

Fiscal Year (FY) 2020-2021 WORK PLAN

Point Source Control & Groundwater Protection Division

Programs:
NPDES Wastewater
NPDES Stormwater
Waste Discharge to Land
Solid Waste Disposal
**Underground Storage Tank Cleanup/Site Cleanup/DoD
Cleanup**
Groundwater Protection
Agricultural Lands Discharges

Division Chief: Charles Reed



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Cover Photos: Santa Rosa Creek upstream of Willowside Road.

1.0 BACKGROUND

1.1 NPDES Wastewater Program

The National Pollutant Discharge Elimination System (NPDES) program is a federal program, which has been delegated to the State of California for implementation. NPDES permits, also referred to as Waste Discharge Requirements, are issued to regulate the discharge of municipal wastewater or industrial process, cleaning, or cooling wastewaters, commercial wastewater, treated groundwater from cleanup projects, or other wastes to surface waters only. If the waste discharge consists only of non-process storm water, it may be regulated under the NPDES Storm Water program.

NPDES wastewater permits contain effluent limitations that prescribe the level of pollutants allowed in the discharge. These limits are based on either technology-based limits or water-quality based limits. Technology-based limits require that the best available technology (BAT) be used for the removal of pollutants. Water-quality based limits are those limits that are more stringent than technology-based limits and are applied when necessary to achieve water quality standards as set by the Basin Plan beneficial uses and water quality objectives.

NPDES wastewater permits can be issued for individual discharges or as a general NPDES permit for a class or group of discharges. Permits are issued for a five-year period and must be reviewed and reissued every five years. Facilities are also classified as either major or minor facilities depending on the volume and/or type of pollutants discharged. Major facilities are facilities with design flows greater than one million gallons per day and facilities with approved industrial pretreatment programs. Minor facilities are facilities with design flows equal or less than one million gallons per day and which have not been determined to have an actual or potential adverse environmental impact classifying the discharge as major.

There are currently forty-one (41) facilities within the North Coast Region which discharge wastewater to surface waters that are currently regulated by NPDES permits issued by the Regional Water Board. The table below indicates the number of facilities by discharge type.

Number of Wastewater NPDES Permits by Type			
Municipal	Industrial	College	Fish Hatcheries
27	6	3	5

The Regional and State Water Board also develop and issue general NPDES wastewater permits to cover multiple facilities within a specific category. The use of general permits allows us to allocate resources in a more efficient manner and provide timely permit coverage for large numbers of facilities in the same category. The table

below indicates the total number of facilities covered by the current available general NPDES permits. There are currently 49 facilities regulated under general NPDES permits in the North Coast Region.

General NPDES Permit	Order Number	Current Number of Active Enrollees in Region 1
General Order for Low Threat Discharges	R1-2020-0006	3
General Order for Treated Groundwater Petroleum Hydrocarbon & Volatile Organic Compound	R1-2016-0034	3
Statewide General Order Pesticide Aquatic Invasive Species	2011-0003-DWQ	2
Statewide General Order Pesticide Spray Application	2011-0004-DWQ	0
Statewide General Order Pesticide Vector Control	2011-0002-DWQ	1
Statewide General Order Pesticide Weed Control	2013-0002-DWQ	9
Statewide General Order Utility Vaults	2014-0174-DWQ	8
Statewide General Order Drinking Water System Discharges	2014-0194-DWQ	23

1.2 NPDES Storm Water Program

The Federal Clean Water Act (Clean Water Act) prohibits certain discharges of storm water containing pollutants except in compliance with a NPDES permit. The NPDES stormwater program regulates stormwater discharges from three potential sources: municipal separate storm sewer systems (MS4s), construction activities, and industrial activities.

1.2.1 Municipal Stormwater Program

The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer systems (MS4s). Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water permits are required for discharges from an MS4 serving a population of 100,000 or more. The Municipal Storm Water Program encompasses the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the California Department of Transportation (Caltrans Permit).

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Phase I Permit Program

There is one Phase I MS4 permit in the North Coast Region, Order No. R1-2015-0030. This permit regulates the discharge of pollutants from the MS4s of the City of Santa Rosa, portions of unincorporated County of Sonoma, Sonoma County Water Agency (Sonoma Water), the City of Cotati, the City of Cloverdale, the City of Healdsburg, the City of Rohnert Park, the City of Sebastopol, the City of Ukiah, and the Town of Windsor. The Phase I permit is scheduled to be reissued by the Regional Water Board in FY 2020-21.

Phase II Permit Program

The State Water Resources Control Board issued a General Permit for the Discharge of Storm Water from Small MS4s (Order 2003-0005-DWQ) to provide permit coverage for smaller municipalities, including non-traditional Small MS4s, which include facilities such as military bases, public school campuses, prison and hospital complexes. The Phase II Small MS4 General Permit covers Phase II permittees statewide. On February 5, 2013, the Phase II Small MS4 General Permit was re-adopted (Order 2013-0001-DWQ) and the new requirements became effective on July 1, 2013. The Phase II Small MS4 General Permit is scheduled to be reissued by the State Water Board in 2021. Regional Water Board staff is participating in this effort.

Caltrans Permit Program

The State Water Board issued the Caltrans Permit, which regulates all discharges from Caltrans MS4s, maintenance facilities, and construction activities. Caltrans is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties, and is subject to the permitting requirements of Clean Water Act section 402(p). Caltrans' discharges consist of storm water and non-storm water discharges from State owned rights-of-way. A Caltrans contract liaison housed in the Region's Nonpoint Source & Surface Water Protection Division is responsible for review and issuance of Caltrans's Clean Water Act section 401 water quality certifications in Region 1, which includes oversight of storm water discharges from those projects. Regional Water Board municipal storm water staff is participating with State Water Board staff to develop a new Caltrans MS4 storm water permit, which is scheduled to be adopted in 2021. Staff will continue to engage with staffs from State Water Board and Caltrans to refine permit language for TMDL Compliance Approach and provide technical support and justification for responsibility of Caltrans. It is also anticipated that Regional Water Board staff will assist State Water Board staff in its comment review and response to comments from Caltrans and work with State Water Board attorneys to fine tune the regulatory approach to TMDL compliance.

1.2.2 Construction Stormwater Program

Dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity, Order 2009-0009-DWQ (Construction Stormwater General Permit). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. There are currently 239 active sites enrolled under the Construction Stormwater General Permit.

1.2.3 Industrial Stormwater Program

Industrial storm water discharges and authorized non-storm water discharges from industrial facilities are regulated under the Statewide Storm Water Industrial General Permit, Order 2014-0057-DWQ (Industrial Stormwater General Permit or IGP. The types of industrial facilities that are required to seek coverage under the IGP include manufacturers, landfills, mining facilities, facilities generating electricity using steam, hazardous waste facilities, transportation facilities with vehicle maintenance, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities. There are currently 448 active facilities currently enrolled under the Industrial Stormwater General Permit in Region 1.

Storm Water NPDES Permit	Current Number of Active Enrollees
Phase 1 Storm Water Permit	10
Phase 2 Storm Water Permit	11
Caltrans Storm Water Permit	1
Construction Storm Water Permit	239
Industrial Storm Water Permit	448

1.3 Waste Discharge to Land Program (Wastewater, Waste Residuals, and Recycled Water)

The Waste Discharge to Land Program regulates all point source discharges of waste to land that do not require full containment (which falls under the Solid Waste Disposal Program), do not involve confined animal facilities (which falls under the Dairy Program), and involve no discharge of a pollutant to a surface water of the United States (which falls under the NPDES Program). To regulate these discharges for the protection of groundwater, the Regional Water Board prescribes waste discharge requirements (WDRs) or issues waivers of WDRs. WDRs are written for a specific discharger (individual WDRs) or to regulate a similar group of dischargers (general WDRs). In recent years, the Program staff has also used conditional waivers to regulate certain types of discharges that have the lowest threat to water quality.

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Dischargers of municipal, commercial, and combined industrial wastewaters in the North Coast Region that discharge exclusively to land rely primarily on aerobic wastewater treatment systems to reduce pollutants to levels that, after discharge, are protective of groundwater quality and public health. Other common methods of land disposal of treated effluent are via percolation ponds, infiltration beds, large leachfield systems, or via spray or drip irrigation.

The State and Regional Water Boards develop and issue general permits to cover multiple facilities within a specific category. The use of general permits allows the Water Boards to allocate resources in a more efficient manner and provide timely permit coverage for large numbers of facilities in the same category. In addition, the use of a general permit ensures consistency of permit conditions for similar facilities. General permits may be written to cover categories of point sources having common elements, such as:

- Facilities that involve the same or substantially similar types of operations
- Facilities that discharge the same types of wastewater
- Facilities that require the same effluent limitations or operating conditions
- Facilities that require the same monitoring where tiered conditions may be used for minor differences within class (e.g., size or seasonal activity)
- Facilities that are more appropriately regulated by a general permit

The following are general permits commonly used in the North Coast Region for wastewater discharges to land:

- General Permit for Small Domestic Wastewater Treatment Systems
- General Permit for Sanitary Sewer Systems
- General Permit for Recycled Water Use
- General Permit for Wine, Beverage, and Food Processor Waste
- General Permit for Low Threat Discharges
- General Permit for Transportation Structure Repainting
- General Permit for Drinking Water Systems Discharges

For certain categories of low threat discharges to land, the Regional Water Board may issue a waiver of waste discharge requirements if the waiver is consistent with the Water Quality Control Plan for the North Coast Region (Basin Plan) and is in the public interest. In 2017, the North Coast Regional Water Board adopted Order No. R1-2017-0039, Conditional Waiver of Waste Discharge Requirements for Specific Categories of Low Threat Discharge in the North Coast Region. As with other waivers of WDRs, this conditional waiver expires after five years and must be renewed by the Regional Water Board.

WDRs issued by the Regional Water Board include prohibitions, effluent limitations, and other general provisions to ensure that the discharge complies with all laws, regulations,

and policies set forth in the Basin Plan for the North Coast Region. Self-monitoring programs are also prescribed that require the waste discharger to collect and submit to the Regional Water Board effluent and other water quality monitoring data to determine compliance with WDRs.

The number and type of facilities currently regulated by waste discharge requirements in the Waste Discharge to Land Program include:

- Municipal and community wastewater treatment facilities (37)
- Wineries and other Beverage and Food Processors (116)
- Recycled Water Producers and Users (20)
- Public Sanitary Sewer Systems (71)
- Mobile Home Parks, Campgrounds, Caltrans Roadside Rest Areas, Private WWTPs (73)
- Sawmills (2)
- Projects involving the land application of biosolids and ash (4)

1.4 Solid Waste Disposal Program

The Solid Waste Land Disposal Program oversees the discharge to land of certain solid or liquid wastes. These wastes include municipal solid waste (MSW), hazardous wastes, designated wastes, nonhazardous, and inert solid wastes. In general, these wastes cannot be discharged directly to the ground surface without adversely affecting groundwater or surface water, and therefore must be contained in waste management units to isolate them from the environment. The land disposal program is a United States Environmental Protection Agency (USEPA) approved program for implementing the USEPA RCRA Subtitle D regulations. California Code of Regulations (CCR) Title 27 contains the regulatory requirements for non-hazardous wastes. CCR Title 23 (Chapter 15) contains the regulatory requirements for hazardous wastes. These regulations prescribe standards for classifying waste; siting of waste management units; waste containment construction; operation; maintenance; closure; monitoring of the vadose zone, storm water, surface water, and groundwater; and requirements for corrective actions in the event of a release of waste constituents from the waste management unit (WMUs). The Regional Water Board implements these requirements through the adoption of waste discharge requirements and enforcement orders.

Increasing Federal and State requirements in the 1990s resulted in the stoppage of operations at many of the locally owned and operated municipal landfills throughout the North Coast Region prior to these landfills reaching full capacity of their existing WMUs. As a result, the region has one remaining operating municipal solid waste disposal site (SWDS): the Sonoma County Central Landfill, located near Cotati. Consequently, permitting workload for one Land Disposal Program staff includes the complicated and resource intensive process for permitting new WMUs (i.e., operating cells) at the Sonoma County Central SWDS or closure permitting. Staff permitting time necessarily prioritizes the open Central landfill and overseeing closed landfills that have not completed the construction of their final landfill cover system.

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Review of closure reports and new WMU construction reports, which are the main documents used for permitting for these types of projects, are one of the biggest workloads staff face. A given closure plan/new cell construction report is a composition of multiple technical reports, all which must be reviewed for technical and regulatory compliance. Typical landfill components which require design review technical reports found within closure plans/new cell construction reports include final cover systems or base liner systems comprised of foundation layer, barrier layer(s), vegetation layer (for closure) or operations layer (for new construction); the leachate, collection, recovery, and storage systems (LCRS); surface water control systems; and landfill gas control systems. Other technical issues found within closure plans/new cell construction reports include slope stability calculations for both static and seismic conditions; CEQA compliance documents; other resource agency permits and their supporting documentation; assessment of material settling; a Construction Quality Assurance Plan (CQA Plan); and water balance models. These large projects require coordination with the local enforcement agency (LEA), CalRecycle, and air quality boards; multiple rounds of review, comments; and new submittal before they are accepted and the process of writing and bringing permits to the Regional Water Board for adoption.

Once the permit has been issued and construction of closure systems or new WMUs has begun, staff must maintain an active regulatory presence via inspections and review of daily field logs, monthly summary reports, CQA testing, and various specific reports required by the project CQA to verify that the project is being completed as proposed. Once the project construction is completed a final CQA report is submitted, which staff must review and approve and issue either Closure Certification or Waste Management Unit Certification.

Staff oversight of the remaining WMUs in the region, which include MSW landfills, wood waste disposal sites (WWDS), burn ash sites (BAS), waste piles, land treatment units, and now compost facilities is ongoing. For these facilities, staff conducts routine site inspections, continues oversight of landfill environmental control systems, reviews self-monitoring and other technical reports, reviews and revises monitoring and reporting programs, continues oversight of any post-closure maintenance issues, and evaluates adequacy of environmental controls for development encroachment in accordance with Land Disposal Program priorities.

In addition to the active regulated facilities managed by staff, historic, non-active sites commonly demand staff time as part of various development projects, third-party inquiries, and other land use issues. Because Land Disposal Program staff are not initiating or directing these projects, they are rarely accounted for in staff work plans. Moreover, these projects are often time-sensitive and demand staff attention to prevent project delay or an unintended environmental release.

The number and types of facilities regulated under the Land Disposal Program include:

- Municipal Solid Waste Landfills (18)
- Wood Waste Disposal Sites (25)
- Burn Dumps/unregulated (110)

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- Land Treatment Units (1)
- Active Mines (2)
- Inactive or Abandoned Mines, not currently regulated under WDRs (45)
- Surface impoundments, Class II (2)
- Waste piles (1)
- Compost Facilities (5)
- Other (8)

1.5 Underground Storage Tank/Site Cleanup/DoD Programs

Petroleum Underground Storage Tanks (USTs) are a historical source of groundwater pollution. Most UST hold or held fuel, which is the main emphasis of this program (other pollutants are covered by the Site Cleanup Program). Under State law USTs need to be monitored for leaks (monitoring is administered by local agencies). If leaks are discovered, Regional Board staff, working with local agencies, require a subsurface investigation, removal of subsurface structures, cleanup of secondary sources and monitoring of groundwater. In the North Coast, Regional Water Board staff works in partnership with only one Local Oversight Program (LOP) to oversee the cleanup of UST sites in Sonoma County. The Sonoma County Department of Health Services, Environmental Health Division is the LOP certified by the State Water Resources Control Board to oversee the implementation of UST cleanups. The Regional Water Board serves as the oversight agency of the Sonoma County LOP.

The Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of 'non-federally owned or used' sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, industrial manufacturing and maintenance sites, dry cleaners, lumber mills, and bulk fueling facilities. These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are diverse and include solvents, pesticides, heavy metals, and fuel constituents.

For Region 1 the Department of Defense (DoD) Cleanup program includes only Formerly Utilized Defense Sites (FUDS) which are facilities that were owned, operated, or leased by a branch of the DoD for various uses such as missile silos, gun batteries, listening posts, and radar stations. Soil and groundwater cleanup activities at Departments of Defense facilities are regulated in conjunction with the California Department of Toxic Substances Control (DTSC). Cleanup of DoD facilities must comply with Water Board policies and directives to protect water quality, beneficial uses, and environmental/ecological health. Areas of concern include soil and groundwater contamination, storm water and surface water discharges, and contaminated sediments.

In all the cleanup programs, impacts and potential impacts must be considered for groundwater, surface water, soil, soil gas, and indoor air vapor intrusion. For groundwater and surface water, our Basin Plan, the Water Code, the Health and Safety Code, and State Water Board policies are used in evaluating impacts. CalEPA and

DTSC guidance documents are used when evaluating soil, soil gas, and indoor air exposure pathways.

As of June 2020, there are 174 open UST program sites, 240 SCP sites, and approximately 50 DoD program sites (with multiple sub-sites at some formerly used defense sites) in the North Coast region.

1.6 Groundwater Protection Program

The goal of the groundwater protection program is to preserve and maintain high quality groundwater and to restore degraded groundwater. The Regional Water Board protects groundwater through several programs that are responsible for developing and implementing plans & policies, waste discharge requirements, groundwater investigations and cleanups, and enforcing water code violations.

A priority project identified by the Triennial Review of the Basin Plan and the Groundwater Strategic Team is the development of a groundwater protection policy. This project began on the Triennial review in 2007 as a comprehensive Basin Plan amendment that included revisions to chapter 3 (water quality objectives) and chapter 4 (implementation plans). Due to the large scope of work, the project was divided into two phases: Phase I involved updating the water quality objectives and phase II includes the development of a groundwater protection policy. Phase I was completed with the adoption of Resolution No. R1-2015-0018 in June 2015. During the adoption of the 2014 Triennial Review of the Basin Plan in March 2015, the Board identified Phase II as priority No. 5¹.

In 2015, the Regional Water Board staff formed the Groundwater Strategic Team to support efforts in groundwater resources preservation, protection, and remediation. The Groundwater Strategic Team expanded the vision of the groundwater protection policy beyond the basin plan amendment project as described in the 2014 Triennial Review to include other regulatory and non-regulatory elements. To capture these other regulatory and non-regulatory elements, the project was renamed as the North Coast Groundwater Protection Strategy. The strategy is intended to prioritize, coordinate, and implement Regional Water Board tools² and statewide tools³ for the protection of groundwater quality on a basin wide scale with the goal of protecting ecosystem function and

¹ Triennial Review Project No. 5 includes the development of a groundwater protection policy, policy to promote groundwater recharge, programmatic approach to managing salts and nutrients in groundwater and the update of Table 2-1 of the Basin Plan to include beneficial uses for individual groundwater basins, where appropriate.

² Existing regulatory and non-regulatory tools include development or revision of water quality standards, policies, and prohibitions (basin plan amendment); monitoring and assessment; issuance of waste discharge requirements; and enforcement actions.

³ Local and statewide activities of importance include: DWR's groundwater management planning; SWRCB's salt and nutrient management planning under the Recycled Water Policy; groundwater-surface interaction assessments; and statewide efforts to update groundwater monitoring protocols, data assessment and presentation tools.

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advancing the human right to clean water under current and future climatic conditions. The strategy includes the following five components:

1. Groundwater Protection Programs
2. Groundwater Ambient Monitoring and Assessment (GAMA) Program
3. Statewide Policies and Regional Planning
4. Data Driven Adaptive Management
5. Partnering

The Groundwater Strategic Team identifies opportunities to better protect water resources and provides resources (in the form of data and background materials) needed to support basin planning, basin-scale assessment, discharge permitting and remediation efforts. The Team serves as a forum through which Regional Water Board staff can share expertise and perspective. The Groundwater Team Charter identifies the following projects as team priorities for the North Coast Region:

1. *Basin Plan Amendments and Order Renewals*: Develop the Phase II Basin Plan amendment which involves development of a groundwater protection policy. Continue to update and renew orders that are protective of groundwater resources.
2. *Basin Scale Groundwater Assessments*: Develop the procedures required to assess, characterize, and determine the condition of and risk to groundwater quality at basin/aquifer scale.
3. *Sustainable Groundwater Management Act (SGMA)*: In coordination with State Water Board and California Department of Water Resources, provide the local Groundwater Sustainability Agencies in the North Coast Region with water quality data, assessment tools, and water quality standards as they develop Groundwater Sustainability Plans.
4. *Periodic Meetings and Presentations*: The Groundwater Team meets periodically to hear presentations from Water Board staff, outside agencies, vendors, or consultants regarding water supply, groundwater protection, and/or groundwater cleanup issues. These meetings are a good opportunity to make contacts with other agencies and learn more about their interests/priorities regarding groundwater issues in the region.
5. *Statewide Policy Development*: Participate in State Water Board and other relevant policy or legislative developments to promote our unique perspective on the protection of high-quality waters in the North Coast Region.
6. *Groundwater/Surface Water Interaction*: Develop strategies for integrating groundwater concerns into the management of watersheds, and vice versa.

To date the team has provided data analysis and/or recommendations for:

- NPDES facilities including Humboldt Creamery, Healdsburg, Forestville, Graton, Sonoma-West Holdings, Cloverdale, Ukiah, McKinleyville, and Ferndale
- State Water Board General WDR for Cannabis Cultivation
- Local Agency Management Plans (LAMPs) for Humboldt Co., Mendocino County, and Sonoma County
- Dairy Program general permit
- Draft Vineyard general permit.

1.7 Agricultural Lands Discharge Program

The North Coast Regional Water Board implements a broad Agricultural Lands Discharge Program, which addresses water quality impacts associated with activities on agricultural lands in the North Coast Region. There are approximately 350,000 acres of agricultural lands in the Region, which are primarily used for vineyards, orchards, row crops, grain, alfalfa, hay pasture, dairies, and lily bulbs. Agricultural discharges can contain pollutants such as pesticides, nutrients, organic matter, salts, pathogens, and sediment. These pollutants can harm aquatic life or make surface or groundwater unusable for drinking water or agricultural uses. Activities on agricultural lands can also result in the removal or suppression of riparian vegetation, which provide shade and other ecological functions to waterbodies. The Agricultural Lands Discharge Program is designed to meet the requirements of the California Water Code, the State Nonpoint Source Policy, and the Total Maximum Daily Loads (TMDLs) developed for certain watersheds in the Region.

The Agricultural Lands Discharge Program encompasses several separate Regional Water Board permits that address discharges of waste associated with agricultural lands. The scope of the program is defined by either the crop type or geographic location. Much of the Regional Water Board's activities associated with the Agricultural Lands Discharge Program are undertaken by the Cannabis and Enforcement Division and Nonpoint Source and Surface Water Protection Division. In April 2018, the North Coast Region hired a new staff person (1.0 PY) with a portion of that funding (0.75 PY) dedicated to the Agricultural Lands Discharge Program. This staff person is now housed in the Groundwater Permitting Unit and the focus of current work is the development of a general permit for vineyards.

One staff from the Region's Adaptive Management Unit has been working under the technical guidance of the Watershed Stewardship Coordinator to establish a watershed stewardship framework that will address water quality problems associated with lily bulb cultivation in the Smith River Plain. This staff person is now housed in the Groundwater Permitting Unit and the focus of current work is finalizing and implementing the draft Smith River Plain Water Quality Management Plan (SRPWQMP). Staff has come together with stakeholders as a Watershed Stewardship Team comprised of staff of NOAA Fisheries, the California Department of Fish and Wildlife, lily bulb growers, the Tolowa-Dee-ni' Nation, and the Smith River Alliance (a local nonprofit restoration group) to develop the draft SRPWQMP.

The SRPWQMP includes the implementation of management practices to reduce the delivery of copper and pesticides in runoff to surface waters, water quality sampling to track changes in water quality in response to implementation of the Plan, and a program of reporting to the public and Regional Water Board. Once approved by the Executive Officer, elements of the Plan will be used to develop a permit to address discharges of waste associated with lily bulb cultivation in the Smith River Plain and fully implement in the State's Nonpoint Source Policy.

2.0 DIVISION RESOURCES

2.1 Staffing

Three units and one specialist implement six distinct programs: (1) NPDES wastewater program, (2) NPDES municipal, industrial and construction stormwater program, (3) waste discharge to land program, (4) solid waste disposal program, (5) UST/Site Cleanup/DoD programs, and (6) groundwater protection program.

The three Division units tasked with implementing the above six programs are: 1) NPDES Unit, 2) the Groundwater Permitting Unit, and (3) Cleanups Unit. The groundwater protection specialist is responsible for developing and implementing our Region's groundwater protection program and provides technical assistance to division staff as needed.

Table 1 – Division Staff, Includes Management and Support Staff

Position	Name	Classification	PYs
Division Chief	Charles Reed	Supervising WRCE	1.0
Groundwater Specialist	Chris Watt	Senior EG (spec.)	1.0
NPDES Unit	Heaven Moore	Senior WRCE	1.0
NPDES Wastewater Program	Cathy Goodwin	WRCE	1.0
NPDES Wastewater Program	Matt Herman	WRCE	1.0
NPDES Wastewater Program	Justin McSmith	WRCE	1.0
NPDES Construction Stormwater Program	Josh Luders	WRCE	1.0
NPDES Industrial Stormwater Program	Farzad Kasmaei	WRCE	1.0
NPDES/Wastewater/Stormwater Program	Rhonda Raymond	SEA	.7
NPDES Municipal Stormwater Program	Brendan Thompson	ES	1.0
Groundwater Permitting Unit	Jeremiah Puget	Senior ES	1.0
Solid Waste/Land Disposal Program	Terri Cia	EG	1.0
Solid Waste/Land Disposal Program	Gina Morrison	WRCE	1.0
WDR Waste to Land Program	Roy O'Connor	EG	1.0
WDR Waste to Land Program	Rachel Prat	ES	1.0
Irrigated Lands Regulatory Program	Lynette Shipsey	WRCE	1.0
Irrigated Lands Regulatory Program/WDR Waste to Land Program	Ben Zabinsky	WRCE	1.0
Site Cleanups Unit	Heidi Bauer	Senior EG	1.0

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Position	Name	Classification	PYs
Site Cleanup/UST Program	Julie Duong	WRCE	1.0
Site Cleanup/UST Program	Craig Hunt	WRCE	1.0
Site Cleanup/UST/DoD Program	Tom Magney	EG	1.0
Site Cleanup/UST Program	Paul Nelson	EG	1.0
Site Cleanup/UST Program	Cody Walker	EG	1.0
Site Cleanup/UST Program	Vacant	WRCE	1.0
Site Cleanup/UST Program	Vacant	EG	1.0
Admin Support			
Support Staff	3 Staff	Administration	Variable
Scientific Aid	1 Scientific Aid (Nic Colbrunn)	Point Source Control & Groundwater Protection	
		Total:	26.7

On May 14, 2020, the Governor Newsom released his revised budget proposal for 2020-21 projecting a revenue decline of 22.3 percent and a \$54.3 billion shortfall, reflecting the severity of the economic consequences of the COVID-19 pandemic. The Governor’s budget proposal includes significant program cuts, a 10 percent pay decrease for state workers, some new revenue sources, as well as borrowing and drawing on state reserves. Program cuts and pay decreases for state workers, which are expected to be realized in the form of furloughs or other mandatory leave requirement for Water Board staff, will effectively reduce the time base of existing Regional Water Board staff, slow the filling of vacant positions, and limit staff activities in all programs due to funding cuts.

To manage the budget uncertainty caused by the pandemic as it relates to management of State and Regional Water Board programs, the State Water Board has given guidance to reduce program metrics by 15 percent across the board. This reduction is recommended to account for the 10 percent reduction in staff time base due to budget cuts and the redirection of approximately 5 percent of the state workforce to COVID-19 contact tracing. For Region 1, four staff have been redirected for an estimated period of six to nine months for the COVID-19 contact tracing effort.

In this Division Work Plan, this reduction in program metrics due to COVID-19 is reflected in PY allocations for all programs, with a commensurate reduction in program activities and work commitments. This Work Plan’s PY allocation also reflects reduction of 0.2 PY per person year for each division staff for activities and leave that are not captured as program metrics, but are integral to the employment at the Water Board (vacation, holidays, sick leave, administrative tasks not related to regulated facilities, training, responding to public records act requests (PRAs), etc.) and must be accounted for. This accounting consideration will enable program managers to establish program performance targets more accurately and will provide staff with meaningful and achievable performance targets.

3.0 NPDES WASTEWATER PROGRAM

3.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 2.

The NPDES Wastewater program will prioritize the renewal of high priority facilities, issuance of necessary new permits, and review of monitoring data for compliance determination.

Table 2 – FY 19/20 NPDES Wastewater Program Core Activities and Projects by Priority

Priority Level	Activity/Project (PYs)	PY	Category	Target Date
1	a. Prepare individual NPDES permits for new unpermitted facilities and new enrollments under General NPDES permits	0.5	Core	On-going
	b. Renew existing individual and General NPDES permits for both major and minor wastewater facilities	1.5	Core	On-going
	c. Conduct inspections for both major and minor wastewater facilities and enrollees under General NPDES permits to ensure compliance with permit requirements	0.3	Core	On-going
	d. Staff Supervision	0.5	Core	On-going
2	a. Case Handling	0.25	Core	On-going
	b. Program Management and Implementation	0.25	Core	On-going
	c. Participation in Development of Statewide General Orders and Initiatives	0.2	Core	On-going
	d. Unplanned Work Activities	Variable	Special	On-going
	Total	3.5		

Categories: Categories are marked as either **Core** or **Special**

3.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 2 above.

1.a – Prepare new individual NPDES Permits and enroll facilities under General Permits

Summary: As permit applications are received, NPDES staff prioritizes and reviews applications, notify the applicants of the completeness of the applications, work with applicants to obtain required information, and prepares waste discharge requirements based on complete applications. In FY 2020-21, Staff plans to prepare two new individual NPDES permits (Fall Creek Hatchery and Mark West Quarry) for Board consideration and adoption and anticipate enrolling Coyote Valley Fish Hatchery and Purple Urchin facility under the Region 1 general NPDES permit for fish hatcheries. However, the final number of new permits and enrollments completed is dependent on the number of new applications received during the fiscal year, which is unpredictable, and could change due to competing work priorities.

Key Issues to Resolve and Considerations: State Water Board has given guidance to reduce program metrics by 15% due to the impacts resulting from COVID-19 and budget uncertainty. Contractor consultant support which was previously provided to review Reports of Waste Discharge and generate draft permits has been discontinued. This additional workload will need to be handled by Staff. Additionally, NPDES permit that authorize the production and use of Recycled Water may experience delays due to the need for the permittee to prepare and obtain approval from the State Water Board's Division of Drinking Water of a Title 22 Engineering Report. All permits must now comply with the Americans with Disabilities Act (ADA) which takes additional staff time to prepare ADA compliant permits.

PY Allocation for FY 19/20: 0.5

New NPDES Permits or Enrollments	Target Date
Mark West Quarry	June 2011
Fall Creek Fish Hatchery	June 2011
General NPDES Permit Enrollments	Ongoing

1.b – Renew existing individual NPDES permits

Summary: NPDES permits are renewed every five years. Based on a review of the region's existing NPDES permits, as well as the guidance from State Water Board and USEPA regarding renewal metrics, the impacts resulting from COVID-19, and budget uncertainty, NPDES Unit staff plans to renew a total of six individual NPDES permits during FY 2020-21 (for 2 major facilities and 4 minor facilities). Additionally, depending on staff resources and projected timing. Staff also plan to draft permits during FY 2020-21 which will be adopted in the first quarter of FY 2020-21. Updates are anticipated for the following facilities:

NPDES Permit Renewal	Target Date
Town of Windsor WWTP (Major)	September 2020
Santa Rosa Laguna Subregional Water Reclamation Facility (Major)	September 2020
Mendocino City SCD (Minor)	December 2020
Russian River Community Services District WWTP (Minor)	December 2020
Willits WWTF (Minor)	March 2021
Hatchery General Order	March 2021
Bodega Farms (Minor)	June 2021

Key Issues to Resolve and Considerations: State Water Board has given guidance to reduce program metrics by 15% due to the impacts from COVID-19 and budget uncertainty. Contractor consultant support which was previously provided to review Reports of Waste Discharge and generate draft permits has been discontinued. This additional workload will need to be handled by Staff. Additionally, NPDES permit renewals that authorize the production and use of Recycled Water may experience delays due to the need for the permittee to prepare and obtain approval from the State Water Board’s Division of Drinking Water of a Title 22 Engineering Report. All permits must now comply with the Americans with Disabilities Act (ADA) which takes additional staff time to prepare ADA compliant permits.

PY Allocation for FY 2020-21: 1.5

During FY 2019-20 draft NPDES permits for the Town of Windsor and the Santa Rosa Subregional Water Reclamation System were prepared and circulated for public review and a draft NPDES permit was prepared under contract for the Russian River CSD. Accordingly, the PY allocation for FY 2020-21 reflects a smaller resource allocation than if the renewal process for these NPDES permits commenced at the beginning of FY 2020-21.

1.c – Conduct inspections and prepared compliance reports for major and minor wastewater facilities

Summary: Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provides an opportunity for Regional Water Board staff to provide compliance assistance where needed. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. The Water Board’s Memorandum of Agreement with USEPA specifies that minor facilities will generally be inspected once a year, as resources allow, but not less than once during the five-year permit cycle. Major facilities will generally be inspected once a year, as resources allow, but not less than once every two years. The ability to conduct in-person inspections may continue to be impacted by

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COVID-19 and the associated public health orders. The table below indicates proposed inspections of three major and five minor facilities for FY 2020-21.

Key Issues to Resolve: State Water Board and EPA have given guidance to reduce program metrics by 15 percent due to the impacts from COVID-19 and budget uncertainty. The ability to conduct in-person inspections may continue to be impacted by COVID-19 and the associated public health orders.

PY Allocation for FY 2020-21: 0.3

Facility Inspection	Target Date
1. Santa Rosa Laguna Subregional Water Reclamation Facility (Major)	December 2020
2. Redway POTW (Minor)	December 2020
3. Shelter Cove POTW (Minor)	March 2021
4. City of Loleta (WWTP) (Minor)	March 2021
5. Mendocino City CSD (Minor)	March 2021
6. Eureka City Elk River WWTP (Major)	June 2021
7. City of Arcata (Major)	June 2021
8. City of Fortuna (Minor)	June 2021

1.d – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve: None

PY Allocation for FY 2020-21: 0.5

2.a – Case Handling

Summary: Each NPDES Wastewater Program staff currently has assigned to them approximately 14 NPDES facilities, for which staff conducts routine case handling tasks throughout the fiscal year. Routine case handling includes self-monitoring report review and compliance determination, facility-related complaint and spill response, response to public inquiries, preparing informal enforcement actions (e.g., staff enforcement letters, NOVs), assisting the Region’s Enforcement Unit with completion of Administrative Civil Liability Complaints (ACLs) for discretionary permit violations, Expedited Payment

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Letters/ACLs for permit violations subject to mandatory minimum penalties (MMPs) under Water Code section 13385, responding to Public Records Act requests, and maintaining the Region's electronic file management system.

In FY 2020-21, NPDES Wastewater Program staff anticipate assisting Enforcement Unit staff in preparing MMP-ACLs for seven NPDES facilities and assist preparing ACLs for discretionary permit violations and evaluating proposed resolution. Timely assistance from program staff help the Enforcement Unit meet its performance target of having "0 Facilities with Over \$12,000 in MMPs (4 or More Violations) Not Assessed within 18 Months of Accrual."

Key Issues to Resolve: The ability to conduct in-person site visits and inspections may continue to be impacted by COVID-19 and the associated public health orders. In addition, the number and complexity of complaints, public inquiries and PRA requests, and the need for progressive enforcement is unpredictable in any given year and this uncertainty may result in reprioritization of the Unit's work activities and reallocation of PYs.

PY Allocation for FY 2020-21: 0.25

2.b – Program Management and Implementation

Summary: In FY 2020-21, Program staff will continue to work with facilities, State Water Board, and EPA to prioritize work, develop and implement new technical requirements and policies, and develop technical and policy understanding to improve compliance support. Task will likely include continued participation in statewide roundtables and subcommittees, continued development of template permit language to reflect new policy changes, and coordination with sister agencies such as Division of Drinking Water, Division of Financial Assistance, Environmental Laboratory Accreditation Program, Coastal Commission, and EPA. These efforts are particularly important in these uncertain times.

Key Issues to Resolve: The amount of resource commitment from the NPDES Wastewater Unit for the per- and polyfluoroalkyl substances (PFAS) investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert NPDES Wastewater Program staff resources away from other division priorities. Additionally, limited staff resources and the uncertain impacts due to COVID-19 may limit participation in these efforts and required the prioritization of work associated with Region 1 performance targets.

PY Allocation for FY 2020-21: 0.25

2.c – Participation in Development of Statewide General Orders and Initiatives

Summary: NPDES Wastewater Program staff are active participants in the statewide NPDES Wastewater Program. Regional Water Board staff regularly attend statewide Program roundtable meetings and participate in technical working groups to resolve statewide issues and assist State Water Board staff in meeting program commitments as well as provide input on the development of statewide general orders and technical policy. In FY 2020-21, NPDES Wastewater Program staff will continue to participate in a special investigation currently being undertaken/led by the State Water Board to determine the presence of PFAS in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve: Limited staff resources and the uncertain impacts due to COVID-19 may limit participation in these efforts and required the prioritization of work associated with Region 1 performance targets.

PY Allocation for FY 2020-21: 0.2

2.d – Unplanned Work Activities

Summary: Like in all organizations, the best laid plans can be upset and derailed by unplanned work. Unplanned work may include work related to regional emergency response, last-minute requests from the State Water Board or elected officials, stakeholder demands, and other urgent work that requires producing information or other deliverable on short notice. These unexpected projects affect the ability of staff to meet planned work commitments or deliver work products on time.

Key Issues to Resolve and Considerations: Responding to unplanned work often requires that managers assess the urgency of the work and reprioritize workload and project commitments. When unplanned work is determined to be of high importance, other planned work commitments may be delayed or not completed.

PY Allocation for FY 2020-21: Variable

3.3 Performance Targets

3.3.1 Reported to State Board via ORPP

The Performance Target for the NPDES Wastewater program that is reported to the State Water Board' Office of Research, Planning, and Performance (ORPP) is based on the number of major and minor wastewater facilities inspected and major and minor individual permits renewed. The following table shows our targets for FY 2020-21.

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Performance Targets for the last FY and proposed for FY 20/21

Fiscal Year	Major Facility Inspections	Major Facilities Permits Renewed/New	Minor Facility Inspections	Minor Facilities Permits Renewed/New
Target 2019-2020	6	3	5	5
Actual 2019-2020	5	1	2	4
Target 2020-2021	3	2	4	5

4.0 NPDES STORM WATER PROGRAM

4.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 3. Most are described in detail in Section 4.2.

In FY 2020-21, the municipal storm water program will prioritize the development and reissuance of the Phase 1 MS4 Permit, as well as continue to take an active leadership role in the subcommittees charged with the development of the statewide Phase II MS4 General Permit and Caltrans Storm Water Permits.

The construction and industrial storm water program will continue to prioritize evaluate, inspect, provide compliance support, and apply progressive enforcement on high priority sites, as well as focusing on sites that have exceeded Numeric Actions Levels (NAL), failed to collect samples, or have insufficient Storm Water Pollution Prevention Plans. Additionally, work will be done to identify sites with high pollutant generating source to ensure that proper sampling and BMP implementation and maintenance occur.

Table 3 – FY 2020-21 NPDES Storm Water Program Core Activities and Projects by Priority

Priority Level	Activity/Project (PYs)	Category	Target Date
1	a. Manage NPDES permit NOIs and NOTs	Core	On-going
	b. Conduct site and facility inspections	Core	On-going
	c. Conduct enforcement actions	Core/Special	On-going
	d. Conduct general case handling tasks	Core	On-going
	e. Participation in Development of Statewide General Orders and Initiatives	Core	On-going
	f. Renew Phase I MS4 Permit	Core	On-going
2	g. Staff Supervision	Core	On-going
	a. Conduct Stakeholder Outreach	Core	On-going
	b. Unplanned Work Activities	Special	On-going

Categories: Categories are marked as either **Core** or **Special**

4.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 3 above.

1.a – Manage NPDES Storm Water Permit Notices of Intent (NOIs) and Notices of Termination (NOTs)

Summary: NPDES Stormwater Program staff plan to enroll under the Phase I Permit three existing, but currently unpermitted, entities: Sonoma Marin Area Rail Transit (SMART) Train, Sonoma State University, and Santa Rosa Junior College. Enrollments and terminations of coverage under the statewide Industrial General Permit and the statewide Construction General Permit occur throughout the year.

Key Issues to Resolve and Considerations: The NPDES Stormwater Program currently has limited staff resources relative to the number of regulated facilities: 1.0 PY dedicated to implementing the MS4 program with 22 permittees, 1.0 PY to implement the Industrial Storm Water Program with 448 facilities enrolled, and 1.0 PY to implement the Construction Storm Water Program with 239 construction sites enrolled in the North Coast Region. In addition, one technical support staff which was originally anticipated to support the storm water programs has been reassigned to the COVID Tracer effort which is expected to last from six to nine months. Further, the work effort to enroll and terminate enrollees is unpredictable and may continue to be impacted by COVID-19 and the associated public health orders.

To complete high priority tasks, support may be provided by redirecting staff from other programs and/or utilizing technical assistance from EPA to conduct inspections and support enforcement efforts. Management will continue to pursue the option of hiring a scientific aid and/or other staff when feasible.

PY Allocation for FY 2020-21: 0.25

1.b – Conduct Site and Facility Inspections

Summary: A core responsibility of NPDES Storm Water Program staff is the inspection of regulated sites and facilities to determine compliance with NPDES permit requirements. The Industrial and Construction Programs each must meet a target of 40 inspections, and the MS4 Program must complete 4 Municipal inspections. In addition to a physical site inspection, inspections include a thorough review of the site/facility file, relevant work plans, monitoring reports, and Storm Water Pollution Prevention Plans.

Key Issues to Resolve and Considerations: As summarized in 1.a, the NPDES Stormwater Program has limited staff resources relative to the number of regulated facilities. The ability to conduct in-person inspections will likely continue to be impacted by COVID-19 and the associated public health orders and result in fewer completed inspections that targeted for FY 2020-21.

PY Allocation for FY 2020-21: 0.75

Milestones	Target Date
Conduct Site and Facility Inspections	On-going

1.c – Conduct Enforcement Actions

Summary: Currently, two Unit Supervisors (NPDES Unit and Groundwater Permitting Unit Seniors), the Division Chief, and three technical staff (two stormwater program staff and one cleanup program staff) are allocating time to three high priority enforcement actions in the Industrial and Construction Stormwater Programs that are being handled with the assistance of the State Water Board’s Office of Enforcement. Two of these cases are currently in settlement negotiations. Other enforcement actions are expected to occur during FY 2020-21. Enforcement actions may include one or multiple site inspections, collecting samples, writing enforcement documents, providing compliance assistance, and developing formal enforcement documents (i.e. cleanup and abatement orders, informational orders, administrative civil liability complaints, settlement agreement and stipulated orders), briefing materials for management, and board presentations.

Key Issues to Resolve and Considerations: The work effort to complete formal enforcement actions is resource-intensive and to some extent unpredictable depending on discharger willingness to come into compliance and to settle alleged violations. Unexpected complications in development of formal enforcement actions have the potential to delay completion of an enforcement action or settlement may result in early completion of the action. If resolution of any of the enforcement cases is through adjudication by the Regional Water Board at a public hearing, additional staff resources will be needed, and other program priorities may not be completed.

PY Allocation for FY 2020-21: 0.5

Milestones	Target Date
Construction General Permit Action No. 1	December 2020
Construction General Permit Action No. 2	March 2021
Industrial General Permit Action No. 1	December 2020
Other enforcement actions	On-going

1.d – Conduct General Case Handling

Summary: General (non-enforcement) case handling tasks include spill response, regular meetings with Permittees, CEQA project review, Low Impact Development (LID) plan review, reviewing and approving submittals through SMARTS, responding to PRA requests, providing technical guidance to enrollees, and responding to public inquiries.

Key Issues to Resolve and Considerations: The ability to conduct in-person site visits and inspections may continue to be impacted by COVID-19 and the associated public health orders.

PY Allocation for FY 2020-21: 0.25

Milestones	Target Date
Conduct General Case Handling	On-going

1.e – Participation in Development of Statewide General Orders and Initiatives

Summary: NPDES Storm Water Program staff are active participants in the statewide NPDES Storm Water Program. In FY 2020-21, NPDES Storm Water Program staff will continue to take an active leadership role in the subcommittees charged with the development of the statewide Phase II MS4 General Permit and Caltrans Storm Water Permits. This effort by staff to invest time and provide technical and implementation expertise is critical to the development of clear, implementable, and enforceable permits. Significant progress has been made through this process and the partnering between Storm Water staff and the Planning and Stewardship to develop a TMDL compliance program for the Caltrans Storm Water Permit. This program will focus resources on the highest priority projects to support restoration efforts and TMDL compliance.

Regional Water Board staff regularly attend statewide Program roundtable meetings and participate in technical working groups to resolve statewide issues and assist State Water Board staff in meeting program commitments and developing statewide general orders and technical policy.

Key Issues to Resolve and Considerations: Program staff's participation in the development of statewide orders and initiatives may be curtailed if staff are directed to high priority tasks, such as storm water enforcement.

PY Allocation for FY 2020-21: 0.25

Milestones	Target Date
Participate in statewide efforts	On-going

1.f – Renew Phase I MS4 Permit

Summary: The North Coast Region's Phase I MS4 permit expires in 2020. NPDES Storm Water Program staff will continue to work in FY 2020-21 on renewal of this permit, which is planned for Board hearing in the third quarter of FY 2020-21.

Key Issues to Resolve and Considerations: The NPDES Stormwater Program currently has 1.0 PY dedicated to implementing the MS4 program in the North Coast

Region. Competing work priorities for the Municipal Storm Water Program have the potential to delay work on this permit renewal.

PY Allocation for FY 2020-21: 0.75 PY

Milestones	Target Date
Phase I MS4 Permit renewal	March 2021

1.g – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.5

2.a – Conduct Stakeholder Outreach and Public Engagement

Summary: Stakeholder outreach is key to the successful implementation of storm water management under both the statewide general permits and individual NPDES permits. Public outreach and early engagement are proven strategies to inform stakeholders about the need to manage stormwater and the benefits of doing so and educate the regulated community about the requirements of the permits for storm water. The intended tasks include proactive engagement with new permittees, existing industry groups such as contractor groups, builders' associations and commercial sea food processors, municipal building and engineering inspectors, and schools, as well as staff participation in trainings and conferences for storm water professionals (e.g., CASQA).

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.25

Milestones	Target Date
Coordinate with permittees, stakeholders, and the public	On-going

2.b – Unplanned Work Activities

Summary: Like in all organizations, the best laid plans can be upset and derailed by unplanned work. Unplanned work may include work related to regional emergency

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response, last-minute requests from the State Water Board or elected officials, stakeholder demands, and other urgent work that requires producing information or other deliverable on short notice. These unexpected projects affect the ability of staff to meet planned work commitments or deliver work products on time.

Key Issues to Resolve and Considerations: Responding to unplanned work often requires that managers assess the urgency of the work and reprioritize workload and project commitments. When unplanned work is determined to be of high importance, other planned work commitments may be delayed or not completed.

PY Allocation for FY 2020-21: Variable

4.3 Performance Targets

4.3.1 Reported to State Board via ORPP

Performance Targets for the last FY and proposed for FY 2019-20

Fiscal Year	Municipal Phase I/II Inspections	Construction Inspections	Industrial Inspections
Target 2019-20	4	40	40
Actual 2019-20	1	73	50
Target 2020-21	4	40	40

This team worked diligently to inspect construction sites and industrial facilities, meet inspection targets, and conduct necessary enforcement actions. In FY 2019-20, storm water program significantly increased the number of storm water inspections to have a greater onsite presence, using both storm water staff and internal staff from other programs within the Division.

5.0 WASTE DISCHARGE TO LAND PROGRAM

5.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 4. Some are described in detail in Section 5.2.

Table 4 – FY 2020-21 Program Core Activities and Projects by Priority

Priority Level	Activity/Project ⁴	Category	Target Deadline
1	a. Prepare New WDRs and General WDR Enrollments	Core	Ongoing
	b. Prepare Revised WDRs and Rescission Orders for existing Facilities	Core	Ongoing
	c. Provide technical and compliance assistance to Disadvantaged Communities	Special	Ongoing
	d. Conduct stakeholder outreach for Russian River Watershed Pathogen TMDL Early Implementation	Special	Ongoing
	e. Review/Approve Local Agency Management Programs	Special	Ongoing
	f. Staff Supervision ⁵	Core	On-going
2	a. Review Self-Monitoring Reports and Conduct Follow up	Core	Ongoing
	b. Respond to State Water Board WDR Program requests and participate in development of statewide general permits	Special	Ongoing
	c. Conduct Facility inspections and prepare inspection reports	Core	Ongoing
	d. Unplanned Work Activities	Special	Ongoing
3	a. Case handling, responding to complaints, and emerging Facility issues	Core	Ongoing
	Total		

⁴ The waste discharge to land program has three funded positions. Each position has an administrative overhead cost, such as leave time, of approximately 0.2 PY per staff (approximately 0.6 PY for three program staff).

⁵ For overall program management and staff supervision, 0.2 PY has been allocated for the Unit senior. Another 0.1 PY of Unit senior time is allocated to Activities 1.d and 2.b, for a total of 0.4 PY for the Waste Discharge to Land Program.

Categories: Categories are marked as either **Core** or **Special**

5.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 4 above.

1.a – Prepare New WDRs and GWDRs Enrollments

Summary: As permit applications are received, Groundwater Permitting staff prioritizes and reviews applications, notifies the applicants of the completeness of the applications, works with applicants to obtain required information, and prepares waste discharge requirements based on complete applications. In FY 2020-21, staff plans to prepare two new draft individual WDRs for Board consideration and adoption and an undetermined number of new enrollments under general WDRs. The number of new permits and enrollments completed during any fiscal year is unpredictable because it is dependent on the number of new applications received during the fiscal year.

Compared to individual WDRs, general WDRs have more streamlined monitoring and reporting requirements and are routinely updated, reducing the long-term case management burden on Unit staff.

Key Issues to Resolve and Considerations: Due to limited staff resources, Groundwater Permitting staff often need to balance competing work priorities that may result in delays developing or amending WDRs. In some instances, factors beyond staff's control, such as natural disasters, planned power outages, facility treatment and disposal changes, property transactions, funding delays, and litigation can create delays in scheduling board agenda items.

PY Allocation for FY 2020-21: 0.4

New WDR Order Issuance	Target Date
Lewiston Community Services District WWTP	December 2020
Roblar Road Quarry	June 2021
General WDR Order Enrollments	On-going

1.b – Prepare Revised WDRs and Rescission Orders for Existing Facilities

Summary: Unlike NPDES permit, which are renewed every five years, non-NPDES WDRs continue in force until they are rescinded or revised. Non-NPDES WDRs are periodically reviewed to reaffirm the adequacy of the WDRs and to determine whether the WDRs should be revised to incorporate new regulatory or policy changes that have occurred since the WDRs were originally adopted or last reviewed. Based on a review of the region's existing WDRs, the Groundwater Permitting staff plans to update one general waiver and two individual WDRs during FY 2020-21. Updates are planned for the following facilities:

Existing WDR Order Revision	Target Date
Wine, Beverage and Food Processors General Waiver of WDRs	March 2021
WDR Multi-Party Rescission Order	June 2021
City of Yreka WWTP	June 2021

In some cases, particularly for low threat discharges, facilities regulated under individual WDRs may be more appropriately regulated under the statewide general WDRs for small domestic wastewater treatment systems or under local agency oversight for OWTS with wastewater flows under 10,000 gallons per day. Where regulation of a facility is transferred from individual WDRs to coverage under general WDRs, the individual WDRs must be rescinded by the Regional Water Board at a public hearing. The Groundwater Permitting Unit anticipates preparing one large rescission order during FY 2020-21 that will rescind up to ten existing individual WDRs, primarily for OWTS with wastewater flows under 10,000 gallons per day and thus are eligible for oversight by a local agency and wineries that are eligible for regulation under the regional general order for wine, beverage, and food processors (WBFP), or the future statewide winery general permit for wineries that is currently under development by the State Water Board. The conditional waiver of WDRs for WBFP facilities (R1-2016-0003) expires on January 28, 2021. Staff propose renewal of the conditional waiver with minor non-substantive revisions. Currently wineries in the North Coast Region are regulated under individual WDRs, the General WDR for Wineries (R1-2002-0012), the General WBFP WDR (R1-2016-0002) and General WBFP waiver (R1-2016-0003). Pending adopting of the statewide winery general permit⁶, staff propose developing a transition plan for winery enrollment in fiscal year 2021-22.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting staff resources, competing priorities, and emerging permit issues, WDR reviews and updates for out-of-date WDRs are subject to delays. Also, updates to WDRs that authorize the production and use of Recycled Water may experience delays due to the need for the Permittee to prepare and obtain approval from the State Water Board's Division of Drinking Water of a Title 22 Engineering Report prior to adoption of WDRs.

PY Allocation for FY 2020-21: 0.3

1.c and d – Conduct Technical and Compliance Assistance to DACs & Stakeholder Outreach for Russian River Watershed Pathogen TMDL Implementation

Summary: The Groundwater Permitting Unit will continue efforts providing technical and compliance assistance to disadvantaged communities (DACs) to advance the Human Right to Water and to improve access to public funding for wastewater treatment and disposal projects. As of June 1, 2020, Unit staff is currently assisting over

⁶ Tentatively scheduled for State Water Board adoption on November 17, 2020.

25 local agencies that have applied for public funding assistance through the California Clean Water State Revolving Fund (Small Community Grant Program). Also expected in FY 2020-21 is continued early implementation activities for the Russian River Watershed Pathogen TMDL, work that includes public outreach to owners of onsite wastewater treatment system (OWTS) in the lower Russian River area and coordination with local agencies and other stakeholders identified as implementing entities in the TMDL Action Plan. Groundwater Permitting Unit staff will begin preparation of the Regional Water Board OWTS Assessment Program, which is expected to launch in summer 2021. The OWTS Assessment Program is a resource intensive effort to assess the operational status of OWTS in over 45,000 parcels in the Watershed during the first phase of the Program. Implementation of this program is expected to require significant staff resources beginning in FY 2021-22.

Key Issues to Resolve and Considerations: Currently, the Unit Supervisor, Division Chief, and one technical staff are allocating time to these high priority tasks instead of other core activities such as inspections, SMR review, and WDR reissuance. The commitment of staff time for these Special Projects, diverting resources from core activities, is unsustainable. Beginning in FY 2020-21, the North Coast Regional Water Board was slated to receive 1.0 PY to implement new sewer service authorities for DACs provided by Senate Bill 1215 (Hertzberg), which was signed into law and became effective on January 1, 2019. A portion of this 1.0 PY will be dedicated to development and implementation of sustainable wastewater solutions (e.g. OWTS upgrades, septic to sewer projects) in Russian River Watershed communities including DACs. However, the status of this position is uncertain due to state budget impacts from the COVID-19 pandemic.

PY Allocation for FY 2020-21: 0.4 (0.3 PYs for technical and compliance assistance to DACs and 0.1 PYs for Russian River TMDL implementation)

1.e – Review/Approve Local Agency Management Programs

Summary: The OWTS Policy authorizes local agencies to regulate new and replacement OWTS using a Local Agency Management Program (LAMP) consistent with Tier 2 of the OWTS Policy instead of regulating new and replacement OWTS under the OWTS Policy's more prescriptive Tier 1 requirements. Prior to local agency implementation of a LAMP, the draft LAMP must be reviewed by Regional Water Board staff and approved by the Regional Water Board or the State Water Board. As of the beginning of FY 2019-20, Humboldt County and Mendocino Counties are implementing approved LAMPs. The County of Sonoma has completed a lengthy and contentious public process to finalize a draft LAMP and OWTS Manual for their submission to the Regional Water Board for approval. However, Regional Water Board staff rejected Sonoma Counties initial LAMP based on conflicts with the regulations established by the OWTS Policy. Staff continues to work with Sonoma County staff and has recently approved their LAMP revisions. Staff anticipate the LAMP to be adopted by the Sonoma County Board of Supervisors late 2020 or early 2021. A public hearing for the Regional Water Board to consider a resolution approving the Sonoma County LAMP is expected

to occur in FY 2020-21. The Counties of Del Norte and Siskiyou have also submitted draft LAMPs to the Regional Water Board for approval. Groundwater Permitting Unit staff anticipates ongoing work with staff from these local regulatory agencies to finalize the draft LAMPs and prepare Regional Water Board resolutions approving the LAMPs. The County of Trinity has not submitted a draft LAMP to the Regional Water Board for approval.

Key Issues to Resolve and Considerations: The Counties of Del Norte, Siskiyou, and Trinity have limited staff resources for preparing a LAMP. Consequently, completion of LAMPs that can be approved by the Regional Water Board will require significant coordination with Groundwater Permitting Unit staff during the development and review process. Due to limited Groundwater Permitting staff resources and competing priorities, coordination efforts with local agency staff may be delayed.

PY Allocation for FY 2020-21: 0.1

1.f – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.5

2.a – Review Self-Monitoring Reports and Conduct Follow Up

Summary: Regulated facilities prepare and submit self-monitoring reports (SMRs) to document their facility's compliance with waste discharge requirements each month or quarterly in accordance with the facility's monitoring and reporting program. Most facilities also submit an annual report that summarizes the preceding year's monitoring data and compliance status. Groundwater Permitting Unit staff review SMRs to determine compliance with waste discharge requirements. Staff follow up may be required to address missing, unclear information, or other reporting problems. Groundwater Permitting Unit staff has committed to review 40 SMRs in FY 2020-21, focusing on facilities whose compliance history has been inconsistent.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting staff resources and competing priorities, the number of SMR reviews has declined in

recent years. Consequently, Staff may be unaware of ongoing permit violations. Additional staff resources would improve Unit staff's ability to review SMRs for all regulated facilities and provide timely response to permit violations.

PY Allocation for FY 2020-21: 0.2

2.b – Respond to State Water Board Program Requests and Participate in Development of Statewide General Permits

Summary: In addition to providing guidance to the nine regional water board to ensure statewide consistency within the State Water Board's WDR Program, State Water Board staff often enlists the input of the regional water boards on emerging issues and development of statewide waste discharge requirements. In FY 2020-21, Groundwater Permitting Unit staff will continue assisting State Water Board staff in their development or renewal of general permits for wineries, sanitary sewer systems, and aggregate and concrete facilities. It is also anticipated that in FY 2020-21, Groundwater Permitting Unit staff will participate in at least one special Investigation currently being undertaken by the State Water Board to determine the presence of per- and polyfluoroalkyl substances (PFAS) in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve and Considerations: The amount of resource commitment from the Groundwater Permitting Unit for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert Groundwater Permitting Staff resources away from other division priorities. Regional Water Board staff engagement with State Water Board personnel during statewide permit development is a valuable investment of time and effort as it increases the clarity of the requirements and improves implementation, which often occurs at the regional level. With a high facility to staff ratio, the challenge is balancing our staff time between statewide coordination and implementing our regional programs. Program staff's participation in the development of statewide permits may be curtailed if staff are directed to higher priority program tasks within the region.

PY Allocation for FY 2020-21: 0.1 (additional time, up to 0.1 PY may be contributed from Unit senior and Division Supervisor, as needed).

2.c – Case Handling, Respond to Complaints, and Emerging Facility Issues

Summary: Groundwater Permitting Unit staff receive complaints and reports of environmental concerns from the public via direct phone calls, notices from the Governor's Office of Emergency Services (OES), and reports transferred to staff from CalEPA's online environmental complaint system. In many cases, these reports are referred by Unit staff to the appropriate local enforcement agency for follow up; in other cases, Unit staff may respond to the complaint with a site inspection. Groundwater

Permitting Unit staff anticipate conducting approximately three complaint inspections in FY 2019-20 (tracked as “other inspections” under performance targets for this program). Groundwater Permitting Unit staff also regularly communicate with representatives of regulated facilities regarding permit compliance, response to facility-related complaints, questions about monitoring and reporting requirements, and other discharger concerns.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting staff resources and competing priorities, complaint response and facility “case handling” has declined in recent years. Additional staff resources would improve Unit staff’s ability to provide timely response to public complaints/concerns and provide case handling services to regulated facilities.

PY Allocation for FY 2020-21: 0.4

2.d – Unplanned Work Activities

Summary: Like in all organizations, the best laid plans can be upset and derailed by unplanned work. Unplanned work may include work related to regional emergency response, last-minute requests from the State Water Board or elected officials, stakeholder demands, and other urgent work that requires producing information or other deliverable on short notice. These unexpected projects affect the ability of staff to meet planned work commitments or deliver work products on time.

Key Issues to Resolve and Considerations: Responding to unplanned work often requires that managers assess the urgency of the work and reprioritize workload and project commitments. When unplanned work is determined to be of high importance, other planned work commitments may be delayed or not completed.

PY Allocation for FY 2020-21: Variable

3.a – Conduct Facility Inspections and Prepare Compliance Inspection Reports

Summary: Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provides an opportunity for Regional Water Board staff to provide compliance assistance where needed. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. There is no established minimum inspection frequency for facilities regulated under non-NPDES permits; however, it is the Groundwater Permitting Unit’s goal to visit each municipal wastewater treatment facility permitted facility every 3-4 years, or more frequently for facilities with higher TTWQ/Complexity ratings. Other regulated facilities, such as wineries, campgrounds, and mobile home parks, are inspected on a much less frequent basis. In FY 2020-21, Program staff plan to conduct 16 inspections.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting Unit staff resources and competing priorities, the number of compliance inspections of regulated facilities conducted by Staff has declined in recent years. Additional staff resources would help increase the number of compliance inspections conducted each year.

PY Allocation for FY 2020-21: 0.2

5.3 Performance Targets for FY 2019-20

FY 2019-20 performance targets for the Groundwater Permitting Unit were not achieved. Delays in Regional Water Board approvals of Local Agency Management Programs (LAMPs) for Sonoma County delayed the anticipated transfers of oversight of up to 12 OWTS currently regulated by state-issued permits to local oversight. These transfers would have required rescission of certain individual WDRs at the time local permit oversight was assumed. Regional Water Board staff slowed the planned pace of enrollments under regional general WDRs and waivers for wineries due to the uncertainty regarding the adoption date of the statewide winery permit, which will supersede the regional WDRs and waiver for regulation of wineries. Targets for compliance and other inspections were missed due to COVID-19 shelter in place orders that prevented staff from conducting field inspections from March through June 2020.

Review of Performance Targets for FY 2019-20

	Target Tasks					
	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
2019-20 Target	4	20	9	27	3	40
2019-20 Completed	4	2	0	18	0	40

5.3.1 Performance Targets for FY 2020-21 (Proposed)

Performance Targets for FY 2020-21

	Target Tasks					
	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
Target	3	8	34 ⁷	16	3	40

⁷ One of the four WDR performance targets is related to renewal of the waiver of WDRs for WBFP facilities.

6.0 SOLID WASTE DISPOSAL PROGRAM

6.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 5. Some are described in detail in Section 6.2.

Table 5 – FY 2020-21 Program Core Activities and Projects by Priority

Priority Level	Activity/Project ⁸	Category	Target Deadline
1	a. Adopt Final Closure WDRs for 2 Solid Waste Disposal Sites	Core	June 2021
	b. Complete Composting Operations GWDR enrollments	Core	March 2021
	c. Conduct facility oversight, inspections, case handling	Core	Ongoing
	d. Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site	Core	September 2020
	e. Update Monitoring and Reporting Programs	Core	Ongoing
	f. Staff Supervision	Core	Ongoing
2	a. Respond to complaints and issue enforcement actions	Core	Ongoing
	b. Respond to State Water Board WDR Program requests	Special	Ongoing
	c. Unplanned Work Activities	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

6.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 5 above.

⁸ The Land Disposal Program has two funded positions. Each position has an administrative overhead cost, such as leave time, of approximately 0.2 PY per staff (approximately 0.4 PY for two program staff).

1.a – Adopt Final Closure WDRs for 2 Solid Waste Disposal Sites

Summary: Land Disposal Staff plan to prepare final closure plans for two solid waste disposal sites: the Mendocino County South Coast and the City of Ukiah Solid Waste Disposal Sites. Land Disposal Staff is reviewing design documents and preparing WDRs for final closure of the Mendocino County South Coast Solid Waste Disposal Site. The Mendocino County South Coast Solid Waste Disposal Site, located in Caspar, is no longer receiving municipal solid waste and the existing waste management unit is protected by an interim cover. The County has proposed an engineered alternative cover design (artificial turf) that is new to the North Coast Region. Regional Water Board staff work includes review of daily reports prepared in accordance with the approved Construction Quality Assurance (CQA) Plan.

Key Issues to Resolve and Considerations: Adoption of the proposed City of Ukiah Closure WDRs is dependent on the completion of a certified CEQA document. Failure of the City to certify the CEQA document or a challenge to the CEQA document will delay the timing of permit adoption.

PY Allocation for FY 2020-21: 0.3

Milestones	Target Date
Preparation and Adoption of Mendocino County Solid Waste Disposal Site Final Closure WDRs	March 2021
Preparation and Adoption of City of Ukiah Solid Waste Disposal Site Final Closure WDRs	June 2021 ⁹

1.b – Complete Composting Operation GWDR Enrollment

Summary: Land Disposal staff is reviewing Notices of Intent and technical reports for three composting operations located in the North Coast Region that are required to obtain coverage under the statewide General WDRs for Composting Operations, which was amended in 2020 and is awaiting a new order number. Staff plans to issue notices of coverage to all current enrollees by March 2021 and work with the enrollees to finalize their technical reports and work plans.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2020-21: 0.1

Milestones	Target Date
Complete Composting Operation GWDR Enrollments	March 2021

⁹ Adoption of the proposed Ukiah SWDS Closure WDRs is dependent on the completion of a certified CEQA document.

1.c – Conduct Facility Oversight, Inspections, and Case Handling

Summary: Land Disposal staff conducts routine facility oversight activities over the fiscal year. These activities typically include facility compliance inspections, inspection report preparation, facility work plan review, complaint response, permit enforcement, as well as response to emerging issues at regulated facilities. Land Disposal staff will schedule 10 compliance inspections for FY 2020-21. Other oversight activities are unpredictable and therefore, unscheduled (for example, because of high precipitation, fire impacts, or other natural disasters).

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.5

Land Disposal Facility Inspection	Target Date
1. Sonoma County Central SWDS (CQA Inspection)	September 2020
2. Sonoma County Central SWDS (Erosion Control Inspection)	September 2020
3. Cummings Road SWDS	September 2020
4. Hely Creek WWDS	December 2020
5. Guerneville SWDS	December 2020
6. Yreka SWDS	December 2020
7. Tulelake SWDS	December 2020
8. Healdsburg SWDS	March 2021
9. Airport SWDS	March 2021
10. Ukiah SWDS	June 2021

1.d – Review/approval of Work Plan/CQA Plan for Sonoma County Central SWDS

Summary: Land Disposal staff is reviewing design documents and preparing WDRs for construction of new, expanding waste management units at the Sonoma County Central SWDS. Staff received the construction design documents in May 2020 and expect to review the documents in FY 2020-21.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2

Milestones	Target Date
Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site	December 2020

1.e – Update Monitoring and Reporting Programs

Summary: Land Disposal Staff plan to update two Monitoring and Reporting Programs: Cummings Road BAS and SWDS and Sonoma County Annapolis SWDS.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.1

Milestones	Target Date
Cumming Road BAS / SWDS ¹⁰	March 2021
Sonoma County Annapolis SWDS	June 2021

1.f – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.3

2.a – Review facility Financial Assurance documents

Summary: All owners/operators of municipal SWDS are required to demonstrate that they will be able to pay for the required closure and post-closure care activities, and any corrective action that might become necessary due to releases of contaminants into the surrounding environment. Financial assurance documents are written, site-specific estimates that are prepared prior to commencement of landfill operations and must be adjusted annually during the active life of the waste management unit to account for inflation. Corrective action cost estimates are prepared when a release is detected and must be adjusted annually during the period of the correction action. Annual updates to financial assurance documents are reviewed each year by the Regional Water Board Land Disposal staff for waste management units regulated under WDRs.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.1

¹⁰ This MRP will be completed in tandem with the rescission of the existing cleanup and abatement Order.

2.b – Respond to State Water Board Program Requests

Summary: In addition to providing guidance to the nine regional water board to ensure statewide consistency within the State Water Board’s WDR Program, State Water Board staff often enlists the input of the regional water boards on emerging issues, regulatory updates, and development of statewide waste discharge requirements. In FY 2020-21, Land Disposal Program will participate in a special Investigation currently being undertaken by the State Water Board to determine the presence of per- and polyfluoroalkyl substances (PFAS) in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve and Considerations: The amount of resource commitment from the Land Disposal Program is for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert additional staff resources away from other division priorities. Program staff’s participation in the development of statewide initiatives may be curtailed if staff are directed to higher priority tasks.

PY Allocation for FY 2020-21: 0.1

2.c – Unplanned Work Activities

Summary Like in all organizations, the best laid plans can be upset and derailed by unplanned work. Unplanned work may include work related to regional emergency response, last-minute requests from the State Water Board or elected officials, stakeholder demands, and other urgent work that requires producing information or other deliverable on short notice. These unexpected projects affect the ability of staff to meet planned work commitments or deliver work products on time.

Key Issues to Resolve and Considerations: Responding to unplanned work often requires that managers assess the urgency of the work and reprioritize workload and project commitments. When unplanned work is determined to be of high importance, other planned work commitments may be delayed or not completed.

PY Allocation for FY 2020-21: Variable

6.2 Performance Targets

6.2.1 Performance Targets for FY 2019-20

Unforeseen delays in receiving necessary documents resulted in delays in completing WDRs and their associated MRPs in the last fiscal year. For example, the CEQA document for the Ukiah SWDS is not yet certified, preventing staff from finalizing the permit. Additionally, the monitoring wells have yet to be installed for the Klamath (Green Diamond) WWDS which delayed the development of the MRP. Of the identified facilities eligible for enrollment in the General WDR for Composting Operations, two are ready

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for enrollment letters, one was determined to be exempt, and two are pending submittal of corrected information from facility.

Table 6 – Performance Targets for the FY 2019-20

	Target Tasks					
	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2019-20 Target	2	5	3	15	16	7
2019-20 Completed	0	1	0	20	23	23

6.2.2 Performance Targets for FY 2020-21 (Proposed)

Performance Targets proposed for FY 2020-21

Fiscal Year	Target Tasks					
	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2019-20	2	3	2	10	16	7

7.0 UST/SITE CLEANUP/DoD PROGRAMS

7.1 Core Activities

The primary responsibilities of program staff are categorized based on priority listed in Table 6. Some are described in detail in Section 7.2.

Table 6 – FY 2020-21 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Deadline
1	a. Reviewing and responding to submitted investigation and remediation reports and plans for open cases.	Core	Ongoing
	b. Prepare and issue directive letters.	Core	Ongoing
	c. Review all monitoring reports for open cases.	Core	Ongoing
	d. Prepare enforcement actions	Core	Ongoing
	e. Keep all records up to date.	Core	Ongoing
	f. Manage case work time to match budgeted program hours.	Core	Ongoing
	g. Staff Supervision	Core	Ongoing
2	h. Perform site inspections.	Core	Ongoing
	i. Review stalled case load and determine next actions to move stalled cases forward (e.g., enforcement, contacting new property owners, etc.)	Core	Ongoing
	j. Unplanned Work Activities	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

7.2 Core Activity and Project Descriptions

The core activity for the Site Cleanup Unit is overseeing and directing the investigation and remediation of contaminated or potentially contaminated sites under all three cleanup programs – Underground Storage Tank, Site Cleanup, Department of Defense. Sites enter these programs (and become cases) due to recent or historic discharges or suspected discharges of hazardous materials (for example, fuels or solvents) to the surface or subsurface, resulting in groundwater and soil contamination. Sites include

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industrial facilities, dry cleaners, lumber mills, underground and above ground petroleum storage tanks, accidental spills, and leaks. Each staff person in the unit is assigned a certain case load (can be up to 50-75 cases/sites per staff person).

The core activities are generally the same for each of the three programs. Tasks 1.a, 1.b, 1.c, 1.e, and 2.g are part of regular case management work, in which staff review and respond to reports and plan, send directive letters, manage records, and perform site inspections. Sometimes for a case, staff prepare and issue enforcement actions (task 1.d).

Some cases in each program are stalled, and the responsible parties are conducting no work on the site. Cleanup staff review these to determine the reason for the stall and take various actions to move the case forward again. Enforcement is one tool for this, but sometimes the properties have changed hands or responsible parties are no longer available and staff must investigate all potentially new responsible parties and involve them in the project. Also, if the responsible parties have insufficient funds to do the needed work but are willing, we help the responsible parties investigate funding possibilities.

Each staff person's time is allocated between two or three of the programs. Staff must manage their work time to work the assigned time within each program, due to different funding sources for each.

The Region's UST/Site Cleanup/DoD Program staff are supervised by a Senior Engineering Geologist, who is allocated 1.0 PY.

Case Work Prioritization

Below is a list of considerations used in prioritizing cleanup cases:

1. Impacts to water supply wells, human health risks including indoor air contamination, direct contact with contamination, or discharge of contaminants to surface water, including consideration of whether or not such impacts are being managed (meaning stopped through interim measures like well head treatment or sub-slab depressurization)
2. Threatened impacts to the above that will likely occur without active remediation
3. Potential impacts to the above not defined
4. High likelihood of future beneficial use of groundwater
5. Redevelopment
6. Cooperation or recalcitrance of responsible parties; funding availability
7. Public interest
8. Achieving case closure
9. Others

Program and Additional Tasks Descriptions

Underground Storage Tank (UST) Cleanup Program

Summary: The UST program is for cleanup work related to current and prior petroleum underground storage tank system releases. Due to USEPA rules requiring the installation of upgraded UST systems in the 1990s, most active USTs were replaced then. When old USTs were removed from the ground, contamination was frequently detected which led to our agency opening UST cleanup cases for those sites. With the upgraded systems, there are now only a few new UST cases per year, and the cases remaining open are mostly those that have significant impediments (e.g., particularly severe and/or complicated contamination impacts, recalcitrant responsible parties, lack of funding).

The Site Cleanup Unit currently has 174 open UST cases.

Key Issues to Resolve and Considerations: The Site Cleanups Unit has had two vacant positions since the beginning of 2020. These positions are poised to be filled but cannot given the State's budgetary uncertainties for FY 2020-21. The cases previously managed by these two vacancies have been redistributed to the current Site Cleanups Unit staff. This has resulted in a substantial increase in technical and administrative work for each staff member. Once the State Board authorizes filling these positions, case workload can be redistributed, and individual case workloads are expected to return to normal.

PY Allocation for FY 2020-21: 4.3 PY within the unit.

Site Cleanup Program

Summary: The Site Cleanup Program is for all other hazardous material release cleanup work not covered by the UST cleanup program and DoD cleanup program. Many of these cases involve chlorinated solvent discharges from dry cleaning operations, petroleum discharges from aboveground storage tank petroleum sites, and a variety of discharges from industrial sites, including metals, wood treatment chemicals, waste oil, as well as fuels and solvents. Some of the sites have proposed redevelopment work that must be considered in the cleanup work. SCP cases also include hazardous materials spills that require significant response time and on-going work for Unit staff.

Many of the sites are enrolled in the State Board's Site Cleanup Cost Recovery Program, in which the responsible parties are billed for staff time. Region 1 is assigned 2.0 PY in direct billable time under this program. Thus, staff track specific case work in a separate database for billing purposes and must also keep within budgeted time.

Program staff also use personnel time from the State Board's Site Cleanup Subaccount to work on non-cost recovery cases as well as work on cases using grant money from the Site Cleanup Subaccount.

The Site Cleanup Unit currently has 240 open SCP cases.

Key Issues to Resolve and Considerations: Progress on site closures is anticipated to increase once vacant Site Cleanups Unit positions are filled.

PY Allocation for FY 2020-21: 3.4 PY

7.3 Department of Defense (DoD) Cleanup Program

Summary: The DoD cleanup program has a separate funding mechanism and separate state-federal agreements for cleanup work on current or former DoD sites. The types of contamination and releases are mostly the same as the other programs, as military sites could have had any number of operations that occur elsewhere (e.g., fueling, solvent work, shooting ranges).

All DoD cleanup program sites in Region 1 are formerly used defense sites (FUDS) and are no longer active military facilities. There are 50 open FUDS cases (active and inactive), though many of the former facilities have multiple sub-sites. Two of the largest, the former Naval Auxiliary Air Station in the middle of Santa Rosa and the former Arcata Naval Auxiliary Air Station (the current Airport outside Arcata), have active investigation and remediation work.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2020-21: 0.1 PY

Spill response

Summary: The site cleanup unit responds to hazardous material spill reports for petroleum and chemical spills occurring within Region 1. Any spill that will involve significant cleanup work overseen by Cleanup staff become cases and are thus covered under task 1.b. Other spill reports are also received that require Cleanup staff attention, often at the request of local agencies overseeing the immediate spill response, but only require interagency consultation and a site inspection. When significant oversight time is not anticipated, these responses do not become cases, and are covered with SCP program overhead funding.

Key Issues to Resolve and Considerations: Improved response to reported spills is anticipated to increase once vacant Site Cleanups Unit positions are filled.

PY Allocation for FY 2020-21: 0.1 PY

Respond to public inquiries on closed cases or non-case property evaluations.

Summary: Site Cleanup Program staff receives multiple public inquiries each week involving closed cases or properties that are not currently cases but are being evaluated for potential contamination from former operations. These inquiries often arise out of

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redevelopment, potential property transfers, or refinancing, and may be part of a Phase I Environmental Site Assessment for the property. As many of these inquiries are time sensitive and may depend on information or responses that only our agency can provide, responding to the inquiries and providing relevant records is considered a high priority.

In addition, staff receives Phase II Environmental Site Assessments, involving actual soil and groundwater sampling, not under our oversight, at a property to investigate potential contamination. While some of these documents report releases that will necessitate staff oversight and direction as new UST or SCP cases, many of these documents report investigation findings that do not warrant oversight by Cleanup staff. Receiving the feedback from our agency that we would not require further work can be important to redevelopment. Thus, we try to provide such evaluations and responses in a timely manner.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.1 PY

7.4 Performance Targets

The general goal with the cases is to define the extent of contamination, remediate the contamination as necessary, verify remediation effectiveness through additional testing and monitoring, and institute any necessary engineering or institutional controls to prevent future exposures. A site is moved into the “Active Remediation” category once remediation work is proposed, approved and conducted on the site so that the quantity of contaminants in the soil, groundwater or soil vapor are removed or their concentrations reduced to acceptable levels. Upon successful completion of this process, the case is moved into the “Closed” category. Sometimes a site can be moved into the “Closed” category without undergoing active remediation if it is determined by Regional Water Board staff that the site and remaining contamination does not pose a threat to water resources or public health. This ties into the ORPP tracked goals for the programs: number of new cases moved into remediation and number of cases closed.

7.4.1 Reported to State Board via ORPP

Performance Targets for FY 2019-20 and FY 2020-21

FY 2019-20 Performance Targets	Target	Reported
# of DoD Sites New into Active	0	0
# of SCP Sites New into Active	4	0
# of SCP Sites Projected Closed	4	5
# of UST Sites New into Active	5	4
# of UST Sites Projected Closed	10	14

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FY 2020-21 Performance Targets	Target
# of DoD Sites New into Active Remediation	0
# of SCP Sites New into Active Remediation	2
# of SCP Sites Projected Closed	4
# of UST Sites New into Active Remediation	3
# of UST Sites Projected Closed	10

8.0 GROUNDWATER PROTECTION PROGRAM

8.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 7.

Table 7 – Groundwater Protection Strategy

Priority Level	Activity/Project ¹¹	Category	Target Deadline
1	a. Develop a Draft Phase II Basin Plan Amendment & Policy Statement for Regional Water Board Consideration	Core	June 2021
	b. Provide technical support to Division staff	Core	On-going
	c. Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team	Special	On-going
	d. Staff Supervision	Core	On-going
2	a. Participate in Development of Statewide General Orders and Initiatives	Special	On-going
	b. Conduct special investigations at sites where there is a threat to groundwater quality	Special	On-going

Categories: Categories are marked as either **Core** or **Special**

8.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 7 above.

1.a – Develop the Phase II Basin Plan Amendment and Policy Statement

Summary: *The Groundwater Protection Strategy* is intended to develop a *Policy Statement in Support of Maintaining High-Quality Groundwater* as part of the Phase II

¹¹ The Groundwater Protection Program has one funding position but utilizes other Division staff and members of the Groundwater Team on an as needed basis to fulfill its mission.

Basin Plan Amendment (BPA). The Phase II BPA will propose a programmatic approach to managing salts and nutrients in groundwater, as per the Statewide Recycled Water Policy; update Table 2-1 to include beneficial uses for individual groundwater basins, where appropriate; provide considerations for groundwater recharge, and provide editorial corrections and clarifications to Chapter 4 of the Basin Plan. A public hearing to consider Phase II BPA is currently unscheduled. Technical work in support of the development of the Policy Statement by the Groundwater Specialist is expected to be completed by June 2011.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2 (Senior Specialist and various PY fractions (not accounted for here) from Groundwater Team members in the Cleanups Unit, NPDES Unit and Enforcement Unit)

Milestones	Target Date
Basin Plan Amendment & Policy Statement	June 2011

1.b – Provide Technical Assistance to Division Staff

Summary: A high priority of the Groundwater Strategic Team is to provide support for improving groundwater protection efforts through our compliance programs by establishing baseline conditions for Regional Water Board staff to consider when developing permits and cleanup and abatement orders, antidegradation analysis, and monitoring and reporting programs. As the Division’s technical expert and on an as needed basis, the Groundwater Specialist will provide technical review of hydrogeological plans and reports, designs of subsurface wastewater disposal systems and waste containment units, and subsurface contaminant fate and transport studies.

In FY 2020-21, it is anticipated that the Groundwater Specialist will provide data analysis and recommendations for groundwater protection measures at various municipal and industrial facilities currently regulated under NPDES and WDR permits including, Roblar Road Quarry, City of Eureka WWTP, Laytonville SWDS, and the Humboldt Bay dredge spoils management project.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2 (Senior Specialist and various PY fractions from team members.

1.c – Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team

Summary: A key task for the Groundwater Specialist is to develop and strengthen external partnerships to realize the Regional Water Boards vision the score goals of the

Groundwater Strategic Team. As opportunities arise, the staff will reach out to establish and foster relationships with partner agencies such as:

- California Department of Fish and Wildlife
- Department of Water Resources
- Groundwater Resource Association
- Local cities, counties, and Groundwater Sustainability Agencies
- Local stakeholders including business and non-profit
- Nature Conservancy
- UC Davis
- U.S. Geological Services
- State Water Board

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.1 Senior Specialist

1.d – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the Division Chief. The Division Chief supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2

2.a – Participate in Development of Statewide General Orders and Initiatives

Summary: State Water Board staff often enlists the input of the regional water boards on emerging issues and development of statewide waste discharge requirements. In FY 2020-21, the Groundwater Team, led by the Groundwater Specialist, will continue assisting State Water Board staff in the development of statewide general orders, initiatives, projects. Key projects to which it is anticipated that Regional Water Board staff will contribute include:

- Constituents of Emerging Concern (CEC) Initiative. The Water Boards have worked on several projects to monitor for Constituents of Emerging Concern (CECs) and to identify the CECs that are of the highest risk to human health and

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the environment. The long-term objective of the CEC initiative is to develop a statewide strategy to monitor and control CECs. Participation in this effort is necessary to:

- Make initial steps towards development of a statewide management strategy for CECs.
 - Improve coordination within the Water Boards on CEC-related issues.
 - Make CEC vocabulary and definitions of terms consistent.
 - Reduce frequency of duplicative CEC efforts.
 - Make a transparent communication effort.
 - Assess the status of State & Regional Water Boards and Division of Drinking Water CEC efforts and then build mechanisms to coordinate these ongoing efforts.
 - Evaluate regional monitoring efforts and pilots project to assess novel approaches to monitoring and future monitoring priorities.
 - Evaluate monitoring results to assess potential impacts to beneficial uses and integrate appropriate monitoring into our regulatory programs.
- **Source Water Protection Action Project.** The Source Water Protection Project is a State Water Board effort led by the GAMA unit to integrate program goals to support source water protection activities across divisions and offices at the Water Boards, as well as with applicable agencies, and to coordinate these efforts. The Source Water Protection Project will also create a central, online, public location for data supporting source water protection, including the ability to create source water protection plans and download data. The purpose of the Source Water Protection Action Plan is to document current activities at the Water Boards that currently support protection of drinking water sources, and outline the actions the Water Boards can expand or develop in order to support and coordinate source water protection. Six categories of action items for the Action Plan were developed by the Source Water Protection work team. The categories are:
 - Collect, Standardize and Share Data
 - Increase Coordination within Water Boards and with Other Agencies
 - Identify and Pursue Policy Issues
 - Expand Funding Opportunities
 - Develop Public Messaging and Outreach
 - Enhance Regulatory Programs

Key Issues to Resolve and Considerations: Staff resources for this program in FY 2020-21 are limited to the Groundwater Specialist (0.7 PY, effective) and members of the Groundwater Strategic Team (as needed and re-directed by Executive Management) to participate in the development of statewide orders and initiatives. Accordingly, staff's contribution to statewide efforts may be reduced or eliminated because of competing regional priorities.

PY Allocation for FY 2020-21: 0.1 Senior Specialist

2.b – Conduct special investigations at sites where there is a threat to groundwater quality

Summary: Several site-specific special investigations have been assigned to the Senior Specialist in the past two years to assess potential threats to groundwater quality in support of enforcement actions. The Senior Specialist provides expertise and recommendations on work needed to adequately assess groundwater impacts at these various sites. In FY 2020-21, the Senior Specialist will continue to guide these investigations as well as any new special investigations as needed.

Key Issues to Resolve and Considerations: Staff resources for this program in FY 2020-21 are limited to the Groundwater Specialist (0.7 PY, effective), other division staff, and members of the Groundwater Strategic Team, as needed and re-directed by Executive Management. Program staff's participation in special investigations may be curtailed if staff is directed to higher priority program tasks within the region.

PY Allocation for FY 2020-21: 0.1 Senior Specialist

8.3 Performance Targets

8.3.1 Reported to State Board via ORPP

No performance targets have been identified by ORPP for Groundwater Protection Program efforts to date.

9.0 AGRICULTURAL LANDS PROGRAM

9.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 8. Some are described in detail in Section 9.2. The cornerstone to the agricultural lands program is the development of agricultural lands permits. The North Coast Region has one and a half PY dedicated to this program for permit development and watershed stewardship. For FY 2020-21, the Groundwater Permitting Unit is developing a vineyard permit and finalizing and implementing the Smith River Plain Water Quality Management Plan (SRPWQMP).

Table 8 – FY 2020-21 Program Core Activities and Projects by Priority

Priority Level	Activity/Project ¹²	Category	Target Deadline
1	a. Prepare administrative draft of Vineyard Permit	Core	December 2020
	b. Prepare public review draft of Vineyard Permit	Core	FY 2021-22
	c. Complete Smith River Plain Water Quality Management Plan	Core	December 2020
	d. Coordinate with the Watershed Stewardship Team on Implementation and Adaptive Management of the SRPWQMP	Special	On-going
	e. Staff Supervision	Core	On-going
2	a. Attend statewide Irrigated Lands Regulatory Program (ILRP) roundtable meetings and provide bi-monthly reports to the State Water Resources Control Board. Respond to State Water Board ILRP Program requests (0.05)	Core	On-going

Categories: Categories are marked as either **Core** or **Special**

9.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 8 above.

¹² The Agricultural Lands Program has two funded positions. Approximately 0.3 PY of this funding is dedicated to Discharge to Land Program activities.

1.a – Prepare Administrative Draft for New Agricultural Lands Vineyard Permit

Summary: Staff will continue work begun in FY 2019-20 to develop the administrative draft permit for the Agricultural Lands Vineyard Permit. The administrative draft will include enrollment tiers relative to water quality risk, prohibitions, specifications, provisions, findings, as well as a monitoring and reporting plan and third-party requirements. Key activities in the permit development process include:

Preparation of CEQA documents. Staff will develop an initial study and mitigated negative declaration or EIR, as well as economic considerations to document the anticipated environmental impacts and the cost of compliance measures related to permit implementation. As per the findings of the initial study, staff shall either proceed with the preparation of a mitigated negative declaration or an EIR. If an EIR is required for this permit, the permit adoption schedule may be adjusted to provide additional time, if needed.

Public Participation. The vineyard permit will apply to vineyards throughout the Region. To receive critical feedback from stakeholders during permit development, staff will hold a series of focused group meetings throughout the North Coast Region and public workshops in Sonoma and Mendocino Counties. This stakeholder work is planned to continue through the permit development process. Based on stakeholder feedback received, staff will continue development of an administrative draft of the permit.

Development of Implementation Work Plan. A GIS database with relevant geo-spatial information will be created and utilized to monitor and track permit enrollment and reporting. This database will allow staff to efficiently and effectively facilitate the expected enrollment of a large number of vineyard operations; conduct third-party oversight to ensure completion of Water Quality Farm Plans, monitoring and reporting; as well as oversee outreach and education efforts, all of which will be included in permit implementation. Implementation is scheduled to begin after Board adoption of the permit in FY 2021-22.

Development of the administrative draft of the vineyard permit is scheduled to be completed in Q2 of FY 2020-21. Final CEQA documents are expected to be completed in June/July 2021.

Key Issues to Resolve and Considerations: COVID-19 restrictions affecting stakeholder and public engagement.

PY Allocation for FY 2020-21: 0.4

Key Milestones	Target Date
Continue focused stakeholder group outreach	Ongoing
Develop implementation work plan for Vineyard Permit	Ongoing
Prepare administrative draft of Vineyard Permit	December 2020
Host public workshop on administrative draft Permit	December 2020
Develop CEQA documents for Vineyard Permit	June 2021

1.b – Prepare Public Review Draft for New Agricultural Lands Vineyard Permit

Summary: In the second half of FY 2020-21, staff will revise the administrative draft permit and corresponding CEQA documents based on stakeholder input and prepare the public review draft of the permit. Revisions to the administrative draft permit may require additional stakeholder outreach. Board adoption of the vineyard permit is planned for late continue stakeholder engagement, consider input from the Watershed Stewardship Team, solicit public comments, and revise the SRPWQMP as appropriate. The Regional Water Board’s Executive Officer will then consider approving the plan.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2020-21: 0.35

1.c – Complete Smith River Plain Water Quality Management Plan

Summary: The Regional Water Board, with input from lily bulb growers, resource agencies, the Tolowa Dee-ni’ Nation, and other stakeholders are developing a coordinated approach to control waste discharges from lily bulb agricultural operations under the SRPWQMP. At the start of FY 2020-21, the draft SRPWQMP will have already begun the public review process. In FY 2020-21, Regional Water Board staff will continue stakeholder engagement, consider input from the Watershed Stewardship Team, solicit public comments, and revise the SRPWQMP as appropriate. The Regional Water Board’s Executive Officer will then consider approving the plan.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2020-21: 0.05

Milestones	Target Date
Complete public review process	September 2020
Finalize SRPWQMP and EO approval	December 2020

1.d – Coordinate with the Watershed Stewardship Team on Implementation and Adaptive Management of the SRPWQMP

Summary: The SRPWQMP includes an adaptive management program, a schedule for soliciting input on the effectiveness of the program, and a process for making revisions. As the Plan is implemented, the working group will consider the following information at the annual workgroup meeting to be held in November 2020:

1. Grower annual reporting forms documenting:
 - Streamside protection area widths, including any filter strips
 - Field specific management practice implementation
 - Operation wide management practice implementation
2. Regional Water Board surface water sampling program. As part of the SRPWQMP, the Regional Water Board will sample the tributaries in the Smith River Plain that receive stormwater runoff from lily bulb fields. The purpose of sampling is to track the status of water quality and water quality trends in the coastal tributaries to assess the effectiveness of water quality practices implemented on lily bulb operations. The goal is to conduct up to three sampling events following storm events of sufficient precipitation intensity to produce runoff. The sampling will be conducted during the wet season from November 2020 to May 2021. The monitoring results will inform the adaptive management strategy and any needed revisions to the Plan.
3. Regional Water Board inspection reports. Staff will conduct inspections of lily bulb operations to determine adherence to Plan implementation measures, and request follow up measures to address water quality protection needs, as necessary. For FY 2020-21, staff will conduct at least one inspection for each lily bulb operation.
4. Adaptive management of the program will be based on information from the previous year's complete growing season. To the extent practicable, Regional Water Board staff will be available to assist growers in filling out their annual reporting forms. The Watershed Stewardship Team will gather stakeholder input, review all data and reporting information, and make recommendations concerning water quality practices to be implemented on lily bulb fields for the 2021–2022 growing season
5. Development of the Biotic Ligand Model and Adaptive Management Thresholds. One of the primary goals of the SRPWQMP is to control the impacts of dissolved copper in stormwater runoff on water quality. To guide this effort, staff will develop adaptive management thresholds for dissolved copper specific to the Smith River Plain. The complexities of copper speciation in the water column and the implications for assessing bioavailability complicates the development of appropriate threshold concentrations. To properly account for these factors, staff plan to make use of a predictive model called the Biotic Ligand Model (BLM). As

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part of the Adaptive Management Monitoring Program established in the SRPWQMP, surface water sampling analytes include the input parameters necessary to run the BLM. It will require at least two years of sampling to establish a range of typical values for these variables and long-term thresholds that properly account for seasonal and geographic variations.

Key Issues to Resolve and Considerations: While the long-term thresholds are being determined, the BLM will be used to evaluate the risk of copper toxicity associated with the copper concentrations measured in a single sample by running the concentrations of the associated input parameters values through the model. The dissolved copper concentration in the water column is then compared to the toxicity threshold determined by the BLM. This interim approach will be used while the monitoring program collects enough data to establish long-term thresholds as described above.

PY Allocation for FY 2020-21: 0.25

Milestones	Target Date
Develop adaptive management program recommendations with the Watershed Stewardship Team.	March 2021
Conduct three sampling events in the Smith River Plain during the wet season November 2020 – May 2021.	March 2021
Conduct four inspections of lily bulb operations	June 2021
Run Biotic Ligand Model to compare to sample results for dissolved copper for samples collected in January 2020.	June 2021

1.e – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2

2.a – Statewide Irrigated Lands Program and Reporting

Summary: Groundwater Permitting Unit staff will attend statewide Irrigated Lands Regulatory Program (ILRP) roundtable meetings and provide bi-monthly reports to the State Water Resources Control Board. Staff will also stay up to date on statewide policies related to agricultural regulatory programs, funding opportunities, technical assistance for growers, and statewide precedential program elements applicable to agricultural permitting.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2020-21: 0.05