California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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Arnold Schwarzenegger
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TO: Interested Person

FROM: Sam Unger
Regional Programs, Section Chief

DATE: November 8, 2006

SUBJECT: **Addendum to the Notice of CEQA Scoping Meeting for a Proposed Amendment to the Water Quality Control Plan for the Los Angles Region (Basin Plan) to Establish Total Maximum Daily Loads (TMDLs) for Boron, Chloride, Sulfate, and TDS (Salts) in Calleguas Creek, Its Tributaries, and Mugu Lagoon**

Our notice dated August 30, 2002, informed you that the California Regional Quality Control Board, Los Angeles Region (Regional Board) will hold a CEQA Scoping Meting pursuant to California Public Resources Code section 21083.9 to receive comments on the appropriate scope and content of the "functionally equivalent" environmental documents to be prepared pursuant to Section 2080.5, and the State Water Resources Control Board's regulations related to its Certified Regulatory Program. (See 23 Cal. Code Regs. §3775 et seq.) The substitute environmental documents are intended to serve as planning level (Tier 1) environmental documents, consistent with Public Resources Code section 21159. The proposed amendment would involve:

- Incorporation of TMDLs for boron, chloride, sulfate, and TDS in the Calleguas Creek, its Tributaries, and Mugu Lagoon
- Incorporation of TMDL implementation programs for boron, chloride, sulfate, and TDS in the Calleguas Creek, its Tributaries, and Mugu Lagoon

This addendum serves to provide key elements of the TMDLs that will be discussed at the CEQA Scoping Meeting. Below are summary of regulatory background, brief description of the proposed project, and proposed implementation actions to achieve a salts balance within the Calleguas Creek Watershed, protect salt-sensitive beneficial uses, and obtain water quality objectives.

Regulatory Background

Ten of fourteen reaches in the Calleguas Creek Watershed (CCW), in southern Ventura County, are identified on the 2002 Clean Water Act Section 303(d) list of water-quality limited segments as impaired due to elevated levels of salts in water. A schedule for development of TMDLs in the Los Angeles Region was established in a consent decree (Heal the Bay Inc., et al. v. Browner C 98-4825 SBA) approved on March 22, 1999. The consent decree combined water body pollutant combinations in the Los Angeles Region into 92 TMDL analytical units. Based on the consent decree schedule, a TMDL for chloride was adopted by USEPA in March 2002 to address analytical unit 3. According to the consent decree, the remaining salts in analytical unit 4 (TDS, sulfate, and boron) TMDLs must be approved or established by United States Environmental Protection Agency (USEPA) by March 2012. This TMDL will supercede the chloride TMDL for analytical unit 3 previously established by EPA.

Description of Proposed Activities

In Calleguas Creek watershed, salts primarily impact two beneficial uses: agriculture irrigation and groundwater recharge. In addition, chloride has the potential to impact aquatic life, there are secondary drinking water standards for some salts, and industrial processing can be impacted by high salts concentrations. Water Quality Objectives (WQOs) for chloride, boron, sulfate, and TDS, are 150, 1, 250, and 850 mg/L respectively for Calleguas Creek Watershed (above Potrero Road) as defined in the current Los Angeles Regional Board Basin Plan. (Table 3-8, Water Quality Objectives for Selected Constituents in Inland Surface Water). Water quality objectives for chloride, boron, sulfate, and TDS were not established for the Mugu Lagoon and the Calleguas Creek Estuary, due to tidal influences. The goal of the TMDL is to achieve a salts balance within the Calleguas Creek Watershed (CCW) and protect salt-sensitive beneficial uses. Through achieving a salts balance, water quality is expected to improve and allow achievement of water quality standards. A salts balance is defined as an equal or greater mass of salts leaving the watershed through surface water flow and the brine line as is brought into the watershed through imported water, deep groundwater pumping, and salt additions from water use. In order to ensure that the TMDL results in achievement of water quality standards, protection of beneficial uses, and the achievement of a salt balance, minimum amount of salt export is required to meet the loading capacity in the surface water. Wastewater treatment plants (POTWs) are assigned wasteload allocations for this TMDL. Mass-based wasteload allocations are assigned for these dischargers to allow tracking and coordination with achieving the salt balance in the watershed. POTW allocations were calculated as the water quality objective multiplied by the design flow of the POTW. An adjustment factor was added to the allocations to reduce the POTW allocations if the salt exports do not meet the minimum requirements. Permitted stormwater dischargers are assigned a dry weather wasteload allocation based on the expected reductions achieved from the implementation actions and the loading capacity of the stream. Dry weather load allocations are assigned as a group allocation to irrigated agricultural discharges. Because wet weather flows transport a large mass of salts at a typically low concentration and wet weather is not a critical condition for this TMDL, permitted stormwater dischargers and irrigated agricultural discharges are only assigned a dry weather allocation.

Proposed Implementation Actions

The implementation plan for the Salts TMDL includes specific projects that will be enacted throughout the watershed and subwatershed specific implementation actions. Specific projects include the Calleguas Regional Salinity Management Conveyance (RSMC), water reservation program, and water softener reduction program. Calleguas Municipal Water District is working with other public water and wastewater agencies to construct the Calleguas Regional Salinity Management Conveyance (RSMC), which is designed to help manage high salinity water use and disposal. The RSMC (or brine line) consists of a pipeline system to collect treated wastewater, poor quality groundwater, and brine concentrations from groundwater treatment facilities in the CCW and convey the effluent to other areas for direct use or to an existing ocean outfall. Construction of the $64 million project began in 2003 and is expected to continue over a seven-year period. Calleguas MWD certified a program environmental impact report in September 2002.

Subwatershed specific implementation actions include the Renewable Water Resource Management Programs (RWRMP) for Northern and Southern Reaches of the Calleguas Creek Watershed. The implementation plan for Revolon is still in development. The RWRMP for the Southern Reaches of the Calleguas Creek Watershed is an integrated set of facilities to reduce reliance on imported water supplies while improving water quality through the managed transport of salts out of the watershed. The Camrosa Water District Board of Directors certified the final EIR for the Renewable Water Resource Management Program at its regular Board meeting of October 26, 2006. Additional actions to be developed in the Calleguas Creek watershed to ensure achievement of water quality standards, protection of beneficial uses, and the achievement of a salt balance, include additional Reverse Osmosis (R.O.) of POTW effluent, interception and R.O. of groundwater from basins in upper groundwater basins, and diversion of storm water to aquifers and treatment facilities.

Please contact Thanhloan Nguyen at (213) 576-6690 if you have any questions about this matter. Please bring the foregoing to the attention of any persons known to you would be interested in this matter.

cc: Michael Levy, Office of Chief Counsel, State Water Resources Control Board