



DEPARTMENT OF THE AIR FORCE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9
510 HICKAM AVENUE, BUILDING 250A
TRAVIS AFB, CA 94535



20 July 2017

Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
Division of Water Quality, Storm Water
1001 I Street, 24th Floor
Sacramento CA 95814

Dear Ms. Townsend and SWRCB staff,

As the Air Force (AF) Regional Environmental Coordinator (REC) in U.S. Environmental Protection Agency Region 9, I am responsible for coordinated responses to various environmental policies and regulatory matters. Thank you for the opportunity to provide comments on the proposed changes to the Total Maximum Daily Load (TMDL) Requirements for California's National Pollutant Discharge Elimination System (NPDES) Phase II Small MS4 Permit. Specifically, we wish to comment on the Lake Elsinore/Canyon Lake TMDL, as applied to March Air Reserve Base (ARB) on Pages 88-89 of the proposed revisions to Attachment G of the permit.

We submitted comments on the previous draft Attachment G on 30 July 2015, and thank you for incorporating the first of the two previously submitted comments by modifying Section a. We support this modification to defer to the "Agreement to Form the Lake Elsinore and Canyon Lake TMDL Task Force, dated June 18, 2012." This ensures the Task Force's careful efforts to address unique federal issues are preserved.

The other comment we submitted in 2015 was not addressed, so we wish to resubmit to you the request to remove item b.3 from the requirements on March ARB. The proposed Attachment G revisions impose certain requirements on March ARB in the instance that they choose to opt out of participating in the TMDL Task Force. It is our opinion that item b.3. of these required activities imposes an unnecessary and burdensome requirement on March ARB by requiring them to implement a program to evaluate the impairment status of Lake Elsinore and Canyon Lake. Such a program would be redundant to current Task Force impairment evaluations which March ARB has already been contributing to as a member of the Task Force, and thus would not provide an environmental benefit commensurate with the resource requirement being imposed. This provision can be removed without affecting water quality. We have no objections to the other three activities mentioned in Section b.

Should you have any questions, please contact my western region water expert, Ms. Lauren Dempsey, at (707) 424-8628 and lauren.dempsey@us.af.mil.

Sincerely,


JAMES T. SPELL, JR
Air Force Regional Environmental Coordinator, Region 9