LSGR Watershed Committee recognizes the recommendation regarding Temperature in Reach 1 and Reach 2 of the San Gabriel River and requests that the Regional Board take into consideration the characterization the of these Reaches of the San Gabriel River in its determination of temperature as a pollutant. As described as a Water Quality Objective: *"the natural receiving water temperature of all regional waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses."* Beginning upstream, Reach 2 is a 7-mile stretch from the outlet of the Whittier Narrows Dam and ends where the Sab Gabriel River crosses Firestone Blvd. Reach 2 is confined by engineered levees and rip-rap. The river remains a soft-bottom channel and during dry-weather has no measurable flow reaching Reach 1 due to having the most productive spreading grounds in Los Angeles County. Reach 1 is a 10-mile stretch beginning at Firestone Blvd in Downey and extends to the confluence of the San Gabriel River with Coyote Creek. It is a heavily urbanized reach with a concrete bottom. Two significant POTWs discharge into this Reach. During dry weather, these POTWs discharge vastly more water than enters the river channel though the combined MS4 outfalls. The volume of the	See response to comment 17.4.	

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	POTW discharge will quickly render any potentially elevated temperature from discharges of MS4 outfalls as negligible. The Committee believes that a Water Quality Objective for Temperature in these Reaches is not applicable.		
25.2	In regards to Iron and Malathion in Coyote Creek; the LSGR Watershed Committee requests the Regional Board suspend the recommendation of Iron and Malathion due to monitoring data inconsistent with recent water body improvements. The LSGR Watershed has made a considerable effort in developing and implementing its Coordinated Integrated Monitoring Program (CIMP) and suggest monitoring data should reflect more recent and current outfall conditions and that any conclusions should be drawn from a more current and comprehensive data set. The LSGR believes this request is justified when considering that Iron and Malathion are derived from nationally Recommended Water Quality Standards and not based on an established EPA TMDL or conditions characteristic of Southern California waters.	See response to comment 24.1 and 32.3.	
26.	Sanitation Districts of Los Angeles County (Sanitation Districts) , March 30, 2017		
26.1	The Sanitation Districts have concerns on some aspects of the Draft List, particularly where the listing thresholds used in the Staff Report appear to differ from receiving water quality objectives contained in the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) or other regulatory programs. Additionally, there appear to be data errors that impact some listing decisions. General comments relating to these concerns are provided below and detailed specific comments for each listing are provided in Attachment 1 and appendices to this letter.	See responses to comments 26.2 – 26.19.	
26.2	***1. Data Were Incorrectly Attributed to Some Reaches*** The Draft List contains a number of newly proposed listings based, in part, on data	Los Angeles Water Board and State Water Board staff are aware of these areas where the reach mapping that underlies the CalWQA database	

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	collected from incorrect reaches. Specific listings where this appears to have occurred include the benthic community and toxicity listings for Santa Clara River Reach 5; the temperature listing for Santa Clara River Reach 6; the toxicity, DO, and iron listings for Rio Hondo Reach 2; and the toxicity listing for San Jose Creek Reach 2.	(which maps the 303(d) list) and the Los Angeles Basin Plan do not agree. It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues and reassess the LOEs and decisions for those reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or at the next Listing Cycle that includes the Los Angeles Region. For additional specific responses, see response to comment 26.10 and 26.19.	
26.3	***2. Not All of the Data Submitted for Listing Consideration Were Used in Making the Listing Decision*** The Draft List contains a number of newly proposed listings where only a subset of the data submitted for listing consideration were evaluated; these data are included in the data files appended to the Staff Report but were not used in the listing analysis. Specific listings where this appears to have occurred include the toxicity listing for Santa Clara River Reach 5 and the temperature listing for Santa Clara River Reach 6.	See response to comment 26.12 for the Santa Clara River Reach 5 toxicity listing and response to comment 26.19 for the Santa Clara River Reach 6 temperature listing.	
26.4	***3. The Draft List Includes Inappropriate Impairment Listings for "Benthic-Macroinvertebrate Bioassessments"*** The Draft February 2017 version of the 2016 303(d) List contains a number of newly proposed listings for "Benthic-Macroinvertebrate Bioassessments." The proposed listings are based on application of the Southern California Coastal Index of Biological Integrity (SCIBI) and, in some cases, the California Stream Condition Index (CSCI). These include listings for Santa Clara River Reach 5, Los Angeles River Reach 3, and Medea Creek Reach 1. The Sanitation Districts	Listings based on the SCIBI and CSCI scores are consistent with State policy and have been assessed relative to appropriate reference sites. Both the IBI and the CSCI assess benthic community relative to reference sites. The SCIBI was developed using data from 275 sites, ranging from Monterey County to the Mexican border. Eighty-eight sites were used as reference sites	

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	believe these proposed listings should be removed, for the reasons listed below. <u>Listings Based on the SCIBI and CSCI Are Inconsistent With State Policy.</u> The Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy) indicates that water bodies should only be listed for degradation of biological populations if they have significant degradation **<u>relative to reference sites</u>** [emphasis added]. Although the scientists that developed the SCIBI attempted to incorporate reference conditions into the index itself, the reference conditions used to develop the index did not include any low elevation, low gradient locations in Los Angeles County similar to the Los Angeles River and the Santa Clara River reaches of concern. Although the CSCI at least partially addresses some of the problems with the SCIBI by employing a modeled reference condition as opposed to the regional reference pool used by the SCIBI, the lack of any reference sites in large watersheds, low gradient, and low elevation systems still limits the identification of appropriate thresholds using the CSCI. Section 6.1.5.8 of the Listing Policy also states that when "evaluating biological data and information, RWQCBs shall evaluate all readily available data and information and shall…**<u>evaluate physical habitat data</u>** and other water quality data, when available, to support conclusions about the status of the water segment." [Emphasis added.] All of the reaches mentioned in this comment letter represent reaches that have undergone various levels of physical habitat modifications and there is no indication that an evaluation of the physical habitat was conducted. It is well recognized by the scientific community that a single standard or threshold is not applicable to all waterbodies of the State due to unmanageable non-pollutant physical habitat alterations that would preclude many streams from ever having biological assemblages similar to reference. The threshold used as the listing criterion for these reaches is therefore likely inappropriate for these modified waterbodies.	based on land use and local conditions. The CSCI employs a modeled reference condition as opposed to the regional reference pool used by the SCIBI. The proposed listings evaluate the physical habitat data in the determination of the reference and each listing decision includes associated water quality impairments. At this time, the CSCI (and IBI where CSCI is not available) is the best measure of biologic integrity in California streams and it is appropriate to use IBI and CSCI in 303(d) listing decisions. As the science progresses, improved methods may supplant older methods and the 303(d) list will be updated, as appropriate, as that occurs. The discussion of the strengths and weaknesses of scoring methods and additional areas needing additional research, are appreciated, but are not a justification to delay making 303(d) listing decisions. The use of the SCIBI and CSCI for 303(d) listing was done in accordance with Section 3.9 and 6.1.5.8 of the Listing Policy with biological data and impairment related to associated pollutants and/or pollution. Santa Clara River Reach 5, Los Angeles River Reach 3, and Medea Creek Reach 1 are discussed	

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		in more detail in response to comments 26.13, 26.14 and 26.15.	
26.5	<u>Appropriate Thresholds for Interpretation of the CSCI Have Not Yet Been Determined</u>. The State Board has not yet developed any recommended thresholds for the CSCI. The proposed threshold of 0.79 used in the Draft List is the 10th percentile of the reference pool and was used as an arbitrary point of reference for a regional monitoring program with no regulatory vetting. Use of this threshold for impairment listings would result in 10% of the unimpaired reference streams being erroneously listed as impaired. Additionally, it is well recognized by the scientific community that a single standard or threshold will not be applicable to all waterbodies of the State since unmanageable non-pollutant features such as habitat condition/modifications are likely to preclude many streams from ever having biological assemblages similar to reference. The Sanitation Districts believe that it is inappropriate to make impairment decisions using the SCIBI and premature to rely on the improved, but still limited CSCI for making impairment decisions, particularly in reaches where surrounding development and instream physical habitat limitations are recognized. Therefore, the Sanitation Districts respectfully recommend that the Regional Board delay making decisions regarding benthic macroinvertebrate community impairments in this listing cycle, and instead continue to work with stakeholders, scientists, and the State Board that are currently engaged in efforts to address these and other issues as part of the Biointegrity/Bio-stimulatory Policy.	Selection of the 10th percentile of the reference distribution to indicate impairment was done by Mazor et al. (2016) and was independently peer-reviewed. The selection and identification of reference is done at the desktop scale, and likely includes some sites that may not be “reference” due to localized impacts not discernable on a desktop basis or by field crews when sampling. For example, known upstream illegal marijuana grow operations could remove a site from reference status due to impacts on water quality. However, accurately identifying active grow sites in the tributary watershed by desktop is largely infeasible. With the CSCI, any given test site gets matched to a subset of reference sites from the statewide pool that are most similar in terms of elevation, watershed size, annual precipitation, geology, etc., and those most-similar reference sites may come from other regions. The benthic macroinvertebrates that were observed in the most-similar group of reference sites are then used to predict what should be observed at the test site if it were in reference condition. Because the statewide reference pool adequately represents important environmental gradients, and because predictive modeling matches test sites to their	

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		most environmentally similar reference sites, the CSCI is appropriate for use.	
26.6	***4. The Draft List Includes Inappropriate Impairment Listings for Temperature*** The Draft List contains a number of newly proposed listings for temperature. The Sanitation Districts believe the proposed temperature listings for San Gabriel River Reach 2, San Jose Creek Reach 1, and San Gabriel River Reach 1 should be removed because the impairment listings are inconsistent with the Basin Plan water quality objective for temperature, which states, "at no time shall these WARM-designated waters be raised above 80˚F **as a result of waste discharges**." [Emphasis added.] This water quality objective clearly distinguishes between exceedance of the 80˚F standard caused by "waste discharges" and those associated with other causes. Evidence indicates that summertime excursions greater than the 80˚F are not caused by wastes discharged but are likely due to elevated ambient air temperature, conductive and radiative heating associated with hardened landscapes, a lack of riparian cover, and increased ambient temperatures related to climate change. Additionally, the Draft List does not contain any analysis or evidence indicating that the elevated temperatures occurred as result of wastes discharged. Additionally, the Sanitation Districts believe that the proposed temperature listing for Santa Clara River Reach 6 is inappropriate. Measurements for this listing were taken immediately downstream of the Saugus Water Reclamation Plant (WRP), where tertiary treated effluent is discharged along one bank of the Santa Clara River bed. The flow remains isolated from the main channel of the Santa Clara River and percolates rapidly into the soil; groundwater resurfaces downstream near Reach 5 of the Santa Clara River. The predominant natural condition of this stretch of river is dry and would not be expected to support aquatic life without the Saugus WRP discharge; therefore, application of the 80˚F water quality objective is unnecessary and inappropriate. The only reasonable alternative for meeting the	The 303(d) list appropriately identifies temperature impairments. Analysis of sources and causes or identification of implementation measures to resolve or correct the impairment are not completed as part of the Integrated Report or 303(d) listing process. There are multiple sources of water to San Gabriel River Reach 2, San Jose Creek Reach 1, and San Gabriel River Reach 1 including "waste discharge" from sources such as wastewater treatment plants and the MS4. Exceedances in temperature may be caused in part by ambient temperatures or exacerbated by the lack of tree cover in some reaches; exceedances may also be caused in part by waste discharge. The relative contribution of the causes of temperature exceedances is largely speculative, at this time. The 80°F temperature objective protects the aquatic life beneficial use of WARM in surface waters regardless of the ultimate source of the water in that reach of the river. The Los Angeles Water Board does not have alternative objectives for effluent-dominated waters. The 2014-2016 Triennial Review includes a review of temperature as a Basin Planning Priority	

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	water quality objective would be to eliminate the discharge flows; however, the California Department of Fish and Wildlife would likely prohibit that option, due to the effluent's contribution to the groundwater and subsequent downstream flows. Upon resurfacing near Reach 5, the water temperature averages 69˚F, demonstrating that elevated temperatures in this isolated discharge area are not detrimental to beneficial uses in reaches where water occurs naturally in the river. Finally, elevated ambient temperatures regularly exceed 90˚F during the summer months, and heavily influence both the Saugus WRP discharge and the immediate downstream receiving water location. As indicated for the other temperature listings, the water quality objective for temperature in the Los Angeles Region Basin Plan clearly distinguishes between temperature exceedances caused by "waste discharges" and those associated with other causes. However, the Draft List does not contain any analysis to distinguish the relative contributions by the temperatures of the ambient air and wastes discharged on the receiving water.	Project. Los Angles Water Board staff may consider the development of more specific numeric temperature objectives for various waterbody classes and aquatic life beneficial uses in the future. See also responses to comments 26.16, 26.17, 26.18 and 26.19.	
26.7	***5. Thresholds Used For Toxicity Impairment Listings Are Inconsistent With Basin Plan Objectives*** The Draft List contains a number of newly proposed listings for toxicity that include San Gabriel River Estuary, San Gabriel River Reach 3, Rio Hondo Reach 2, and Santa Clara River Reach 5. These listings should be removed for the reasons below. <u>The Acute Toxicity Impairment Criterion is Inconsistent With the Basin Plan Water Quality Objective for Acute Toxicity</u> The Staff Report fact sheets for the specific listings mentioned above state that "<100% survival (acute) was considered an exceedance." However, the Basin Plan states that "the acute toxicity objective for discharges dictates that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival when using an established USEPA, State Board, or other	The acute toxicity and chronic toxicity data was included in the original data submission to State Board by the August 30, 2010 deadline. However, the necessary control data were not included. Los Angeles Water Board staff agrees that the existing evaluation guideline, *"Toxicity data was not reported with a control, therefore anything reported as <100 (chronic) or <100% survival (acute) was considered an exceedance"* for LOE 87842, LOE87970, LOE88019, and LOE87452 is not appropriate. For acute toxicity, the Los Angeles Water Board agrees that the use of the specific numeric target included in the Los Angeles Regional Basin Plan	Several recommended toxicity listing decisions have been revised. For San Gabriel River Estuary, revision to "do not list," see response to comment 26.8. For San Gabriel River Reach 3, revision to "delist," see response to comment 26.9. For Rio Hondo Reach 2, revision to no toxicity assessment, see response to comment 26.11. For Santa Clara River Reach 5, revision to "do not list," see response to comment 26.12.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	protocol authorized by the Regional Board." Therefore, a single-test threshold of less than 70% survival should be used to determine impairments; even a threshold of less than 90% survival would still be more conservative than Basin plan objective. <u>The Chronic Toxicity Impairment Criterion is Inconsistent With Water Quality Objective Interpretations Provided in NPDES Permits</u> The Staff Report fact sheets for the specific listings mentioned above indicate that a single NOEC result of less than 100% receiving water represents an exceedance of the water quality objective. Although the Basin Plan provides no numeric chronic toxicity objectives, recently adopted Los Angeles Region NPDES permits do provide very specific direction on interpretation of the narrative water quality objectives for chronic toxicity. In a number of these permits, a footnote associated with the Receiving Water Monitoring Requirements Table of the Monitoring and Reporting Program states; "The **median monthly summary result is a threshold value** for a determination of meeting the narrative receiving water objective and shall be reported as 'Pass' or 'Fail'."[2] [Emphasis added.] In addition to aligning with the NPDES permit language, use of a monthly median will also address concerns regarding false positive error rates. The USEPA has determined that the expected false positive error rate for chronic toxicity testing using the NOEC is 5%. With this error rate, on average, one in 20 individual chronic toxicity tests will be erroneously identified as "toxic" using the NOEC, and there is a nearly 34% probability that 2 or more individual chronic toxicity test exceedances would be observed within a set of 24 discrete measurements in a completely non-toxic stream reach. When there are two or more exceedances out of 24 measurements, the Listing Policy specifies that a reach be listed as impaired. Therefore, using single chronic toxicity exceedances as the 303(d) criterion would eventually result in more and more non-toxic stream reaches being erroneously listed over time. However, using a monthly median chronic toxicity exceedance threshold would reduce the likelihood of inappropriate reach listings due to false	is appropriate. More specifically, "*there shall be no acute toxicity in ambient waters, including mixing zones. The acute toxicity objective for discharges dictates that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival when using an established USEPA, State Board, or other protocol authorized by the Regional Board.*" For chronic toxicity, as stated in the Basin Plan, "*there shall be no chronic toxicity in ambient waters outside mixing zones. To determine compliance with this objective, critical life stage tests for at least three species with approved testing protocols shall be used to screen for the most sensitive species. The test species used for screening shall include a vertebrate, an invertebrate, and an aquatic plant. The most sensitive species shall then be used for routine monitoring. Typical endpoints for chronic toxicity tests include hatchability, gross morphological abnormalities, survival, growth, and reproduction.*" However, there is no specific numeric target for chronic toxicity in the Basin Plan. In light of this, it may also be that the use of the monthly median of chronic toxicity to assess the chronic toxicity is appropriate since this method is used in recently adopted Los Angeles Region NPDES permits.	

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	positive chronic toxicity results to less than 1 %.	As data was reassessed per the discussion above, the decision recommendations have been changed to "do not list" due to insufficient information (poor QAQC).	
26.8	***6. Specific Comments on Individual Reach/pollutant Listing Decisions*** In addition to these general comments, the Sanitation Districts have comments on some specific listing decisions. As stated above, detailed comments are provided in the appendices to this letter. Because the implications of erroneous listings are substantial, the Sanitation Districts urge the Regional Board to consider this information in making the appropriate changes to the Draft List. **Fact Sheet #1** **Water Body: San Gabriel River Estuary** **Pollutant: Toxicity** **Listing: List on 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 toxicity be made to the 303(d) list for the San Gabriel River Estuary, based on one line of evidence: 14 of 113 samples exceeded the objective. The Districts believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved, for the reasons listed below; supporting evidence is provided in the sections that follow. • Appendix A of this letter contains the full set of data applicable to this listing from Appendix G of the Regional Board Draft Staff Report. Using	LOE 87842 and Decision 66269 will be changed to reflect the changes in the evaluation guidelines discussed in response to comment 26.7. The listing decision will be changed to "Do Not List" due to insufficient information as the control data was not submitted. The review of the decision for San Gabriel River Reach 3 toxicity is in process at this time.	Per the discussion in response to comment 26.7, the recommended decision for San Gabriel River Estuary is "do not list" and San Gabriel River Reach 3 is "delist."

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	the temporal range indicated (June 2006 through May 2010), only six of 120 samples failed the thresholds specified in the fact sheet. According to Table 3.1 of the California Clean Water Act 303(d) Listing Policy (Listing Policy), an impairment listing is appropriate if 11 or more exceedances are observed when 120 samples are available. • Although the Staff Report fact sheet states that "<100% survival (acute) was considered an exceedance," the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that "the acute toxicity objective for discharges dictates that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival when using an established USEPA, State Board, or other protocol authorized by the Regional Board." Therefore, a single-test threshold of less than 70% survival should be used to determine impairments; even a threshold of less than 90% survival would still be more conservative than Basin Plan objective. Applying a 90% threshold, none of the 120 samples would have exceeded the water quality objective. Therefore, this reach fails to meet the listing criteria for toxicity. • The full set of data appended to Appendix G of the Staff Report, including those that fell outside the indicated temporal range, contain a total 151 discrete toxicity tests. Sixteen failed the <100% acute survival threshold. Using a conservative 90% acute survival threshold, there are no toxicity exceedances, and the number of measured exceedances is insufficient to place this water segment on the section 303(d) list. • *Use of a <100% Survival Water Quality Objective Threshold Is Inappropriate and Unsupported.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with the Basin Plan and Other Documentation from the Regional Board.*		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with Criteria Used for Other Acute Toxicity Listings.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with the Results of Statistical Testing.* • *The Water Quality Objective/Threshold for Chronic Toxicity Should Be a Monthly Median.* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.9	**Fact Sheet #2** **Water Body: San Gabriel River Reach 3** **Pollutant: Toxicity** **Listing: List on 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 proposing that a new listing for toxicity be made to the 303(d) list for Reach 3 of the San Gabriel River, based on one line of evidence using two datasets: 2 of 38 samples exceeded the objective in a dataset related to a previously conducted TMDL study and 13 of 75 samples exceeded the objective in a second dataset comprised of routine receiving water tests conducted as part of an NPDES permit. The Sanitation Districts of Los Angeles County (Sanitation Districts) believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved, for the reasons listed below; supporting evidence is provided in the sections that follow. Appendix A of this letter contains the full set of data applicable to this listing from Appendix G of the Regional Board Draft Staff Report. No data related to the TMDL study were provided; therefore, the number of tests and exceedances	LOE 87970 and Decision 32521 will be changed to reflect the changes in the evaluation guidelines discussed in response to comment 26.7. The listing decision will be changed to "Do Not List" due to insufficient information as the control data was not submitted. The review of the decision for San Gabriel River Reach 3 toxicity is in process at this time.	Per the discussion in response to comment 26.7, the recommended decision for San Gabriel River Reach 3 is "delist." (Because San Gabriel River Reach 3 was delisted in a previous 303(d) listing cycle, even though new data was assessed, the CalWQA database regards the decision to not list as a continued decision to "delist.")

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	reported (2 of 38) could not be independently verified and were assumed to be accurate. For the dates indicated (June 2006 through May 2010), 13 exceedances were associated with only 66 samples. Combining the two datasets resulted seven acute and eight chronic toxicity exceedances out of 104 samples. • Although the Staff Report fact sheet states that "<100% survival (acute) was considered an exceedance," the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that "the acute toxicity objective for discharges dictates that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival when using an established USEPA, State Board, or other protocol authorized by the Regional Board." Therefore, a single-test threshold of less than 70% survival should be used to determine impairments; even a threshold of less than 90% survival would still be more conservative than Basin plan objective. Applying a 90% threshold, no acute toxicity samples in the dataset exceeded the water quality objective and 8 of 104 total samples exceeded the objective. According to Table 3.1 of the California Clean Water Act 303(d) Listing Policy (Listing Policy), an impairment listing is appropriate if 9 or more exceedances are observed when 104 samples are available. Therefore, this reach fails to meet the listing criteria for toxicity. • The Staff Report considered each chronic toxicity test result as an independent data point, even when multiple bioassays were conducted within a single month. However, the San Jose Creek (SJCWRP) and Whittier Narrows Water Reclamation Plant (WNWRP) permits state that the water quality objective for chronic toxicity is based on a monthly median; therefore, all tests within a single month should be considered part of a monthly median, rather than independent tests. Based on appropriate application of the monthly median as the chronic water quality objective (and a 90% acute toxicity threshold), there were 6 toxicity exceedances out of a total of 96 tests. According to Table 3.1 of the		

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	California Clean Water Act 303(d) Listing Policy (Listing Policy), an impairment listing is appropriate if 9 or more exceedances are observed when 96 samples are available. Therefore, this reach fails to meet the listing criteria for toxicity. • The full set of data (sets 1 and 2) appended to Appendix G of the Staff Report for all dates, including those outside the indicated temporal range, contain a total of 119 discrete toxicity tests. Using a conservative 90% acute survival threshold and appropriate monthly median chronic threshold, there are no acute exceedances and 6 chronic exceedances out of 110 results. This total does not meet the minimum number of measured exceedances needed to place a water segment on the section 303(d) list. • *Use of a <100% Survival Effect Water Quality Objective Threshold Is Inappropriate and Unsupported for Acute Toxicity Testing.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with the Basin Plan and Other Documentation from the Regional Board.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with Criteria Used for Other Acute Toxicity Listings.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with the Results of Statistical Testing.* • *The Water Quality Objective/Threshold for Chronic Toxicity Should Be a Monthly Median.* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.10	**Fact Sheet #3** **Water Body: San Jose Creek Reach 2** **Pollutant: Toxicity** **Listing: List on 303(d) List (TMDL Required List)**	Los Angeles Water Board and State Water Board staff are aware of several areas where the reach mapping that underlies the CalWQA database (which maps the 303(d) list) and the Los Angeles	The data has been moved from San Jose Creek Reach 2 to San Jose Creek Reach 1. The San Jose Creek Reach 2 toxicity decision has been retired. The San Jose Creek Reach 1 recommended

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	Comment & Recommendation: Apply Data to Reach 1 The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing that a new listing for toxicity be made to the 303(d) list for Reach 2 of the San Jose Creek, based on one line of evidence: 8 of 24 samples exceeded the objective. The Sanitation Districts believe this proposed listing is inappropriate and should be moved to Reach 1. All cited toxicity data is from receiving water station RC (N 34° 01' 8.6" W 117° 50' 27.7") for the Pomona Water Reclamation Plant, which is located in Reach 1 of San Jose Creek (Figure 1). This reach is already listed for toxicity under section 303(d). *Figure 1. Station Pom-RC (Blue Symbol) and San Jose Creek Reach 1 (Aqua Line)* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*	Basin Plan do not agree. It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues and reassess the LOEs and decisions for those reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or at the next Listing Cycle that includes the Los Angeles Region.	decision has been changed from "list" (a carryover decision, as there was no new data to assess) to "do not delist."
26.11	**Fact Sheet #4** **Water Body: Rio Hondo Reach 2** **Pollutant: Toxicity** **Listing: List on 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 proposing that a new listing for toxicity be made to the 303(d) list for Reach 2 of the Rio Hondo, based on one line of evidence: 5 of 31 samples exceeded the objective. The Districts believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved, for the reasons listed below; supporting evidence is provided in the sections that follow.	LOE 87452 and Decision 66146 will be changed to reflect the changes in the evaluation guidelines discussed in response to comment 26.7. The listing decision will be changed to "Do Not List" due to insufficient information as the control data was not submitted. The review of the decision for Rio Hondo Reach 2 toxicity is in process at this time.	The toxicity data has been moved to Rio Hondo Reach 3 and the toxicity decision for Rio Hondo Reach 2 has been retired. The toxicity data in Rio Hondo Reach 3 was assessed as "insufficient information" and the recommended decision is "do not list."

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Appendix A of this letter contains the full set of data applicable to this listing from Appendix G of the Regional Board Draft Staff Report. All cited toxicity data are from receiving water station RD1 for the Whittier Narrows Water Reclamation Plant (WNWRP). This sampling location (N 34° 02' 26.5" W 118° 04' 27") is in Reach 3 of the Rio Hondo, not Reach 2 (Figure 1). • Using the data for the temporal range indicated (June 2006 through May 2010), 7 of 33 samples failed the thresholds specified in the fact sheet. • Although the Staff Report fact sheet states that "<100% survival (acute) was considered an exceedance," the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that "the acute toxicity objective for discharges dictates that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival when using an established USEPA, State Board, or other protocol authorized by the Regional Board." Therefore, a single-test threshold of less than 70% survival should be used to determine impairments; even a threshold of less than 90% survival would still be more conservative than Basin plan objective. Applying a 90% threshold, no samples exceeded the acute toxicity water quality objective. • The Staff Report considered each chronic toxicity test result as independent data, even when multiple bioassays were conducted within a single month. However, the WNWRP permit states that the water quality objective for chronic toxicity is based on a monthly median; therefore, all tests within a single month should be considered part of a monthly median, rather than independent tests. Based on appropriate application of the monthly median as the chronic water quality objective (and a 90% acute toxicity threshold), there were 2 toxicity exceedances out of 31 tests. According to Table 3.1 of the California Clean Water Act 303(d) Listing Policy (Listing Policy), an impairment listing is appropriate if 3 or more exceedances are observed when 31 samples are		

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	available. Therefore, Reach 2 of the Rio Hondo fails to meet the listing criteria for toxicity. • The full set of data appended to Attachment G of the Staff Report, including those that fell outside the indicated temporal range, contains a total 38 discrete toxicity tests. Using a conservative 90% acute survival threshold and appropriate monthly median chronic threshold, there are no acute exceedances and 2 chronic exceedances out of 36 results. This total does not meet the minimum number of measured exceedances needed to place a water segment on the section 303(d) list. *Figure 1. Monitoring Station WN-RD1 (Blue Symbol) and Rio Hondo Reach 3 (Aqua Line)* • *Use of a <100% Survival Water Quality Objective Threshold Is Inappropriate and Unsupported.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with the Basin Plan and Other Documentation from the Regional Board.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with Criteria Used for Other Acute Toxicity Listings.* • *Use of a <100% Survival Water Quality Objective Threshold Is Inconsistent with the Results of Statistical Testing.* • *The Water Quality Objective/Threshold for Chronic Toxicity Should Be a Monthly Median.* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.12	**Fact Sheet #5** **Water Body: Santa Clara River Reach 5** **Pollutant: Toxicity**	Los Angeles Water Board staff will work with the State Board staff to address the issues related to the spatial representation of samples.	LOE 88730 and Decision 67031 have been changed to reflect the changes in the evaluation guidelines discussed in response to comment 26.7

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Listing: List on 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 proposing that a new listing for toxicity be made to the 303(d) list for Reach 5 of the Santa Clara River, based on one line of evidence: 2 of 2 samples exceeded the objective. The Sanitation Districts of Los Angeles County (Sanitation Districts) believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved, for the reasons listed below; supporting evidence is provided in the sections that follow. • Inappropriate data were utilized. Toxicity results were reported for sites SCR 1272 and SCR 14156. However, SCR 14156 is in Reach 6 of the Santa Clara River and should not be included in an evaluation of Reach 5 (Figure 1). • Incomplete data were utilized. The ”Data for Various Pollutants in Various Water Bodies in Sanitation Districts of Los Angeles County 2005-2010” dataset should be included in this analysis as it was provided in response to the call for data, readily available, and used in other current listing recommendations. Appendix A of this letter contains the full set of data applicable to this listing from Appendix G of the Regional Board Draft Staff Report. • The Los Angeles Region Basin Plan states, “the acute toxicity objective for discharges dictates that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival when using an established USEPA, State Board, or other protocol authorized by the Regional Board.” Therefore, a single-test threshold of less than 70% survival should be used to determine impairments. Applying this threshold (or even a more conservative 90% threshold) to the appropriate and complete dataset that	Los Angeles Water Board staff will also work with the State Board staff to address the missing data from the development of LOE 88730. LOE 88730 and Decision 67031 will be changed to reflect the changes in the evaluation guidelines discussed in response to comment 26.7. It is the intention of the Los Angeles Water Board staff to work with State Board staff to resolve mapping issues and reassess the LOEs and decisions for those reaches, as appropriate, prior to the State Board approval of the 2016 303(d) list, or at the next Listing Cycle that includes the Los Angeles Region.	and the recommended decision for toxicity for Santa Clara River Reach 5 has been changed from “list” to “do not list.” Data from site SCR 14156 and additional data was added to Santa Clara River Reach 6 and the recommended decision for Santa Clara River Reach 6/toxicity remains “do not delist.”

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	excludes site SCR 14156 and includes Sanitation Districts data, there were five chronic toxicity exceedances out of 90 valid toxicity tests. This total does not meet the minimum number of measured exceedances needed to place a water segment on the section 303(d) list. *Figure 1. Santa Clara River Reach 5 and RWB4 Stormwater Monitoring Council CY2008 CY2009 Sampling Locations* • *The Los Angeles Region Basin Plan Establishes Acute Toxicity Thresholds* • *The Water Quality Objective/Threshold for Chronic Toxicity Should Be a Monthly Median.* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.13	**Fact Sheet #6** **Water Body: Santa Clara River Reach 5** **Pollutant: Benthic Community Effects** **Listing: List on 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 benthic community effects be made to the 303(d) list for Reach 5 of the Santa Clara River, based on two lines of evidence: Southern Coastal California Index of Biotic integrity (SCIBI) and California Stream Condition Index (CSCI) scores. The Districts believe this proposed listing is inappropriate and recommend not listing for the reasons listed below; supporting evidence is provided in the sections that follow. • The SCIBI-based analysis has been demonstrated to be inadequate for use in	For additional discussion on the use of IBI and/or CSCI in listing decisions see response to comment 26.4. At this time, the CSCI (and IBI where CSCI is not available) is the best measure of biologic integrity in California streams and it is appropriate to use both IBI and CSCI scores in 303(d) listing decisions. The State Water Board has not 'rejected' the use of the SCIBI. The State is transitioning into using the CSCI because it is applicable statewide, accounts for a much wider range of natural variability, and provides equivalent scoring thresholds in all regions of the state. While, eventually, the State may assess waterbodies only by CSCI scores, it will take time	The data from site SCR 14156 has been moved to Santa Clara River Reach 6. The decision for Santa Clara River Reach 5/Benthic Community Effects remains "list." The decision for Santa Clara River Reach 6/Benthic Community Effects was "do not list" and has been revised to "list."

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	low gradient/low elevation watersheds similar to the reaches in the upper Santa Clara River. For this and other reasons, the State Water Resources Control Board (State Board) has rejected use of the SCIBI in favor of the technically superior CSCI scoring tool. • Although the CSCI at least partially addresses some of the problems with the SCIBI by employing a modeled reference condition as opposed to the regional reference pool used by the SCIBI, the lack of any reference sites in large watersheds, low gradient, and low elevation systems still limits the identification of appropriate thresholds using the CSCI. Specifically, several Santa Clara River sites have been shown to fall outside the experience of the CSCI model. • Appropriate water quality thresholds for the CSCI have not been established. Although examples of approaches for developing CSCI thresholds have been published (e.g., by the Southern California Coastal Water Research Project), it is well recognized by the scientific community that a single standard should not be applicable to all water bodies because unmanageable nonpollutant features such as habitat condition are likely to preclude many streams from ever having biological assemblages similar to reference. The State Board is currently investing considerable resources to develop thresholds and should be allowed to complete the process before determination of impairment and listings. • The CSCI analysis for this listing used data from both Reach 5 and Reach 6 of the Santa Clara River. The CSCI analysis of the data collected from the Reach 5 location actually met the 0.79 threshold proposed by the Regional Board. • Physical habitat was not assessed, as required by the State Board Water Quality Control Board Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy). Historically unmanaged or unmanageable stressors (e.g. channel/habitat modifications) are well documented as precluding sites from achieving reference conditions.	to replace IBI scores with CSCI scores and this does not in any way mean that IBI scores (and assessments using them) are no longer valid. The commenter has provided several documents that review and discuss the development of, and challenges with, aquatic life bio-criteria including IBI, CSCI and TALU (tiered aquatic life criteria). However, it appears that the principal evidence for the commenter's "inadequate for low elevation/lack of an appropriate reference site" argument is the CSCI Reference Density Cloud from a presentation of the California Bioassessment Workshop from 2012. The text accompanying the Reference Density Cloud in the presentation states, "*Could be used to establish exceptions for truly unique environmental settings.*" Nonetheless, it does not appear that any "truly unique environmental settings" have been established or are recognized by the State Bioassessment workgroup or other authority. The development of alternative thresholds via State Water Board efforts does not have a firm schedule to provide more useful guidance in the near future. It is appropriate to make listing decisions based on the best available data and science at this time. For the CSCI, the 10th percentile of reference pool is an appropriate evaluation guideline. Selection	

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	• The proposed listing fails to associate the alleged impairment with other pollutants, namely toxicity and iron, which were listed as co-occurring. • *SCIBI Is an Inadequate Metric for Assessing Low Gradient, Low Elevation Streams.* • *CSCI Improves on the SCIBI But Some Limitations Remain* • *Appropriate Water Quality Standards (i.e. Biocriteria) Have Not Been Established* • *CSCI Data from Within Reach 5 of the Santa Clara River Show No Impairment* *Figure 1. CSCI Reference Density Cloud (Santa Clara River Sites Within Green Circle).* *Figure 2. Santa Clara River Reach 5 and Monitoring Stations Used in Listing* • *The Proposed Listing Fails to Evaluate Physical Habitat Data* • *The Proposed Listing Fails to Associate the Alleged Impairment with Other Pollutants* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*	of the 10th percentile of the reference distribution to indicate impairment was done by Mazor et al. (2016) and was independently peer-reviewed. As previously noted, the selection and identification of reference is done at the desktop scale, and likely includes some sites that may not be "reference" due to localized impacts not discernable on a desktop basis or by field crews when sampling. The data considered in the LOE and for the listing decision for Reach 5 included IBI assessments from station Old Rd. on the west side of I-5 (three of three exceeding), and the site NR1 located 300 ft. upstream of the Los Angeles/Ventura County Line (one of two exceeding). The CSCI assessment was from the Santa Clara River Site 1272 and Santa Clara River Site 14156 (one out of one exceeding). The two sampling sites have now been "dis-aggregated" such that now, the data considered in the LOE and decision for Reach 5 includes IBI assessments from the Old Rd. station, on the west side of I-5 (three of three exceeding), and the site NR1 located 300 ft. upstream of the Los Angeles/Ventura County Line (one of two exceeding) and the CSCI assessments from the Santa Clara River Site 1272 and Santa Clara River Site 14156 (one out of two exceeding).	

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		Staff will review the inclusion of the second site (identified as SCR 14156) with State Water Board to determine whether it should be in Reach 5 or Reach 6, as part of resolving our mapping issues, see comment 26.2 The proposed listing evaluates the physical habitat data; physical habitat data is incorporated into the determination of reference sites. In addition, a Causal Assessment (Causal Assessment Evaluation and Guidance for California, K. Schiff, D. Gillett, A. Rehn and M. Paul, Southern California Coastal Water Research Project Technical Report 750, April 2015) concluded that elevated conductivity was the likely cause of biological conditions at the site and not the physical features of habitat simplification or river discontinuity. The proposed listing is associated with the documented impairments of other pollutants, including iron, toxicity and zinc. Furthermore, the Causal Assessment demonstrated that the impairment is associated with chloride. In summary, at this time, we know that the reach is impaired and that it is appropriate to list it per the Listing Policy. We anticipate further scientific work will be accomplished in upcoming years, which may make revisions and clarifications to the listing possible, including listing under 4c	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
		(impairment due to pollution, e.g. channelization) instead of 4b (impairment due to pollutants e.g. zinc, chloride, etc.).	
26.14	**Fact Sheet #7** **Water Body: Los Angeles River Reach 3** **Pollutant: Benthic Community Effects** **Listing: List on 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 proposing that a new listing for benthic community effects be made to the 303(d) list for Reach 3 of the Los Angeles River, based on a weight of evidence approach using Southern Coastal California Index of Biotic integrity (SCIBI) scores. The Districts believe this proposed listing is inappropriate and recommend not listing for the reasons listed below; supporting evidence is provided in the sections that follow. • The SCIBI-based analysis has been demonstrated to be inadequate for use in low gradient/low elevation watersheds similar to Los Angeles River Reach 3. For this, and other reasons, the State Water Resources Control Board (State Board) has rejected use of the SCIBI in favor of the technically superior CSCI scoring tool. No CSCI results have been used for this listing, but a more detailed assessment of the CSCI can be found in Fact Sheet #6. • Physical habitat was not assessed, as required by the State Board Water Quality Control Board Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy). Historically unmanaged or unmanageable stressors (e.g. channel/habitat modifications) are well documented as precluding sites from achieving reference conditions.	For the "inadequate for low elevation/lack of an appropriate reference site" argument, see response to comment 26.13. The proposed listing evaluates the physical habitat data; physical habitat data is incorporated into the determination of reference sites. At this time, we know that the reach is impaired and that it is appropriate to list it per the Listing Policy. We anticipate further scientific work will be accomplished in upcoming years, which may make revisions and clarifications to the listing possible, including listing under 4c (impairment due to pollution, e.g. channelization) instead of 4b (impairment due to pollutants e.g. zinc, chloride, etc.).	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• *SCIBI Is an Inadequate Metric for Assessing Low Gradient, Low Elevation Streams.* • *CSCI Improves on the SCIBI But Some Limitations Remain* • *The Proposed Listing Fails to Evaluate Physical Habitat Data* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.15	**Fact Sheet #8** **Water Body: Medea Creek Reach 1** **Pollutant: Benthic Community Effects** **Listing: List on 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 proposing that a new listing for benthic community effects be made to the 303(d) list for Reach 1 of the Medea Creek, based on a weight of evidence approach using California Stream Condition Index (CSCI) and Southern Coastal California Index of Biotic integrity (SCIBI) scores. The Districts believe this proposed listing is inappropriate and recommend not listing for the reasons listed below; supporting evidence is provided in the sections that follow. • Appropriate water quality thresholds for the CSCI have not been established. Although examples of approaches for developing CSCI thresholds have been published (e.g., by the Southern California Coastal Water Research Project), it is well recognized by the scientific community that a single standard should not be applicable to all water bodies because unmanageable nonpollutant features such as habitat condition are likely to preclude many streams from ever having biological assemblages similar to reference. The State Board is currently	Appropriate water quality standards have been established, see response to comment 26.4. The proposed listing evaluates the physical habitat data; physical habitat data is incorporated into the determination of reference sites. The impairments of both trash and selenium are associated with the benthic community effects listing. The Medea Creek Reach 1 decision is supported by exceedances of both IBI and CSCI scores and is in accordance with Section 3.9 and 6.1.5.8 of the Listing Policy. We anticipate further scientific work will be accomplished in upcoming years, which may make revisions and clarifications to the listing possible, including listing under 4c (impairment due to pollution, e.g. channelization) instead of 4b (impairment due to pollutants e.g. zinc, chloride, etc.).	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	investing considerable resources to develop thresholds and should be allowed to complete the process before determination of impairment and listings. • Physical habitat was not assessed, as required by the State Board Water Quality Control Board Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy). Historically unmanaged or unmanageable stressors (e.g. channel/habitat modifications) are well documented as precluding sites from achieving reference conditions. • The proposed listing fails to associate the alleged impairment with other pollutants, namely trash and selenium, which were listed as co-occurring. • *Appropriate Water Quality Standards (i.e. Biocriteria) Have Not Been Established* • *The Proposed Listing Fails to Evaluate Physical Habitat Data* *Figure 1. Medea Creek Channel Modifications* • *The Proposed Listing Fails to Associate the Alleged Impairment with Other Pollutants* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.16	**Fact Sheet #9** **Water Body: San Jose Creek Reach 1** **Pollutant: Temperature, Water** **Listing: List on 303(d) List (TMDL Required List)** **Comment & Recommendation: Do Not List – Meets Water Quality Objective** The California Regional Water Quality Control Board, Los Angeles Region	The water quality standard has been exceeded in 42 of 301 samples; even with the commenter's purported corrections to the database, 46 out of 339 or 32 out of 339 samples exceeded, in both cases, the data still exceed the allowable number of exceedances per the Listing Policy.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	(Regional Board) is proposing that a new listing for impairment due to water temperature be made to the 303(d) list for Reach 1 of San Jose Creek. The Sanitation Districts of Los Angeles County (Sanitation Districts) believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved. ***Failure to Meet Water Quality Objectives Has Not Been Demonstrated*** The Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that: "At no time shall these WARM-designated waters be raised above 80ºF **as a result of waste discharges**." [Emphasis added.] This water quality objective clearly distinguishes between exceedance of the 80ºF standard caused by "waste discharges" and those associated with other causes. Evidence indicates that summertime excursions greater than the 80ºF are not caused by waste discharges but are likely due to elevated ambient air temperature, conductive and radiative heating associated with hardened landscapes, a lack of riparian cover, and increased ambient temperatures related to climate change (details below). Additionally, the Draft List does not contain any analysis or evidence indicating that the elevated temperatures occurred as result of wastes discharged. The Regional Board Fact Sheet states that a single line of evidence was used in the assessment of temperature. Specifically, 42 of 301 samples from Pom-RD, Pom-RC, SJC-C1, and SJC-C2 exceeded the objective from July 2005 to November 2010 using the "Data for Various Pollutants in Various Water Bodies in Sanitation Districts of Los Angeles County, 2005-2010" dataset. Appendix A of this letter contains the full set of data applicable to this listing from Appendix G of the Regional Board Draft Staff Report.	Temperature, in some cases, may be because of pollution, e.g. habitat alteration, but may also be caused by discharges of waste, i.e. pollutants; therefore Category 5 is the appropriate category. Temperature is conventional pollutant with an objective defined in the Los Angeles Basin Plan, "*At no time shall these WARM designated waters be raised above 80 degrees F…*" See also response to comment 17.4 for additional discussion of temperature as a pollutant.	

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	Based on a review of the dataset utilized for the listing evaluation, the Sanitation Districts identified 339 discrete temperature measurements, not 301. The dataset contains 368 results (Appendix 1); however, 29 samples were duplicates. Of the 339 unique temperature measurements, 46 exhibited a temperature that exceeded 80 ºF, not 42. However, 14 of the 46 temperature exceedances were demonstrably caused by conduction and radiation (details below), not waste discharges. Conduction and radiative heating likely also caused the remaining 32 exceedances out of 339 measurements; this total does not meet the minimum number of measured exceedances needed to place a water segment on the section 303(d) list. ***Pom-RC and Pom-RD Excursions Above 80 ºF Are Demonstrably Not a Result of Waste Discharges*** Tertiary treated water from the Pomona Water Reclamation Plant is discharged to the south fork of San Jose Creek and flows into Reach 1. Receiving water stations Pom-RC, Pom-RD, and SJC-C1 are located approximately 3, 12, and 12.5 miles from the upstream border of Reach 1, respectively. Reach 1 is fully lined in concrete from the upstream border to just upstream of SJC-C1 (Figure 1). As observed by Sanitation Districts staff and corroborated by EPA staff, groundwater exudes from relief structures distributed throughout the concrete-lined bottom, even in mid-summer (August) after several years of drought (Figure 2).[1] In the absence of discharge from the Pomona Water Reclamation Plant or other observed discharges, flows in SJC between Pom-RC and Pom-RD increase by 200% to greater than 400% (Figure 3) due to the release of this groundwater, which has a localized average temperature of approximately 67 ºF.[2] As this groundwater-dominated flow travels downstream, the temperature naturally rises (Figure 4) due to heat conduction through the warm concrete lining and solar radiation exposure in the unshaded channel (Figure 5 shows ambient air temperature as a proxy for solar radiation[3]). When the concrete		

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	channel ends upstream of SJC-C1, the water leaves the heat source (concrete channel) and mixes with additional groundwater, resulting in consistently cooler temperatures. The observed spatial and temporal temperature profile, coupled with no identifiable waste discharges and substantial groundwater contributions, clearly demonstrates that the temperature excursions in Reach 1 of San Jose Creek are not a result of waste discharges. *Figure 2. Manhole Exuding Groundwater into San Jose Creek* *Figure 3. Measured Flow at Pom-RC and Pom-RD in the Absence of Discharge from Pomona WRP* *Figure 4. Monthly Average Water Temperatures Between July 2005 and November 2010 in the Absence of Discharge from the Pomona WRP* *Figure 5. 30-Year Normal Monthly Maximum Air Temperature at Pom-RD3* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.17	**Fact Sheet #10** **Water Body: San Gabriel River Reach 1** **Pollutant: Temperature, Water** **Listing: List on 303(d) List (TMDL Required List)** **Comment & Recommendation: Do Not List – Meets Water Quality Objective** The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing that a new listing for impairment due to water temperature be made to the 303(d) list for Reach 1 of the San Gabriel River. The Sanitation Districts of Los Angeles County (Sanitation Districts) believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved. ***Failure to Meet Water Quality Objectives Has Not Been Demonstrated***	The water quality standard has been exceeded in 93 of 234 samples; even with the commenter's purported corrections to the database, 117 of 288 samples exceeded, which still exceeds the allowable number of exceedances per the Listing Policy. Exceedance do happen more frequently in the summer months when air temperatures, radiative heating and the temperature of waste discharges are greater. However, the Los Angeles Water Board does not have alternative maximum temperature objectives for the different seasons.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	The Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that: "At no time shall these WARM-designated waters be raised above 80ºF **as a result of waste discharges**." [Emphasis added.] This water quality objective clearly distinguishes between exceedance of the 80ºF standard caused by "waste discharges" and those associated with other causes. Evidence indicates that summertime excursions greater than the 80 ºF are not caused by waste discharges but are likely due to elevated ambient air temperature, conductive and radiative heating associated with hardened landscapes, a lack of riparian cover, and increased ambient temperatures related to climate change (details below). Additionally, the Draft List does not contain any analysis or evidence indicating that the elevated temperatures occurred as result of wastes discharged. The Regional Board Fact Sheet states that a single line of evidence was used in the assessment of temperature. Specifically, 93 of 234 samples from LC-R4, R3-1, and R3-1b exceeded the objective from July 2005 to November 2009 using the "Data for Various Pollutants in Various Water Bodies in Sanitation Districts of Los Angeles County, 2005-2010" dataset. Based on a review of the entire dataset utilized for the listing evaluation,[1] the Sanitation Districts identified 288 discrete temperature measurements, 117 of which exhibited a temperature that exceeded 80ºF. However, these temperature exceedances were not as a result of waste discharges, but were directly associated with high elevated ambient air temperatures as well as conduction and radiation (details below). Therefore, under the definition in the Basin Plan, no exceedances of the water quality objective were observed.	See, also, response to comment 17.4.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	San Gabriel River Reach 1 Excursions Above 80 ºF Are a Result of Radiative and Conductive Heating Tertiary treated water from the San Jose Creek and Los Coyotes Water Reclamation Plants (WRPs) is discharged to the main stem of the San Gabriel River. Reach 1 is a fully lined concrete channel from approximately 0.25 miles downstream of the San Jose Creek WRP discharge point 001 to the San Gabriel River estuary. As explained in Fact Sheet #9, elevated temperatures in Reach 1 of San Jose Creek occurred even in the absence of observable waste discharges and were caused by conductive heating through the concrete lining and solar radiation exposure. Although a comprehensive assessment of flows, in the absence of WRP discharge, cannot be conducted along the San Gabriel River, the same conditions associated with the radiative and conductive heating exist in San Gabriel River Reach 1. This is supported by a significant correlation between ambient air temperature and receiving water temperature (R2 = 0.61) and the fact that 90% of excursions above 80ºF in the receiving water environment occurred during summer months, between June and September. The weight of evidence supports the contention that receiving water temperatures above 80ºF were a result of ambient and environmental conditions (i.e., summer weather and a concrete channel) and not waste discharges. *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.18	**Fact Sheet #11** **Water Body: San Gabriel River Reach 2** **Pollutant: Temperature, Water** **Listing: List on 303(d) List (TMDL Required List)** **Comment & Recommendation: Do Not List – Meets Water Quality Objective** The California Regional Water Quality Control Board, Los Angeles Region	The water quality standard has been exceeded in 81 of 224 samples; even given the commenter's purported corrections to the database, 81 of 232 samples exceeded, which still exceeds the allowable number of exceedances per the Listing Policy.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	(Regional Board) is proposing that a new listing for impairment due to water temperature be made to the 303(d) list for Reach 2 of the San Gabriel River. The Sanitation Districts of Los Angeles County (Sanitation Districts) believe this proposed listing is inappropriate and recommend not listing due to water quality objectives being achieved. ***Failure to Meet Water Quality Objectives Has Not Been Demonstrated*** The Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that: "At no time shall these WARM-designated waters be raised above 80ºF **as a result of waste discharges**." [Emphasis added.] This water quality objective clearly distinguishes between exceedance of the 80ºF standard caused by "waste discharges" and those associated with other causes. Evidence indicates that summertime excursions greater than the 80 ºF are not caused by waste discharges but are likely due to elevated ambient air temperature, conductive and radiative heating associated with hardened landscapes, a lack of riparian cover, and increased ambient temperatures related to climate change (details below). Additionally, the Draft List does not contain any analysis or evidence indicating that the elevated temperatures occurred as result of wastes discharged. The Regional Board Fact Sheet states that a single line of evidence was used in the assessment of temperature. Specifically, 81 of 224 samples from SJC-R2 and SJC-R12 exceeded the objective from July 2005 to November 2009 using the "Data for Various Pollutants in Various Water Bodies in Sanitation Districts of Los Angeles County, 2005-2010" dataset. Based on a review of the entire dataset utilized for the listing evaluation,[1] the	See, also, response to comment 17.4.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Sanitation Districts identified 81 excursions above 80 ºF out of 232 discrete temperature measurements, not 224. However, these temperature exceedances were not as a result of waste discharges, but were directly associated with high elevated ambient air temperatures as well as conduction and radiation (details below). Therefore, under the definition in the Basin Plan, no exceedances of the water quality objective were observed. ***San Gabriel River Reach 2 Excursions Above 80 ºF Are a Result of Radiative and Conductive Heating*** Tertiary treated water from the San Jose Creek Water Reclamation Plant (WRP) is discharged to the main stem of the San Gabriel River. The uppermost ¼ mile of Reach 2 is a fully lined concrete channel, containing the R2 receiving water station. Data from this station represents 215 of 232 data points. As explained in Fact Sheet #9, elevated temperatures in Reach 1 of San Jose Creek occurred even in the absence of observable waste discharges and were caused by conductive heating through the concrete lining and solar radiation exposure. Although a comprehensive assessment of flows, in the absence of WRP discharge, cannot be conducted along the San Gabriel River, the same conditions associated with the radiative and conductive heating exist in San Gabriel River Reach 2. This is supported the fact that 99% of excursions above 80 ºF in the receiving water environment occurred during summer months, between June and October. The weight of evidence supports the contention that receiving water temperatures above 80 ºF were a result of ambient and environmental conditions (i.e., summer weather and a concrete channel) and not waste discharges. *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
26.19	**Fact Sheet #12** **Water Body: Santa Clara River Reach 6**	Staff will review the inclusion of the site identified as SCR-14 with State Water Board staff to	Staff will review the inclusion of the site identified as SCR-14 with State Water Board staff to

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	Pollutant: Temperature, Water **Listing: List on 303(d) List (TMDL Required List)** **Comment & Recommendation: Do Not List** The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is proposing that a new listing for impairment due to water temperature be made to the 303(d) list for Reach 6 of Santa Clara River. The Sanitation Districts of Los Angeles County (Sanitation Districts) believe this proposed listing is inappropriate and recommend not listing. ***Incorrect Datasets Were Used for Listing*** The Regional Board Fact Sheet states that a single line of evidence was used in the assessment of temperature. Specifically, 40 of 152 samples from Sa-RA, Sa-RB, and SCR-14 exceeded the objective from June 2005 to October 2010 using the "Data for Various Pollutants in Various Water Bodies in Sanitation Districts of Los Angeles County, 2005-2010" dataset. Temperature data from location SCR-14 (34.42833333N 118.5394444W) was evaluated as part of Reach 6 of the Santa Clara River. However, SCR-14 is located on Bouquet Canyon Creek, which is recognized as a distinct waterbody by the Region 4 Basin Plan. Figure 1 utilizes a reach delineation layer provided to the Sanitation Districts by Regional Board staff that clearly places SCR-14 in the Bouquet Canyon Creek Reach and not Reach 6. Therefore, temperature measurements from SCR-14 should not be included in the Reach 6 evaluation. *Figure 1. Stations Sa-RB (1), Sa-RA (2), SCR-14 (14), and Bouquet Canyon Creek (Aqua Line)* Locations Sa-RA and Sa-RB were correctly associated with Reach 6, but results were averaged in the listing evaluation based on the assessment that they were	determine whether it should be in Santa Clara Reach 6 or Bouquet Canyon Creek, as part of resolving our mapping issues; see also comment 26.2. With respect to the sites identified as SA-RA and SA-RB, only the temporally overlapping samples from these stations have been averaged such as during extreme rainfall events when the sites were hydrologically connected. The commenter does not adequately describe "upstream dewatering activities" for the Los Angeles Water Board staff to be able to discern the significance of these to the comment. The 80°F temperature objective protects the aquatic life beneficial use of WARM in surface waters regardless of the ultimate source of the water in that reach of the river. The Los Angeles Water Board does not have alternative objectives for effluent-dominated waters. See, also, response to comment 17.4.	determine whether it should be in Santa Clara Reach 6 or Bouquet Canyon Creek, during the State Board public comment period.

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	"not spatially independent." However, as highlighted in Figure 2, Sa-RA is located within the main channel of the Santa Clara River and is typically dry; all 25 temperature measurements at Sa-RA utilized in the Staff Report were associated with upstream dewatering activities or extreme storm events. Sa-RB is located in an isolated pool at the southern edge of the Reach 6 channel that receives recycled water discharges from the Saugus Water Reclamation Plant (WRP). Surface flows from this location travel less than a half-mile downstream in a disconnected side channel before percolating into the dry riverbed. Therefore, even though the two locations are relatively close to each other, Sa-RA is hydrologically isolated from Sa-RB except during extreme rainfall events. Consequently, the two locations would be expected to have very different temperature profiles and should therefore be considered spatially independent, with no averaging of results. *Figure 2. Satellite Imagery of Saugus WRP Ambient Monitoring Stations* ***The 80ºF Water Quality Temperature Objective Is Unnecessary and Inappropriate for Santa Clara River Reach 6*** The only dry weather surface flows within this stretch of Reach 6 are associated with recycled water discharges from the Saugus WRP, which percolate into the dry riverbed and eventually resurface downstream near the Reach 5 boundary. At the point of resurfacing, the water temperature averages 69ºF and this perennial surface flow supports a diverse aquatic life community in Reach 5.1 However, the predominant natural condition of Reach 6 is dry and would not be expected to support any aquatic life without the Saugus WRP discharge. In addition, the cool temperatures in the water that resurfaces near the Reach 5 boundary demonstrate that elevated temperatures in the isolated discharge area are not detrimental to beneficial uses. Therefore, application of the 80ºF water quality objective in Santa Clara Reach 6 is unnecessary and inappropriate, as the presence of water exceeding the 80ºF water quality objective would not result in any impairment to naturally occurring aquatic life.		

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	Mitigating the Elevated Temperature at Sa-RB Is Not Feasible The only reasonable alternative to address the temperature water quality objective below the Saugus WRP at location Sa-RB during dry weather would be to eliminate the discharge. However, it is highly unlikely that the California Department of Fish and Wildlife would support any discharge reductions or elimination, because this action would remove all dry weather surface flows in that stretch of Santa Clara Reach 6 and could potentially reduce the amount of resurfacing groundwater flows that actually support a diverse aquatic community in Santa Clara River Reach 5. ***An Evaluation of the Relative Contribution of Radiative and Convective Heating Was Not Conducted*** Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) states that: "At no time shall these WARM-designated waters be raised above 80ºF **as a result of waste discharges**." [Emphasis added.] This objective clearly distinguishes between temperature exceedances caused by "waste discharges" and those associated with other causes. Both the Saugus WRP discharge and the immediate downstream receiving water location (Sa-RB) are heavily influenced by ambient air temperature. Figure 3 includes a plot of the 15-day average values of the maximum air temperature along with the individual water temperature measurements collected at the Sa-RB location. Nearly all of the 80ºF temperature exceedances were associated with the higher summer time air temperatures and the two have a statistically significant correlation (R2 = 0.76). Because exceedances of the Basin Plan temperature objective are limited to those "as a result of waste discharges," an evaluation of the contribution of ambient air		

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	temperature to the receiving water should have been conducted before identifying receiving water excursions above 80ºF as exceedances of the objective. *Figure 3. Sa-RB Temperature vs. Maximum Ambient Air Temperature (15-Day Average Value)* *[See Sanitation District of Los Angeles County letter dated March 30, 2017 for complete text, figures and appendices.]*		
27.	Santa Barbara Channelkeeper (SBC), March 30, 2017		
27.1	Please accept the following comments on the Los Angeles Regional Water Quality Control Board's (Regional Board's) 2016 Integrated Report, which are hereby submitted by Santa Barbara Channelkeeper. Santa Barbara Channelkeeper is a non-profit environmental organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through science-based advocacy, education, field work and enforcement. We have been conducting water quality monitoring in watersheds from Gaviota to the Ventura River since 2001. We have engaged more than 1,200 volunteers in our monitoring efforts and represent over 750 members. Our comments address the following concerns: • Procedural issues related to data solicitation gaps • Category 4C and Hydrologically Impaired Waterways • Inappropriate de-listing of the Ventura River Reach 3 Pumping Impairment Generally, Channelkeeper supports the Regional Board's ongoing efforts to document water quality impairments on the 303(d) List. Specific concerns regarding the Draft 2016 Integrated Report are summarized below.	See response to comment 32.3.	

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	<u>Procedural Concerns Related to Data Solicitation Gaps</u> Channelkeeper is troubled that the Regional Board has fallen so far behind on data solicitations and review of 303(d) listings. 40 C.F.R. § 130.7(d)(1) mandates that: > Each State shall submit biennially to the Regional Administrator beginning in 1992 the list of waters, pollutants causing impairment, and the priority ranking including waters targeted for TMDL development within the next two years as required under paragraph (b) of this section. The 2016 Integrated Report is based on data submitted in 2010 and will not be finalized until the middle of 2017. Based on EPA Guidance, the 2016 Integrated Report was due in April 2016. Clearly, the Regional Board has failed to achieve pertinent milestones and mandates related to the biennial review process. The lack of any recent data solicitation is particularly troubling as a fully accurate and current depiction of water quality is not available for the 2016 Integrated Report. The Regional Board has a mandate to "assemble and evaluate all existing and readily available water quality-related data and information to develop the list."[2] Accordingly, the Regional Board should base 2016 Integrated Report decisions based on "all existing and readily available" data, which includes data collected since the 2010 data solicitation. Six years of additional data is available to the Board and should be appropriately utilized for the Region's listing, de-listing and planning purposes. Channelkeeper questions how such determinations can reasonably or legally be made without consideration of the last six years of existing and readily available data. It is additionally concerning that due to the State's new staged approach to 303(d) List review, further data solicitation will be delayed until the Los Angeles Regional Board's 2022 report, which will include data submitted through 2021. This means that the Regional Board will not have reviewed existing water quality		

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	data for our region for more than a decade. This is clearly unacceptable from a legal standpoint.		
27.2	**Category 4C and Hydrologically Impaired Waterways** Channelkeeper echoes and supports comments submitted to the Regional Board on March 30, 2017 by *Earth Law Center* regarding the necessity for evaluation and listing for hydrologically impaired waterways to fully comply with Clean Water Act Sections 305(b) and 303(d). Such evaluation and listing is clearly called for under the Clean Water Act, is supported by EPA Guidance, and paves the way for sound public policy and planning. Many other states around the country follow such Guidance to properly identify flow impaired waterways in their Integrated Reports. Recently, the San Diego Regional Water Quality Control Board notably identified 30 waterway segments for listing in Category 4C. Channelkeeper notes with concern that the Los Angeles Region has apparently forgone assessment of Category 4C impairments altogether in the Draft 2016 Integrated Report. We question the legality of such an oversight.	See response to comment 21.1, 21.2, 21.3, and 21.4.	
27.3	**Inappropriate de-listing of the Ventura River Reach 3 Pumping Impairment** The Los Angeles Regional Board currently proposes to delist Reach 3 of the Ventura River for "Pumping" impairment. Channelkeeper strongly opposes this delisting decision. On February 5, 2015 Channelkeeper submitted detailed comments (Attachment 1) and data to the State Water Resources Control Board regarding its stated intent to delist Reaches 3 and 4 of the Ventura River for pumping and diversion impairments. These comments were submitted in response to the State Water Board's Draft Staff Report for the 2012 Integrated Report dated December 31, 2014, which stated that the four listings on the existing 303(d) list due to flow related alterations in the Ballona Creek and Ventura River watersheds "will likely be proposed for delisting as part of the next Listing Cycle."	See response to comment 21.1, 21.2, 21.3, and 21.4.	

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	Channelkeeper's submittal outlined in detail why Reaches 3 and 4 of the Ventura River may not be delisted from the 303(d) list as impaired for flow by pumping and diversion. The existing listings for Reaches 3 and 4 of the Ventura River accurately reflect the current diminished flows and resulting impairments to designated beneficial uses in those Reaches. The listings are legally valid, and consistent with the State Water Board's Listing Policy. In contrast, delisting Reaches 3 and 4 from the 303(d) list as impaired for flows due to excessive pumping and diversion is inconsistent with the Listing Policy, the Clean Water Act, and facts on the ground. We refer the Los Angeles Regional Board to our February 5, 2015 letter as its legal and technical merits remain unchanged. Channelkeeper additionally submitted multiple years of continuous monitoring data (submitted electronically via file "*MasterData_2013-2014.xls*") along with our 2015 comment letter. These data were summarized in tables as well as within an example "Listing Line of Evidence" provided with our 2015 letter. Lacking any formal data solicitation by the Los Angeles Regional Board since 2010, these submittals represent existing and readily available water quality-related data and information, which should have been used to develop the Draft 2016 Integrated Report. Since the submittal of our 2015 comment letter, Channelkeeper has collected additional water quality data that supports the existing listings for pumping and diversions in Reaches 3 and 4. We are submitting an updated data file ("*MasterData_2013-2016*") electronically along with this comment letter. **<u>Conclusion</u>** When Reaches 3 and 4 of the Ventura River were identified as flow-impaired by pumping and diversions on California's 1998 303(d) list, the State Water Board took an important first step towards restoring the chemical, physical, and biological integrity of these waters. However, there is ongoing documentation that		

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	flow alterations from pumping and diversions continue to degrade Reaches 3 and 4 such that these waters cannot support their designated beneficial uses and water quality standards are not attained. Reaches 3 and 4 of the Ventura River are impaired for pumping and diversions based on the "Numeric Water Quality Objectives for Conventional or Other Pollutants in Water" listing factor, the "Situation-Specific Weight of Evidence" listing factor, as well as the "Degradation of Biological Populations and Communities" listing factor. Removing the pumping impairment listing for Reach 3 is not only illegal but will also impede existing and future efforts to remedy the ongoing flow impairments in the Ventura River. Channelkeeper strongly urges the Los Angeles Regional Board to comply with the Clean Water Act by continuing to identify Reach 3 on the 303(d) list as flow- impaired by pumping.		
28.	Sherwood Valley Homeowners Association, March 30, 2017		
28.1	We thank you for this opportunity to comment on the proposed changes to the 303(d) list prior to the upcoming public hearing on May 4, 2017. Representatives from the Lake Sherwood Joint Lake Advisory Committee plan to attend this meeting to discuss these important issues. We appreciate the proposed removal of the two pollutants, Ammonia and Organic Enrichment/Low Dissolved Oxygen. This is gratifying and recognizes the positive results produced by the time, effort and expense the Association has put forth over many years to mitigate these concerns. Respectfully, however, we are troubled to see that Algae and Eutrophic remain on the list. To help understand why these are still considered pollutants in Lake Sherwood, we reviewed the Los Angeles Water Board's website of the Draft 2016 303(d) List, and specifically Appendix G – Fact Sheets of the Draft. Here we see that the listing of Algae and Eutrophic are noted as "placeholders" to support decisions made prior to the 2006 Clean Water Act, and further that no evidentiary data	Lake Sherwood was as listed impaired for algae, ammonia, eutrophic conditions and organic enrichment/low dissolved oxygen in the 2010 Integrated Report. On the 2016 303(d) list, the Los Angeles Water Board has recommended delisting "organic enrichment/low dissolved oxygen" and ammonia, based on data showing there is not an impairment. "Placeholder" LOEs are those LOEs derived prior to the 2006; they are 'placeholder" in the sense that the raw data is not included in the CalWQA database. Per the Listing Policy, section 4.71.1, impairments are delisted when, based on all the readily	

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	samples were collected which could be used to assess these pollutants relative to the 2006 standards. Clearly there are zero measured exceedances of these standards at this point yet they remain on the list. It seems to us somewhat arbitrary to continue to consider these as "pollutants" in Lake Sherwood especially where there is a consistently good dissolved oxygen level, a continuous effort to remove excess plant growth via a special harvester with a full time crew, monthly monitoring of water chemistry, and special attention to and approved treatment of any algae that occurs as needed throughout the year. If sufficient justification does exist to continue to include these on the 303(d) list, we would appreciate having the reasons and rational detailed to us in writing so we may take any necessary actions to remove them in the future.	available data, there is sufficient evidence or data to justify a recommendation for delisting. The USEPA established a TMDL for the Malibu Creek watershed for nutrients to address these listings on March 21, 2003. The assessment of whether or not it is appropriate for the Lake to be removed from the 303(d) list for algae and eutrophic conditions must consider how those conditions interact with nitrogen and phosphorus levels, as discussed in the TMDL, and whether the TMDL targets are being met.	
29.	Stakeholders Implementing TMDLs in the Calleguas Creek Watershed, March 30, 2017		
29.1	The development and implementation of TMDLs is a significant investment of resources and it is critical that the 303(d) List be based on sound science and methodologies. The Stakeholders understand that the Los Angeles Regional Water Board (Water Board) is proposing over 200 new waterbody-pollutant segment combination 303(d) listings, of which 95 changes fall within the Calleguas Creek Watershed (CCW). The Stakeholders have developed and implemented six effective TMDLs in the CCW and thus have extensive experience in the area. The Stakeholders have serious concerns with the Region's Proposed 303(d) List and feel that it requires significant review and modification before adoption. The Stakeholders request that the issues identified in this letter be addressed and the proposed 303(d) List be released for another 60-day comment period prior to adoption. Several of the issues identified herein have resulted in the inability of the proposed 303(d) List to be fully vetted and reviewed by the Stakeholders. The requested modifications fall into four general categories: 1. New Category 5 listings that should not be listed due to incorrect thresholds	The Los Angeles Water Board recognizes the significant implications of the 303(d) list and TMDLs. The 303(d) list is based on sound science and the readily available data. However, as the Los Angeles Water Board determines its priorities for TMDL development or other regulatory programs, it will not depend exclusively on the 303(d) list or the data contained therein (currently through 2010 only). Los Angeles Water Board staff intends to make the necessary corrections in the CalWQA database and revise, as appropriate, listing/delisting decisions as the State Board staff prepare the Integrated Report and 303(d) list for State Board approval later this year or prior to the next Listing	

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	being applied for the beneficial use and incorrect interpretation of the data (e.g., mismatched units, incorrectly assigned sample locations) 2. Potential delistings that may exist if all watershed data were evaluated (e.g., TMDL monitoring program and all wastewater treatment plant NPDES monitoring). 3. New Category 5A listings that should be categorized as Category 5B because TMDLs already exist to address the pollutants. 4. Errors in the listing information that make it difficult to fully evaluate the listings. Examples include inconsistencies between the Category 5 list (Appendix B) and the Proposed updates to the 303(d) List (Appendix A), incorrect HUC/Calwater designations, incorrect beneficial uses listed for the applicable water quality objectives, and inconsistent use of thresholds for interpreting narrative objectives. The remaining sections of this letter provide the detailed list of requested changes to the 303(d) List and the rationale for the requests. In summary, the Stakeholders request that all waterbody-pollutant combinations in Table 1 not be listed on the 303(d) List, the waterbody-pollutant combinations in Table 3 be considered for delisting through analysis of all available watershed data, waterbody-pollutant combinations in Table 4 and Table 5 be designated as being addressed by a TMDL if they remain on the 303(d) List after the reassessment and the errors and inconsistencies identified in Comment IV be addressed for all waterbodies.	Cycle that includes the Los Angeles Region. See response to comment 29.2-29.67 for specific responses.	
29.2	1. REQUESTED MODIFICATIONS TO THE LISTING STATUS Based on a review of the proposed Category 5 waterbody-pollutant combinations, the Stakeholders have identified a number of waterbodies that we feel should either be delisted based on available data or proposed listings that should not be listed based on errors in the evaluation. The requested modifications are shown in Table 1, below, with a summary of the justifications for the requested change. A detailed discussion of each of the justifications follows the table.	Comment noted. See detailed responses below and response to comment 29.1.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
29.3	**Table 1. Waterbody-pollutant combinations that should not be listed** Waterbody segment: **Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.14	
29.4	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.15.	
29.5	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Dimethoate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.16.	
29.6	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Nitrogen, Nitrate Justification: • Data from agricultural drain rather than waterbody used as basis for listing	See response to comment 7.17.	

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	decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.		
29.7	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Specific Conductivity Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.18.	
29.8	**Calleguas Creek Reach 2 (estuary to Potrero Rd)** Pollutant: Total Dissolved Solids Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.19.	
29.9	Waterbody segment: **Calleguas Creek Reach 3 (Potrero Road upstream to Conejo Creek confluence)** Pollutant: Mercury Justification: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	See response to comment 7.20.	
29.10	Waterbody segment: **Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Ammonia Justification:	See response to comment 7.21.	

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	• Data from agricultural drain rather than waterbody used as basis for listing decision. • TMDL data demonstrates delisting possible.		
29.11	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Bifenthrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.22.	
29.12	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Chloride Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.23.	
29.13	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Cyfluthrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.24.	
29.14	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Cypermethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.25.	
29.15	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Malathion Justification:	See response to comment 7.26.	

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	• Data from agricultural drain rather than waterbody used as basis for listing decision.		
29.16	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Mercury Justification: • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	See response to comment 7.27.	
29.17	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Nitrogen, Nitrate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.28.	
29.18	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Permethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • This pollutant is already covered by the Calleguas Toxicity TMDL.	See response to comment 7.29.	
29.19	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Specific Conductivity Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.30.	

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29.20	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Sulfate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.31.	
29.21	**Calleguas Creek Reach 4 (was Revolon Slough Main Branch)** Pollutant: Total Dissolved Solids Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.32.	
29.22	Waterbody segment: **Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Chlorpyrifos Justification: • Data does not appear to be from a station in Reach 12.	See response to comment 7.33.	
29.23	**Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Diazinon Justification: • Data does not appear to be from a station in Reach 12.	See response to comment 7.34.	
29.24	**Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Malathion Justification:	See response to comment 7.35.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	• Data does not appear to be from a station in Reach 12.		
29.25	**Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork)** Pollutant: Temperature, water Justification: • Inappropriately applied beneficial use criteria (see temperature comment below)	See response to comment 7.36.	
29.26	Waterbody segment: **Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Sulfate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.39.	
29.27	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Specific Conductivity Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.40.	
29.28	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2** Pollutant: Total Dissolved Solids Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.41.	
29.29	**Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2**	See response to comment 7.42.	

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	Pollutant: Toxaphene Justification: • J-flagged data incorrectly used in assessment.		
29.30	Waterbody segment: **Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Nitrogen, Nitrate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.47.	
29.31	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Sulfate Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.49.	
29.32	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Specific Conductivity Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.50.	
29.33	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Total Dissolved Solids Justification: • Maintained as a brackish waterbody therefore criteria do not apply. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.51.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
29.34	**Rio De Santa Clara/Oxnard Drain No. 3** Pollutant: Toxicity Justification: • Insufficient exceedances to warrant listing.	See response to comment 7.52.	
29.35	Waterbody segment: **La Vista Drain (Ventura County)** Pollutant: Chlordane Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • J-flagged data incorrectly used in assessment.	See response to comment 7.53.	
29.36	**La Vista Drain (Ventura County)** Pollutant: Chlorpyrifos Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.54.	
29.37	**La Vista Drain (Ventura County)** Pollutant: Copper Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.55.	
29.38	**La Vista Drain (Ventura County)** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not	See response to comment 7.56.	

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	applicable to waterbody.		
29.39	**La Vista Drain (Ventura County)** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.57.	
29.40	**La Vista Drain (Ventura County)** Pollutant: DDT Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.58.	
29.41	**La Vista Drain (Ventura County)** Pollutant: Indicator Bacteria Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.59.	
29.42	**La Vista Drain (Ventura County)** Pollutant: Mercury Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Data and objectives have different units (ng/L vs. µg/L); data do not exceed objectives.	See response to comment 7.60.	
29.43	Waterbody segment: **Santa Clara Drain**	See response to comment 7.61.	

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	Pollutant: Chlordane Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.		
29.44	**Santa Clara Drain** Pollutant: Chlorpyrifos Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.62.	
29.45	**Santa Clara Drain** Pollutant: Cypermethrin Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.63.	
29.46	**Santa Clara Drain** Pollutant: DDD Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates.	See response to comment 7.64.	
29.47	**Santa Clara Drain** Pollutant: DDE Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using COMM criteria; public access is prohibited by	See response to comment 7.65.	

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
	chain link fencing and locked gates.		
29.48	**Santa Clara Drain** Pollutant: DDT Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using COMM criteria; public access is prohibited by chain link fencing and locked gates,	See response to comment 7.66.	
29.49	**Santa Clara Drain** Pollutant: Nitrogen, Nitrate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.67.	
29.50	**Santa Clara Drain** Pollutant: Specific Conductivity Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.68.	
29.51	**Santa Clara Drain** Pollutant: Sulfate Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.69.	

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29.52	**Santa Clara Drain** Pollutant: Total Dissolved Solids Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision. • Incorrectly listed using guideline for MUN beneficial use that is not applicable to waterbody.	See response to comment 7.70.	
29.53	**Santa Clara Drain** Pollutant: Toxaphene Justification: • Data from agricultural drain rather than waterbody used as basis for listing decision.	See response to comment 7.71.	
29.54	**1. Agricultural Drain monitoring data incorrectly used as basis for listing decisions.** There are multiple instances where VCAILG monitoring data from agricultural drains that discharge to waterbody reaches were used to list these waterbody reaches. The drains are not listed tributaries or waterbodies in the Basin Plan and are not located within the waterbody that is being listed. As a result, the data should not be used for the listing decisions for these waterbodies. Calleguas Creek Reach 2 and Reach 4 were listed using data from the VCAILG monitoring sites 02D_BROOM (Reach 2) and 04D_ETTG and 04D_LAS (Reach 4), which are the locations of agricultural drains which drain to Reach 2 and 4. Santa Clara River Reach 3 was listed using data from the VCAILG sampling location S03D_BARDS, which is located on an agricultural drain that ultimately discharges into Santa Clara River Reach 3. These agricultural monitoring sites were selected to be representative of agricultural discharges to Calleguas Creek Reaches 2 and 4 and Santa Clara River Reach 3, and are not representative of	See response to comment 7.88.	

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	receiving water conditions. Therefore, data collected from these sites cannot be used to list the downstream Calleguas Creek or Santa Clara River Reaches. All listings should be evaluated to ensure that the monitoring locations were in receiving waters rather than agricultural drains. In addition, La Vista Drain and Santa Clara Drain were listed as new waterbodies never before included in the previous 303(d) list, even though data has been collected on both agricultural drains by the MS4 program since the early 1990s. These waterbodies are not designated in the Basin Plan or listed as tributaries in the Basin plan appendices. The La Vista Drain is an agricultural drain designed to convey excess agricultural irrigation water from agricultural lands, and as such, it is predominantly an open ditch that flows alongside W. Los Angeles Avenue and then along Santa Clara Avenue where it becomes the Santa Clara Drain. Additionally, inclusion of the COMM beneficial use for the Santa Clara Drain is inappropriate, as public access is prohibited because of fencing and locked gates maintained by the Ventura County Watershed Protection District. It is inappropriate to apply the MAR and EST beneficial uses to the Santa Clara Drain because the drain is located upstream of Highway 101 and is not tidally influenced. The monitoring location on each drain was selected to represent agricultural discharges for the Agricultural Waiver and was not designed to characterize receiving waters. Because these are agricultural drains and not tributaries, they should be removed from the Draft Category 5 list. **Requested Action:** • **Remove all listings shown in Table 1 that were based on Ag monitoring data from agricultural drains not representative of the listed waterbody and evaluate remaining listings to ensure no other listings are based on agricultural drain monitoring rather than receiving water monitoring.** • **Remove the La Vista Drain and the Santa Clara Drain from the List as they are agricultural drains and not waterbodies that fall under the jurisdiction of the 303(d) List.**		

No.	Comment	Response	Additional / Revised Response (included where LOEs/Decisions were re-assessed and changes made after the Los Angeles Water Board workshop on May 4, 2017)
29.55	***2. Remove any pollutant listing based on municipal drinking water objectives where the MUN beneficial use does not apply.*** Numerous listings were made using water quality objectives for the protection of the municipal drinking for waterbodies that do not have applicable municipal drinking water beneficial uses. Many of the waterbodies listed are brackish waterbodies for which no beneficial uses are designated or waterbodies designated for the municipal beneficial use with an asterisk (i.e., P*) in the Basin Plan. The asterisked MUN beneficial use should not be used to propose new 303(d) listings. Fact Sheets for previous 303(d) listing cycles have clearly noted that the asterisked MUN beneficial uses should not be used for 303(d) listing purposes. State Board Resolution No. 88-63 (Sources of Drinking Water) and Regional Board Resolution 89-03 (Incorporation of Sources of Drinking Water Policy into the Water Quality Control Plans (Basin Plans)), state that "All surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic waters supply and should be so designated by Regional Boards... [with certain exceptions which must be adopted by the Regional Board]." The Regional Board adopted a Water Quality Control Plan for the Los Angeles Region (Basin Plan) on June 4, 1994, that included provisions to implement State Water Board Resolution 88-63. On May 26, 2000, the USEPA approved the revised Basin Plan except for the implementation plan for potential MUN-designated water bodies. On August 22, 2000, the City of Los Angeles, City of Burbank, City of Simi Valley, and the County Sanitation Districts of Los Angeles County challenged USEPA's water quality standards action in the U.S. District Court. On December 18, 2001, the court issued an order remanding the matter to USEPA to take further action on the 1994 Basin Plan consistent with the court's decision. On February 15, 2002, USEPA revised its decision and approved the 1994 Basin Plan in whole. In its February 15, 2002 letter, USEPA stated:	See response to comment 7.89.	

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	"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 ("CWA"). 33 U.S.C. § 1313(c)(3)."*[1] In addition to the above decision, the Basin Plan states that until the additional study is undertaken and the Basin Plan is modified "no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations". The Regional Board has also determined that water quality objectives applicable to the MUN beneficial use will not be used to assess impairments under the 303(d) listing programs. For constituents that only have objectives that are applicable to the MUN beneficial use, the decision Fact Sheets for the 303(d) listing process state that there are no applicable water quality objectives in waterbodies designated with an asterisk ("*"). In the 2010 listing cycle, a number of 303(d) listings were actually removed based on this determination. Below is an example of the language from a listing decision for Los Angeles River Reach 1: *"The listing for aluminum in this water body was originally based on data assessed using the MCL for aluminum. Since MUN is a "potential" beneficial use, it is not appropriate to use the MCL to evaluate aluminum data from this reach. Thus, there is no aluminum objective for this reach and the original listing is faulty."*		

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	Based on this evidence, it is clear that for waterbodies with a MUN designation that includes an asterisk ("*"), water quality objectives specific to the MUN beneficial use are not applicable. As such, water quality data collected in these receiving waters should not be compared to water quality objectives applicable to the MUN beneficial use. The listings of total dissolved solids, sulfates, and conductivity are all based on secondary maximum contaminant levels applied to protect the MUN beneficial use. In addition, Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 and Rio De Santa Clara/Oxnard Drain No. 3 are maintained as fresh/brackish water via tide gates on both drains and do not have designated MUN beneficial uses. Therefore, the listing of TDS, sulfate, and specific conductivity is inappropriate as naturally occurring levels of these three constituents in groundwater entering both drains within the footprint of Naval Base Ventura County far exceed the secondary MCLs upon which these listings are based. USEPA validated this reasoning in its "TMDLs for Pesticides, PCBs and Sediment Toxicity for Oxnard Drain 3",[2] where the MUN beneficial use was not considered to be "relevant to the impairments" addressed by the TMDL and so was not included in the TMDL. Additionally, Calleguas Creek Reach 2 and Reach 4 are considered brackish waterbodies according to the California Toxics Rule thresholds and are designated with an asterisked MUN beneficial use. Due to the brackish nature of these waterbodies, other Basin Plan objectives for TDS and sulfate are not considered to be applicable to Reach 2 or Reach 4 below Laguna Road. For all of these reasons, these proposed listings summarized in **Table 1** should not be listed. The proposed Calleguas Creek Reach 2 dimethoate listing was based on three lines of evidence which the Fact Sheet states all show no exceedances (this appears to be a typo). However, it appears that the only line of evidence that shows an exceedance is based on the potential (P*) MUN, which as described above, cannot be used to justify a listing. Furthermore, the Fact Sheet cites a		

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	guideline from the California Department of Health Services Notification Levels (1 µg/L) which has not yet gone through the formal MCL regulatory process and it is not clear that this threshold would meet the Listing Policy requirements. **Requested Action:** • **Revise all of the new listings in the Fact Sheets to ensure that none are based on municipal drinking water objectives when the MUN beneficial use does not apply.** • **Remove the segment-pollutant combinations for total dissolved solids, specific conductivity, sulfates, nitrogen, nitrate, dimethoate, and other MUN-based pollutants listed in Table 1 above from the 303(d) List.**		
29.56	***3. Reassess mercury listings using correct objective and correct units*** The data used to assess mercury for Calleguas Creek Reach 3, Reach 4, and La Vista Drain are in ng/L and the objective is µg/L. The data have to be converted to the same units as the objective before an exceedance can be determined. The Stakeholders expect that after this calculation has been performed the waterbodies will no longer meet the listing guidelines for mercury. Additionally, although a California Toxics Rule objective exists for mercury, an EPA nationally recommended criterion was used for the assessment. An explanation for the use of a recommended criterion when an established water quality objective exists should be provided. **Requested Action:** • **Repeat the mercury analysis after correcting the units error.**	See response to comment 7.90.	
29.57	***4. Incorrect location and data were used for listings in Reach 12*** The name of the monitoring site presented in the Fact Sheet for the chlorpyrifos, diazinon and malathion listings in Calleguas Creek Reach 12 is unclear. The University site is in Reach 3, not 12 and T01 is an MS4 discharge characterization site, not a receiving water monitoring location. Therefore, T01 should not be used	See response to comment 7.92	

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	for a 303(d) listing decision and University data is not from Reach 12. A review of the datasets provided in the link on the Fact Sheet only show data from University (ME-CC) and the number of samples appears to match up with the sample numbers shown in the Fact Sheet. As a result, it appears that the chlorpyrifos, diazinon and malathion listings do not apply to Reach 12. In addition, the Stakeholders request that only data collected after the implementation of applicable pesticide use restrictions were in place for these pesticides be considered in the listing decisions. Data from the Calleguas Creek TMDL watershed monitoring program that were not used in the assessment (see Comment II) demonstrates a marked reduction in these pesticides in receiving water since the use restrictions were implemented (approximately 2009 to present), particularly for receiving waters downstream of urban areas (e.g., Reach 12). Given the changed condition resulting from the pesticide use restrictions, monitoring data collected prior to 2009 is not representative of waterbody conditions for these constituents. Therefore, these constituents should not be listed unless data collected after the use restrictions were implemented demonstrates a continued impairment. **Requested Action:** • **Remove listings for Reach 12 that are not based on receiving water data from that reach.** • **Remove listings for chlorpyrifos, diazinon, and malathion based on historic data that are not representative of conditions after implementation of pesticide use restrictions.**		
29.58	***5. Correct the proposed temperature listing for Calleguas Creek Reach 12 (was Conejo Creek/Arroyo Conejo North Fork on 1998 303d list) which is based on incorrect criteria.*** The temperature listing for Reach 12 uses an evaluation guideline of 13-21°C as the optimum growth range for rainbow trout. However, the beneficial use listed	A review of the Calleguas Creek Reach 12 decision for temperature is in process at this time.	The temperature data for Calleguas Creek Reach 12 has been re-evaluated and compared to a standard of not to exceed 80° and the decision has been revised to "do not list."

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	for Reach 12 is WARM. The rainbow trout growth range threshold used for the listing is only applicable to the COLD beneficial use. This guideline should be removed and the number of exceedances recalculated based on the Basin Plan criteria for WARM. The basin plan criteria for WARM beneficial uses states the following: "For waters designated as WARM, water temperature shall not be altered more than 5 degrees F above the natural temperature. At no time shall these WARM designated waters be raised above 80 degrees F as a result of waste discharges." The Fact Sheet states that of 567 samples there were 3 instances of the downstream sample exceeding 80°F and in some cases a 30°F difference between upstream and downstream reaches. The Fact Sheet statement is unclear because Reach 12 is the upstream location and is not downstream of a waste discharge. Reach 12 drains a portion of the City of Thousand Oaks and open space areas and is located upstream of the Thousand Oaks Wastewater Treatment Plant. Therefore, it is unclear if the exceedances discussed in the Fact Sheet actually occur in Reach 12 and if exceedances do occur, whether they are a result of waste discharge or are a natural condition. The data provided for review was not compiled in a way that made it possible to easily review the assessment to determine if the exceedances were observed in Reach 12 (upstream) or Reach 10 (downstream). Regardless of the location of the samples, if there were 3 instances of temperature above 80°F and if they can be confirmed to be a result of waste discharge and not natural temperature conditions, according to the SWRCB 2015 303(d) Listing Policy three samples out of 567 would not meet the minimum number of measured exceedances needed to place a water segment on the 303(d) List (see Listing Policy table 3.2). According to the binomial test, with a sample size of 500+ there would need to be well over 20 exceedances in order to be added to the 303(d) List, however, the Fact Sheet mentions only three exceedances of the Basin Plan criteria. According to the SWRCB's own guidance, this proposed listing should be removed.		

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	Requested Action: • **Do not use the 13-21°C rainbow trout evaluation guideline which only applies to COLD beneficial use segments.** • **Remove the temperature listing for Reach 12 as it does not meet the minimum listing requirements based on the binomial test described above and ensure that the analysis is applied to the correct reach.**		
29.59	***6. Ensure no J-flagged data were used in the assessment.*** The Listing Policy specifically prohibits the use of J-flagged ("estimated") data that fall below the quantitation limit but above the water quality standard. Section 6.1.5.5 of the Listing Policy specifically states: *"When the sample value is less than the quantitation limit and the quantitation limit is greater than the water quality standard, objective, criterion, or evaluation guideline, the result shall not be used in the analysis. The quantitation limit includes the minimum level, practical quantitation level, or reporting limit."* All listings based on the use of J-flagged data should, therefore, be removed from the draft 303(d) List. Specific instances are included in **Table 1** and further explained in **Table 2** below, but this list is by no means inclusive; this significant error will have to be addressed by a thorough review of all listing data to confirm that no J-flagged data were used to justify listings. Table 2. Incorrect use of J-flagged data [See the posted letter for Table 2] **Requested Action:** • **Review all Fact Sheets and LOEs for the use of J-flagged data and remove any instances where J-flagged data were used.** • **Delist toxaphene for Duck Pond Agricultural Drains/Mugu**	See response to comment 7.93.	

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	Drain/Oxnard Drain No. 2, chlordane for La Vista Drain, and any other pollutants listed in Tables 1 and 2 that lack the minimum number of exceedances required to justify a listing.		
29.60	***7.* Remove listings where a waterbody assessment does not meet listing thresholds based on data provided.** Finally, the toxicity listing for Rio De Santa Clara/Oxnard Drain No. 3 does not meet the minimum requirements to be listed according to the Listing Policy (pg. 9). According to the Listing Policy, a waterbody can be listed only when the number of exceedances meets the binomial test; in the case of this waterbody, four samples were collected and only one sample showed an exceedance. However, two exceedances would be required for the waterbody to be added to the 303(d) List. Therefore, toxicity was incorrectly listed for this waterbody and should be removed entirely from the 303(d) List. **Requested Action:** **Remove the toxicity listing for Rio De Santa Clara/Oxnard Drain No. 3 based on meeting listing threshold requirements in the Listing Policy.**	See response to comment 7.52.	
29.61	**II. REQUESTED REASSESSMENTS USING COMPLETE DATA SET** The assessments for the Calleguas Creek watershed do not appear to include any of the submitted Calleguas Creek Watershed TMDL monitoring data, monitoring data from the Camarillo Sanitary District, or monitoring data from the Simi Valley Wastewater Treatment Plant. All of this monitoring data has been provided to the Regional Board in annual monitoring reports and all data were collected using approved QAPPs. As a result, there is no reason why this data should not be included in the 303(d) listing process. In 2013, the Stakeholders did an assessment of the watershed using all watershed	See response to comment 32.3.	

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	data through 2012 and found that multiple waterbody-pollutant combinations could potentially be delisted as shown in Table 3. A summary of the assessment is included as an attachment to this letter and the datasets used in the analysis as well as all of the TMDL annual monitoring reports are available upon request. **[See the posted letter for Table 3]** While we recognize that this assessment uses two additional years of data than the current 303(d) listing analysis, a number of these waterbodies had many more samples than were necessary for delisting. As a result, we feel if all the watershed data were used in the assessment, a number of these waterbodies (particularly for metals) would be delisted. We also feel this assessment would demonstrate that several of the proposed listings, particularly for diazinon and chlorpyrifos and a number of organochlorine pesticides, are not warranted. A large number of new proposed listings are being added that are already covered by a TMDL. While the list acknowledges that a TMDL does not need to be developed by categorizing these new listings in Category 5B, in several cases, the watershed now has sufficient data to delist, whereas the listing is an artifact of old data being used to make the listing decision. These listings should not be added to the current list only to be removed during the next listing cycle as an artifact of the timing of the listing assessments. **Requested Action:** **Reassess all Calleguas Creek waterbodies using all available data.**		
29.62	**III. REQUESTED CATEGORY ASSIGNMENT CHANGES** ***8. Correct pollutants listed as Category 5A which should be 5B based on coverage by an existing TMDL.*** There are a number of proposed new listings for pollutants that are already covered by an existing TMDL and are incorrectly categorized as 5A. While the	See response to comment 7.96.	

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	Stakeholders maintain that all of these listings should be removed entirely because of the issues detailed in Comment I, if they are not removed they should, at a minimum, be changed from 5A to 5B, as applicable. A nutrient TMDL addressing nitrogen has been in effect since 2003, including for Reach 9A where a new 5A listing for nitrite is proposed. In 2006, the Toxicity and OC Pesticide and PCBs TMDLs for the Calleguas Creek watershed were established to address chlordane, chlorpyrifos, DDT, DOE, ODD, dieldrin, PCBs, sediment toxicity, and toxaphene. The La Vista Drain and Santa Clara Drain ultimately flow into Calleguas Creek Reach 4 (was Revolon Slough Main Branch), which is already addressed by an OC Pesticides and PCBs TMDL, the Toxicity TMDL, the Salts TMDL, and the Metals TMDL and therefore all of these proposed listings should be Category 5B. Furthermore, two other segments were listed for Chlorpyrifos - Honda Barranca and Duck Pond Agricultural Drains - but were correctly listed as Category 5B, citing the 2006 Toxicity TMDL. The Stakeholders request that any listings in **Table 4** and **Table 5** that are maintained after addressing the issues in Comment I should also be corrected to be designated as Category 5B. **[See the posted letter for Table 4]** In addition, we feel that the Toxicity TMDL should cover all new listings in the watershed for pyrethroids and organophosphate pesticides (e.g., malathion) if they are not removed as requested in the first comment. The Toxicity TMDL includes a trigger for additional investigation if ongoing toxicity is identified in the watershed. The toxicity trigger has resulted in the identification of pyrethroids as a potential cause of toxicity and the Stakeholders have already begun actions to address these pesticides in addition to the organophosphate pesticides included in the TMDL. The structure of the TMDL is designed to proactively prevent toxicity and therefore it is not necessary to develop another TMDL for these constituents. There are already sufficient controls in place through the agricultural waiver and MS4 permit. As a result, if the waterbodies are placed on the 303(d) List as new		

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	listings, we request that the waterbodies in Table 5 be changed from 5A to 5B. **[See the posted letter for Table 5]** **Requested Action:** • **Change all pollutant-waterbody segment combinations in Table 4 and Table 5 from SA to 5B or 4A based on coverage by an existing USEPA approved TMDL.**		
29.63	**IV. ADDRESS ALL OTHER INCONSISTENCIES AND ERRORS IN LIST** In reviewing the list the Stakeholders identified a large number of inconsistencies and issues in the list that should all be addressed prior to adoption. The summary below provides examples of issues identified and is not a comprehensive list as in many cases the information provided made it challenging to provide comprehensive comments. **9.** ***Correct Appendix G Fact Sheets.*** The Appendix G Fact Sheets often include incorrect information and discussion. While most of the identified issues do not appear to impact the listing decisions, they make the review of information difficult. Examples of errors found include: • Incorrect beneficial uses assigned to a waterbody. For example, MUN beneficial uses assigned to a tidally-influenced waterbody (e.g., Duck Ponds Agricultural Drain). • Incorrect TMDLs assigned to a pollutant. For example, for chlordane in Calleguas Creek Reach 2, the applicable TMDL is listed as the Calleguas Creek Metals TMDL. It should be the Organochlorine Pesticides, PCBs, and Siltation TMDL. • Incorrect QAPPs identified. For example, the VCAILG QAPP is often referenced for the Ventura County MS4 monitoring data set. • Incorrect number of samples evaluated and incorrect number of criteria exceedances. For example, the number of samples evaluated for	See response to comment 7.98.	

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	toxaphene on the Rio de Santa Clara/Oxnard Drain No. 3 is identified as 2 samples, whereas data files obtained from the Regional Board website contain 5 samples for the date range indicated in Fact Sheets, including 3 samples with results of "ND". Stating that a pollutant actually exceeds criteria in only 40% of samples, versus 100% exceedances as presented in Fact Sheets, provides a more accurate picture of the degree of impairment for that pollutant in a waterbody. The inclusion of J-flagged data when enumerating exceedances (e.g., for chlordane in the same waterbodies) further exacerbates these numbering inaccuracies. **Requested Action:** **Correct the Appendix G Fact Sheets for errors such as incorrectly assigned beneficial uses, existing TMDLs, QAPPs, and number of samples/number of exceedances.**		
29.64	**10.** ***Correct the Appendices and Fact Sheet Categories*****.** Appendix A, Appendix B, Appendix C, and Appendix G are inconsistent which makes the analysis of new additions very difficult since it is unclear which segment-pollutant combinations actually are new listings. Following are examples of a number of identified issues that need to be corrected to allow the Stakeholders to fully vet and understand the proposed listings. A number of proposed "name changes" in Appendix A are not shown in Appendix B and there are not associated Fact Sheets describing the name change (e.g., Reach 4 listings for chlorpyrifos and total DDT). This makes it very challenging to assess the validity or basis for the name change. In other instances, listed name changes are found in Appendix B or C but not supported by an explanation for the name change in Appendix G. The Fact Sheets for the following name changes should provide justification or explanation for the name change as many appear to be switching tissue or sediment listings to water listings. If this is, in fact, the change being made, the justification for the water listing needs to be provided in	See response to comment 7.99.	

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	the Fact Sheet. It is not appropriate to modify the medium that is the basis for the listing as a name change. **[See the posted letter for Table 6]** There are a number of inconsistencies where Appendix A does not include all of the new 2014 listings found in Appendix B. Below are a few examples of such inconsistencies. **[See the posted letter for Table 7]** There are also a number of instances where existing waterbody-pollutant listings from the 2010 303(d) List were not stated as delisted in Appendix A and do not appear in Appendix B, C, or G under the waterbodies to delist. The Stakeholders would like clarification if these listings are in fact being delisted as some align with the assessment shown in Table 3. **[See the posted letter for Table 8]** **Requested Action:** **Correct the numerous inconsistencies described above in Table 6, Table 7, and Table 8 and ensure that all of the proposed 303(d) List appendices are internally consistent.**		
29.65	**11**. ***Correct the waterbody assigned Hydrologic Unit (HUCs) and Ca/water numbers to reflect those listed in the Basin Plan*.** There are multiple instances of what appear to be incorrectly Hydrologic Unit numbers (HUCs) and Calwater numbers assigned to the various waterways. For instance, a comparison of the 8 digit HUCs listed in Appendix B of the 303(d) List to the 12 digit HUCs listed in Appendix I of the Basin Plan indicate a number of inconsistencies such that waterbodies present in the Santa Clara River Watershed (e.g., Santa Clara River Reach 1, 2, and 3) are listed with a Calleguas watershed HUC (18070103) while	See response to comment 7.100.	

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	the same reaches are listed as 18070102 in the Basin Plan. This makes identifying the location of unknown waterbodies not previously listed or described in the Basin Plan to assess if they are receiving waters that should be assessed especially difficult. A full review of the 303(d) List HUCs should be completed to correct all errors. **Requested Action:** **Perform a full review of HUCs and Calwater numbers listed in Appendix B through F and correct any inconsistencies with the Basin Plan.**		
29.66	**12**. ***Correct or clarify inconsistencies in the staff report*.** There is inconsistent discussion in the staff report about some proposed listings that should be clarified to avoid confusion about the listings. For instance, on page 10 of the Staff Report there is a discussion about existing TMDLs covering newly proposed pollutants " For example, the proposed new listings for DOE and DOD in Calleguas Creek Reach 3 ... are being addressed by the Calleguas Creek Organochlorine Pesticides, PCBs and Siltation TMDL ... and would then be in Category 4A." However , we could find no listings of ODE and ODD for Reach 3 in any Appendix of the report including Appendix C - Category 4A Waterbody Segments. Furthermore, the Fact Sheets in Appendix G state that ODE and DOD should not be listed for Reach 3. We ask the RWQCB to either clarify or remove the above referenced statement and clarify any other inconsistencies between the staff report and the list. **Requested Action:** **Correct or remove language cited on page 10 of the staff report regarding DOE and ODD listing of Calleguas Creek Reach 3 and clarify any other identified inconsistencies within the staff report.**	See response to comment 7.101.	
29.67	**13**. ***Ensure that all thresholds being used for assessment are consistent and valid under the Listing Policy*.** In many cases, the same pollutant is assessed using different thresholds without any explanation for the basis of the threshold.	See response to comment 7.102.	

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	Additionally, in several cases, an LC50 or threshold for individual species were used for the assessment, which is inconsistent with the Listing Policy which states that it must be demonstrated that an evaluation guideline is "applicable to the beneficial use, protective of the beneficial use, scientifically-based and peer reviewed, and well described". Because it has not been demonstrated that the individual species response to these pollutants is applicable and protective of the beneficial use these guidelines should not be used to make a listing. The Stakeholders ask that the Board review all assessments for consistency, especially for the pesticides (bifenthrin, cyfluthrin, cypermethrin, malathion, permethrin) as well as applicability to the beneficial use as described in the Listing Policy. **[See the posted letter for Table 9]** The 303(d) List includes new listings for bifenthrin, cyfluthrin, cypermethrin, malathion, and permethrin in CCW. Currently, no water quality objectives have been promulgated by USEPA or the State of California for these pollutants and so the criteria listed are from a variety of studies. Some issues with these criteria include the following (this list is by no means inclusive; a thorough review of all listings for these pollutants should be undertaken): • The criterion used for listing bifenthrin on Duck Pond Agricultural Drains/Mugu Drain/Oxnard Drain No 2 is 0.00397 µg/L based on the CDFG criteria. The selective use of a saltwater genus mean acute value is inappropriate when the CDFG study clearly states in the "Conclusions and Recommendations" section that "insufficient freshwater and saltwater acute toxicity data were available to calculate CMC values for bifenthrin." The same use of a criterion unsupported by the study author(s) applies to cypermethrin on the Santa Clara Drain. • Use of LC50 for listing of cyfluthrin for CCW Reach 4 is inappropriate. LC50s do not meet the standard set forth in the Listing Policy as stated on page 20 *"the evaluation guideline ... identifies a range above which impacts occur and below which no or few impacts are predicted."* By		

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	definition, an LC50 is simply the concentration at which half of the population of the tested species has died. The LC50 should not be used as the evaluation guideline. • The criterion used for listing permethrin for Calleguas Creek Reach 4 is 0.0002µg/L based on the UC Davis[12] criteria. However, upon reviewing the UC Davis source the listed chronic standard for permethrin is 2 ng/L (page 92) which is 0.002µg/L, not 0.0002µg/L as listed in the 303(d) List. • In many instances the incorrect evaluation guideline and guideline reference are used. For example, the evaluation guideline (i.e., criterion) provided for cyfluthrin (a pyrethroid) in LOEs 84065, 83200, and 88712 is for the chlorinated herbicide 2,4,5-TP. The stated criterion (29 mg/L) was not found in the cited guideline reference. Many additional instances were noted in LOEs for phorate, dimethoate, disulfoton, endosulfan sulfate, and many other LOEs. Because the numeric guidelines (and reference documents from which these are obtained) form the basis for any listing, it is critical that these be carefully reviewed and verified prior to issuing the final Fact Sheets and 303(d) List. **Requested Action:** • **Review the guidelines used for interpreting narrative objectives and ensure that they are consistently applied and use correct unit conversions.** • **Remove all guidelines that do not comply with the stated Listing Policy as described above.** **[See the posted letter for Attachment A]**		
30.	TECS Environmental Compliance Services, March 30, 2017		
30.1	TECS Environmental is pleased to comment on the Regional Board's proposed 2016 303(d) list revisions.	See response to comment 3.4.	

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	Because there are almost 900 listing revisions for water quality segments in the Los Angeles County Basin, it would be impossible to address each one. Therefore, I will restrict my comments to general issues. To begin with, I am sure that a number of MS4 Permittees and industrial dischargers will be pleased to know that many of the pollutants proposed on the 303(d), which are current TMDLs or are scheduled to become ones, have been placed on the "de-list" or placed on the "do not list" category. Most conspicuous are metals for Reach 2 of the Rio Hondo and Reach 3 of the San Gabriel River. Although the 2010 303(d) list did not list any of these reaches for metals-related impairment, they were nevertheless required to comply with metals TMDLs (Los Angeles River Metals TMDL for Reach 2 of the Rio Hondo and the San Gabriel River Metals TMDL for Reach 3 of the San Gabriel River). The 2016 303(d) list proposes to rectify this mistake by placing both of these reaches under the "do not list" category for copper, lead, selenium and zinc, which form the basis for both of the TMDLs. However, the proposed 2016 303(d) list did not place any of the Arroyo Seco reaches on the "do not list." Like Reach 2 of the Rio Hondo and Reach 3 of the San Gabriel River, Arroyo Seco Reaches 1 and 2 were not on 2010 303(d) list, nor were they on the 2012 303(d) list, which did not make it to Los Angeles Basin Plan as an amendment. Nevertheless, the Los Angeles MS4 Permit subjects MS4 Permittees by extending the Los Angeles River Metals TMDL to Arroyo Seco reaches. The 2016 303(d) list should place these reaches on the "do not list" category for metals. Recommendation: place Arroyo Seco Reaches 1 and 2 on the "do not list" for any metal.		
30.2	**I. CTR and 303(d) Listing Policy** Nevertheless, additional pollutants should be considered for exclusion because they were not established in accordance with the California Toxics Rule (CTR) adopted	See response to comments 3.2.	

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	in 2000; and/or did comply with the *Water Quality Control Policy for California's Clean Water Act Section 303(d) List* (Listing Policy), which was adopted in 2004. • *California Toxic Rule* CTR was adopted to provide a mathematical method for establishing ambient (dry weather) water quality standards for toxics necessary to protect beneficial uses of receiving waters. The LAR-MTMDL, however, along with other TMDLs, does not comply with CTR in two significant respects. First, the TMDL calculates numeric water quality standards/TMDLs for both wet weather and ambient receiving water conditions instead of only on ambient. The LAR-TMDL misinterprets CTR by claiming EPA did not differentiate between wet and dry weather conditions when establishing metals and toxics limitations. There is nothing in CTR that supports that view. CTR makes it clear that its purpose is to establish ambient water quality standards: *This final rule establishes ambient water quality for priority toxic pollutants.* USEPA defines ambient as: *Natural concentration of water quality constituents prior to mixing of either point or nonpoint source load of contaminants. Reference ambient concentration is used to indicate the concentration of a chemical that will not cause adverse impact to human health.* In other words, ambient is the normal reference condition of a receiving water. This is also the clear understanding of the Regional Board's Surface Water Ambient Monitoring Program (SWAMP). MS4 and other point source stormwater (wet weather) outfall discharges, using sampling and analysis results, are measured against the ambient target for a pollutant established by CTR. For example, suppose a copper limitation is set at 37 micrograms per liter for a given water body. This limit is required to protect fish. Persistent exceedances of the limit based on outfall monitoring would necessitate a revision to the MS4 Permittee's stormwater		

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	management program.		
30.3	Second, CTR requires a hardness parameter (calcium carbonate) to make chemical water quality analysis of metals and toxics more accurate. Generally, the higher the hardness value the higher the toxic/metal pollutant expressed as a numeric limit. And, the higher the limit there less difficult it is to meet. The metals and toxics TMDLs rely on differing hardness values. For the Dominguez Channel/Harbor Toxics TMDL an average hardness value of 50 mg/l is used. For Ballona Creek hardiness values for setting the wet weather TMDLs metals are varied, based on an average or median hardness that ranged from 77 mg/l to 108 mg/l. For dry weather, a median hardness value of 300 mg/l was applied. As mentioned, CTR is expressed exclusively as ambient and not wet weather standards. Thus the77 mg/l to 108 mg/l hardness values relative to wet weather are meaningless. For dry weather, a median value of 300 mg/l was used. For the Los Angeles River Metals TMDL variable hardness values were also used for wet and dry weather. The same is true to the San Gabriel River Metals TMDL. In any case, CTR requires actual hardness value to be determined at the time samples of metals/toxic pollutants are taken. Thus, in the final analysis, each of the metals/toxics pollutants that was placed on the "list" or "do not de-list" category should be placed on the "de-list" or "do not list" category because they were not established in ambient terms only and failed to use an actual hardness value.	Comments on TMDLs are outside the scope of this proposed action.	
30.4	• 303(d) Listing Policy The Listing Policy was adopted to provide a statistical method to determine how many water quality samples that exceed a water quality standard are required to place a pollutant on the 303(d) list. That method is a binomial distribution based on the rejection of a null hypothesis measured against sample sizes (see attachment #1). A review of the 2016 303(d) list fact sheets reveals that many of	See response to comment 3.3.	

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	the metals and toxics placed on previous 303(d) lists did not conform to the Listing Policy. Those that do not should be placed on the "de-list" or "do not list" category.		
31.	Ventura Countywide Stormwater Quality Management Program, March 30, 2017		
31.1	On behalf of the 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, we thank you for the opportunity to provide input on the proposed revisions to the Clean Water Act Section 303(d) list of impaired waterbodies in the Los Angeles Region [hereinafter referred to as 303(d) list] which was distributed for public review on February 8, 2017. The Program has many concerns with the draft 2016 Los Angeles Water Board's proposed revisions to the 303(d) list of impaired waters. Several errors and inconsistencies hampered our ability to fully vet and review the proposed 303(d) list. It is our opinion that significant review and modifications must be made before adoption and additional public review after modifications will be necessary. Requested Action: After full consideration of all comments, revise draft 303(D) list, and allow for another 60-day comment period prior to adoption. It is critical that the Los Angeles Water Board's proposed revisions to the 303(d) list follow the State Water Resources Control Board (SWRCB) Listing Policy and be based on sound science and methodologies. The development and implementation of Total Maximum Daily Loads (TMDLs) is already a significant investment of resources, and the 303(d) list will drive pollutant waterbody prioritization under the potential Watershed Management Plan option in our next NPDES MS4 Permit.	See response to comment 32.1 and 7.2.	

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31.2	Data from a single point in time, or which is not representative of the receiving water, should be excluded from this effort as should data with results reported below reporting limits (J-flagged). It appears the Program's outfall data was erroneously included for the Santa Clara River. This sampling location represents the runoff discharging from an MS4, not the receiving water quality, and is mostly from infrequent and short-term rain events. Of special concern is where the beneficial use MUN is driving 303(d) listings even though it should not be applied because it is identified as P* and is a conditionally applicable beneficial use. **Requested Action:** **Strictly comply with the State Water Resources Control Board (SWRCB) Listing Policy on identifying beneficial uses, impairments due to natural sources, and the appropriate data to support a listing.**	It is in accordance with the Listing Policy to use samples collected on the same day to assess waterbody condition if the samples are from different locations. The Listing Policy does provide for consideration of circumstances in which the samples represent an unusual condition (see Listing Policy, Section 6.1.5.3, *If the majority of the samples were collected on a single day or during a short-term natural event (e.g. a storm, flood, or wildfire), the data should not be used as the primary data set.)* LOEs and decisions which included "J-flagged" data are being reassessed, as identified. Decisions based on protection of a P*MUN beneficial use are being reassessed, as identified.	
31.3	The Program supports the comments from the County of Ventura where a more detailed description of the issues identified here is discussed. The Program also supports the comments from the Calleguas Creek Watershed Stakeholders, as well as the Ventura County Irrigated Lands Group (VCAILG) who will be submitting separate comment letters regarding the proposed listing changes in the Calleguas Creek Watershed and VCAILG- affected waterbody segments. Significant resources are expended when a pollutant is included on the 303(d) list. Errors in this process, and the challenges of delisting a pollutant, divert our limited funding and staff time away from improving water quality. We greatly appreciate your attention to these requests and look forward to a 303(d) list that appropriately identifies the water quality issues within Ventura County.	Comment noted.	

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32.	Ventura Water Department of the City of San Buenaventura, March 30, 2017		
32.1	The specific focus of this comment letter by Ventura Water is on the Santa Clara River Estuary (SCRE) proposed listings. New constituents on the list for the SCRE include ammonia and pH. Constituents that are proposed to remain on the list of particular note include nitrate and toxicity. Ventura Water specifically requests the Los Angeles Regional Water Quality Control Board (Regional Board): • Reconsider proposed ammonia listing by recalculating the exceedances and using more recent data sets currently available to the Regional Board. • Reconsider the proposed pH listing based on consideration of reference conditions data, which indicate that substantial fluctuations in estuarine pH values are typical, and consistent pH values that comply with water quality objectives are not biologically attainable within estuaries. • Delist nitrate based on a recalculation using appropriate data and correct use of averaging periods for the data. • Reevaluate toxicity listing once the data is appropriately aggregated and averaged. • Reevaluate ChemA, Toxaphene, and Indicator Bacteria listings once more recent data is taken into consideration. • Address the issues identified in this letter and release a revised, proposed 303(d) list for another 60-day comment period prior to adoption.	See response to comments, below, for specific responses: 32.4 for ammonia, 32.5 for pH, 32.6 for nitrate, 32.7 for toxicity, 32.8 for ChemA, 32.9 for toxaphene, and 32.10 for indicator bacteria The public has had a 50-day comment period prior to the Los Angeles Water Board meeting. In addition, the State Water Board will provide an additional 30-day comment period so that the public may comment on the Los Angeles Region 303(d) list (in combination with five other Regional 303(d) lists) prior to bringing the list to the State Water Board for approval. Lastly, commenters will have an opportunity to comment to USEPA Region 9 regarding the California 303(d) List portion of the Integrated Report prior to final approval by USEPA.	
32.2	**Relevant Background Information.** It is important to our overall comments on the 303(d) list to understand the context of the Santa Clara River and SCRE. Like many southern California rivers, the Santa Clara River has very minimal flows in the dry months leading to stagnant conditions in the SCRE that encourage algae growth and variations in both dissolved oxygen (DO) and pH due to the algae	Comment noted.	

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	respiration cycles, as is the case to some extent even in more natural estuaries where conditions have not been modified. The river ends in the SCRE, which experiences both open and closed mouth periods due to beach berm formation and periodic, typically wet weather breaches. The SCRE is wind-mixed and mostly uniform in water quality, especially during closed mouth conditions. The Ventura Water Reclamation Facility (VWRF) discharges approximately 8 million gallons per day (mgd) of disinfected, tertiary effluent first to wildlife/water quality ponds, and then to the SCRE. During dry weather, the tertiary treated flows can be the dominate supply of water to the SCRE to support wildlife species that utilize it. Species that utilize the SCRE include the following state and federally listed species: steelhead trout, tidewater goby, snowy plover, and California least tern. Ventura Water has spent many years studying the SCRE both independently, and pursuant to requirements of its NPDES permits. Ventura Water has invested more than $21,000,000 dollars in treatment process upgrades of the Ventura Water Reclamation Facility (VWRF) to improve the quality of the tertiary treated flows discharged to the SCRE. Ventura Water also currently recycles approximately 1 mgd for urban irrigation. Ventura Water is also currently working on implementing a potable reuse program that would divert up to 100% of its discharges to water reclamation uses, and identifying how much effluent can be diverted from the SCRE while still protecting its ecology and ecology-related beneficial uses and without "taking" (as that term is defined under the state and federal Endangered Species Acts, as applicable) any of the listed species that use or occupy the SCRE.		
32.3	**General Comments.** Of particular concern to Ventura Water with regard to the proposed 303(d) list is that much of the data used to determine water quality impairment for the SCRE is older data that is not representative of current conditions. The Staff report states, "Data used as part of the 2016 Integrated Report were received through August 30, 2010." The report then goes on to later say, "All readily available data and information in the administrative record was	The Los Angeles Water Board staff has developed the Integrated Report consistent with project plans and timelines established by the State Water Resources Control Board. Staff is working closely with the State Water Board to ensure that the remaining steps in the process for State Water	

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	considered in the development of the 2016 Integrated Report." These statements are at odds with each other as by choosing to only rely on data collected through 2010; quite clearly the 303(d) list was not developed with all readily available data as required by the Listing Policy. Significant plant improvements have be implemented since 2010. VWRF monitoring data since the plant upgrades are readily available and should be included within the 303(d) list determination analyses. The SCRE has also been heavily regulated by the VWRF's NPDES permits. Many of those permit requirements have become more stringent since 2010, with the application of technology based limitations. By Ventura Water's estimation, many of constituents on the proposed 303(d) list are not appropriate given recent water quality data. Lastly, based on current data and the State Water Resources Control Board's "Water Quality Control Policy For Developing California's Clean Water Act Section 303(d) List" ("Listing Policy") requirements to aggregate the data by appropriate reach or area and to use appropriate averaging periods, Ventura Water disagrees with some of the constituent listings and requests recalculation of exceedances. This letter addresses the proposed 303(d) listings and presents current data for each proposed SCRE impairment listing.	Board approval go smoothly and meet the State Water Board's schedule. Los Angeles Water Board staff considered all readily available data and information in the administrative record in the development of the 2016 California Integrated Report. The State Water Board defined readily available data as those data submitted during the 2010 public data solicitation period, which began on January 14, 2010 and concluded on August 30, 2010. The State Water Board issued a memo dated November 12, 2013, which explains the strategy of handling the data assessment for the 2014 Integrated Report as follows: Due to the volume of data received during the 2010 data solicitation period, the State Water Board will not solicit additional data until all of the current data is assessed and migrated to the California Water Quality Assessment Database (CalWQA) for Regional Water Board listing and delisting recommendations. Consequently, at the direction of the State Water Board and consistent with the other Regional Water Boards, Los Angeles Water Board staff did not include data after the 2010 solicitation period in the development of the 2016 Integrated Report for the Los Angeles Region.	

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		Further, the State Water Board adopted Resolution No. 2015-0005, to amend the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (Listing Policy) on February 3, 2015. The revisions to the Listing Policy were available for public comment prior to the public hearing to adopt those changes. Finding number eight in the Resolution states the following: State Water Board staff anticipates that next notice of solicitation will be sent out to solicit data and information for the 2018 Integrated Report (the CWA section 303(d) and 305(b) reporting requirements). For the upcoming 2012, 2014 and 2016 Integrated Reports, the data and information submitted in response to the 2010 notice of solicitation shall be assessed and considered. Notwithstanding the above information, Los Angeles Water Board staff appreciates the concern that data must be is as up-to-date as possible and reviewed frequently in order to implement our various programs. Staff reviews all types of water quality data on an ongoing, real-time basis separately from the Integrated Report process to develop TMDLs or other regulatory programs. Staff strives to increase its use and application of current data, and improving in this manner is one of our highest priorities.	

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		Staff encourages commenter to submit data to CEDEN in preparation for the next listing cycle.	
32.4	**Ammonia Comments** The new ammonia listing cites that it is based on 4 exceedances out of 42 samples based on un-ionized ammonia concentrations using data collected from 1997 to 2010. While this meets the technical, formulaic requirements for number of exceedances set forth in the Listing Policy Table 3.1 for placing a waterbody on the 303(d) list, the methods and data used to calculate the exceedances are not clear. To calculate the concentration of un-ionized ammonia, total ammonia must be converted to un-ionized ammonia using site specific pH and temperature conditions within the SCRE at the time of the ammonia sampling. No conversion calculations for total ammonia were provided in the data set provided in the fact sheet; therefore, it is difficult to determine which pH and temperature data were used to correlate to corresponding total ammonia data. An accurate analysis should ideally connect pH, temperature, and ammonia data with a reasonable averaging criteria or statistical determination if multiple data points were used. Ventura Water requests recalculation of the exceedances based on current total ammonia data as well as proper calculations of un-ionized ammonia that take into account temperature and pH conditions that occurred, or should have been expected during the total ammonia sampling events. More specifically, closer inspection of the 1997 through 2010 data set used to determine the 4 exceedances indicates that the pH data used to calculate un-ionized ammonia was potentially data retrieved from a continuous monitoring, multiparameter Sondes (2009-2010) deployed for the City's Phase 1 Estuary Study (Stillwater Sciences 2011), among other data. The only total ammonia data collected as part of the Phase 1 study were collected on 6 days in 2009 and 2010. Corresponding pH and temperature were collected along with these samples.	The data used to determine the listing can be found from a link on the factsheet "Decision ID 66589 Santa Clara River Estuary" for ammonia. The data is linked as Data for Various Pollutants from the city of Ventura, 1997-2010. Commenter does not explain why grab data would not reliable for purposes of determining the one-hour maximum values for temperature and pH. See response to comment 32.3 for a discussion of the "readily available" data considered for this Integrated Report and 303(d) list.	

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	However, Ventura Water is concerned that these data do not represent the SCRE as a whole, specifically after the improvements to the VWRF (after November 2011). Moreover, only total ammonia is shown in that data set, and the data set does not include the calculation of un-ionized ammonia. Monthly grab sample temperature and pH data for the receiving water exists for some of the monitoring years cited (1997 - 2010), but grab data is not reliable for purposes of determining the one-hour maximum values for temperature and pH. In light of the aforementioned issues with the methods that appear to have been used to calculate unionized ammonia using a 1997 to 2010 data set, Ventura Water requests the Regional Board provide the calculation for the un-ionized ammonia, and update the calculation as appropriate to include more recent and more valid total ammonia, pH, and temperature assumptions from other data sets readily available to the Regional Board. Based on Ventura Water's more recent monitoring results, all of which constitute data readily available to the Regional Board, it does not appear that the SCRE un-ionized ammonia water quality objective is likely to have been exceeded a sufficient number of times to warrant a listing. Ventura Water requests the Regional Board utilize the data submitted to it by Ventura Water more recently than 2010 to assure that the evaluation of receiving water conditions in the SCRE is reasonably representative of current conditions. The Regional Board imposed stringent ammonia limits and a time schedule to attain those limits on VWRF discharges of tertiary treated flows in both its 2008 and 2013 NP DES permits. To comply with these limits and to better control nitrates, Ventura Water invested more than $21 million in a VWRF plant improvement project to implement nutrient removal in its biological processes. This treatment upgrade project undertaken to meet the stringent NPDES permit ammonia effluent limits came online in November 2011. Since then, VWRF NPDES permit effluent limits for ammonia, including its water quality based effluent limits, have only been exceeded once, indicating that ammonia conditions		

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	in the SCRE have changed since November 2011, and the data relied upon in developing the proposed 303(d) list is not representative of conditions within the SCRE. The receiving water standards for the SCRE (used to establish the NPDES effluent limitation) are set based on un-ionized ammonia for saltwater criteria. The limits used to determine the 303(d) listing are the same criteria that are used to calculate limits in the NPDES permit (1999 Update of Ambient Water Quality Criteria for Ammonia): • One Hour Concentration = 0.233 mg/I unionized ammonia, based on fish spawning, and • 4 day average of 0.035 mg/L of unionized ammonia The total ammonia NPDES effluent limit calculated to meet this water quality objective is total ammonia of 1.07 mg/l average monthly and 1.17 mg/l max daily in the summer. Limits in the winter months are slightly higher. The limits were determined in accordance with EPA standards by considering the 50th and 90th percentile pH and temperature for considering chronic and acute toxicity. As shown in Figure 1 below, the total effluent ammonia from 2012 to 2016 only exceeded 1 mg/l once out of 59 samples, thus not exceeding the Listing Policy's binomial distribution null hypothesis Table 3.1 criteria for listing a constituent on the 303(d) list (i.e., would need at least 5 exceedances). Similarly, the receiving water samples from 2012 to 2016 only exceeded 1 mg/l total ammonia twice out of 60 samples, so also not meeting the Table 3.1 criteria for listing a constituent on the 303(d) list. *Figure 1 Historical Effluent and Receiving Water Ammonia Monitoring* **[See the comment letter for Figure 1]**		

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	The effluent compliance point for all constituents except for flow in the 2013 NPDES permit for the VWRF is station MOOl, which is located at the Effluent Transfer Station (ETS) right before discharge into the wildlife ponds. Station MOOlA is located downstream of the wildlife ponds. It is only used for compliance with flow, but ammonia levels have been monitored there, starting in December 2013. Total ammonia actually drops from the compliance point to MOOlA as water passes through the wildlife ponds, likely due to a combination of volatilization and vegetative uptake. Therefore, the ammonia concentrations in the discharges into the SCRE are well below the permit standards that were set up to meet the ammonia receiving water quality objectives for saltwater, which are more stringent than freshwater standards. The comparison of ETS versus MOOlA data is shown in Figure 2. *Figure 2 Historical Effluent Ammonia Before and After Wildlife Ponds* **[See the comment letter for Figure 2]** **In light of the treatment plant upgrades implemented to reduce ammonia, and the fact that more recent data indicates only 1 exceedance in 59 samples, Ventura Water requests recalculation of the exceedances for ammonia and reconsideration of the listing decision based on the more recent data set currently available to the Regional Board.**		
32.5	pH Comments It is important to understand that many estuaries exhibit wide daily variations in pH mediated by algae as the result of daily photosynthesis and nighttime respiration (Park et al 1958). Beyond potential connections between algal productivity with the multiple nutrient sources to the SCRE (e.g., VWRF, agricultural runoff, groundwater, riverine, VWRF, ocean exchanges), algal growth and pH variations in the SCRE are exacerbated by physical factors as well (e.g., shallow waters, lack of consistent riverine flows, intermittent breaching and limited tidal exchange with the ocean). Consideration of the estuarine conditions	The 303(d) list appropriately identifies the pH impairments. Analysis of sources and causes or identification of implementation measures to resolve or correct the impairment are not completed as part of the Integrated Report or 303(d) listing process. There are multiple sources of water to Santa Clara River Estuary including “waste discharge” from	

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	likely to induce large pH swings is supported by recent monitoring data fully available to the Regional Board that shows that the VWRF plant tertiary treated flows are always in compliance with pH effluent limits (shown as a black dot on Figure 3). However, despite the very steady and compliant pH values for the tertiary treated flows, the receiving water does experience wide swings in pH as shown in Figure 3 below even when data collected from 2012 through 2016 is analyzed. However, it is important to note that the receiving water pH data is collected by grab samples (via boat) in the SCRE, likely at similar times of day and therefore does not necessarily reflect actual conditions in the estuary over the course of the day or the month. The receiving water data collected could theoretically meet the Listing Policy formulaic criteria. However, the determination whether to list should not be considered in a vacuum, but rather must also take into account the "type of waterbody (Bay and Harbors, Coastal Shoreline, *Estuary*, Lake/reservoir ...)" being considered for impairment. One way to take into account the type of waterbody considered for a 303(d) listing is to consider "reference conditions" as defined in Section 7 of the Listing Policy to understand the characteristics of estuarine water bodies that are least impaired by human activities to determine attainable biological conditions for such waterbodies in southern California. As discussed earlier, studies of pH variation in estuaries reveals that wide swings in pH due to the presence of algae constitute reference conditions for typical estuaries. The proposed listing does not appropriately demonstrate that the high pH was a result of waste discharge as required in the Los Angeles Region Basin Plan (Basin Plan). As stated in the Fact Sheets and according to the Basin Plan, "The pH of inland surface waters shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges." However, it was not demonstrated for the SCRE that the elevated pH levels were a result of waste discharge as opposed to natural causes. Therefore, the Regional Board should either provide evidence that the	sources such as wastewater treatment plants and the MS4. Exceedances of pH may be caused in part by waste discharge. The relative contribution of the causes of pH exceedances is largely speculative, at this time. The way to “take into account” the type of waterbody, or reference conditions, or the interaction between pH and other factors such as algae, is during the development of a TMDL. See also, response to comment 16.2.	

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	elevated pH was a result of waste discharge and detail that in the Fact Sheets or, if not such evidence exists, the Regional Board should remove this proposed listing. **Ventura Water requests reconsideration of the proposed pH listing for the SCRE based on consideration of reference conditions data, which indicate that substantial fluctuations in estuarine pH values are typical, and consistent pH values that comply with water quality objectives are not biologically attainable within estuaries.** *Figure 3 pH at VWRF and Receiving Water Locations* **[See the comment letter for Figure 3]**		
32.6	**Nitrogen and Nitrate Comments** Nitrogen/nitrate (collectively "nitrate") was originally listed on the 303(d) list adopted in 2012. The nitrate listing is based on receiving water samples collected between 2002 and 2007. Given that Ventura Water implemented a nitrification and denitrification project in November 2011, nitrate data collected before 2011 is no longer representative of SCRE conditions, and is therefore not reliable for determining current SCRE exceedance estimates. In reviewing receiving water data collected monthly from 2012 through 2016 (60 sample dates}, which is submitted to the Regional Board as part of NPDES reporting and is therefore readily available data under the Listing Policy, there were only 5 days during which SCRE water quality exceeded the nitrate receiving water quality objective of 10 mg/I . Because the SCRE is wind-mixed and fairly uniform (Phase 1 Estuary Subwatershed Study, Stillwater 2011}, we would argue that on any given day, sampling at a given location is strongly influenced by conditions at other nearby locations. The Listing Policy states: "Based on these evaluations of the water body setting, the Regional Water Boards should aggregate the data by appropriate reach or area . ... To be	The data used to list the Santa Clara River Estuary for Nitrogen Nitrate was NPDES receiving water monitoring from the City of San Buenaventura, Water Reclamation Plant (NPDES No. CA0053651) collected from 2002 to 2007. The commenter has presented additional data collected from 2012 to 2016. See response to comment 32.3 for a discussion of the "readily available" data considered for this Integrated Report and 303(d) list. The Listing Policy does allow for not using older data; Section 6.1.5.3 states, in part, "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	

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	considered temporally independent, samples collected during the averaging period shall be combined and considered one sampling event. ... If the averaging period is not stated for the standard, objective, criterion, or evaluation guideline, then the samples collected less than 7 days apart shall be averaged." As shown in Figure 4 below, exceedances in multiple locations occurring in the SCRE on the same sampling date should be considered a single event because the multiple sampling results are designed to provide a spatial representation of the estuary during any particular event of exceedance. According to the binomial distribution null hypothesis (Listing Policy Table 3.1), the listing requirement for 60 to 71 data points is 6 exceedances, which is more than the current 5 exceedances demonstrated by the more recent data set developed after Ventura Water's implementation of treatment plant and treatment process upgrades. Section 4 of the Listing Policy states that a water segment shall be removed from a 303(d) listing if the water meets the water quality standards. Using Policy Table 4.1, the null hypothesis indicates that for 60 to 71 data points, if there are 5 exceedances or less, then the water segment can be delisted. **Based on current data, the number of exceedances (S) meets the delisting criteria, and given that VWRF already has an NPDES permit limit for nitrate, Ventura Water requests recalculation of the exceedances based on current data and correct use of averaging periods for the data (data collected on the same day to be averaged}. Ventura Water requests that based on this recalculation, nitrate be removed from the 303(d) list for the SCRE.** *Figure 4 Receiving Water Nitrate Levels* **[See the comment letter for Figure 4]**	management measure(s)) should be considered…" In the next listing cycle, when Water Board staff is able to consider the more recent data, staff can consider the implementation of nitrification and denitrification in 2011 and the appropriateness of averaging the more recent data.	
32.7	**Toxicity Comments** The City monitors chronic toxicity using Selanstrum for both effluent and receiving water. Using readily available data collected by Ventura Water from	The data used to list the Santa Clara River Estuary for toxicity was NPDES receiving water monitoring from the City of San Buenaventura	

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	2012 - 2016 and submitted to the Regional Board, the VWRF tertiary treated flows consistently met toxicity criteria of 1 TUc for the 60 samples, as shown in Figure 5. However, receiving water monitoring data does not similarly show consistent and full attainment of toxicity criteria. The receiving water monitoring locations have a data set of 25 sample dates. **Using the argument presented above that the data should be aggregated and appropriate averaging should be used, Ventura Water requests that each sampling event (day) be considered separately and the data points be averaged.** To meet the Listing Policy Table 4.1 requirements for delisting, with 26 data points there would need to be 2 or fewer exceedances of toxicity objectives for the SCRE. Even considered as single events, there have been more than 2 exceedances of a 1 TUc, although those exceedances are unrelated to toxicity of tertiary treated flows, which did not show exceedances. Therefore, it does not appear that de listing the SCRE for toxicity would be appropriate at this time, even though toxicity exceedances are unrelated to VWRF tertiary treated flows. **However, Ventura Water requests this listing be reevaluated once the data is appropriately aggregated and averaged.** *Figure* 5 *Effluent and Receiving Water Toxicity* **[See the comment letter for Figure 5]**	Ventura, Water Reclamation Plant (NPDES No. CA0053651) collected from 2002 to 2007. The commenter has presented additional data collected from 2012 to 2016. See response to comment 32.3 for a discussion of the "readily available" data considered for this Integrated Report and 303(d) list.	
32.8	**ChemA** ChemA is being included on the 303(d) list without any supporting data. The reasons for its listing are that the U.S. EPA approved a TMDL for the estuary in 2011. However, no data, historic or otherwise, were used to support the continued placement on this list. **Ventura Water requests that recent data be taken into consideration when assessing the placement of ChemA on the 303(d) list.**	ChemA is a suite of bio-accumulating pesticides that includes aldrin, dieldrin, chlordane, endrin, heptachlor, heptachlor epoxide, hexachlorocyclohexane (HCH) (including lindane), endosulfan, and toxaphene. ChemA was placed on the 303(d) list for the Santa Clara River estuary in 1998. Data used for listing or delisting decisions prior to 2006 are not included in the	

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		CalWQA database and this is reflected on the factsheets. The 1998 303(d) listing (and subsequent listings) for Chem A were predominately based on fish tissue concentrations of toxaphene. Los Angeles Water Board developed a TMDL for toxaphene in fish tissue in the Santa Clara River Estuary in 2010, which was approved by EPA in 2011. Source analysis showed that the source of toxaphene was irrigated agriculture and the TMDL was adopted as a single regulatory action through the renewal of the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands. The agricultural discharges regulated by the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands monitor for toxaphene and chlordane. During the next listing cycle, when Water Board staff is able to review this more recently collected monitoring data, staff may recommend revision of the 303(d) list including, potentially, a simplification of the list, by removing Chem A because the toxaphene and chlordane data more appropriately represent the impairment or non-impairment of the Estuary.	
32.9	**Toxaphene** Similar to ChemA, toxaphene was included on the 303(d) list due to its TMDL status with the U.S. EPA, circa 2011. No new information or data was brought	Similar to ChemA, toxaphene was placed on the 303(d) list for the Santa Clara River estuary in 1998. Data used for listing or delisting decisions	

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	forward to support the status on the list. Based on data collected semiannually by the VWRF, toxaphene has not even been detected in either the effluent or the receiving water in recent memory. **Ventura Water requests that recent readily available data be taken into consideration when assessing the placement of toxaphene on the 303(d) list.**	prior to 2006 are not included in the CalWQA database and this is reflected on the factsheets. Data more recent than 2010 will be considered in the next listing cycle for the Los Angeles Region. See response to comment 32.3 for a discussion of the "readily available" data considered for this Integrated Report and 303(d) list.	
32.10	**Indicator Bacteria** Similar to ChemA and toxaphene, indicator bacteria was included in the 303(d) list due to its TMDL status with the U.S. EPA, circa 2011. No new information or data was brought forward to support the status on the list. **Ventura Water requests that recent data be taken into consideration when assessing the placement of indicator bacteria on the 303(d) list.**	Indicator Bacteria was placed on the 303(d) list for the Santa Clara River estuary prior to 1998 (this impairment was originally called "coliform bacteria"). Data used for listing or delisting decisions prior to 2006 are not included in the CalWQA database and this is reflected on the factsheets. The Los Angeles Water Board developed a TMDL for indicator bacteria in 2010, which was approved by USEPA in 2012. Data more recent than 2010 will be considered in the next listing cycle for the Los Angeles Region. See response to comment 32.3 for a discussion of the "readily available" data considered for this Integrated Report and 303(d) list.	
32.11	Summary/Conclusion Ventura Water appreciates the opportunity to comment on the proposed 303(d) list. Based on the analysis presented above using more recently collected, readily available data that	Comments noted. See response to comment 32.4 for ammonia, 32.5 for pH, 32.6 for nitrate, 32.7 for toxicity, 32.8 for ChemA, 32.9 for toxaphene, and 32.10 for indicator bacteria.	

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	properly represents existing conditions in the SCRE (2012 - 2016), our findings include: • Appropriate ammonia data were not considered in the proposed listing and current data do not meet the Listing Policy criteria for 303(d) listing. • A listing for pH is not warranted in light of reference conditions for pH within estuaries, which indicates that steady state pH values in compliance with water quality objectives are not biologically attainable even in high functioning estuaries. • Nitrate should be delisted based on relevant Listing Policy criteria. • Toxicity is unrelated to VWRF discharges of tertiary treated water to the SCRE, and the listing should be reevaluated once the data is appropriately aggregated and averaged. • Chem A, Toxaphene, and Indicator Bacteria listings did not include recent data and should be reevaluated based on current data. It is important to note the City has been conducting studies on the SCRE since 2009 per the special studies requirements in the NPDES permits for the VWRF. These studies analyze the existing discharge impacts/benefits to aquatic habitat, and evaluate alternatives that include a reduction in discharge, improvement in discharge water quality, or a combination of both, for the purpose of improving aquatic habitat. These studies are site specific, taking into account the listed species using or occupying the SCRE, and the associated physical/chemical parameters that contribute to site specific aquatic habitat conditions. The results of the studies will be presented in the Phase 3 Estuary Studies Report (expected January 2018), and will provide a detailed understanding of the SCRE and information relevant to the 303(d) listing process.	See response to comment 32.3 for a discussion of the “readily available” data considered for this Integrated Report and 303(d) list.	