# 2022 TRIENNIAL REVIEW OF THE LAHONTAN WATER QUALITY CONTROL PLAN DRAFT STAFF REPORT

December 2021

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## Introduction

The California Regional Water Quality Control Board, Lahontan Region (Water Board) is the state agency with primary responsibility for setting and implementing water quality standards in the part of California located east of the Sierra Nevada crest, from the Oregon border into the northern Mojave Desert. The Lahontan Region encompasses roughly 24 percent of California and includes 700 lakes and over 3,000 miles of rivers and streams. The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) defines and designates beneficial uses of surface waters and groundwaters (i.e., waters of the state), establishes narrative or numeric water quality objectives (WQOs) to protect beneficial uses, and contains provisions to protect high quality waters from degradation (i.e., antidegradation). The Basin Plan also includes programs of implementation for achieving water quality objectives. The current Basin Plan took effect in 1995. The current Basin Plan, complete with approved amendments, can be accessed from the Lahontan Water Board Basin Plan Program webpage.

California Water Code section 13240 states that basin plans "shall be periodically reviewed and may be revised." Additionally, section 303(c)(1) of the federal Clean Water Act (CWA) requires that a State review its water quality standards and, as appropriate, modify and adopt standards, at least once every three years. This process is known as the *Triennial Review*. Examples of issues considered in a Triennial Review include developing new or revising existing water quality objectives; evaluating, adding, or removing beneficial use designations for specific surface water bodies and/or ground water basins; and developing new or revising existing implementation measures, such as waste discharge prohibitions. The issues evaluated as part of this Triennial Review are described in **Appendix A**.

The Water Board's Triennial Review process produces a prioritized list of basin planning issues but does not include a description of the method or the strategy staff will take to address the priority issues. The prioritized Triennial Review List serves as the three-year work plan for the Water Board's Basin Planning Program. The Water Board's current Triennial Review List was adopted in November 2018 and has been used to prioritize resources allocation for basin planning efforts. The status of 2018 Triennial Review priorities is presented in **Appendix B**. The Triennial Review does not require environmental analysis under the California Environmental Quality Act.

## **Water Quality Standards**

Under the Clean Water Act, water quality standards include designated uses, water quality criteria, and an antidegradation policy. The Porter-Cologne Water Quality Control Act (Porter-Cologne) modifies the federal language to refer to designated uses as beneficial uses and water quality criteria as water quality objectives, which includes the State Board's antidegradation policy (Resolution 68-16). Porter-Cologne authorizes the Water Board to establish a program of implementation for water quality protection in

California. A program of implementation includes actions necessary to achieve objectives, a time schedule for the actions to be taken, and monitoring to determine compliance with water quality objectives and protection of beneficial uses of water. Water quality encompasses the physical, chemical, and biological health of a waterbody. Changes to water quality standards (beneficial uses and water quality objectives) require a Basin Plan amendment. Water quality standards (beneficial uses and water quality objectives) are set forth in Basin Plan Chapters 2, 3, and 5 and can be viewed at:

http://www.waterboards.ca.gov/lahontan/water\_issues/programs/basin\_plan/reference s.shtml. The Basin Plan's beneficial use tables (Tables 2-1 and 2-2) include both existing and potential beneficial uses.

#### **Triennial Review Process**

Water quality issues with a potential basin planning nexus are solicited from multiple sources. These include State Board requirements, Water Board staff, permittees, Tribal governments, and an assortment of stakeholders.

The Triennial Review process will result in a generalized priority ranking of issues that may be addressed by the basin planning program. There are many different issue types, including efforts to improve program(s) implementation, improvements to reflect updated science, and water quality standards actions.

**Appendix A** includes a description of each issue and an estimate of the time required to complete a project to address the issue. Appendix A also includes an abbreviated title, or code, for each basin planning issue. Some issues presented in the October 6, 2021 Agenda Item 6, Enclosure 2, were combined. Therefore, this effort prioritizes a total of 18 basin planning issues.

Triennial Review is a public process. The 2022 Triennial Review process has so far included a Board workshop on October 6, 2021 and the release of this draft staff report for comment. After receiving comments, staff will produce a final staff report and response to comments document. The Water Board will consider a resolution approving the Triennial Review during a Water Board hearing. The hearing, currently scheduled for the March 9 and 10, 2022 Board meeting, will be publicly noticed at least 45 days prior to the hearing. Staff will also transmit an adopted resolution and Triennial Review staff report to the U.S. Environmental Protection Agency.

#### **Prioritization**

At the June 16, 2021 Board Meeting the Water Board executive team presented a new Strategic Narrative of the Lahontan Water Board (<u>link to Board Item</u>). The Strategic Narrative describes the agency's Vision, Mission, Core Values (Integrity, Accountability, Transparency, Respect, Balance) and revised goals. Most of the prioritization criteria

are derived directly from the agency goals. The prioritization criteria are listed below. The breadth of prioritization criteria provides a suitable approach to compare disparate basin planning issue types for workplan assignment.

#### **Prioritization Criteria**

<u>Protect human health:</u> An issue has a nexus with the protection of human health and such protections can be improved by addressing the issue. Examples could include protecting or restoring beneficial uses, such as REC-1, MUN or COMM, or incorporating updated human health water quality objectives into the Basin Plan.

<u>Protect aquatic life:</u> An issue has a nexus with improving the Water Board's ability to protect aquatic life beneficial uses, such as COLD, WARM, or SPWN. Examples include standards actions or improving or updating implementation tools available to regulatory staff.

<u>Outstanding National Resource Waters:</u> A nexus to restoring, maintaining, or enhancing the water quality of Lake Tahoe or Mono Lake, California's two ONRWs.

<u>Climate Change Adaptation and Mitigation:</u> Changes to the Basin Plan which help the Water Board implement the Climate Change Adaptation and Mitigation Strategy and support the Water Board's ability to restore, enhance, and preserve water resources in the face of climate change. Examples include protections for source waters, changes to encourage meadow restoration and floodplain protections.

<u>Seek Environmental Justice and intentional support of Disadvantaged Communities:</u>
Actions that allow for proactive and intentional support of Disadvantaged Communities or historically disenfranchised populations, including Native American residents of the Lahontan Region. Such populations are often more susceptible to the human health risks associated with drinking water pollution, climate change, and land use patterns, and are often the least financially able to adapt to such challenges.

Improve communication by promoting clarity and consistency: Opportunities to improve issues of clarity or consistency within the Basin Plan. Benefits of such efforts include consistent interpretation of the Basin Plan by staff. Such changes will help improve internal communication, communication with stakeholders, and will ease personnel succession planning and training. Inaction on these issues will have a negative impact on the effectiveness of Water Board programs. Promoting clarity and consistency will help create a psychologically safe workplace.

<u>Customer service responsiveness by improving process, efficiency and seeking agreeable water quality improvements</u>: Addressing an issue helps the Water Board be responsive to stakeholder input and assists with, or provides for, agreeable water quality improvements. This criterion also seeks to improve efficiency in core regulatory programs and avoid actions that place unnecessary burden on public resources without the benefit of commensurate water quality protections.

Previous Priority with Allocated Resources: Issues were prioritized in previous Triennial Review cycles and/or resources were otherwise committed. Basin planning projects designed to address specific issues do not often begin and end on the exact cycle of a Triennial Review. Similarly, many projects take more than three years to be completed, depending on the complexity of the technical and policy issues of an issue. This criterion supports the continued work on issues supported by Board action and/or Executive direction.

<u>Basin Planning Need Aligns with Triennial Review Period:</u> The issue is ripe to evaluate and address. It will not be dependent on outside information or resources not to be available in the three-year period of this Triennial Review.

# **Scoring and Results**

Staff assessed the 18 basin planning issues against the nine criteria listed above, then divided the issues into a High, Medium, and Low Priority categories. The criteria are equally weighted, with exception of the Protect Human Health criterion, which is weighted 150% of the other individual criteria. The result of the prioritization assessment is the division of the basin planning issues into High, Medium, and Low priority categories. Issues within each category are not ranked. Having grouped categories instead of individual rankings is intended to provide flexibility for the basin planning program to consider individual staff expertise and available resources when assigning work. This exercise includes seven (7) issues that will be prioritized for resources in the forthcoming Triennial Review period. An additional five (5) issues are given Medium Priority, and six (6) issues were scored Low Priority.

Prioritization results in this report are presented to guide the Water Board in their prioritization and are not binding. The Water Board may choose to adjust the category of a basin planning issue before adopting the Triennial Review list. In addition, the Water Board may consider updates to the planning priorities prior to the next scheduled Triennial Review through direction to the Executive Officer and Water Board staff.

#### High Priority issues include:

- Bacteria Water Quality Objectives: Fecal coliform removal
- Editorial Amendment
- Groundwater Protection Prohibitions
- High Quality Beneficial Use
- Mojave Groundwater WQO
- Riparian, Floodplain, and Wetland Protection Updates
- Tribal Beneficial Use and Subsistence Beneficial Use Designations

#### Medium Priority Issues include:

Evaluate Developing Instream Flow Criteria

- Evaluate USEPA Clean Water Act Section 304(a) Criteria Groundwater Beneficial Use Designations
- Update Prohibition Language for Consistency
- Wastewater Basin Plan Updates

# Low Priority Issues include:

- Add Laurel Pond as a Named Waterbody in Table 2-1 and Evaluate BUs
- Evaluate Site Specific WQO for TDS for Susan River
- Evaluate Truckee River Site Specific Objectives
- Evaluate WQOs for Association with Specific Beneficial Uses
- Update Basin Plan Reference Documents
- Update Total Nitrogen WQO for Hot Creek

# **APPENDIX A – Issue Descriptions**

Below are descriptions of the basin planning issues being considered for prioritization. Presented are summaries of the issues, estimated time to address the issues, and relevant notes. Issues are presented by priority category (High, Medium, Low) and are alphabetized within the category.

Appendix A does not include a description dedicated to tracking State Board Policies and standards actions under development, though such resource commitment will be included in annual workplans. Tracking such projects, and responding to State Board requests for engagement, takes relatively few resources and ensures Water Board staff can bring region-specific input into the development process. Such efforts could result in a basin planning action, but the readiness for these efforts to result in potential amendments to the Basin Plan is not consistent with this Triennial Review period. Examples of State Board projects under development include the Biostimulatory Substances Objective Program to Implement Biological Integrity and the Toxicity Assessment and Control Policy.

# **High Priority**

## **Bacteria Water Quality Objectives: Fecal coliform removal**

**Summary**: Bacteria WQOs use the presence of fecal indicator bacteria (FIB) as a measurement of pathogen risk. Two bacteria WQOs apply to the Lahontan Region surface waters. These include a regionwide WQO of 20 cfu/100 mL fecal coliform WQO measured as a logarithmic mean and a statewide WQO for REC-1 designated waters of 100 cfu/ 100 mL E. coli WQO measured as a geomean. Having two bacteria WQOs causes difficulty for stakeholder messaging, permitting, and water quality assessment purposes. Additionally, using fecal coliform has not been a US EPA recommended FIB since 1986. This project would remove the regionwide fecal coliform based water quality objective from the Basin Plan. The statewide WQO would be added to the Basin Plan, and the full statewide bacteria WQO provisions, including the implementation section, would be included by reference. The action may also update the narrative WQO.

**Notes**: Updating the bacteria WQO in the Lahontan Basin Plan has been a top Triennial Review priority for several cycles. The USEPA's approval letter of the current Basin Plan also recommended an update to the FIB used for the bacteria WQO. This project is underway and is scheduled for board action in early 2023.

**Resources**: Estimated project time 1-2 years (project underway). Estimated 0.75 PY.

#### **Editorial Amendment**

**Summary**: Update the Basin Plan to fix errors in the Mojave River Surface Water Beneficial Uses Basin Plan amendment (Mojave BU BPA). The amendment was adopted by the Water Board and approved by the USEPA with the expectation that the Water Board would fix some inadvertent errors in the amendment text. Staff will also propose making other changes to the Basin Plan with this amendment, as well as fixing typos and other edits that are not substantive changes.

**Note**: The amendment will not be subject to CEQA if it will not have a direct or reasonably foreseeable indirect impact on the environment.

**Resources**: Estimated project time is 0.5 years. Staff has begun working on this amendment and plans to bring it to the Water Board for consideration as early as June 2022.

#### **Groundwater Protection Prohibitions**

**Summary**: Establish prohibitions limiting certain land uses and development in critical recharge areas and high priority groundwater basins to mitigate impacts from climate change and population growth. Such actions would be a source water protection measure and compliment protection of headwaters. Prohibition areas could coincide with high priority groundwater basins as identified by the Department of Water Resources. Lake Tahoe and Truckee riparian and floodplain development prohibitions could serve as a template.

**Resources**: Estimated project time is 4 years. Estimated 1.5 – 2 PY.

#### **High Quality Beneficial Use**

**Summary**: The Lahontan Region contains an abundance of exceptionally high-quality waters. This project would explore creation of a beneficial use that defines high quality waters. Designation of waters with the beneficial use could be associated with commensurately protective water quality objectives. The protection of high-quality waters is important for preserving water quality, water supply, hydrologic function, and habitat in the face of climate change and population pressures, including recreational pressures.

**Notes**: Development and designation of such a beneficial use will assist the success of future updates to the Basin Plan (see 2018 Triennial Review Priority 11; WQOBU) while ensuring continued water quality protection of waters that meet the use definition. This project was borne of the Bacteria WQO Evaluation Project (2018 Triennial Review Priority 1) and endorsed in the proceedings of the May 2021 Board meeting.

**Resources**: Estimated project time is 3-5 years. Estimated staffing need 1.5-2.5 PY.

# **Mojave Groundwater WQO**

**Summary**: This project will evaluate groundwater quality information in the groundwater basins of the Mojave River to determine whether it is appropriate to set site specific groundwater quality objectives and, if so, set them at appropriate levels. The Mojave River basin is a fast-growing part of the Lahontan Region and includes disadvantaged communities. Groundwater pollution is a concern to protect a sustainable domestic and industrial water supply.

**Note**: This project is ongoing, led by the regional groundwater specialist.

**Resources**: Estimated project time is 4 years. Estimated 2+PY.

## Riparian, Floodplain, and Wetland Protection Updates

**Summary**: Staff would evaluate the need for updating existing Basin Plan language for consistency and clarity and would consider the need to add additional protections. Such amendment to the Basin Plan would increase the ability of staff to protect water resources and their efficiency in doing so, specifically through the 401/Dredge and Fill and Enforcement programs. Some of the possibilities would include: an updated and specific floodplain definition for ephemeral streams to support staff in implementing the applicability of the Truckee and Tahoe 100-year floodplain prohibition; refining the definition of "riparian areas" to ease determinations by staff and dischargers if a riparian area is a Water of the State; clarify or update the definition of Stream Environment Zones (SEZ) in Chapter 5 (Lake Tahoe Basin) as it relates to lands below high water line in Lake Tahoe and other area lakes; and consider language requiring setbacks from wetlands, which does not clearly exist in the Basin Plan.

**Note**: The issue combines several topics included in the October 2021 Triennial Review Board Workshop. Some of the topics described have clear solutions and others would require a more involved development and administrative process.

**Resources**: Estimated project time is 4 years if addressed as single project. Estimate of 1.5 PY Basin Planning staff and 1-2 PY 401 Program staff.

# Tribal Beneficial Use and Subsistence Beneficial Use Designations

**Summary**: In 2017 the State Board developed Tribal and Subsistence Fishing beneficial uses. The definitions are for Tribal Tradition and Culture (CUL), Tribal Subsistence Fishing (T-SUB), and Tribal Subsistence Fishing (SUB). Mercury WQOs are associated with T-SUB and SUB. In September 2020 the Water Board adopted Resolution R6T-2020-0057 adding the beneficial use definitions to the Basin Plan. This action was approved by the Office of Administrative Law in September 2021. This project would designate water bodies in the Lahontan Region

with the appropriate beneficial use or uses. To designate the CUL or T-SUB beneficial use a California Native American Tribe must confirm the designation is appropriate.

**Note**: The TBUs project was a priority of the 2018 Triennial Review. The project is assigned staff resources in the current work plan.

**Resources**: Estimated project time is 5+ years regionwide. Estimated staff time is 0.5-1PY per year, excluding assistance from the Office of Public Participation and executive engagement.

# **Medium Priority**

## **Evaluate Developing Instream Flow Criteria**

**Summary:** This issue considers developing narrative or site-specific numeric flow criteria. Flow is a complex characteristic of streams and rivers. It can be considered an influence on the physical, chemical, and biological aspects of waterbody health. Flow affects a waterbody's water quality in different manners depending on the analyte of concern and the source of the analyte in the water column. Seasonal flow variation is also important to the timing and success of life cycle stages of various aquatic vertebrates and invertebrates. This issue has a climate change nexus with changing precipitation regimes and peak snowmelt runoff, and with the release and timing of impounded waters and water rights.

**Note**: Traditionally the purview of the Division of Water Rights and California Department of Fish and Wildlife, there is building interest from the Division of Water Quality and Regional Board in addressing instream flow from a water quality perspective. Most notably, the State Board Policy for Maintaining Instream Flows in Northern California Coast Streams (effective 2014) has a limited geographic scope and focus (anadromous salmonids). The <u>Cannabis Cultivation Policy</u> (2019) includes flow and gaging requirements so growers can determine when they may divert water. The Cannabis Policy instream flow requirements includes many <u>Lahontan Region waters</u>.

**Resources**: Estimated project time is 5-10 years, fewer if Cannabis Policy requirements can be adapted. Estimated 1-5 PY.

# Evaluate USEPA Clean Water Act Section 304(a) Criteria

**Summary**: Federal regulations at 40 CFR 131.20(a) require states to consider, as part of their triennial review process, the adoption of new or revised Clean Water Act section 304(a) water quality criteria recommendations for human health, aquatic health, and recreation as water quality standards (WQS) into their state plans.

Criteria published by the United States Environmental Protection Agency (USEPA) since May 30, 2000, are required to be evaluated.

**Note**: The 2018 Triennial Review included the recommendation that the Water Board support the State Board in its authority to consider these criteria for statewide standards actions. As a medium priority issue, as identified above, the recommendation is to continue to support the State Board.

**Resources**: Estimated project time is 0.5-5 years. Resource need varies from 0.2 PY to 2 PY depending on decisions to review, adopt, or defer to State Board action.

## **Groundwater Beneficial Use Designations**

**Summary**: There exist some groundwater basins that are unmapped in the Basin Plan or unnamed in Table 2-2. Staff would identify the groundwater basins with the Municipal and Domestic Supply (MUN) beneficial use. Staff would also designate groundwater basin 6-22, upper Kingston Valley Basin, with the Industrial Service Supply (IND) beneficial use. Basin 6-22 includes the site of Mountain Pass Mining Operations.

**Resources**: Estimated project time is 2 years. Estimated 0.75-1 PY between Basin Planning and regulatory programs.

# **Update Prohibition Language for Consistency**

**Summary**: The action would revise the language of the unit/area-specific prohibitions in Chapter 4.1 so that they are written in plain language and to be consistently interpreted and applied for the specific waste types, regionwide. Unit/area-specific prohibition language is inconsistent between unit/areas even though the prohibitions appear to be for the same types of wastes. The issue has led to inconsistent application of the prohibitions regionwide.

**Resources**: Estimated project time is 2 years. Total PY estimate of 0.75-1 PY split

#### **Wastewater Basin Plan Updates**

**Summary**: Staff would coordinate with the NPDES and WDR programs to revise and update Chapter 4.4 of the Basin Plan (Municipal and Domestic Wastewater: Treatment, Disposal, and Reclamation) to provide a more consistent and specific implementation plan for protection of water quality. Such an effort would also provide dischargers and stakeholders more clarity and specificity to meet such requirements. This issue includes evaluating the need for a regionwide prohibition on cesspools.

**Resources**: Estimated project time is 2 years, 0.5 PY Basin Planning staff and 0.5 PY wastewater programs staff.

# **Low Priority**

## Add Laurel Pond as a Named Waterbody in Table 2-1 and Evaluate BUs

**Summary:** Laurel Pond receives effluent from Mammoth Community Water District. The project would add Laurel Pond as a named water body and identify beneficial uses. Currently, as an unnamed waterbody in Chapter 2 of the Basin Plan, the beneficial uses assigned to Laurel Pond are those of "Minor Surface Waters." Subsequently, the project would evaluate whether the REC-1 and MUN beneficial uses are appropriate.

**Note:** This issue has a nexus with the Hot Creek issue. Further investigation is needed to determine the contribution level, if any, of the discharge to the Hot Creek nitrogen inputs through groundwater connectivity. The two issues are linked and require staff coordination on work and timing.

**Resources:** Estimated project time is 3-5 years. This project would involve staff from several programs, with an estimated total staffing requirement of 2.5 PY. MCWD has indicated interest in funding contractors to assist, which would reduce staffing needs.

# **Evaluate Site Specific WQO for TDS for Susan River**

**Summary**: Staff would evaluate the appropriateness of the existing TDS water quality objective and determine if the Susanville Sanitary District can meet permit conditions through capital improvements or alternative methods. The Susan River Water Quality Objective (WQO) for total dissolved solids (TDS) at Litchfield is at 185 mg/L with a 90 percentile at 250mg/L. Data from 2011 indicated the TDS at the Litchfield site was 240 mg/L on average. The Susanville Sanitary District TDS discharge in 2011 below 400mg/L. In comparison, the drinking water standard for TDS is 500 to 1000mg/L. Altering the standards to a lower number standard could still be protective of beneficial use. Any Water Board action to change the WQO would include consideration of an antidegradation analysis.

**Resources**: Estimated project time is 4 years. Estimated staff time 0.25 Basin Planning staff and 0.25 NPDES staff per year.

## **Evaluate Truckee River Site Specific Objectives**

**Summary**: The Truckee River has multiple site-specific objectives with multiple points of compliance, each in close proximity. Having such numerous objectives complicates water quality assessment and regulatory practices. The project would evaluate the need for so many compliance points and if the many objectives are appropriate. Staff would recommend keeping as-is, reducing compliance points, and/or changing WQOs.

**Resources**: Estimated time is 4-5 years. Resolving this issue may draw on resources from the Basin Planning, TMDL, SWAMP, and regulatory programs, with an estimate of 2-3 PY total.

# **Evaluate WQOs for Association with Specific Beneficial Uses**

**Summary:** Many of the Basin Plan WQOs are not explicitly linked to specific beneficial uses. Staff would evaluate WQOs and beneficial uses for association. In some situations, it will be appropriate to associate existing or updated WQOs with a specific beneficial use, and in some cases the objective may continue to apply generally, or to all beneficial uses. Associating WQOS with the protection of specific beneficial uses would be consistent with USEPA guidance on standards development and would ensure a scientific basis for numeric objectives. Such a change to the Basin Plan would aid staff work developing water quality assessments for the Integrated Report.

**Note**: This effort is a long-term need but is not necessarily ready for this Triennial Review period. The issue will be resource intensive and should be coordinated with (or after) the HQBU issue. This issue can also be used to create a regionwide approach to evaluate and update surface water TDS water quality objectives and potentially other standards actions, as well.

**Resources**: Estimated project time 10 years; can be divided into sub-efforts. The issue presents an important need, but one that is resource intensive. Such an effort could be accomplished with an estimated is 1+ PY per year plus contract funds.

# **Update Basin Plan Reference Documents**

**Summary**: The plates that display and categorize groundwater basins and watersheds in the Basin Plan can be digitized to increase ease of use and visual resolution. Appendices C and D address sewage and wastewaters disposal and related exemptions. They would be evaluated to determine if they are current and updated or deleted if superseded. Appendix B includes copies of State and Regional Board Policies used in Basin Plan Implementation. The list has not been updated to account for development of newer Policies, which are available online.

**Resources**: Estimated project time is 1-2 years. It is not clear that updating the plates needs a basin planning action, or if developing and linking to a digitized, or GIS, resource is sufficient.

# **Update Total Nitrogen WQO for Hot Creek**

**Summary**: The California Department of Fish and Wildlife (CDFW) operates the Hot Creek Fish Hatchery (Hatchery). The project would assess the nitrogen inputs to the Hatchery's spring fed water supply and determine if a site-specific objective for nitrogen should be developed for Hot Creek. A revised, or new, site-specific objective may supplant the existing limit in the Hatchery's NPDES permit.

**Notes:** The Water Board, at the March 2021 Board meeting, adopted a Time Schedule Order providing the CDFW time to comply with the permit effluent limitations and requiring tasks to assess sources of nitrogen. See note on Laurel Pond issue, above.

**Resources:** Estimated project time is 3-5 years. This project would involve staff from several programs, with an estimated total staffing requirement of 2-2.5 PY. Staffing could be reduced depending on project contribution from CDFW.

# **APPENDIX B – Status of 2018 Triennial Review Priorities**

2018 Priority	Title or Description	Status
1	Evaluate Bacteria Water Quality Objectives	Active
2	Climate Change Adaptation and Mitigation Strategy	Done
3	Source Water Protection	Hold
4	Riparian Protection Policy	Hold
5	Mojave River Surface Water BUs	Done (editorial amendment planned)
6	Site-specific Water Quality Objectives for Mojave Ground Water	Active
7	Remove Lake Tahoe Prohibition on New Pier Construction	Done
8	Tribal and Subsistence Beneficial Uses	Definitions Amendment Done
		Designations Amendment Active
9	Truckee River Embedded/Deposited Sediment Objective	Active
10	Editorial Revisions, Corrections, and Incorporation of Adopted State Water Board Policies	Included in Priority 5 amendments