

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LAHONTAN REGION**

**MEETING OF MARCH 13-14, 2019  
SOUTH LAKE TAHOE**

**ITEM 11**

**DISCUSSION OF LAHONTAN WATER BOARD PRIORITIES AND  
ACCOMPLISHMENTS**

**CHRONOLOGY**

Fiscal Year 2008-09	State Water Resources Control Board (State Board) began Annual Performance Report with performance measures established for most State and Regional Board programs, requiring regional boards to set targets for each performance measure.
2014 to present	Water Board staff have annually presented an informational item summarizing the priorities and accomplishments by fiscal year for the Lahontan region.

**BACKGROUND**

Annually each Spring, Water Board staff produces individual staff and program unit workplans to identify performance targets under each Water Board program to meet State Board and U.S.EPA requirements within our available resources. The timing of this agenda item in March provides an opportunity for staff to solicit input from the Water Board in preparation of its workplans and targets for next fiscal year.

This item also provides an opportunity to share the past year's accomplishments. Since 2008, State Board produces annual performance reports sharing region-specific targets set and accomplished for performance measures identified in most of the water board programs. For the last 6 years, Water Board staff have prepared individual Program Fact Sheets to highlight and describe specific accomplishments and outcomes not readily revealed in the State Board's Performance Reports that mostly account for permits and inspections completed without context or descriptions of importance or water quality results.

**ISSUES**

Identifying ongoing and future priority workshops and policy initiatives (Enclosure 3)

Focusing Water Board staff resources on 2019 Key Efforts (Enclosure 2)

Implementing new statewide policies and General Orders (Enclosure 6)

Training new workforce and establishing Eastern California Regional Cannabis Unit

**DISCUSSION**

Water Board Executive Officer and Assistant Executive Officer will highlight Water Board accomplishments from 2018 and present key efforts for 2019 and beyond, including region-specific workshops and program reviews. An organizational and fiscal overview of the Water Board will also be shared.

The Program Fact Sheets (Enclosure 4) continue to contain a section titled 'Unaddressed Work'. Enclosure 9 also summarizes our key unaddressed tasks. Since the Water Board receives fixed resources in each program, much known work goes unaddressed. We have highlighted these tasks to inform you of the limits of the Water Board's resources at meeting the requirements of many of the state and federal water quality programs.

In 2017 we faced with unprecedented number of vacancies and individuals on leave; totaling 42% of our workforce. This reduction in staff resources limited our ability to complete tasks and meet stakeholder and Water Board expectations. By the end of 2018, the Water Board was fully staffed and efforts in fiscal year 2018-2019 will focus on training and building capacity in our new workforce. Priority has also been placed on implementing the cannabis regularity laws and establishing the new Eastern California Regional Cannabis Unit. In 2018, the state saw an unprecedented increase in wildfires which resulted in all Regional Boards focusing on emergency response improvements. Also, staff evaluated backlogged workload and resuming delayed projects, as demonstrated in several General Orders that will be before the Water Board for consideration in mid-2019 (Enclosure 3).

In 2019, key challenges include applying limited resources to address requests from dischargers to act on permits, CEQA document review, including flood control and maintenance activities in stream channels. Additionally, with the economy improving, we are seeing increased applications for transportation and housing construction projects and those involving impacts to wetlands and waters of the region. Newly enacted forest health, emergency response, transmission line and septic tank laws and a large number of Caltrans road construction projects will tax our limited resources. The State Water Board has also enacted several important policies and Orders (Enclosure 6) that need to be implemented but lack additional resources, which total 2.8 PY. At the same time, the Water Board is taking steps to respond to climate change by updating its plans, policies and permits to increase watershed resiliency, protect infrastructure and improve stormwater management to address extreme conditions such as drought and increased precipitation (e.g. flood events, fires).

The purpose of this informational item is to review, discuss and provide direction to staff, on the following areas:

- Key efforts for the current and upcoming fiscal years, including Water Board workshops and program reports.
- Priorities within the 2019 statewide water quality policies that directly affect or involve the Water Board.

The Program Fact Sheets and our 2019 Key Efforts inform the public and the Water Board on goals, accomplishments and priorities. The Water Board members may provide direction to staff for future goal and priority setting.

Water Board staff will share the performance target results from the previous fiscal year and targets for this fiscal year, along with the progress to date.

#### **PUBLIC OUTREACH/INPUT**

Agenda materials posted on webpage.

#### **RECOMMENDATION**

This is a discussion item only. No Water Board action is required for this item; however, the Water Board may provide direction to staff.

<b>ENCLOSURE</b>	<b>ITEM</b>	<b>BATES NUMBER</b>
<b>1</b>	2019 Staffing in Programs	<b>11-5</b>
<b>2</b>	2019 Key Efforts	<b>11-9</b>
<b>3</b>	Workshops and Program Update Schedule	<b>11-13</b>
<b>4</b>	2019 Program Fact Sheets	<b>11-23</b>
<b>5</b>	2019 Statewide Pending Policies & Orders	<b>11-57</b>
<b>6</b>	2018 Statewide Adopted Policies & Orders	<b>11-63</b>
<b>7</b>	State Water Board's FY 2017-18 Performance Targets	<b>11-67</b>
<b>8</b>	State Water Board's FY 2018-19 Performance Targets (completed to date)	<b>11-71</b>
<b>9</b>	Summary of Unaddressed Work	<b>11-75</b>
<b>10</b>	Power Point Presentation	TO BE SUBMITTED UNDER SEPARATE COVER



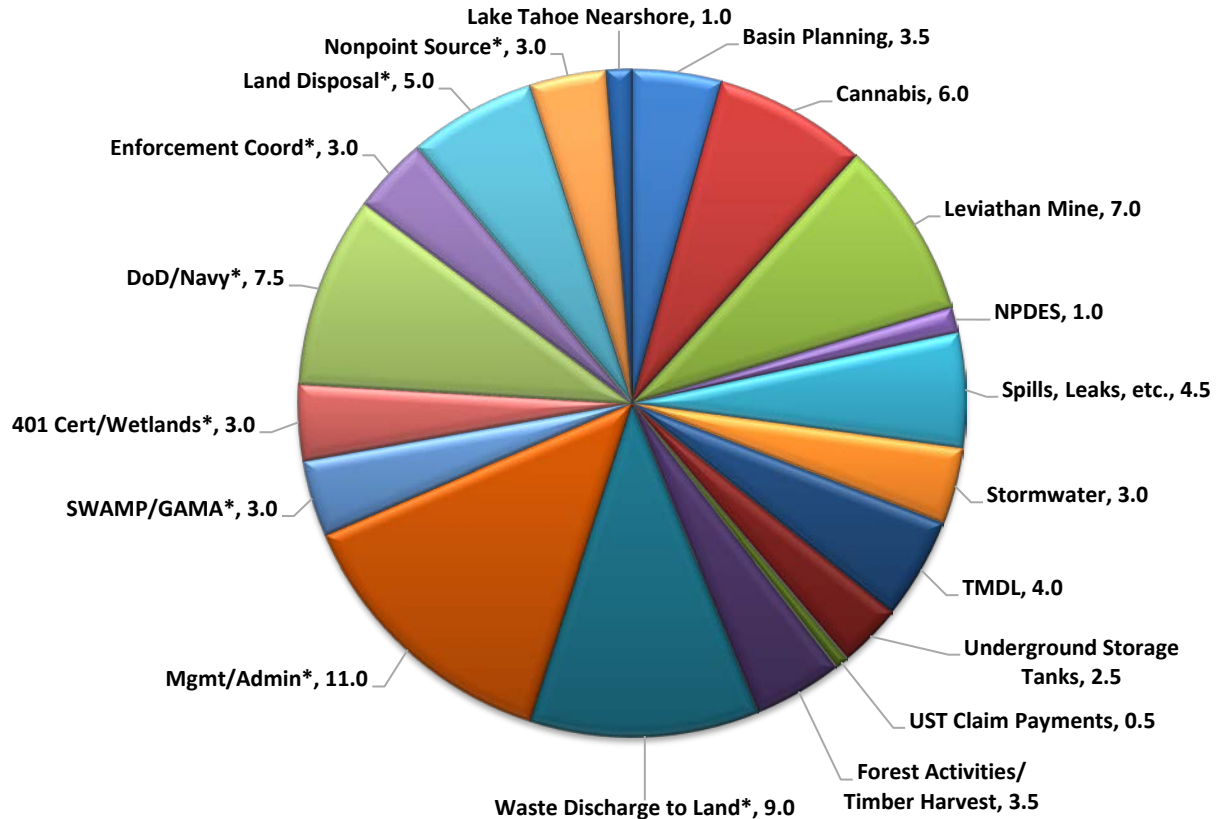
# **ENCLOSURE 1**



## 2019 STAFFING IN PROGRAMS

### Lahontan Regional Water Quality Control Board

**81 Staff\***



\* *This number includes part-time support staff*

### Change in Staffing Levels

Description	FY 14/15	FY 15/16	FY 16/17	FY 17/18	FY 18/19
Beginning of Fiscal Year	61.6	65.1	69.1	73	75
Total Additions	3.5	4	4.9	4	6
Total Reductions	0	0	-1	-2	0
<b>Total Positions</b>	<b>65.1</b>	<b>69.1</b>	<b>73</b>	<b>75</b>	<b>81</b>





## **ENCLOSURE 2**



## Lahontan Regional Water Quality Control Board Goals

- Protect Human Health and Aquatic Life
- Protect/Improve Aquatic Resources & Surface Water Quality
- Support Disadvantaged Communities
- Respond to Climate Change

## 2019 KEY EFFORTS

### Protect Human Health

#### Nitrate and Other Salts in groundwater

- Ensure compliance with Drinking Water Replacement Water Orders
- Develop General Orders for confined animal facilities and irrigated agriculture to reduce sources of nitrates and other salts
- Investigate drinking water contamination in Barstow
- Continue groundwater remediation at LACSD No. 20 and Barstow sites
- Require facilities discharging wastewater to not contribute to nitrate pollution
- Evaluate groundwater basins to determine development of Salt and Nutrient Management Plans
- Assist local government agencies to implement Local Area Management Plans, water quality monitoring and permitting of onsite wastewater systems
- Investigate other sources of nitrates and salts in the Hinkley Valley

#### Chromium in groundwater

- Oversee Pacific Gas and Electric Hinkley Compressor Station cleanup, and ensure background study completion
- Improve monitoring and remediation at Ducommun chemical manufacturing



Stock photo.

#### Perchlorate in ground waters

- Implement construction project to cleanup Barstow perchlorate plume

#### Petroleum in groundwater

- Close cleanup sites that are a low-threat to public health and the environment
- Oversee investigation and cleanup at abandoned or orphan sites
- Require and oversee cleanup of groundwater at priority sites

#### Other pollution problems in groundwater

- Expedite active cleanup at military bases in south Lahontan
- Investigate and implement groundwater cleanup, and provide replacement water at impacted sites (South Lake Tahoe, Victorville, Barstow)
- Investigate groundwater and soil contamination of the emerging contaminate PFAS
- Identify priority groundwater pollution cases and require investigation, plume control, cleanup
- Apply appropriate remedies (active, monitored natural attenuation, or combination) – Implement Board's guidance and develop General Order for the use of monitored natural attenuation
- Request state funds for investigation and cleanup at Victorville, Barstow, and South Lake Tahoe sites with no responsible party

#### Bacteria in surface waters

- Develop grazing regulatory approaches, in collaboration with ranchers, to improve water quality and public health in Eagle Lake, Bridgeport, Bishop and other priority areas in Eastern Sierra
- Implement USEPA Vision Projects in Bishop Creek and West Fork of the Carson River
- Develop Federal lands order to control sources of bacteria in recreational waters

### **Acidic Drainage at Leviathan Mine**

- Implement Emergency Spring Treatment to prevent discharge of untreated acid mine drainage.
- Provide input to United States Environmental Protection Agency (USEPA) on investigation and remedy alternatives



### **Mercury in surface waters**

- Analyze fish tissue from several surface waters to provide data for fish consumption guidance
- Participate in statewide policy development for control of mercury in reservoirs

## **Protect Aquatic Life and Surface Water Quality**

- Expedite projects to reduce wildfire threat and improve forest health
- Continue Tahoe Municipal Storm Water Phase I Permit implementation to reduce pollutant loads and restore Lake Tahoe's clarity
- Track implementation of Total Maximum Daily Load requirements for Lake Tahoe, Truckee, Squaw Creek, Indian Creek Reservoir, Heavenly Valley Creek, and Blackwood Creek
- Ensure compliance with stormwater permit requirements
- Require avoidance and mitigation for construction projects to protect wetlands and riparian areas
- Support watershed restoration efforts and projects, including Squaw Creek, West Fork Carson, Eastern Sierra and Upper Truckee River improvements

## **Environmental Justice**

- Participate in Integrated Regional Water Management projects involving disadvantaged communities
- Consult with tribes on regulatory and CEQA projects to increase participation and protect cultural resources and tribal community health
- Incorporate environmental justice when developing waste discharge requirements and permits
- Conduct outreach, host workshops on new permits, policies and programs in affected communities
- Develop subsistence fishing and tribal beneficial use definitions in Basin Plan

## **Climate Change**

- Adopt Climate Change Mitigation and Adaptation Strategy with recommendations for Water Board actions
- Continue nearshore monitoring and research in Lake Tahoe to improve clarity, nearshore conditions and climate change impacts
- Encourage and permit recycled water use, wetlands restoration and groundwater recharge projects
- Require improved infrastructure resilience for sewer conveyance, pump stations, storm drainage
- Adapt regulatory requirements to protect floodplains, wetlands, stream environments, and recharge zones

## **ENCLOSURE 3**



## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

#### PROPOSED

Project	Purpose	Status
Irrigated Lands General Order September 2019	The Water Board will consider a General Order to address discharges from irrigated lands in the Lahontan Region. The State Water Board adopted on February 2018 a General Order for the Eastern San Joaquin River Watershed that requires all Regional Boards to adopt a revised irrigated lands order by February 2024.	Staff is reviewing the State Board's General Order and will hold an informational workshop in September 2019 to discuss options for a Water Board irrigated lands order; development of a draft General Order in would begin in 2020.
Closed, Abandoned Landfills and Burn Dumps General Order July 2019	The Water Board will consider a General Order to regulate closed, inactive, abandoned landfills and burn dumps.	Staff will present a draft General Order at the July 2019 Water Board meeting. The Order is part of the Landfill Disposal Facility Core Program Review Report that is also scheduled for July 2019.

#### UNDERWAY

Project	Purpose	Status
May-November 2019 Climate Change Mitigation and Adaptation Strategy	Climate Change Strategy will include a framework and policy statement. The Climate Change Strategy will also contain actions the Water Board can take and identify efforts underway at other agencies.	Staff will present a draft framework and policy statement at the May 2019 Board meeting. Staff will present a draft Climate Change Strategy Report at the November 2019 Water Board meeting.
July 2019 Land Disposal Facilities	Core program review. A staff report will be prepared on the status of land disposal facilities, water quality concerns, and policy options.	Staff report will be presented at an informational workshop in July 2019.

## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

July 2019 General Order for Small Domestic Wastewater Treatment Facilities	Water Board is developing a General Order to regulate small domestic wastewater treatment facilities that treat under 20,000 gallons per day and establish nitrogen effluent limitation for those facilities.	Staff will present a draft General Order at the July 2019 Water Board meeting.
July 2019 General Order for Small Non-Domestic Wastewater Treatment Facilities	Water Board is developing a General Order to regulate small non-domestic (industrial) wastewater treatment facilities that treat under 100,000 gallons per day and separate waste from domestic wastewater (i.e., cannabis, manufacturing or other commercial operations).	Staff will present a draft General Order at the July 2019 Water Board meeting.
July 2019 Surface Water Ambient Monitoring Program (SWAMP) Update	Core program review. A staff report will be prepared on the status of the SWAMP program, key projects, proposed changes, and emerging issues.	Staff report will be presented at informational Water Board workshop in July 2019.
September 2019 General Order for Groundwater Remediation	Water Board is developing a General Order to regulate pollutant remediation products in groundwater and discharge of treated groundwater to land.	Staff will present a draft General Order at the July 2019 Water Board meeting.
September 2019 2018 Integrated Report	The 2018 California Integrated 303(d) List of Impaired Waters and 305(b) Surface Water Assessment Report (Integrated Report) will assess data and information for the North Coast, Lahontan, and Colorado River regions. The data solicitation period ended in May 2017. The Regional Board is expected to adopt the Report by September 2019.	Staff will begin the public comment process in June 2019 on the draft Integrated Report. Staff will present a draft 2018 Integrated Report at the September 2019 Water Board meeting.
November 2019 Confined Animal Facility General Order	Water Board is developing a General Order to regulate confined animal facilities, including dairies.	Staff will present a draft General Order at the November 2019 Water Board meeting.



## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

January 2020 Waters of the State - Storm Water	Core program review. A staff report will be prepared on options for regulating waters of the state. The report will focus on storm water discharges from industrial and construction activities and dredge and fill activities in areas of the region that do not contain waters of the United States.	Staff report will be presented at informational Water Board workshop in January 2020; pending State Water Board adoption of the statewide Dredge and Fill Procedures.
March 2020 Monitored Natural Attenuation General Order	Water Board is developing a General Order to regulate groundwater cleanups using monitored natural attenuation as a remedial action.	Staff will present a draft General Order at the March 2020 Water Board meeting.
2017-2020 Federal Lands Non-Point Source (NPS) General Order	Water Board is developing a General Order with the Central Valley Regional Board to regulate non-point source pollution on federal lands.	Six public outreach workshops were held in Fall 2017; permit language and environmental analysis will be developed in 2019; public comment in 2020; General Order adoption in 2020.
2016-2018 Salt and Nutrient Management Plans (SNMP)	Water Board is reviewing local government SNMPs. The SNMP evaluates the potential for salt and nutrient increases from all current and future sources and to develop a management plan to protect groundwater for beneficial uses.	The SNMPs still underway in 2019-2020 by the following IRWMs: Inyo-Mono, Lahontan Basin and the Tahoe-Sierra. Staff will present a strategy informational item at the July 2019 Board meeting for implementing the State Water Board's Recycled Water Policy SNMP evaluations.

## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

2016-2019 Onsite waste water treatment systems (OWTS) – Local Agency Management Plans (LAMPs)	Water Board is reviewing LAMPs and providing direction to local governments as they develop final reports for approval. The LAMPs are required under the State Water Board OWTS policy that requires Regional Boards to review and approve LAMPs to ensure that water quality is protected.	The LAMPs still underway in 2019 include: Alpine County, Lassen County, and City of Adelanto.
2020-2022 Next Generation Monitoring Project	Pilot project with the San Diego Regional Board (lead) and the San Francisco Regional Board. Project will evaluate effectiveness of using next generation technology to improve monitoring methods in regulatory programs.	Work underway

### POSTPONED

Project	Purpose	Status
March 2020 Department of Defense (DOD) Cleanup Site	Core program review. Staff report will update the cleanup status of DOD sites, groundwater quality concerns; PFOA strategy, policy and enforcement options.	Staff report will be presented at informational Water Board workshop in March 2020; pending enforcement and PFOA Strategy direction from State Water Board.
January 2020 Wetland Mitigation Update	Core program review. Staff report will explore options for promoting and protecting wetland restoration projects in the region. The item will also include updates on state and federal wetland policies.	Staff report will be presented at informational Water Board workshop in January 2020; pending State Water Board adoption of the statewide Dredge and Fill Procedures.

## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

May 2020 Site Cleanup Program Update	Core regulatory review. A staff report will be prepared on the status of site cleanup projects, impacts on water quality and policy options.	Staff report will be presented at informational Water Board workshop in May 2020. Delay due to staffing limitations.
June 2020 TMDL Implementation and Impaired Water Bodies	Core Program review. Water Board will be updated on adopted TMDL accomplishments. Water Board will receive information to adopt the impaired water bodies list and strategy to address listed impaired water bodies.	Staff report will be presented at informational Water Board workshop in June 2020. Delay due to staffing limitations.

### COMPLETED

Project	Purpose	Status
March 2019 Lake Tahoe Programs Update Lake Tahoe Nearshore Plan	Progress report prepared on Lake Tahoe Programs: TMDL implementation and adaptive management; Lake Tahoe nearshore; Lake Tahoe Municipal Storm Water Permit was presented in September 2018; status of Lake Tahoe Shoreline Ordinances.	Informational workshop will be held in September 2018. Final revised Lake Tahoe Nearshore Plan will be presented at informational Water Board workshop in March 2019.
July 2018 Harmful Algal Bloom Update	Water Board staff assisted local water body managers in 2018 to evaluate respond to harmful algal blooms	Informational workshop was presented at the July 2018 Water Board meeting; regular updates provided in Executive Officer Reports.
September 2018 Leviathan Mine Update	Water Board held a workshop on status of remedial investigation, feasibility study, interim combined treatment and facility status.	Informational workshop held September 2018; regular updates provided in Executive Officer Reports.
November 2018 Triennial Review	Water Board developed a priority list of Basin Planning projects to be worked on for the next three years.	Public comments workshops were held at the July and September 2018 Board meetings;

## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

		Triennial Review Priority List was adopted at November 2018 Board meeting.
July 2018 Cannabis Program Update	Core program review. Staff reported on implementation of the cannabis program, permitting efforts, and impacts on surface/ groundwater quality. State Water Board staff provided updates on their enforcement and water rights programs.	Staff presented at an informational workshop in July 2018.
June 2014 Environmental Justice	In June 2014 the Water Board held a workshop that included State Board, Water Board staff and local partners (Mojave Water Agency and CalTrout) that explored outreach and technical assistance efforts to assist disadvantaged communities. Water Board received input and prepared a report with recommendations.	July 2015. Water Board adopted "Environmental Justice Program Implementation" report and it was transmitted to State Water Board and other state agencies.
September 2015 Monitored Natural Attenuation (MNA)	Over 2014 and 2015 Water Board held workshops to review MNA as a method for groundwater cleanup in lieu of active groundwater remediation. The Water Board considered criteria, conditions and acceptable methods for using MNA at cleanups and prepared a report with recommendations	March 2016. Water Board adopted "MNA Evaluation and Implementation for the Lahontan Region" report and it was transmitted to State Board and other state agencies. Staff will present a draft General Order at the March 2020 Water Board meeting.
March-July 2015 TMDL Implementation and Impaired Water Bodies	Water Board staff presented accomplishments from implementing several adopted TMDLs. Water Board staff shared future strategy to addressing list of impaired water bodies.	TMDL Fact Sheets, Lake Tahoe Performance Report and online tools available on Water Board website.
May 2015 Underground Storage Tank (UST) Program Update	Core program review. Water Board held a workshop to review closure of low threat underground tank cases and remaining high priority cases that require action.	GEOTRACKER updated underground tank case information.
February 2016 Desert Renewable Energy Conservation Plan and Update on Alternative	Water Board held a workshop that included the California Energy Commission, Department of Fish and Wildlife and other state and federal	Water Board continues to permit alternative energy projects. Water Board requested more



## 2019 WORKSHOP AND PROGRAM UPDATE SCHEDULE

### Lahontan Regional Water Quality Control Board

Energy Projects in Region	agencies to discuss a comprehensive plan to address mitigation requirements for future renewable energy projects. The Bureau of Land Management (BLM) presented the Phase 1 Plan that governs projects on BLM land. Water Board staff presented an update of alternative energy project development in the region.	information and guidance for mitigation of impacts. wetland mitigation workshop set for November 2019.
July 2016 Mono Lake Update	Water Board conducted a tour of Mono Lake and discussed water quality and drought impacts to the Lake. The Mono Lake Committee also provided updates on Mono Basin policy and scientific issues.	July 2016
March 2017 Leviathan Mine	Water Board held a workshop on implementation of the settlement agreement with ARCO. Updates provided on remedial investigation, feasibility study, interim combined treatment and facility status.	Informational workshop held March 2017.
July 2017 Bridgeport Grazing Waiver	Water Board staff is working with Bridgeport ranchers to develop a long-term watershed approach to address water pollution in the Bridgeport reservoir and tributaries.	Water Board renewed the waiver in July 2017, with the expectation the Bridgeport ranchers would fully develop a new, long-term watershed approach for the next permit cycle.
November 2017 Flow Requirements and Water Quality Update	Informational workshop on the Water Board's role in establishing minimum flow requirements in surface waters to protect beneficial uses, such as aquatic life, and to maintain water quality. State Water Board staff provided updates on their water rights program and role in flow requirements.	Staff is beginning to explore specific surface water bodies that are connected to groundwater supply aquifers (such as Squaw Creek in Olympic Valley) and investigating how flow requirements may help protect beneficial uses.



## **ENCLOSURE 4**





# Lahontan Water Board Program Fact Sheet FY 2018-2019

## Timber Harvest

### Overview

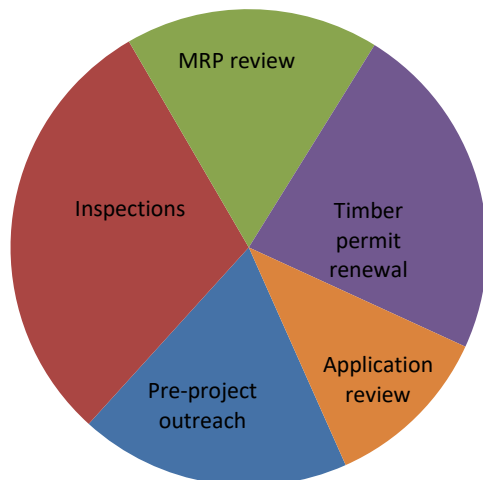
The Region's Timber Harvest Program resources are 3.5 PY from the State General Fund and the State's lumber product assessment fund. The program uses a conditional waiver (2014 Timber Waiver) to implement the Nonpoint Source Pollution Control Program. The 2014 Timber Waiver applies to vegetation management projects that range from homeowner defensible space operations; to local Fire Protection Districts' community protection plans; to large Wildland Urban Interface projects proposed by the California Department of Parks and Recreation, the BLM, and the USFS. Commercial timber harvest conducted by small landowners, industrial timber companies, and the USFS are also covered under 2014 Timber Waiver categories.

For commercial logging projects, the State has developed a Review Team process that involves the Water Boards, the CA Department of Fish and Wildlife (CDFW), the CA Geological Survey (CGS), and CalFire. The Review Team process satisfies the California Environmental Quality Act (CEQA) requirements with CalFire as the lead agency.

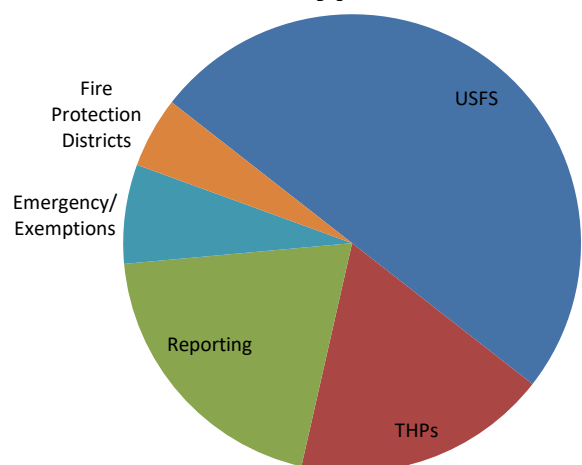
### Key Efforts

- Review proposed projects to ensure compliance with 2014 Timber Waiver requirements.
- Conduct inspections of active and completed harvesting projects.
- Identify potential or existing water quality problems and request corrective actions.
- Review and track Timber Waiver monitoring reports.
- Provide outreach to entities with projects in the planning phase.

### Staff Activities



### Types



### Accomplishments

**Timber Waiver Outreach and Renewal Efforts** - Staff coordinated with Cal Fire, TRPA, USFS LTBMU, California Tahoe Conservancy, Tahoe Fire and Fuels Team, timber industry representatives, and other stakeholders regarding planned renewal of the expiring 2014 Timber Waiver. Renewing the 2014 Timber Waiver will provide staff time to develop a revised timber harvest and vegetation management regulatory strategy and conduct broad stakeholder outreach, especially with statewide focus on wildfire prevention.

**Lake Tahoe Basin** - Under the USFS LTBMU's South Shore Fuel Reduction Project, during the 2018 field season, the LTBMU thinned by hand crews approximately 217 acres and mechanically treated 167 acres. Staff also worked with the LTBMU on the Restoration of Fire Adapted Ecosystems Baldwin Meadow Project where 34 acres were thinned by hand crews, 47 acres were mechanically treated, and 68 acres were treated by prescribed burning.

**Statewide** - Staff coordinated with State Water Board, CalFire, CDFW, and CGS in implementing AB 1492, the Timber Regulation and Restoration Program. Staff are part of the newly formed statewide Emergency Response Technical Working Group to develop and implement Water Board action plans during and after catastrophic fire events.

**CalTREES**- CalFire has developed a new on-line system for timber harvest permitting. The California Timber Regulation and Environmental Evaluation System (CalTREES) streamlines the submission and review processes for timber harvest documents. CalTREES is being rolled out in phases and Review Team agencies (State and Regional Water Boards, CDFW , and CGS) are already using CalTREES to review timber harvest documents uploaded by CalFire staff.

## Performance targets for FY 2017-2018

	<u>Target</u>	<u>Completed</u>
Timber Harvest Inspections	20	21

## Performance targets for FY 2018-2019 – Progress to date

	<u>Target</u>	<u>Completed</u>
Timber Harvest Inspections	25	24

**Unaddressed Work-** Development of state-wide permit for vegetation management within utility line corridors.



## **Lahontan Water Board Program Fact Sheet**

### **Fiscal Year 2018-2019**

## ***Waste Discharge to Land***

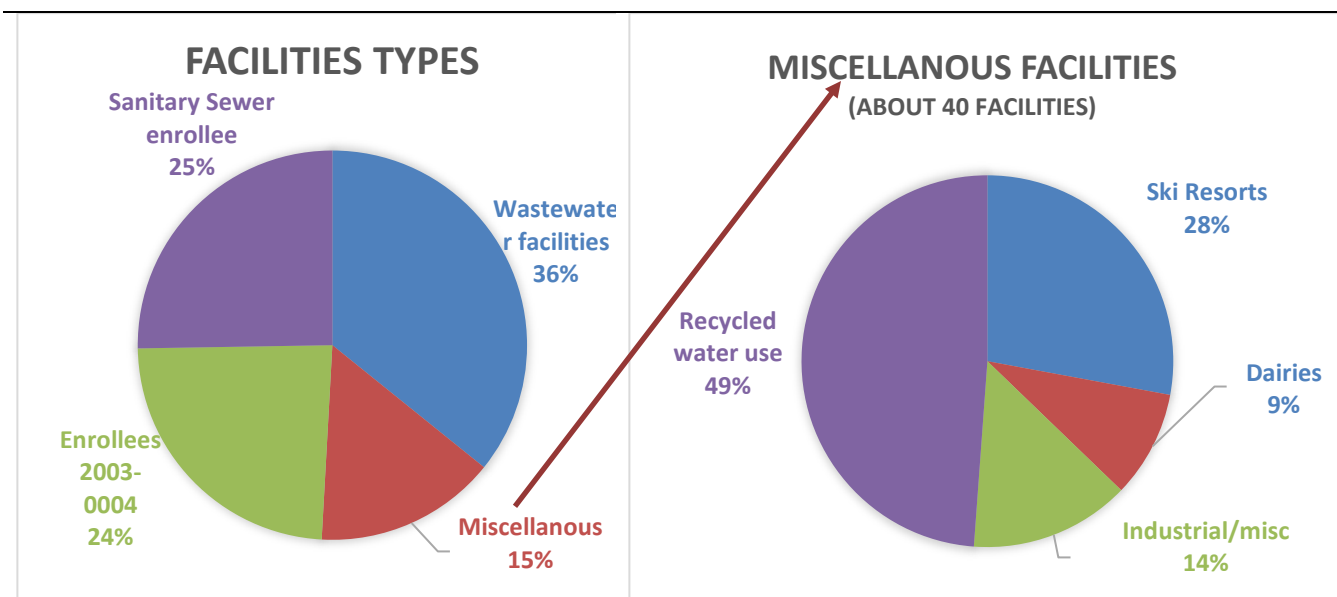
***(not under Title 27 regulations)***

### **Overview**

The Waste Discharge to Land Program authorizes and regulates actions or discharges of waste that pose a threat to waters of the state (both surface waters and groundwater). This performance-based program primarily covers domestic wastewater (sewage) treatment facilities. In the Lahontan region, wastewater flows at regulated facilities range from 1,500- to 15-million gallons per day. The program also regulates ski resorts and golf courses, confined animal feeding operations, onsite septic systems managed by local agencies, recycled water production and use, reclamation and mitigation projects, sanitary sewer collection systems.

### **Key Efforts**

- Work with Alpine and Lassen County to finish their respective Local Agency Management Programs (LAMP).
- Adopt General Waste Discharge Requirements (WDR) for small domestic wastewater treatment systems (less than 20,000 gallons per day).
- Work with Golden States Water Company (GSWC) and others to identify the cause of elevated nitrate that shut down four municipal supply wells for the City of Barstow.
- Require dischargers to begin uploading collected groundwater data into GeoTracker.
- Develop strategies to implement new State Board requirements part of revised Recycled Water Policy, including evaluation of all recycled water requirements.
- Work with Bridgeport Public Utility District (BPUD) and US. Forest Service on the disposal of waste streams from arsenic removal systems, both proposing flocculation system for drinking water treatment. BPUD system proposes to have a waste stream that will discharge to BPUD wastewater facility with sludge being disposed of offsite and may require a WDR update. The US Forest Service has proposed an arsenic treatment facility that will discharge arsenic laden sludge into a septic tank and leach field, this proposal may need a new WDR for the discharge.



## Performance Targets for Fiscal Year 2017-2018

	<u>Target</u>	<u>Achieved</u>
• Inspections	33	41
• Permit updates or new WDRs	2	1

## Performance Targets for Fiscal Year 2018-2019

	<u>Target</u>	<u>Progress to Date</u>
• Inspections	50	49
• Individual WDRs	3	0

## Unaddressed Work

- Unknown number of RV parks or facilities with flows of greater than 10,000 gallons per day wastewater into onsite septic systems; unregulated discharge is adding salts and nutrients to closed groundwater basins, impacting assimilative capacity.
- Approximately 114 individual WDRs that need to be reviewed and considered for updating to address assimilative capacity issues of specific groundwater basins.
- There are 15 reclamation WDRs that should be reviewed/updated for consistency with the recycled water policy. New recycled water projects are being proposed.
- Multiple requests for permit actions from Dischargers not being implemented.
- Request to work with Town of Truckee and Nevada County to authorize increased septic tank density for the Town of Truckee and surrounding area. Complaint on limited housing availability, current Basin Plan Prohibition in-place.
- Update numerous facility Monitoring and Reporting Programs to incorporate groundwater monitoring requirements, require sufficient data to evaluate compliance, or reflect current operations.

# Lahontan Water Board Program Fact Sheet FY 2018–2019

## *Dredge and Fill*

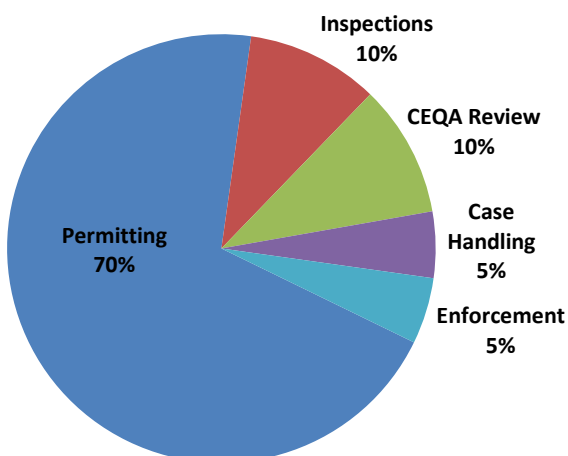
### Overview

This Program regulates discharges of dredge and fill material to all waters of the State under the Porter-Cologne Water Quality Control Act, including waters of the US under Clean Water Act section 401. Additional protections are provided for wetlands, special aquatic sites, and headwaters because these waterbodies have important functions and values including pollutant removal, flood water retention, and habitat connectivity. The Program's core protection strategy is impact avoidance, followed by impact minimization, and then mitigation to compensate for impacts and to ensure no net loss of water resources and beneficial use. The Program is supported by 2.1 PYs.

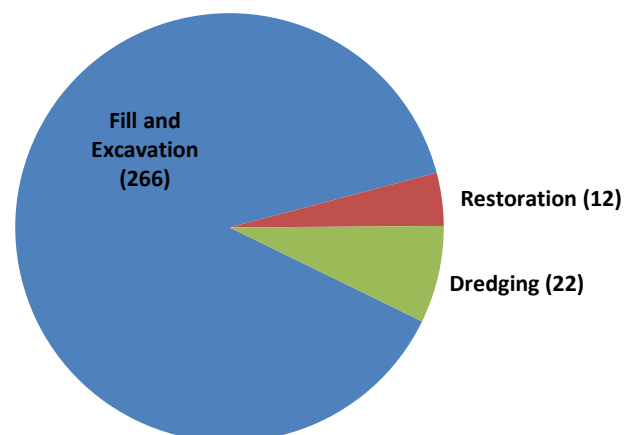
### Key Efforts

- Require applicants to propose the least environmentally damaging practicable alternative (LEDPA) for a project.
- Encourage applicants to avoid impacts to water resources; all unavoidable impacts require minimization and then mitigation.
- Impose permit conditions that are enforceable and trackable in CIWQS for efficient compliance and enforcement.
- Require monitoring and reporting, including use of California Rapid Assessment Method protocols and EcoAtlas.
- Comment on environmental documents to ensure requirements of the Program, including our core protection strategy (avoid, minimize, mitigate), LEDPA, and water resource issues are clearly explained and taken into consideration early on in project planning.
- Inspect project sites and mitigation areas for compliance with permit requirements.
- Development of general orders for Los Angeles Department of Water and Power (LADWP) and San Bernardino County.
- Continue to assist and engage in discussions with State Board on the statewide Draft Procedures for Discharges of Dredged or Fill Material to Waters of the State.

### Staff Activities



### Active Permits



## Accomplishments

- Issued 44 new dredge and/or fill permits (30 Water Quality Certifications [WQC], 10 Notices of Applicability for WDR enrollments, and 4 General Order enrollments).
- Actively processing 23 applications for new dredge and/or fill permits.
- Performed 27 inspections.
- Completed 3 informal enforcement actions for non-compliance with permit conditions that ultimately resulted in full compliance.
- Reviewed and commented on nearly 40 environmental documents.
- Lead Agency for CEQA compliance for five projects including the Bonnie Clare Road Project to restore public access to Scotty's Castle in Death Valley.
- Progress towards a long-term, multi-year WQC for LADWP activities in Inyo and Mono counties. Meetings are held quarterly to discuss planned maintenance needs; site-specific permits are issued on an as-needed basis.
- Progress towards the development of the Mojave River Watershed Mitigation Bank in the Mojave watershed.

## Performance Measures for Fiscal Year 2018-2019

State Board has developed four statewide performance measures (without numeric targets) to evaluate Program efficiency:

1. The number of Program-specific regulatory measures active during any part of the fiscal year.
2. The number of applications received during the fiscal year.
3. The median number of days between receipt of an individual WQC application and initial regulatory action/response.
4. The average number of days between the latest of two events: (1) the application complete date and individual WQC issuance or denial, or (2) the receipt of all supplemental information and individual WQC issuance or denial.

## Unaddressed Work

- Lack of PYs causes more than two-thirds of permitted sites to go uninspected each year.
- Limited opportunities and resources to ensure mitigation is successful.
- Limited regulatory tools to protect and regulate impacts to waters of the State where no waters of the US are designated.
- Identification of priority functions and values of waters requiring protection and impact avoidance, where possible.
- Incentivizing watershed restoration and resiliency efforts (partly being evaluated as part of the Climate Change Strategy efforts).
- Limited resources for outreach and education.





# Lahontan Water Board Program Fact Sheet FY 2018-19

## *Basin Planning*

### Overview

The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains the water quality objectives to protect identified beneficial uses. The Basin Plan also outlines control measures to achieve water quality objectives. The Water Board sets planning priorities in its Triennial Review, most recently adopted in November 2018.

Funding for the Basin Planning Program is from the state Waste Discharge Permit Fee account, which has allocated 4.3 PY to complete both Basin Planning and TMDL program work. 1.2 PY are identified for Basin Planning work in FY 18-19.

### Key Efforts

2018 Triennial Review priority projects being worked on include:

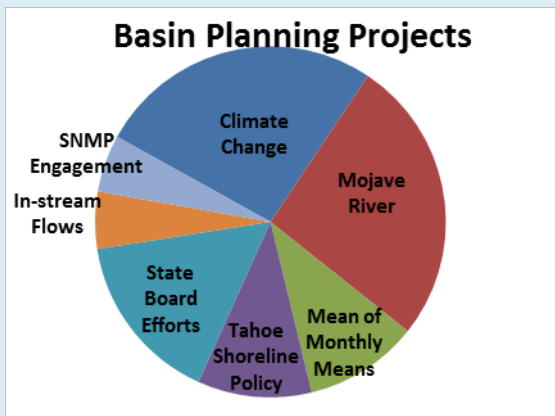
- The Lake Tahoe Shoreline Basin Plan Amendment to remove the prohibition on pier development in fish habitat is scheduled for consideration before the Water Board in March 2019.
- The Mojave Surface Water Basin Plan Amendment is scheduled for consideration at the June 2018 Water Board meeting. The amendment proposes to update beneficial uses in the Mojave River and tributaries to accurately reflect conditions on the ground and provide protections for existing beneficial uses and water quality.
- The Mojave Groundwater Objectives Project will include development of a draft staff report with recommended groundwater quality objectives and stakeholder workshops. The project will focus on the upper Mojave groundwater sub basin and will subsequently address the middle and lower sub basins.
- Participation in State Water Resources Control Board (State Water Board) Standards Unit project to address nutrients with a biostimulatory substances objective and develop guidance or a numeric objective for biological integrity, which will be a higher priority for State Water Board now that the REC-1 Bacteria Objectives project is complete.

Other Triennial Review priorities scheduled for staff to work on include Tribal and Subsistence Beneficial Use Designations, Evaluating Bacteria Objectives, Evaluating Climate Change Adaptation and Mitigation Plan recommendations, and the Truckee River Embedded/Deposited Sediment Objective Project.

## Key Accomplishments

### Mojave River Watershed

Conducted CEQA Scoping meeting for Surface Water Basin Plan Amendment in April 2018 and initiated AB 52 Tribal Consultation beginning in May 2018. Conducted information workshop at January 2019 Water Board meeting and circulated a Draft Staff Report and CEQA document for public comment.



### State Water Board Standards Projects

Continued tracking the State Water Board Standards Unit's project to develop a biostimulatory substances objective and develop guidance or a numeric standard for biological integrity.

**Lake Tahoe Pier Prohibition Removal** – Scoping completed in November 2018, Draft Staff Report and CEQA circulated in early 2019.

**Climate Change Adaptation Planning** - Staff continued work towards development of a Climate Change Adaptation and Mitigation Plan, expected completion later in 2019.

**2018 Triennial Review** - Adopted by Water Board in November 2018 and transmitted to USEPA and State Water Board in February 2019.

## Performance Targets FY 17/18


<u>Target Description</u>	<u>Targets</u>	<u>Achieved</u>
# of Basin Plan Amendments Adopted	0	0

## Performance Targets FY 18/19

<u>Target Description</u>	<u>Targets</u>	<u>Achieved</u>
# of Basin Plan Amendments Adopted	1	0*

\*Two proposed Basin Plan Amendments, Lake Tahoe Pier Prohibition Removal and Mojave River Surface Water Beneficial Use, are currently scheduled for Water Board consideration at the March 2019 and June 2019 Board meetings, respectively.





## Lahontan Water Board Program Fact Sheet FY 2018-19

### ***Cannabis Regulatory Program***

#### Overview

The purpose of the Cannabis Regulatory Program is to provide a mechanism for the Water Boards to permit the diversion of water and discharge of waste associated with cannabis cultivation activities to protect our water resources. Cannabis cultivation industry in California has grown and is often located in sensitive environmental areas that have the potential to significantly impact water quality.

In June 2017, the Governor signed into law a unified code of regulations for medical and adult use of cannabis. In October 2017, the State Water Board adopted the Cannabis Cultivation Policy - Principles and Guidelines for Cannabis Cultivation (Cannabis Policy) and General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities (Cannabis General Order) which implements the Cannabis Policy.

Given the scope and unique circumstances of regulating a formerly illegal industry unaccustomed to government regulation, the keys to developing and implementing an effective program are: (1) a clear and simplified process for permittees to enroll in the Cannabis General Order; (2) enforcement against cultivators that evade or do not comply with the permit requirements, and (3) interagency coordination.

The Eastern California Regional Cannabis Unit (housed at the Lahontan Water Board) provides program implementation for both the Lahontan and the Colorado River Basin Water Boards. The unit covers all eastern California, from the Oregon border to the Mexican border (approximately one-third of the area of the State of California). The unit received an additional four PYs this fiscal year for a total of six PYs.

#### Key Efforts

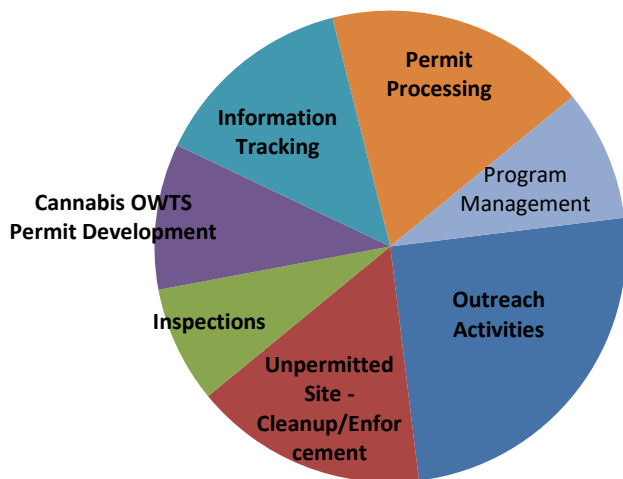
The Cannabis Regulatory Program is focused on continuing to expand the program throughout the state, and for the program to become fee supported. The program implements measures that help achieve Action 4 (Protect and Restore Important Ecosystems) and Action 6 (Expand Water Storage Capacity and Improve Groundwater Management) of the California Water Action Plan.

Within the Lahontan region, cultivation is largely concentrated within the communities of Lancaster, California City, and Adelanto. Indoor cultivation is predominant in these areas. Inyo and Mono Counties have finalized cannabis cultivation requirements, and outdoor cultivators are locating within the Walker River and Stewart Valley areas. Nevada County is developing ordinances allowing additional cultivation within unincorporated areas, and the City of South Lake Tahoe is completing its ordinances for cultivation and distribution. Key efforts this fiscal year include:

- Provide outreach to local governments, permittees, and stakeholders.
- Develop a strategy to address unauthorized cultivation on public and private lands.
- Address onsite disposal of wastewater associated with cannabis cultivation and small domestic systems.
- Evaluate water quality impacts from regulated and unregulated cannabis cultivation.
- Expand the Cannabis Identification and Prioritization System (CIPS) throughout the Unit's area.

- Process permit applications.
- Inspect permitted facilities and provide compliance assistance.
- Develop electronic data collection form with GIS interface.
- Coordination and collaboration for cannabis cultivation on or near tribal properties.

### Staff Activity by Program Tasks



Cultivation Related Waste, Refuse, and Doi  
Cultivation\_Related\_Waste\_Refuse\_and\_Domestic\_V

Soil Disposal and Spoils Management  
Soil\_Disposal\_and\_Spoils\_Management

Roads and Drainage  
Roads\_and\_Drainage

Riparian and Wetland Protection and Man  
Riparian\_and\_Wetland\_Protection\_and\_Management

Land Development, Erosion Control, and C  
Land\_Development\_Erosion\_Control\_and\_Drainage

Indoor Cultivation  
Indoor\_Cultivation

Fertilizers, Pesticides, and Petroleum Prodt  
Fertilizers\_Pesticides\_and\_Petroleum\_Products

Cultivation\_Parcel  
Cultivation\_Parcel

Sample Electronic Inspection Data  
Form for Tilth Farms, Walker, CA



### Accomplishments

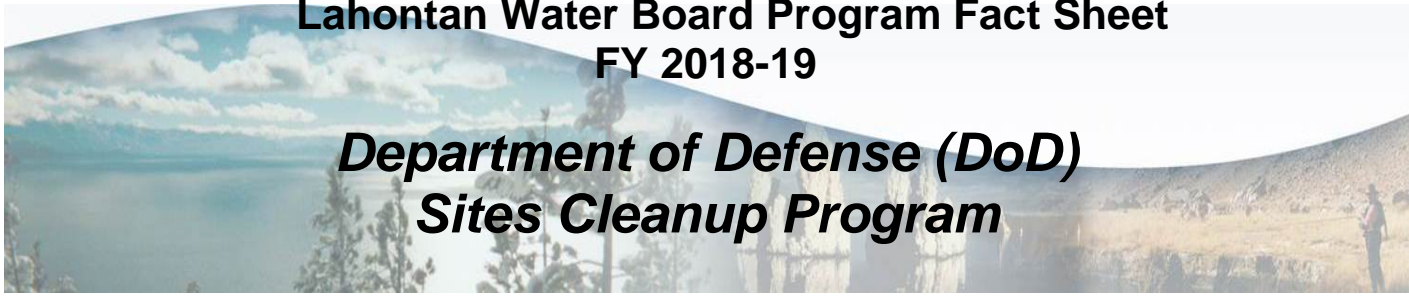
- Issued approximately 200 Permits.
- Conducted outreach workshops in Adelanto, Palm Desert, and Needles.
- Developed statewide tablet-based inspection form prototype, linking site GPS coordinates.
- Hosted first regional Cannabis Roundtable in October 2018.
- Provided CEQA review of 35 individual projects and county cannabis ordinances.

### No Performance Targets Established

Performance targets will be established in coordination with other State and Regional Water Board efforts next year.

### Unaddressed Work

Over 1,000 illegal sites are estimated to exist within the Eastern Cannabis Unit area (based upon local law enforcement sources), primarily on public lands in remote mountainous areas. A key effort is to develop a strategy to address this issue in coordination with public land partners. However, funding to provide appropriate enforcement and site cleanup associated with these sites is currently not available.



# Lahontan Water Board Program Fact Sheet FY 2018-19

## *Department of Defense (DoD) Sites Cleanup Program*

### Overview

The DoD program addresses cleanup and abatement of contaminated sites from historic activities at military facilities. The Water Board's oversight work is conducted under the Defense and State Memorandum of Agreement (DSMOA), which specifies the current and planned restoration efforts and provides for cost recovery for regulatory oversight. There are approximately 6.6 PYs assigned to DoD work this FY. We oversee eight military facilities in the Lahontan Region where there are over 500 active cleanup cases under the DoD program. Most of the cases consist of solvent or petroleum releases and waste disposal to land. Other contaminants include perchlorate, nitrate, metals, munitions-related chemicals, and per- and polyfluoroalkyl substances (PFAS).

### Key Efforts

Program priority is the protection of human health and the environment. This is achieved by remediation of soil and groundwater and reducing human and ecological exposure to contaminants. Some DoD facilities are proposing remedies that focus on land use controls instead of restoration of groundwater quality.

Major staff efforts include:

- **George Air Force Base (AFB):** Working to implement active groundwater remediation and restoration of groundwater and to characterize and remediate munitions sites.
- **Edwards AFB:** Working to resolve disputes related to decision documents, refining conceptual site models, and ensuring investigations provide a robust basis for decisions.
- **China Lake Naval Air Weapons Station (NAWS):** Navy requested halt of State oversight work in October 2018, citing a need for partnering meetings between State and Navy. These efforts have not yet been initiated. Water Board staff still performing oversight and working to resolve issues and to move forward.
- **Sierra Army Depot (SIAD):** Ensure groundwater contaminants of concern are characterized. Evaluate active remediation at TCE hot spots and monitored natural attenuation. Army has conducted an indoor vapor intrusion study and is evaluating five new sites.
- **Marine Corps Logistics Base (MCLB), Barstow:** Nebo and Yermo: Completing a revised decision document (Explanation of Significant Difference [ESD]) for removal of lead, PCBs, and PAH-contaminated soils from a former trap and skeet range. Removal is scheduled for April 2019. Additional PFAS soil and groundwater sampling completed November 2018.
- **Ft. Irwin National Training Center (Ft. Irwin NTC):** Reviewing feasibility study for a landfill and results of a soil vapor extraction (SVE) study. Evaluating sites related to munitions and soil/groundwater contamination.
- **Air Force Plant 42 (AFP 42):** Restarted groundwater pump and treat system and continue operation of Site 29 SVE system to remediate TCE-impacted soil and groundwater.
- Providing regulatory and technical oversight for ongoing efforts by all DoD branches to evaluate sites for presence of PFAS. State Board taking lead on statewide PFAS issues.

## Accomplishments

**Soil and Groundwater Remediation:** George AFB is preparing a pilot study using in-situ groundwater technology to remediate TCE from groundwater. In-situ system operating at Sierra Army Depot appears successful in remediating TCE hotspots in groundwater. AFP 42 restarted a groundwater pump and treat system and continued operation of an SVE system.

**Removal Actions:** George AFB removed PAH-contaminated soil.

**Five Year Reviews:** Completed three Five-Year Reviews: AFP 42, Ft. Irwin NTC, and Edwards AFB.

**Investigations:** Installed additional wells at Edwards AFB to assess plume stability. Installed additional wells at MCLB Barstow to characterize plumes at two sites. Initial PFAS sampling was conducted at AFP 42, MCLB Barstow, Edwards AFB, George AFB, and China Lake NAWS.

**Decision Documents:** Reviewed several ESDs that modify or change the remedial approach agreed to in previous Records of Decisions (RODs). One ESD at MCLB, one at Edwards AFB, and two at George AFB. Two ESDs are in the review process: MCLB Barstow and Edwards AFB.

**PFAS:** The Air Force (AFP 42, Edwards AFB, George AFB) and Navy (MCLB Barstow) continue sampling soil and groundwater at suspected PFAS source areas. New data is being used to expand PFAS investigations at each base. China Lake NAWS is preparing a work plan to conduct additional sampling in the near future. The Army is starting the preliminary assessment phase.

## Performance Targets for Fiscal Year 2017-2018

	<u>Target</u>	<u>Achieved</u>
DoD Sites New into Active Remediation	2	0*

\*Delayed until FY 2018-2019

## Performance Targets for Fiscal Year 2018-2019

	<u>Target</u>	<u>Achieved</u>
DoD Sites New into Active Remediation	2	0*

\*On schedule to meet these targets this fiscal year.

## Unaddressed Work

- Work at some sites is stalled due to informal and formal disputes for a variety of reasons related to active remediation, minimal site characterization, streamlined risk assessments, unwillingness to incorporate State regulations into remedial strategies, and DoD contracting issues.
- No resources to address statewide PFAS investigation requirements issued by State Board

**Percent of Staff Time by Facility**





A wide banner image showing a scenic view of a lake, likely Lake Tahoe, with mountains in the background and a person walking on a trail in the foreground. The text is overlaid on this image.

## Lahontan Water Board Program Fact Sheet FY 2018-19

### ***Enforcement***

#### Overview

The Enforcement Program's responsibilities are:

- Evaluating and prioritizing violations of water quality protection laws, regulations, and permits.
- Initiating formal enforcement actions/strategies intended to reestablish compliance, to address environmental damage, and to deter future violations.
- Coordinating with other Regional Water Boards and the State Water Board in pursuing multi-region or state-wide enforcement actions; and to improve enforcement consistency and effectiveness.

These actions are conducted under federal and state law, and the State Water Board's Water Quality Enforcement Policy, with 1.9 PYs and support from other programs. Most enforcement resolves violations at the lowest level, typically informal enforcement by Regulatory Program staff.

#### Key Efforts

- Enforce against violations that have adversely affected water quality and beneficial uses with priority to Disadvantaged Communities. Two key priorities are (1) protecting public health (e.g., providing safe alternative water supply when necessary), eliminating the pollutant source, and then cleanup; and (2) protecting/restoring environmental health (e.g., requiring restoration of damaged/destroyed surface waters, including wetlands, and cleanup of contaminated surface water and groundwater).
- Resolve outstanding formal enforcement efforts and begin new formal enforcement activities as identified through the Water Board's Enforcement Committee.
- Enforcement types include 1<sup>st</sup> and 2<sup>nd</sup> Notices of Non-Compliance for Annual Report violations (Storm Water Program); Administrative Civil Liability Complaints and Expedited Payment Letters (NPDES, WDR, and Storm Water Programs); and Cleanup and Abatement Orders, and Investigative Orders (Site Cleanup Program).
- Follow up on enforcement related activities related to the South Y PCE Contamination (South Lake Tahoe).
- Expand efforts to improve compliance with submittal of self-monitoring reports that are the heart of the Water Board's compliance evaluation program for permitted facilities.
- Work with CA Department of Toxic Substances Control to jointly enforce DOD facilities to comply with state regulations to protect human health and cleanup polluted groundwater.

## Key Accomplishments

**Lake Tahoe Laundry Works** - Responsible Parties began implementing an acceptable Site Investigation Work Plan to delineate the full extent of chlorinated solvent pollution from the site.

**Staff Enforcement Training**- Enforcement Program training was provided during fall 2018 to our new staff and experienced staff members, clearly outlining roles and responsibilities regarding responses to violations. Templates and examples for informal and some formal enforcement actions have also been created and made available to staff. Staff is expecting to see an increasing trend in the Region's response rate to violations over the next several months in response to more stable staffing and recent training.

## Performance Targets FY 2017-18

- **Mandatory Minimum Penalties (MMP)** –addressed (or continuing to address/plan to address) **100 percent of known MMP violations within 18 months of discovery**
- **Priority 1 Violations** – Took (or continuing to take/plan to take) **formal enforcement action against 100 percent of Priority 1 Violations within 18 months of discovery.**

All Priority 1 violations identified in the past 18 months have been (or continue to be/are planned to be) addressed by formal enforcement actions.

## Performance Targets FY 2018-19

- **Mandatory Minimum Penalties (MMP)** – Performance target is to address 100 percent of MMP violations within 18 months of discovery.

Staff is currently addressing a backlog of MMP violations involving three facilities. Anticipate resolving backlog by the end of 2019.

- **Priority A (or 1) Violations** – Performance target is to take enforcement action against 100 percent of Priority A (or 1) Violations within 18 months of discovery.

All Priority A (or 1) violations identified in the past 18 months have been or continue to be addressed by enforcement actions.

## Unaddressed Work

- In most programs (e.g. WDRs, Storm Water), only a small percentage of regulated facilities get inspected; and therefore, potentially many violations and associated water quality impacts are not observed and go unreported and unaddressed.
- Follow up on monitoring and technical reports that are not submitted.
- Adequate data entry for violations to be tracked within the GeoTracker database system.
- Timely completion of formal enforcement actions, because limited resources prevent staff from carrying forward some formal enforcement (e.g. ACLs, MMPs) because the intensive hours needed to bring forward the enforcement orders; State Board's Office of Enforcement is preparing to assist our Enforcement Unit staff on carrying forward some formal enforcement because we lack resources to complete all the formal enforcement steps.

# Lahontan Water Board Program Fact Sheet

## Fiscal Year 2018-2019

### *Land Disposal*

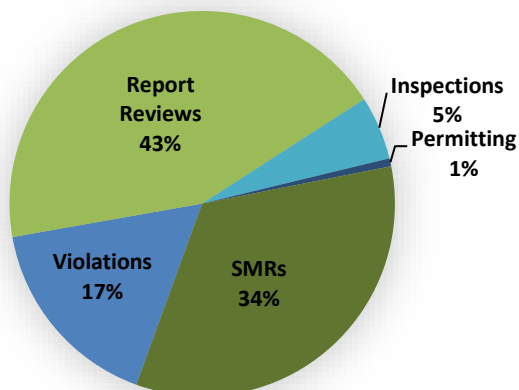
#### Overview

The purpose of the Land Disposal Program is to regulate facilities that discharge waste to land that may negatively impact water quality in an effort to ensure they are operated in a manner that protects water quality, in accordance with the California Code of Regulations (CCR), Title 27, and the California Water Code. The program covers landfills, mines, composting operations, cement plants, land treatment units, and other facilities regulated pursuant to CCR, Title 27. The program is supported by 3.2 PYs.

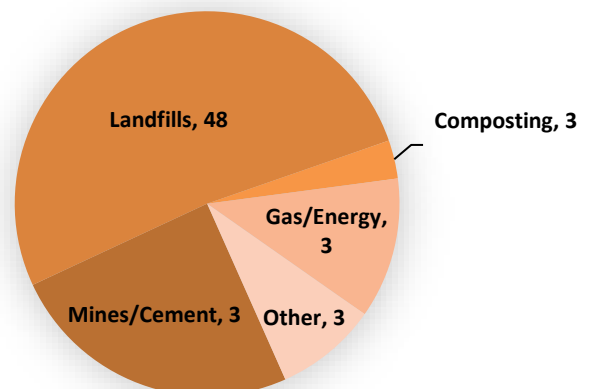
#### Key Efforts

- Collaborate with State Water Resources Control Board (State Water Board), California Department of Resources, Recycling, and Recovery (CalRecycle), California Division of Mine Reclamation, local counties, and industry stakeholders.
- Review monitoring reports and other technical documents for landfills and other land disposal facilities to ensure permit compliance and water quality protection.
- Ensure financial assurance documents and instruments are current and amounts are sufficient to account for current costs of closure, post closure, and corrective actions.
- Respond to discharger requests for new, revised, or rescission of waste discharge requirements (WDRs) related to new, modified, or closed operations at land disposal facilities.
- Inspect all Threat to Water Quality (TTWQ) 1 land disposal facilities annually and inspect all TTWQ 2 and TTWQ 3 land disposal facilities biennially.
- Developing closure WDRs for the Trona-Argus Class III Landfill and Corrective Action Program WDRs for the Apple Valley Municipal Landfill.
- Developing a region-specific general WDR for closed, abandoned, and inactive landfill sites, to include addressing historical burn dumps.
- Continue working to permit composting operations under General Waste Discharge Requirements for Composting Operations, Order No. 2015-0121-DWQ.
- Land Disposal Program Seminar to be presented at the May 2019 board meeting.

#### Staff Activities



#### Facilities



## Accomplishments

- Exceeded inspection performance targets in FY 17-18. Permitting targets were not met, but two WDR amendments were processed. An expected revised report of waste discharge for a landfill site was not received.
- On track for meeting FY 18-19 performance targets.
- Reviewed 180 technical documents and financial assurance documentation to ensure compliance with existing permits and program requirements.
- Reviewed 58 self-monitoring reports and identified 36 permit violations.
- Issued a Notice of Applicability under the Statewide General Order for Composting Operations to Burrtec Waste Industries, Inc.
- Amended WDR for the U.S. Borax Mine to allow for engineered alternative liner.
- Continued public outreach regarding issues such as composting and other land disposal facilities, including meetings with CalRecycle and the local enforcement agencies.
- Hosted the State Water Board Land Disposal Program Roundtable and title 27 Rulemaking Session in November 2018.
- Worked with NPDES staff and California Energy Commission on compliance with construction storm water and CCR, Title 27 requirements at solar facilities.

## Performance Targets for Fiscal Year 2017-2018

	<u>Target</u>	<u>Achieved</u>
• Landfill Disposal Permits (Landfills) Updated	1	0
• Land Disposal Permits (Other Facilities) Updated	2	0*
• Landfills Inspected	12	25
• Land Disposal (Other Facilities) Inspected	18	31

\*Accomplished 2 amendments.

## Performance Targets for Fiscal Year 2018-2019

	<u>Target</u>	<u>Achieved (to date)</u>
• Landfill Disposal Permits (Landfills) Updated	0	0
• Land Disposal Permits (Other Facilities) Updated	4	2**
• Landfills Inspected	25	12
• Land Disposal (Other Facilities) Inspected	25	15

\*\* Issued 1 NOA for Compost General Order and amendment.

## Unaddressed Work

- Approximately half of the landfills and other facilities do not get inspected each year.
- Reports do not get reviewed for facilities with low threat to water quality.
- Approximately nine facilities require revised monitoring programs or permits to address closure conditions, corrective action plans, or other changes in facility operations.
- Approximately 79 WDRs were issued over 10 years ago and need to be evaluated to determine whether updated WDRs are needed.





## Lahontan Water Board Program Fact Sheet FY 2018-19

### *Leviathan Mine*

#### Overview

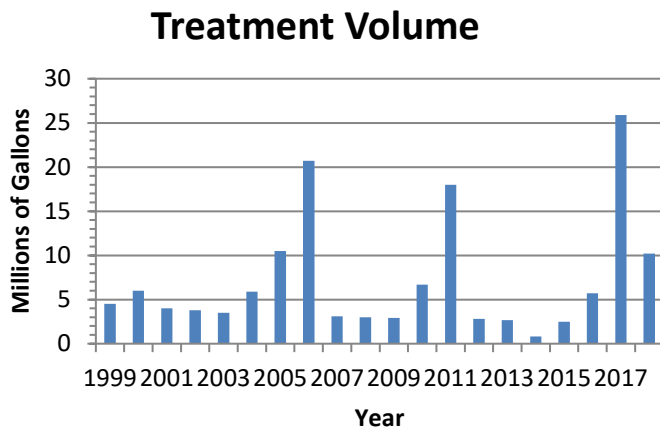
The State of California owns the Leviathan Mine property, which is on the federal list of the most polluted sites in the nation (National Priorities List). The goals of the Water Board's Leviathan Mine program are to:

- Prevent overflow of untreated AMD from storage ponds by treating stored AMD during summer treatment campaigns and, if needed, with spring treatment.
- Achieve USEPA discharge criteria for discharges of treated AMD.
- Ensure the Remedial Investigation and Feasibility Study (RI/FS) adequately describes the nature and extent of mine waste deposited at and from the Site, evaluates the risk to human health and the environment from that waste, and analyzes reasonable alternatives for reducing the risk to acceptable levels.
- Design and implement a remedy that restores and protects water quality and the environment to the extent feasible.

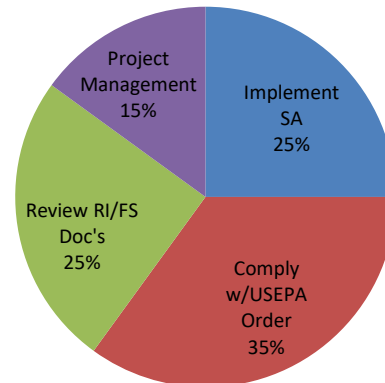
The Water Board implements the program with an allocation for seven positions.

#### Challenges

- The site is remote, fully accessible only in the summer, and has no permanent power or communications.
- The amount of needed treatment is highly variable and largely depends upon the previous winter's precipitation. The volume of AMD has varied from a low of approximately one (1) million gallons in a very dry year to a high of approximately 25 million gallons in a very wet year.
- Storage pond volume is not enough for wet-year storage of AMD and accumulated precipitation. To prevent overflow in wet years, emergency spring treatment must be done during times of limited access, deep snow, and freezing conditions.
- Coordination with Atlantic Richfield Company (AR) and USEPA to develop and implement future Remedial Actions remains challenging. AR is a responsible party, as is the Water Board, and is also subject to USEPA Orders.



### Staff Activities



### Accomplishments 2018

- Prepared 2018 Annual Work Plan and submitted to USEPA.
- Conducted emergency spring treatment of AMD (approx. 920,000 gallons) to prevent potential pond overflow.
- Removed a record volume of sludge generated during 2017 AMD treatment campaign.
- Successfully treated AMD stored in the ponds (approx. 9.2 million gallons) during summer months to create storage capacity for subsequent winter and spring months.
- Performed routine maintenance activities (site fencing and storm water system).
- Repaired Pond 3 liner following leak detection testing.
- Assisted Department of General Services (DGS) in preparation of Request for Proposals (RFP) for selection of new pond water treatment contract.
- Reviewed and commented on several AR-prepared RI/FS-related documents, including the Site Characterization Report (SCR) (pre-cursor to Draft RI).

### Performance Targets for 2019

- Remove and dispose of sludge generated by AMD treatment process in 2018.
- Treat stored AMD to create storage capacity for subsequent winter and spring months.
- Conduct site maintenance – scope to be determined.
- Report to USEPA on 2018 activities – scheduled for completion February 2019.
- Prepare Work Plan for 2019 field season – scheduled for completion March 2019.
- Prepare road use plan for US Forest Service – scheduled for completion April 2019.

# Lahontan Water Board Program Fact Sheet

## FY 2018-2019

### ***National Pollutant Discharge Elimination System***

#### Overview

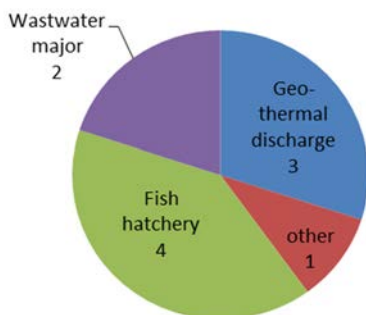
The State of California implements the federal National Pollutant Discharge Elimination System (NPDES) program under authorization by the United States (US) EPA, except for the wastewater treatment plant biosolids component. All facilities discharging pollutants (including storm water) from any point source into waters of the US must obtain a permit. Stormwater discharges are covered by the NDPEs stormwater program.

This Region has two major treated wastewater discharges: Victor Valley Wastewater Reclamation Authority (VWVRA) and Susanville Consolidated Sanitary District (SCSD). Eight minor individual permits cover other discharges from non-wastewater treatment facilities. Additionally, this program is responsible for assisting, monitoring and enforcement of General Permits issued and to include pesticide and herbicide prohibition exemption.

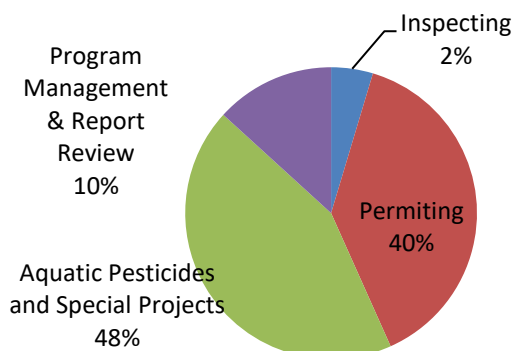
#### Key Efforts

- Meet numerical and narrative effluent limitations contained in permits; violations subject to mandatory minimum penalties (fines) must be assessed.
- California Department of Water Resources and Los Angeles Department of Water and Power are moving to provide complete permit applications to comply with the Basin Plan Prohibition exemption to use aquatic pesticides/herbicides.
- Tahoe Keys Property Owners Association has proposed to apply aquatic herbicides, with non-chemical control methods, to control aquatic invasive species. A collaborative process is underway to assist in soliciting input from public agencies and interested parties to produce an Environmental Impact Report (EIR).
- Permits are written for all discharges into waters of the US and expire after five years. Goal is to maintain 90 percent of all permits being updated and reissued on time.

**Types of Facilities**



**Staff Activities**



## Performance Targets FY 17 -18

	Target	Actual
Major individual facility permit issued or renewed	0	0
Major Individual facility inspected	2	2
Minor individual facility permit issued or renewed	2	1
Minor individual facilities inspected	1	0
Minor general facilities inspected	0	0

Of two permits scheduled for reissuance last year, Grover Hot Springs was delayed and may not be reissued this calendar year due to limited resources and other demands from work in this program. See Unaddressed Work, below.

## Performance Targets for Fiscal Year 2018-2019 – Progress to Date

	Target	Progress to Date
Majors Facilities Inspected:	1	0
Minor Facilities Inspected:	1	0
Major Permits Renewed:	1	0
Minor Permits Renewed:	1	0

## Unaddressed Work

- Permit renewal for Hot Creek Hatchery has started. Staff are exploring potential offsite wastewater influences and whether this site may need Site-Specific Objectives, insufficient resources to complete in 2019.
- Collaboration with Susanville CSD and other stakeholders needed to evaluate options such as storage and increased recycled water use (e.g., irrigation) to reduce discharges while ensuring minimum flows in Susan River for protection of fish habitat; research whether water quality objectives for Susan River may be altered or site-specific objectives should be developed.
- Work on database and reporting issues, and requirements for entering Detection Monitoring Reporting reports required by USEPA.
- Oversight of NPDES general permits issued by State Board, there are roughly 37 dischargers. The general permits cover a wide range of discharges such as flushing drinking water systems, hydrostatic pressure testing of natural gas piping system – discharging the water, discharge of accumulated water in utility vaults, pesticides discharges for vector control and pesticide/herbicide discharger to control algae and aquatic weed controls.
- Basin Plan prohibitions for pesticide and herbicide use in small managed lakes some by Home owner association in southern Lahontan Basin, examples are Spring Valley Lake, Lake Arrowhead, Silver Lakes in Helendale, Horseshoe Lake (manage by San Bernardino County).
- Issuing permits for small NPDES discharges that have never been regulated.

# Lahontan Water Board Program Fact Sheet FY 2018-19

## Nonpoint Source Pollution Control

### Overview

The NPS Program purpose is to protect unimpaired waterbodies and restore waters impacted by NPS pollution. Restoration and fire fuels reduction on forested lands and grazing management are high priorities. The Federal Clean Water Act Section 319(h) allocation this fiscal year is 2.0 PYs with an additional \$2,812,029 in grant support to local technical assistance projects. The NPS Program implements the statewide California Nonpoint Source Program Implementation Plan 2014-2020 and is consistent with the statewide Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program.

### Key Efforts

The NPS Program focuses on preventing adverse impacts to water quality due to wildfire and livestock grazing; implementing grants and issuing permits supporting watershed restoration efforts, and stakeholder outreach.

#### Federal Lands Management Activities

- Review and comment on project NEPA documents; issue permits for project activities.
- Develop a draft Federal Lands Nonpoint Source Permit.

#### Grazing Activities in Bridgeport Valley and Eagle Lake watersheds

- Engage with Bridgeport ranchers and other stakeholders to develop watershed-based approach.
- Work with Eagle Lake stakeholders to assess and limit grazing impacts.

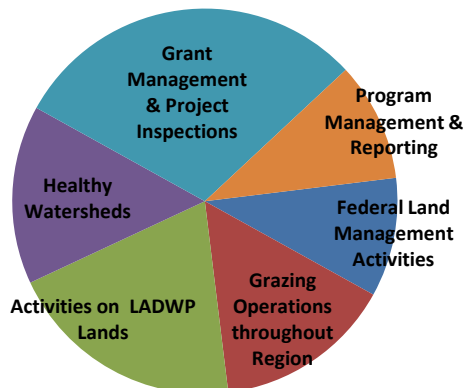
#### Grazing Activities on Los Angeles Department of Water and Power (LADWP) Lands

- Work with LADWP to draft permit to cover grazing activities while protecting water quality.

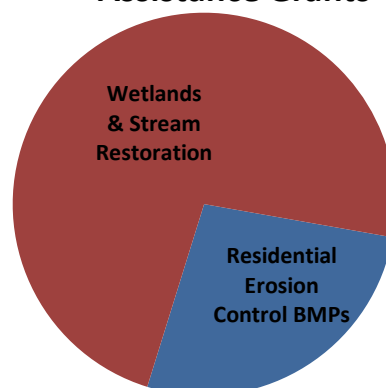
#### Identifying and Protecting Healthy Watersheds

- Continue work on a Climate Change Adaptation and Mitigation Strategy, involving 1) partnerships with land management agencies to develop more climate change resilient, landscape scale projects and planning, 2) incident response and monitoring of harmful algal blooms, and 3) multi-agency collaboration on emergency response preparedness for climate-related events.
- Update fuels management regulatory document(s) consistent with Governor's executive orders.
- Conduct environmental education and outreach activities to help stakeholders better understand their role in protecting the state's water resources when conducting NPS-related activities.

Staff Activity by Program Tasks



Types of Technical Assistance Grants



## Accomplishments

### Grants

- Two 319h grant projects were completed during the past year:
  - *Accelerated BMP Implementation in the Lake Tahoe Basin*
  - *Truckee River Voluntary BMP Retrofit Program*
- Two new 319h grant projects have started implementation this year:
  - *Reducing Sediment in Squaw Creek through Meadow Restoration*
  - *Truckee River Tributaries Sediment Reduction*

### Regulatory and Compliance

- Provided oversight and inspections of major stream restoration on Upper Truckee River.
- Issued water quality certification orders and conducted compliance inspections for forest, meadow, and stream restoration projects.
- Renewed the 2014 Timber Waiver and continued outreach with stakeholders to update the Region's Timber Harvest and Vegetation Management regulatory document.

### Federal Lands Nonpoint Source Permit

- Partnered with Central Valley Regional Water Quality Control Board to conduct BLM and USFS BMP development, implementation and effectiveness inspections throughout both regions.

## No Performance Targets Established

Though no formal performance targets are established for the NPS Program, each Region and the State Water Board are required to submit an annual report and two semi-annual reports to US EPA to report on activities funded from the federal Clean Water Act 319(h) program.

## Unaddressed Work

- Development of a regulatory mechanism for grazing activities on private lands.
- Development of a regulatory mechanism for native surface road maintenance, closure and repair.



# Lahontan Water Board Program Fact Sheet FY 2018-19

## Site Cleanup Program (SCP)

### Overview

The Site Cleanup Program (SCP) focuses on investigation and cleanup of pollutants (other than petroleum releases associated with underground tanks) discharged to soils, groundwater, and surface waters. Typical cleanup sites include industrial facilities such as chemical milling plants, power plants, sawmills, dry cleaners, and aboveground storage tanks. The types of pollutants encountered at SCP sites can include fertilizers, fuels, heavy metals, nutrients, salts such as perchlorate, and solvents.

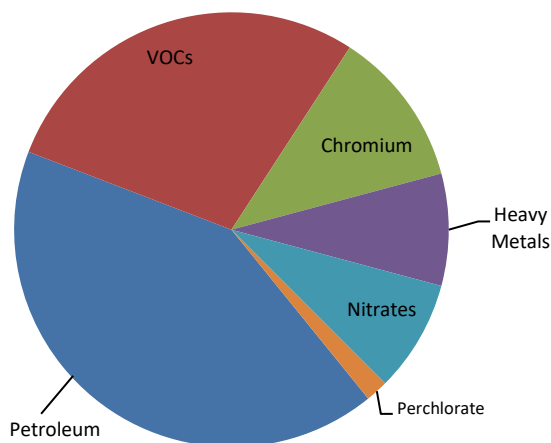
A total of 21 SCP cases are in the cost recovery program where the responsible party (RP) reimburses staff costs for regulatory oversight (approximately 1.8 PYs). SCP cases *not* in cost-recovery are funded through the state General Fund (0.70 PY) this fiscal year.

The Site Cleanup Subaccount Program (SCAP), established by Underground Storage Tanks: Hazardous Substances: Petroleum: Groundwater and Surface Water Contamination (SB 445 [Hill, 2014]), provides funds that allows the State Water Board to issue grants to regional water boards or outside parties for projects that remediate the harm or threat of harm to human health, safety, or the environment caused by surface or groundwater pollution where no responsible parties are financially capable to clean up a site. We were allocated 0.70 PY through SB 445 this fiscal year under SCAP funds.

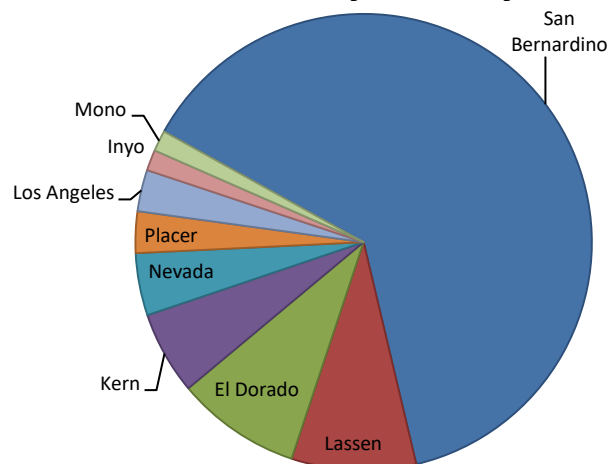
### Key Efforts

- Ensuring PG&E compliance of 2015 Cleanup Order for hexavalent chromium remediation in Hinkley and completion of the Chromium Background Study.
- Using SB 445 grant funds awarded from State Board's SCAP account, staff will oversee a pilot study at the source area to help remediate Barstow perchlorate. SB 445 grant funds are also being utilized to investigate regional solvent pollution in the South Lake Tahoe Y area and hydrocarbon impacts in Termo (Lassen County).

### Contamination Types



### Cases by County



## Accomplishments for Selected Projects

### **PGE Hexavalent Chromium, Hinkley**

The USGS revised chromium background study remains on schedule with continued community support. USGS background study is anticipated to be completed late-2019. PG&E continues to employ an adaptive management approach for the remedial systems. Remedial actions are refined based on data gathered from investigations and remedial systems. Overall, plume contraction is occurring, and monitoring data generally continue to support decreasing chromium trends, to comply with cleanup targets set in the 2015 CAO.

### **Lake Tahoe Laundry Works, South Lake Tahoe**

In late 2018, the Responsible Party began an intense investigation to delineate the lateral and vertical extent of contamination originating from the site and an evaluation of the site's contribution to regional groundwater contamination. Board staff are currently overseeing field work. On-site remediation is on-going.

### **Mountain Pass Mine and Mill**

MP Mine Operations (MPMO) submitted a new Feasibility Study to evaluate cleanup at the site in September 2018. Board staff is expecting a revised version in April 2019 to address Board staff comments. The Feasibility Study will include cost estimates.

### **Nitrate Plume, Barstow**

The City of Barstow continues quarterly monitoring of groundwater in residential and monitoring wells and currently provides bottled water to eight residences.

### **Perchlorate Plume, Barstow**

Board staff continue quarterly monitoring of wells; replacement bottled water provided to five affected homes. Aptim was the contractor selected to conduct the source area treatability study, under Board staff guidance, with \$2.67 grant award; cost estimates and planning documents were prepared/approved, and work is scheduled to begin Spring 2019.

### **Nuway Cleaners, Victorville**

State Board awarded the City of Victorville \$1.46 million dollars of Senate Bill 445 funding for cleanup of PCE through SCAP. Joint Executive Team (JET) kick-off meeting was held on December 12, 2018. The JET team consists of members from Lahontan, State Board, and City of Victorville.

#### Performance targets for fiscal year 2017/2018

	<u>Target</u>	<u>Completed</u>
Case Closures	6	6
Cases into Active Remediation	0	1

#### Performance targets for fiscal year 2018/2019 – Progress to date

	<u>Target</u>	<u>Completed</u>
Number of Cases Closed	4	2
Number of Cases into Active Remediation	0	0

#### Unaddressed Work and Challenges

- Staff has identified one position annually of unaddressed work at several sites that have limited water board oversight but require additional time to hasten cleanup efforts to restore drinking water supplies.
- SB 445 program is significantly underfunded at 0.7 PYs for current responsibilities, priorities, and staff assignments. Current staff assignment being funded by SCAP currently include Barstow Perchlorate, South Tahoe Y area, and Termo Store.





# Lahontan Water Board Program Fact Sheet FY 2018–2019

## *Storm Water*

### Overview

The Storm Water Program permits discharges of pollutants in storm water runoff to waters of the United States under the National Pollutant Discharge Elimination System (NPDES) in two main program areas: Municipal Separate Storm Sewer Systems (MS4s, Phases I and II), and Industrial. Construction activities are a major Industrial category, among other heavy and light industries. General permits are used to reduce pollutants from reaching surface waters by requiring specified control measures for:

- Pollutants in storm water and non-storm water, including sediment
- Preventing exposure of pollutant sources to storm water
- Preventing alterations to hydrology affecting sediment loads in local waters
- Pollutants in discharges from construction and roadways/operations

**Phase I MS4s:** Four in the Lake Tahoe basin, including Caltrans (a state-wide Phase I MS4).

**Phase II (Small) MS4s:** Placer County, Town of Truckee, and in the Mojave River basin: Adelanto, Apple Valley, Barstow, Hesperia and portions of San Bernardino County (Spring Valley Lake, Mountain View Acres, Oak Hills and Phelan). Non-traditional Small MS4s are also regulated and include facilities such as military bases, public campuses, prisons and hospital complexes.

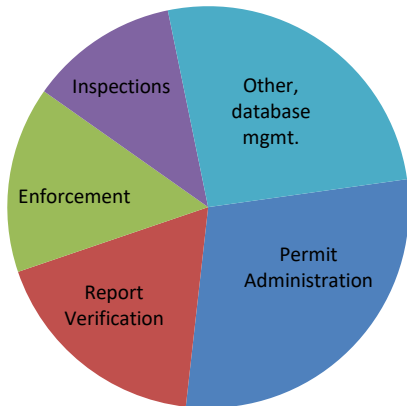
**Industrial and Construction:** In 2018: 225 industrial sites and approximately 376 construction sites. Approximately 2.5 PYs funded, including Lake Tahoe MS4 and TMDL funding.

### Key Efforts

Maintain effective programs across the Region by:

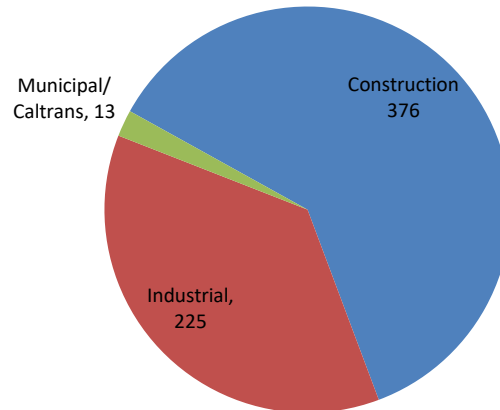
- Reviewing environmental documents, advising permittees on requirements and storm water pollution prevention through Low Impact Development and similar methods.
- Reviewing monitoring reports and conducting compliance inspections.
- Working with municipalities under MS4 permits to control pollutants. Reviewing monitoring/reporting requirements, including implementation of new statewide trash control requirements.

## Staff Activities



## Permittee Types

(Number of permits, not work efforts)\*



### Accomplishments

- Verified compliance with General Permits for Victorville-area and Lake Tahoe MS4s and Industrial sites, and for Lake Tahoe Marinas.
- Oversaw compliance assurance actions related Statewide General Industrial Permit enrollees.
- Completed enforcement actions to address failures with meeting annual reporting requirements in the Construction and Industrial programs.
- Reviewed submittals related to Lake Tahoe MS4 trash requirements.

### Performance Targets for Fiscal Year 2017 – 2018

	Target	Performed
Construction site Inspections:	35	35
Industrial facility Inspections:	18	18
MS4-Phase I/II Audits/Inspections	5	5

### Performance Targets for Fiscal Year 2018 – 2019

	Target	Progress to Date
Construction site Inspections:	75	37
Industrial facility Inspections:	18	4
MS4-Phase I/II Audits/Inspections	8	0

### Unaddressed Work

- Unable to assess penalties for lack of reports, and late or deficient reports
- Unknown number of facilities are not enrolled in the permits where permits apply = “non-filers”
- Unable to completely address municipal program deficiencies in South basin with respect to permit compliance and implementing Low Impact Development practices to maintain natural hydrology and watershed resiliency



## Lahontan Water Board Program Fact Sheet FY 2018-19

### ***Surface Water Ambient Monitoring Program (SWAMP)***

#### Overview

The Surface Water Ambient Monitoring Program (SWAMP) is a statewide monitoring effort designed to assess the conditions of surface waters for status and trends in water quality as well as targeted monitoring to answer specific regional questions. The program provides resource managers, decision makers, and the public with high quality information to evaluate and manage the water quality of California's waters. SWAMP accomplishes this through carefully designed, externally reviewed monitoring programs, and by assisting other entities state-wide with generating comparable data that can be brought together in integrated assessments that provide answers to resource management questions.

The two primary components of SWAMP are: 1) "regional" monitoring led by the Regional Water Boards; and 2) statewide surveys led by the State Water Board. SWAMP also supports the development, deployment, and maintenance of a statewide database (California Environmental Data Exchange Network or CEDEN), to permanently store surface water monitoring data collected by all entities throughout California.

#### Key Efforts

Long-Term Trends: Collect conventional water quality monitoring data at over 100 sites annually, following the SWAMP Quality Assurance Program Plan and all relevant Standard Operating Procedures.

Data Management: Review data through rigorous data validation and verification process to certify all SWAMP-funded data is of known quality when made available in the publicly accessible CEDEN database.

Modernize Website: Redesign the Region's website to be more user-friendly and informative. This includes the addition of a dynamic data visualization tool that will include such tools as graphs, maps, charts, dashboards, and data stories.

Bioassessment: Complete the third year of a three-year bioassessment sampling effort to assess the biological and physical integrity of the Region's streams and rivers. Staff will focus on the Region's long-term SWAMP sampling sites, water bodies with sedimentation issues, data gaps, and reference sites. Analyze available data and determine future monitoring efforts.

Harmful Algal Blooms: Determine if human health is being protected by providing response to growing occurrences of Harmful Algal Blooms (HABs) and through field indicator bacteria monitoring.

Eagle Lake Special Study: Collaborate in a monitoring effort with Eagle Lake Guardians to determine current water quality conditions in Eagle Lake. The project will include testing for nutrients, bacteria, and pigments chlorophyll-a and phycocyanin (specific to cyanobacteria HABs) at four discreet in-lake sampling locations. Findings to inform the need for improved grazing practices on public and private lands along the shoreline.

## Accomplishments

- Visited 93 sites and conducted 256 water quality collections. Performed rigorous data validation/verification on all data and made available in CEDEN.
- Processed over 150 in-house laboratory samples for Fecal Coliform and *E. coli*.
- Addressed 13 total HAB events in the region triggering 13 “Caution” postings and one “Danger” posting. Facilitated HAB training that was attended by 16 partner agencies and 16 Water Board staff. Equipped nine state vehicles with HAB response field kits.
- Completed the second year of a three-year bioassessment monitoring effort. With assistance from contractors, Water Board staff sampled an additional 19 sites collecting water quality samples, benthic macroinvertebrates, diatoms, soft bodied algae, physical habitat measurements, and calculated 2017 [California Stream Condition Index \(CSCI\)](#) and Index of Physical Integrity (IPI) scores.
- Launched a special study in collaboration with Eagle Lake Guardians to leverage limited resources.
- Hosted a joint SWAMP and Basin Planning roundtable with over 50 attendees from every Regional Board, State Water Board, and partner agencies. The meeting included a field trip to Leviathan Mine and discussion of a 20-year bioassessment dataset (partially SWAMP-funded) that demonstrates the success in treatment at Leviathan Mine (see January 2019 Leviathan EO report for more on this study).
- For FYs 17/18 and 18/19, Region 6’s SWAMP program has produced and made available data from 2,396 site visits. The data has, in part, included 2,396 water chemistry results and 1,563 field results. These results were obtained while Region 6’s program resources were being reduced.

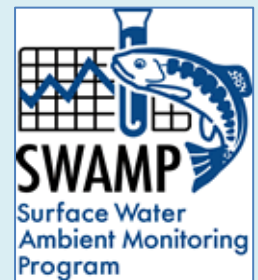


Red Lake HAB response 2018

## Performance Targets for FY 18/19

- 1) Make available on CEDEN at least 50 percent of SWAMP-funded data within one year of sample collection
- 2) Make available on CEDEN at least 95 percent of data within two years of sample collection. Including laboratory analyses, quality assurance checks (i.e., data verification and validation), and data transfer.

The Region’s SWAMP program has met its performance targets for all prior years and expects to continue meeting the targets going forward.



## Unaddressed Work

- Additional sampling in headwaters to assess long-term changes in water quality and flows to protect state’s water supply.
- Assessment of minimum flows needed to maintain beneficial uses. Increased sampling events (ten sampling events per site/annually, recommended) at long-term monitoring sites to better capture seasonality of long-term sites.
- Historical SWAMP workload cannot be sustained due to State Board’s reduction of one (1) PY.
- Increasing responsibilities for Harmful Algal Blooms and regulatory support without additional resources.

The background image of the fact sheet shows a scenic view of a lake, likely Lake Tahoe, with mountains in the distance and a person standing on a rocky shore in the foreground. The text is overlaid on this image.

## Lahontan Water Board Program Fact Sheet FY 2018-19

### ***Total Maximum Daily Load (TMDL)***

#### Overview

The TMDL Program addresses impaired waters of the Region. The TMDL Program resources are a combination of funds from the state's Waste Discharge Permit Fee account and federal TMDL development program (Clean Water Act §106 funds). The state funds 4.3 PY shared between the TMDL and Basin Planning programs. Federal program funds provide 1.2 PY for TMDL development. TMDL staff assesses waterbodies for water quality impairments, determines possible sources, types and magnitude of impairments, and prepares plans to restore beneficial uses of the impaired waterbodies through TMDLs and other means.

In 2013, the U.S. Environmental Protection Agency (USEPA) announced a new collaborative framework for implementing the Clean Water Act (CWA) Section 303(d) program called the Vision. The Vision prioritizes water quality outcomes over TMDL development, and encourages the use of alternatives to traditional TMDLs when appropriate to address an impairment. Staff committed to address impairments in two waterbodies by 2022 as part of the USEPA Vision effort. The two waterbodies are the West Fork Carson River (multiple pollutants including pathogens) and Bishop Creek (pathogens).

#### Key Efforts

##### **USEPA Vision Projects –**

- **Bishop Creek** Staff will continue to analyze bacteria data from Water Board and stakeholder monitoring efforts, and then determine additional data gathering needs. Formal outreach efforts with key partners and stakeholders will begin, as will evaluation of opportunities for implementation measures. The Inyo County Department of Environmental Health has a public health posting regarding high bacteria levels.
- **West Fork Carson River** Staff will continue data analysis and determining opportunities for implementation measures. Formal outreach with key partners and stakeholders will begin. Staff will develop a project website and establish a Lyrus email subscription list. Staff will write draft sections of a 9-Element Watershed Plan.

**2018 Integrated Report** [303(d)/305(b) List] – Staff will finalize water quality assessment decisions, which determines which waterbodies are placed on the Clean Water Act §303(d) Impaired Waters List. Staff will prepare a staff report for public distribution, and present the Integrated Report to the Water Board for consideration.

**Implement** adopted TMDLs through permits and support of grant-funded projects.



## Key Accomplishments

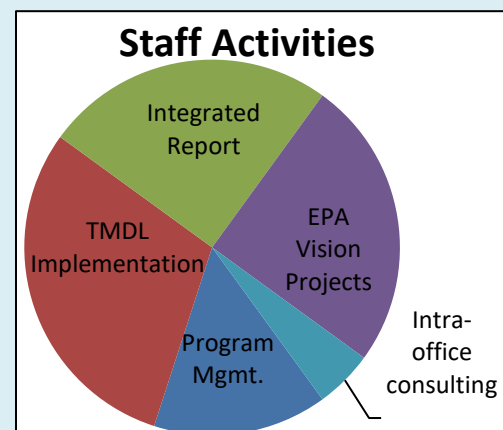
### TMDL Vision Projects

- **Bishop Creek** (pathogens)  
Staff developed a public participation plan and a project website ([https://www.waterboards.ca.gov/lahtontan/water\\_issues/programs/tmdl/bishopcreek.html](https://www.waterboards.ca.gov/lahtontan/water_issues/programs/tmdl/bishopcreek.html)). Staff drafted conceptual watershed models to illustrate potential sources of and locations with high pathogen levels, researched implementation measures, and engaged partners.
- **West Fork Carson River** (nitrate, total nitrogen, total phosphorus, sulfates, TDS, turbidity, fecal coliform) Staff continued engagement with stakeholders, and developed a strategy for establishing a 9-Element Watershed Plan. As part of the Integrated Report, the river was re-segmented for purposes of water quality assessment, with the segmentation determined based on predominant land use (public lands headwaters and dispersed recreation; canyon segment; agriculture and private lands). Staff also developed an outreach strategy and began data analysis. Staff presented its planned approach for the West Fork Carson Vision Project during the Carson River Forum (April 2018) and the “Get on the Bus” Watershed Tour (October 2018). In coordination with SWAMP staff, a headwaters bioassessment site was established.

**Integrated Report** – Staff manually developed 564 new Lines of Evidence (LOE) based on data for waterbody-pollutant combinations and performed quality control efforts for 4,150 electronically and manually produced LOEs. Staff evaluated these LOEs to develop over 2,100 assessment decisions.

**Heavenly Creek TMDL** – Staff engaged with representatives from Heavenly Ski Resort to update the project’s Quality Assurance Program Plan to ensure that the data could be used in 303(d) assessments and a future delisting from the Impaired Waters List.

**TMDL Program Website** was updated to a more modern and accessible format.



## Performance Targets FYs 2017-18 and 2018-19 (unchanged between FYs)

<u>Target Description</u>	<u>Targets</u>	<u>Achieved</u>
# of pollutant/waterbody combinations addressed	0	0
# of TMDLs (or TMDL alternatives) adopted	0	0

## Unaddressed Work

- 119 impaired water body 303(d) listings are prioritized, but unaddressed
- Formulating Natural Source Exclusions Policy
- Impairment verification/determine validity of 303(d) listings for TDS



## Lahontan Water Board Program Fact Sheet FY 2018-19

### ***Underground Storage Tank (UST)***

#### Overview

The UST program protects public health and safety and the environment from releases of petroleum and other hazardous substances from UST systems. The Region received 3.0 PYs for FY 18/19 to oversee the cleanup element of the UST program. Approximately 85 percent of the funding is provided through the Underground Storage Tank Cleanup Fund and the remaining 15 percent is provided by the federal government. On July 1, 2018, there were 61 Water Board-lead UST cleanup cases in the region.

#### Key Efforts

High-threat cases continue to be addressed and the caseload primarily consists of mature cases and is shrinking due to closing low threat sites. Of the 61 open cases, 14 were identified as “Open-Eligible for Closure” and 10 did not have responsive or willing responsible parties. To close a site identified as “Open-Eligible for Closure”, all monitoring wells must be properly destroyed by the responsible party. A closure letter cannot be issued until the wells are destroyed and this has kept many cases open.

Staff is targeting 15 cases, or nearly 25 percent of the Region’s caseload, for closure this year. Most active cases are in the southern Lahontan Region with 19 in San Bernardino County and 9 in Los Angeles County. Staff continues to focus on providing timely and consistent guidance to ensure protection of human health and the environment, issuing closures for eligible cases, and coordinating with the State Water Board and the United States Environmental Protection Agency (USEPA) to address remaining “Inactive” cases.

#### Accomplishments (March 2018 to Present)

- Regularly met with USEPA staff and contractors to identify potential paths to closure for select “stuck” cases
- Assisted in the development of project execution plans, invoice processing, and task tracking for EAR Account program sites
- Used informal enforcement directives to achieve monitoring well abandonment leading to case closure
- Directed responsible parties to the appropriate financial assistance programs

- Utilized expanded public participation notice for proposed closures in the Baker area through coordination with the Office of Public Participation.
- Updated and uploaded information to Geotracker for public review.

## Performance Targets and Measures

### Summary of Performance Targets for FY 17-18

- |                                                       |    |              |
|-------------------------------------------------------|----|--------------|
| • Number of projected case closures:                  | 15 | Completed: 7 |
| • Number of projected cases into active remediation*: | 3  | Completed: 2 |

### Performance Targets for FY 18-19 and Progress as of Jan 1, 2019

- |                                                       |    |                      |
|-------------------------------------------------------|----|----------------------|
| • Number of projected case closures:                  | 15 | Completed to date: 8 |
| • Number of projected cases into active remediation*: | 1  | Completed to date: 0 |

*\*This target reflects the number of cases that have progressed from investigation to active remediation during the year.*

## Unaddressed Work

Scanning and uploading of existing hard copy reports and files into Geotracker to ensure information is available and being communicated to Regional Water Board, State Water Board, UST Cleanup Fund, USEPA staff, and the public.

“Inactive” cases that have not been nominated to the EAR program or do not qualify for potential funding sources will likely continue to languish due to a lack of willing responsible parties and funding.



# **ENCLOSURE 5**



## 2019 STATEWIDE PENDING POLICIES & ORDERS

### Lahontan Regional Water Quality Control Board

Title	Summary	Lahontan Role	Staff Lead
Toxicity Water Quality Objectives and Implementation	This project establishes statewide provisions for aquatic toxicity in the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays and Estuaries of California. The proposed provisions establish numeric acute and chronic water quality objectives for aquatic toxicity; establish effluent limits for municipal and industrial wastewater discharge permits; incorporate the United States Environmental Protection Agency's (U.S. EPA's) Test of Significant Toxicity (TST) statistical approach for data analysis; and establish monitoring requirements for wastewater discharges to inland surface waters, enclosed bays, and estuaries in California. A draft for public review was released October 2018. The State Water Board is expected to adopt the policy Spring 2019.	Region 6 has been involved in policy discussions. This policy has a modest impact on our Region, given the small number of NPDES permits but may result in permit revisions.	Russell Norman Trevor Miller
Procedures for Discharges of Dredged or Fill Materials to Waters of the State	This project is establishing statewide Procedures for Discharges of Dredged or Fill Material to Waters of the State (proposed Procedures), for inclusion in the Water Quality Control Plan for Inland Surface Waters and Enclosed Bays and Estuaries and Ocean Waters of California. The Procedures consist of four major elements: 1) a wetland definition; 2) a framework for determining if a feature that meets the wetland delineation is a water of the state; 3) wetland delineation procedures; and 4) procedures for application submittal, and the review and approval of Water Quality Certifications and Waste Discharge Requirements for dredged or fill activities. Several drafts have been released for review since 2017. A new draft was released in January 2019. The State Water Board is expected to adopt the policy in March. A draft for public review was released October 2018. The State Water Board is expected to adopt the policy Spring 2019.	Region 6 has been actively involved in policy discussions to make the procedures workable and consistent with our Basin Plan. This policy has a major impact on our future permitting practices.	Jan Zimmerman Rob Tucker
Statewide General Waste Discharge Requirements for Wineries	This project establishes statewide general WDRs (general order) for wineries to address the backlog, streamline permitting, reduce permit burden, improve consistency, and make the permitting process more transparent and predictable for dischargers. Because there is great variation in winery size, the general order will contain a tiered approach based on the threat to water quality. A draft for public review will be released April 2019. The State Water Board is expected to adopt the General Order in June 2019.	Region 6 is monitoring this order and a small number of wineries in South Lahontan may be affected. This policy has a minor impact on our Region.	Rob Tucker Jeheil Cass

# 2019 STATEWIDE PENDING POLICIES & ORDERS

## Lahontan Regional Water Quality Control Board

Title	Summary	Lahontan Role	Staff Lead
Mercury TMDL and Implementation Plan (Statewide Reservoirs)	This project is proposing a TMDL and implementation plan to address fish mercury (Hg) impairments in about 130 reservoirs around the state. Staff prepared the scientific and technical analysis and regulatory provisions for the implementation plan. The scientific peer review is complete, and staff are drafting responses to peer review comments. Staff is forming a reservoir owner working group to develop coordinated pilot tests. Dates for public comments are being determined.	Region 6 has been actively involved for several years on this project. This policy has a moderate impact on our Region and several lakes are in the pilot program.	Dan Sussman
Statewide Urban Pesticide Reduction	A statewide multi-agency strategy is being developed to minimize urban pesticides that will be proposed as amendment to both the Inland Surface Waters, Enclosed Bays, and Estuaries Plan and the Ocean Plan. An advisory committee provided information and materials for development of the following amendment components: 1) an inter-agency coordination framework, 2) a statewide monitoring framework, and 3) suggested permit language for MS4 permittees. A draft for public review will be released in-2019.	Region 6 has been actively involved in this Strategy. This Strategy has a moderate impact and may result in evaluation of our NPDES permits and Basin Plan prohibition process.	Russell Norman
Statewide Storm Water Construction General Permit Reissuance	A statewide reissuance of the current Statewide Storm Water Construction General Permit (also referred to as the CGP). The proposed CGP reissuance will include implementation of Total Maximum Daily Loads (TMDLs) and revisions to update the CGP requirements. A draft for public review will be released August 2019. The State Water Board is expected to adopt the General Order in October 2019.	Region 6 has been actively involved in the permit revision discussions. This permit reissuance would have a moderate impact on our Region and require revisions to our Lake Tahoe construction permit.	Jan Zimmerman Rob Tucker
Sanitary Sewer System Order Reissuance	A statewide reissuance of the Statewide Sanitary Sewer System General Order originally adopted in 2006. Staff are proposing to extend the Order's regulatory coverage to include private collection systems such as mobile home parks, industrial; parks, shopping centers, etc. Costs of permitting compliance and climate change will be considered in the proposed Order.	Region 6 has been actively involved in the order revision discussions. This permit reissuance would have a moderate impact on our Region, as these changes would result in more private facilities under regulation.	Jeheil Cass Rob Tucker

## 2019 STATEWIDE PENDING POLICIES & ORDERS

### Lahontan Regional Water Quality Control Board

Stormwater Phase II Small MS4 Permit Reissuance	A statewide reissuance of the Phase II MS4 Stormwater permit is being developed. Staff is conducting public outreach to school districts, charter schools and community college districts, informing the districts of proposed requirements for school districts. Staff also are conducting outreach to traditional stakeholders to develop the proposed Permit. reissuance.	Region 6 has been actively involved in the Order discussions. This permit reissuance would have a moderate impact from added facilities.	Jan Zimmerman Rob Tucker
2018 Integrated Report	The 2018 California Integrated 303(d) List of Impaired Waters and 305(b) Surface Water Assessment Report (Integrated Report) will consist of an assessment of data and information for the North Coast, Lahontan, and Colorado River regions. The data solicitation period ended in May 2017. State and Regional Water Board staff are assessing the data with a tentative State Water Board approval scheduled for fall of 2020. Lines of evidence and decisions are currently being written and reviewed. Region 6 will release a draft Report for public comment by June 2019. The Water Board is expected to adopt the Report by September 2019.	Region 6 has been actively working to update the Integrated Report.	Dan Sussman
Bio stimulatory & Biological integrity Project	Staff is developing the technical foundation and policy options for a statewide water quality objective and implementation program for nutrients and other bio stimulatory substances for wadable streams. A Science Advisory Panel meeting to review technical documents to support this project was held in December 2018. The Science Panel members will report their findings in February 2019.	Region 6 has been actively working on this Project. This Project would have a major impact and may result in new objectives that require permit and Basin Plan revisions.	Dan Sussman
Statewide Aggregate and Concrete General Order	A statewide general order for aggregate and concrete processing facilities that discharge wastewater to land is being developed. Meetings between Regional Boards and industry stakeholders was held in November 2018 to discuss the order requirements. A draft general Order is under development for release in 2019.	Region 6 has been actively involved in the Order discussions. This Order would have a major impact on our Region due to our numerous aggregate and concrete manufacturing facilities.	Jeheil Cass



## **ENCLOSURE 6**





## 2018-2019 – ADOPTED STATEWIDE POLICIES & ORDERS

### Lahontan Regional Water Quality Control Board

Title	Summary	Program Affected	FY 2018-19 Costs
Bacteria Standards for Ocean and Inland Surface Waters	The State Water Board in August 2018 adopted statewide water quality objectives and implementation options for the control of indicator bacteria (e.coli) to protect human health in waters designated for water contact recreation (REC-1). The Standards required the Water Board to 1) evaluate its fecal coliform objectives for surface waters; and 2) clarify their regulatory and water quality assessment applications.	Basin Planning Non-Point Source SWAMP	0.2 PY*
Amendment to the Recycled Water Policy	The State Water Board adopted in December 2018 amendments to the Recycled Water Policy. The Policy required Regional Boards: 1) by December 2020 evaluate all groundwater basins/sub basins to determine if SNMP needed, and reevaluate every 5 years; 2) by December 2021 update all recycled water permits and monitoring plans to comply with the Policy; 3) meet specified permitting requirements for recycled water groundwater recharge projects.	Waste Discharge to Land	1.5 PY*
Climate Change Resolution	The State Water adopted in May 2017 a Resolution that requires a proactive response to climate change in all Regional Board actions. The Resolution required Regional Board to: 1) update plans, permits, and policies, and work with other agencies on ecosystem resilience; 2) advance carbon sequestration; 3) work with other agencies to restore healthy watersheds, reduce vulnerability to catastrophic fires; 4) support the Air Resources Board's Short-Lived Climate Pollutant Reduction Strategy; and 5) report annually on recycled water permits and water reclamation requirements.	All Programs	.1 PY
Irrigated Agriculture General Orders	The State Water Board in February 2018 adopted General WDRs for the Eastern San Joaquin River Watershed that established precedential requirements for all irrigated agriculture regulatory orders statewide. The Order required Regional Board by February 2023 to revise existing Orders or adopt new Orders to conform with the East San Joaquin River Watershed Order.	Non-Point Source Waste Discharge to Land	1 PY*
Cannabis Cultivation Policy and General WDRs for Discharges of Waste Associated with Cannabis Cultivation Activities Proposed Updates	The State Board in February 2019 adopted updates to the Cannabis Cultivation Policy, General WDRs and Waiver of WDRs for Discharges of waste associated with cannabis cultivation activities. The updates made technical, clarifying changes to indoor cultivation facilities, winterizing requirements, tribal buffers and onstream reservoirs.	Cannabis	Minor, absorbable costs
<b>TOTAL</b>			2.8 PY

\*Costs expected to increase in following years.



## **ENCLOSURE 7**



**Fiscal Year 2017 - 2018 Performance Targets  
Region 6 Lahontan**

Target Description	Targets	Achieved
<b>TOTAL MAXIMUM DAILY LOAD AND BASIN PLANNING</b>		
<b>TMDL</b>		
# of Pollutant/Waterbody Combinations Addressed	0	0
# of TMDLs Adopted	0	0
<b>Basin Planning</b>		
# of Basin Plan Amendments Adopted	0	0
<b>REGULATE</b>		
<b>NPDES Wastewater</b>		
# of NPDES Wastewater Major Facilities Inspected	1	3
# of NPDES Wastewater Majors Renewed	0	0
# of General NPDES Permits Adopted	0	0
# of NPDES Wastewater Minor General Facilities Inspected	0	0
# of NPDES Wastewater Minor Individual Renewed	2	1
# of NPDES Wastewater Minor Individual Facilities Inspected	1	0
<b>NPDES Stormwater</b>		
# of NPDES Stormwater Municipal (Phase I/II) Inspections (total # of inspections)	4	1
# of NPDES Stormwater-Construction Inspections (total # of inspections)	50	58
# of NPDES Stormwater-Industrial Inspections (total # of inspections)	18	14
<b>Waste Discharge to Land - Wastewater</b>		
# of WDR "All Facilities" Inspections (total # of inspections)	33	41
# of WDR Individual Permits Adopted/Updated	2	1
<b>Confined Animal Facilities (WDR, NPDES, etc.)</b>		
# of Confined Animal Facility Inspections (total # of inspections)	3	2
<b>Land Disposal</b>		
# of Land Disposal Individual Permits All Other Adopted/Updated	2	1
# of Land Disposal Individual Permits Landfills Adopted/Updated	1	0
# of Land Disposal All Other Inspections (total # of inspections)	18	32
# of Land Disposal Landfills Inspections (total # of inspections)	12	24
<b>Timber Harvest</b>		
# of Timber Harvest Inspections	20	20
<b>ENFORCEMENT</b>		
% of facilities with over \$12,000 in MMPs (5 or more violations) that have MMPs assessed within 18 months of accrual	100%	Backlog of approx. 57 MMPs for 2 facilities
% of Class 1 Priority Violations with formal enforcement or an Investigative Order pursuant to Water Code section 13267 within 18 months of discovery.	100%	100%
<b>CLEANUP</b>		
<b>Tanks, Department of Defense &amp; Site Cleanup</b>		
# of DoD Sites New into Active Remediation	2	0
# of SCP Sites New into Active Remediation	0	1
# of SCP Sites Projected Closed	6	4
# of UST Sites New into Active Remediation	3	2
# of UST Sites Projected Closed	15	7

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER



## **ENCLOSURE 8**







Fiscal Year 2018-2019 Performance Targets  
Region 6 Lahontan

Target Description	Targets	As of:
<b>PLAN &amp; ASSESS</b>		<b>2/21/19</b>
<b>TMDL</b>		
# of Pollutant/Waterbody Combinations Addressed	0	
# of TMDLs Adopted	0	
<b>Basin</b>		
# of Basin Plan Amendments Adopted	1	
<b>REGULATE</b>		
<b>NPDES Wastewater</b>		
# of NPDES Wastewater Major Facilities Inspected	1	
# of NPDES Wastewater Majors Renewed	1	
# of General NPDES Permits Adopted	0	
# of NPDES Wastewater Minor General Facilities Inspected	0	
# of NPDES Wastewater Minor Individual Renewed	1	
# of NPDES Wastewater Minor Individual Facilities Inspected	1	
<b>NPDES Stormwater</b>		
# of NPDES Stormwater Municipal (Phase I/II) audited/Program Element Reviews	3	
# of NPDES Stormwater Municipal (Phase I/II) Inspections (total # of inspections)	5	
# of NPDES Stormwater-Construction Inspections (total # of inspections)	75	39
# of NPDES Stormwater-Industrial Inspections (total # of inspections)	18	5
<b>Waste Discharge to Land - Wastewater</b>		
# of WDR "All Facilities" Inspections (total # of inspections)	50	51
# of WDR Individual Permits Adopted/Updated	3	
<b>Confined Animal Facilities (WDR, NPDES, etc)</b>		
# of Confined Animal Facility Inspections (total # of inspections)	4	2
<b>Land</b>		
# of Land Disposal Individual Permits All Other Adopted/Updated	4	
# of Land Disposal Individual Permits Landfills Adopted/Updated	0	
# of Land Disposal All Other Inspections (total # of inspections)	25	17
# of Land Disposal Landfills Inspections (total # of inspections)	25	12
<b>Timb</b>		
# of Timber Harvest Inspections	25	23
<b>ENFORCEMENT</b>		
% of facilities with over \$12,000 in MMPs (5 or more violations) that have MMPs assessed within 18 months of accrual	100	Backlog of approx. 57 MMPs for 2 facilities
% of Class 1 Priority Violations with formal enforcement or an Investigative Order pursuant to Water Code section 13267 within 18 months of discovery.	100	100
<b>CLEANUP</b>		
<b>Tanks, Department of Defense &amp; Site Cleanup</b>		
# of DoD Sites New into Active Remediation	2	
# of SCP Sites New into Active Remediation	0	
# of SCP Sites Projected Closed	4	
# of UST Sites New into Active Remediation	1	1
# of UST Sites Projected Closed	15	9



## **ENCLOSURE 9**





## 2019 SUMMANY OF UNADDRESSED WORK

### Lahontan Regional Water Quality Control Board

**Facility Inspections** - Many permitted facilities cannot be inspected on a regular basis because of insufficient staff resources to perform the inspections. For example, about 85% of construction/industrial sites, 75% of waste discharge to land facilities, 50% of 401 certification sites and 50% of land disposal sites go uninspected annually. To address the highest priority sites, staff will continue to evaluate inspection need and priority based on threat to water quality. We are exploring ideas for innovative ways to gain facility inspection-type information, such as Dischargers submitting videos/photos of the facility, because of limited staff resources prohibit us from physically visiting each site.

**Permit Updates** - Numerous individual permits and monitoring requirements at facilities require updates. For example, approximately 114 individual waste discharge to land requirements (WDRs) need to be updated and 15 reclamation WDRs should be updated consistent with the recycled water policy. Three NPDES permits require renewal – one, Susanville CSD requires collaboration with recycled water users and district on options to reduce flows to river. Also, approximately 9 land disposal facilities require revised monitoring programs or permits to address closure conditions, corrective action plans or other changes in facility operations. Staff continues to prioritize workload or redirect staff to address high priority sites.

**Unpermitted facilities** - Numerous facilities require permits to ensure protection of water quality and beneficial uses. The State Board Onsite Wastewater Treatment System Policy requires Water Board regulation of RV parks, schools, rest areas and other facilities with greater than 10,000 gallons per day. Over 220,000 acres of irrigated agricultural lands lack permits. Other non-point source pollution activities, such as grazing, discharges from rural roads are unpermitted. To indirectly address this need, staff is developing a draft general order intended to cover small wastewater facilities that process volumes up to 50,000 gallons per day. Staff are working on a tiered and performance-based approach in the general order that will prioritize facilities based on threat to water quality and beneficial uses.

**New Permits** – New facilities are being planned for construction that will require staff time to permit, without additional staff resources. These include alternative energy projects and new residential developments primarily in the South Lahontan areas. Though the applicants pay applicable permit fees, the addition of this work does not come with additional staff resources and these proposed new facility permits must be evaluated for threat to water quality and prioritized with all other work.

**Report Review** - Water Board orders typically require permittees to regularly submit technical and monitoring reports. About 1,650 self-monitoring reports are due annually. With a high volume of technical and monitoring reports submitted, combined with few staff resources, staff was able to review only about 750 reports. Without completing all reviews, staff is unable to determine if water quality and beneficial uses have been affected. Similar to exploring ways to



## 2019 SUMMARY OF UNADDRESSED WORK

### Lahontan Regional Water Quality Control Board

increase our facility inspections, staff will be exploring ideas to complete the report reviews so we can effectively evaluate the threat to water quality and beneficial uses.

**Statewide Policy Projects and Related Permit Updates** – The State Board recent adoption of new beneficial uses, or adoption of specific water quality objectives, or adoption of new statewide permits often requires Regional Boards to update Basin Plans or amend permits. This additional work does not come with additional staff resources, so we must prioritize these tasks with other tasks. Examples include the new beneficial uses of fish consumption for Tribal or Subsistence Fishing, adoption of statewide Irrigated Lands Regulatory Permit, and the new bacteria water quality objectives for the Recreation-1 beneficial use.

**Cleanup Sites** – Several groundwater cleanup sites do not have adequate staff to oversee remedial action. For example, the South Lahontan site cleanup unit identified workload (one position annually) at orphan sites that must expedite cleanup to restore drinking water supplies. About three (3) positions annually are needed to adequately address the orphan sites and protect beneficial uses from the polluted groundwater, including cleanup at nine (9) underground storage tank (UST) sites where there are no responsible parties. Work is also required at Department of Defense (DOD) sites with non-CERCLA pollution or sites containing emerging chemicals of concerns, such as PFAS compounds, found in soil and groundwater at over 17 DOD sites. PFAS compounds may become an issue at non-DOD sites, including landfills, airports, and wastewater treatment facilities because it is unknown if the groundwater contains those pollutants. Work on some DOD sites has been stalled due to various reasons including disputes on level of protectiveness, DOD unwillingness to incorporate State regulations into remedial strategies, and DOD contracting issues. Staff continues to prioritize workload to address high priority sites, based on threat to human health and the environment.

**Enforcement** – The Quarterly Violations Report identifies all violations, but not all violations can be addressed. The state provides not quite 2 fulltime positions for enforcement, but those resources are needed for updating databases, tracking informal enforcement actions, and on addressing formal enforcement. Formal enforcement takes a considerable amount of time to address because of the legal steps involving noticing, response time, and due process. Violations that affect water quality or human health are prioritized for enforcement. Emphasized use of informal enforcement approaches is improving compliance. Most resources on the informal enforcement come from our core regulatory programs, which are also inadequately funded. Review of submitted reports to ensure compliance is occurring and tracking failures to report continue to be a challenge.

**Water Quality Assessment** – Given the Water Board's large land base, ongoing assessment of water quality is challenging. Water quality impacts from abandoned mines or other historical industries remain unaddressed. Currently 119 listings of impaired water bodies are not being addressed. Limited opportunities and resources are available to ensure mitigation projects are successful; including use of in-lieu fees and mitigation banks. More work is needed to identify priority functions and values of surface waters requiring protection and impact avoidance.





## 2019 SUMMANY OF UNADDRESSED WORK

### Lahontan Regional Water Quality Control Board

Development of new rapid assessment tools for episodic streams is needed and the surface water ambient monitoring program has been cut back. Also, constituents of emerging concerns (e.g. pharmaceuticals) are not being monitored. Staff continues to prioritize workload and redirect staff to high priority projects.

**Surface Water Protection** - Additional work is needed to ensure protection of our surface waters, but we lack sufficient resources in these core regulatory programs. Several applications for using aquatic herbicides are pending in the Region and no additional resources are provided for this work. For example, we have applications from LADWP, Department of Water Resources, Tahoe Keys Property Owners Association in Lake Tahoe, and other private lakes are anticipated to be submitted. we need to assess minimum flows for maintaining beneficial uses. Additional work on total maximum daily limits (TMDLs) is required for Eagle Lake nitrogen and phosphorus listings and a Truckee River TMDL target assessment. Staff continues to prioritize workload and redirect staff to high priority projects.

**Basin Plan Updates** – Several basin planning projects cannot be completed including site specific objectives for surface waters including Hot Creek, addressing in-stream flow requirements, linking water quality objectives to beneficial uses, among others identified in the 2018 Triennial Review Priority list.

**Outreach and education** –We lack dedicated funding and staff to conduct necessary public, environmental justice or tribal outreach and education. Staff will continue to incorporate outreach into action items, such as permits and enforcement, and redirect staff from other tasks to conduct outreach.



# **ENCLOSURE 10**

(To be submitted under separate cover)