

## State Water Resources Control Board

September 5, 2014

Ms. Alicia Thompson  
Water Quality Program Manager  
Naval Base Ventura County  
Port Hueneme, CA

### COMMENTS ON DRAFT COMPLIANCE PLAN FOR SAN NICOLAS ISLAND AND BEGG ROCK (NO. 21) AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE FROM THE U.S. NAVY AT VENTURA COUNTY

Dear Ms. Thompson,

The State Water Resources Control Board (State Water Board) received the Areas of Special Biological Significance (ASBS) draft Compliance Plan from the U.S. Navy at Ventura County dated September 20, 2013. A draft compliance plan is required under section I.A.3.b of Attachment B of the State Water Board's Resolution No. 2012-0012 *Approving Exceptions to the California Ocean Plan for Selected Discharges into ASBS, Including Special Protections for Beneficial Uses, and Certifying a Program Environmental Impact Report (General Exception)*. Attachment B in the General Exception contains the *Special Protections for ASBS, Governing Point Source Discharges of Storm Water and Nonpoint Source Waste Discharges (Special Protections)*, which describes special conditions required of the discharger.

State Water Board staff has reviewed the draft Compliance Plan and provides the following comments:

1. **Map of storm water runoff:** Section I.A.2.a of the Special Protections requires a map of surface drainage of storm water runoff showing areas of sheet runoff, prioritized discharges, and a description of any structural Best Management Practices (BMPs) already employed or to be employed. Priority discharges are those that pose the greatest water quality threat and which are identified to require installation of structural BMPs.

Figure 1 in the draft Compliance Plan includes a map that presumably includes the above requirements. However, staff is not able to read or discern whether all required items have been included due to the small font and resolution of the map. In the final Compliance Plan, please make the symbols and writing on the map larger and legible.

2. **Erosion controls:** Section I.A.2.e of the Special Protections requires the ASBS Compliance Plan to address erosion control and prevention of anthropogenic

sedimentation in ASBS. The natural habitat conditions in the ASBS shall not be altered as a result of anthropogenic sedimentation.

The draft Compliance Plan states there is evidence of anthropogenic erosion of unpaved parking areas near beaches. If there is evidence of anthropogenic sedimentation reaching the ASBS, please incorporate structural BMPs to address anthropogenic erosion in the final Compliance Plan.

- 3. Compliance and implementation schedule:** Section I.A.3.b requires the final Compliance Plan to include a schedule for structural controls based on results of the runoff and receiving water monitoring to be submitted within 30 months from the effective date of the General Exception. Section I.A.3.d stipulates that any structural controls identified in the final Compliance Plan be operational within six years of the effective date.

Staff understands the Department of the Navy at San Nicolas Island and Begg Rock has not yet received results from receiving water and core discharge monitoring, and these results may change which structural controls are determined to be necessary to comply with the Special Protections. In the final Compliance Plan, please include a description and schedule for any additional projects to be implemented and operational by the compliance deadline of March 20, 2018. If this compliance deadline cannot be met, additional information is required to support an extension.

Staff appreciates the efforts of the U.S. Navy on the draft Compliance Plan and will continue to collaborate to resolve the comments mentioned in this letter as needed. Within 30 days from the date of this letter, please submit the final Compliance Plan addressing these comments for approval by the State Water Board Executive Director.

For further questions pertaining to this subject matter, please contact Dr. Maria de la Paz Carpio-Obeso, Ocean Unit Chief, at (916) 341-5858 or [MarieleaPaz.Carpio-Obeso@waterboards.ca.gov](mailto:MarieleaPaz.Carpio-Obeso@waterboards.ca.gov).

Sincerely,



Victoria A. Whitney, Deputy Director  
Division of Water Quality

Cc:

Mr. Jonathan Bishop, Chief Deputy Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Ms. Marleigh Wood, Office of Chief Counsel  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Mr. Samuel Unger, Executive Officer II  
Los Angeles Regional Water Quality Control Board  
320 W. Fourth Street, Suite 200  
Los Angeles, CA 90013

