
State Water Resources Control Board

September 5, 2014

Mr. Thomas P. Devenoge
Chief, Environmental
30 CES/CEIE
1028 Iceland Ave
Vandenberg AFB CA 93437

COMMENTS ON DRAFT COMPLIANCE PLAN FOR JAMES V FRITZGERALD (NO.9) AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE FROM THE DEPARTMENT OF THE AIR FORCE AT PILLAR POINT AIR FORCE STATION

Dear Mr. Devenoge,

The State Water Resources Control Board (State Water Board) received the Areas of Special Biological Significance (ASBS) draft Compliance Plan from the Department of the Air Force at Pillar Point Air Force Station 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 Areas of Special Biological Significance, 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 Areas of Special Biological Significance, 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. **Best Management Practices (BMPs):** Section I.A.2.d of the Special Protections requires the Compliance Plan to address storm water discharges and describe how pollutant reductions in storm water runoff will be achieved through BMPs.

Staff understands you have not yet received results from receiving water and core discharge monitoring and these monitoring results may change which structural controls are determined to be necessary to comply with the Special Protections. Once this data has been evaluated, the final Compliance Plan should include a description how pollutants have been reduced through employed BMPs.

2. **Non-authorized non-storm water runoff:** Section I.A.2.b of the Special Protections requires a description of the measures by which all non-authorized non-storm water runoff has been eliminated, how the measures will be maintained over time, and how these measures are monitored and documented.

Section 2.1 of the draft Compliance Plan identifies sources of non-authorized non-storm water runoff and how they have been eliminated. Please include a description of how the measures will be maintained over time and how they are monitored and documented 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 of the effective date of the General Exception.

As stated in the first comment, Staff understands monitoring data is not yet available. However, once this data does become available, 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 Department of the Air Force at Pillar Point Air Force Station 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 MarielePaz.Carpio-Obeso@waterboards.ca.gov.

Sincerely,



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