



LECL TMDL Task Force Meeting

January 15, 2025

Tess Dunham,
Regulatory Facilitator

Schedule for Consideration by Santa Ana Water Board

Circulation of Tentative Documents for
Public Review and Comment (45-day
review period)

- Released December 26, 2024
- Comments due Noon, February 10,
2025

Santa Ana Water Board Hearing

- February 14, 2025



Revision to Compliance Determination Language

~~The following options are included to clearly indicate how compliance with the WLAs and LAs will be determined in future Santa Ana Water Board regulatory actions to implement these TMDLs. These compliance options are part of the assumptions and requirements of the Phase III WLAs and LAs and should be incorporated into future permitting actions to the extent permitted by law. The Santa Ana Water Board ~~has discretion to~~may exclude or modify any of these options in permitting actions as necessary to ensure compliance with applicable law, including State Water Board precedential orders, or ~~as appropriate based on new or different information in the record of the permitting action~~to the extent the Santa Ana Water Board finds an option would be infeasible or ineffective or as necessary to account for unanticipated watershed conditions.~~

Revision to Phase II Milestone Language

In general, the milestones in these TMDLs are numeric values designed to ensure that dischargers make progress in reducing watershed runoff loads. The milestones are set at levels that are intended to result in the lakes meeting the interim numeric targets, which are designed to protect and maintain beneficial uses in the lakes as associated with a reference watershed condition based on a median of existing data. The milestones are not WLAs and therefore Title 40, section 122.44 of the CFR does not require them to be implemented as final water quality-based effluent limitations (WQBELs). However, pursuant to Title 40, sections 122.44 and 122.47 of the CFR, permit requirements must be require WQBELs that are consistent with the assumptions and requirements of the TMDLs, including the Phase II milestones. Therefore, the Phase II milestones and interim numeric targets will be implemented as milestones or interim WQBELs in compliance schedules, as applicable. Further, although the milestones are not LAs as applied to non-point sources of nutrients to the lakes, non-point source waste discharge requirements must be consistent with schedules in the Basin Plan.

EPA's Partial Disapproval San Jacinto River Reach 1

- Adding 44 waterbodies to Category 5 of the 303(d) List
 - Means that TMDL would be required
- Of the 44, 5 are in Santa Ana River Region
 - San Jacinto River Reach 1
 - Santa Ana River Reaches 2 and 3
 - Perris Valley Channel
 - Silverado Creek
- Rationale for Listing
 - State uses CSCI Index score of 0.79 to evaluate biological populations
 - Scores below 0.79 considered impaired until State can demonstrate that impact to biological communities is NOT from a pollutant

SCCWRP Study re: Modified Channels, Intermittent Streams, and Streams on the Central Valley Floor

- Released by the Central Valley Water Board on December 30, 2024, for review and comment
- Comments due by January 30, 2025
- Report topic areas:
 - Testing goodness of fit for biointegrity indices and biostimulatory relationships for Central Valley streams
 - Process for categorizing modified channels based on features observable in the field
 - Options for nitrogen and phosphorus thresholds for intermittent and modified streams