California Regional Water Quality Control Board,
San Diego Region

2011 REVIEW OF THE WATER QUALITY CONTROL PLAN FOR THE SAN DIEGO BASIN (BASIN PLAN)

STAFF REPORT

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David W. Gibson, *Executive Officer*

James G. Smith, *Assistant Executive Officer*

This report was prepared
by
Deborah Woodward, Ph.D., *Environmental Scientist*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD,
SAN DIEGO REGION
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340
Telephone: (858) 467-29
http://www.waterboards.ca.gov/sandiego/

2011 Review of the Water Quality Control Plan for the San Diego Basin (Basin Plan)

Staff Report

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Executive Summary

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has completed its review of the Water Quality Control Plan for the San Diego Basin (Basin Plan) to identify needed revisions to water quality standards and other elements. The Basin Plan review is also known as the "triennial review."

To formally conclude its Basin Plan review, the Board must adopt a resolution approving the review and adopting a "short list" of suggested revisions for staff to work on in the upcoming three years. At its June 8, 2011 meeting, the Board will consider adoption of Resolution No. R9-2011-0047, *Resolution Adopting a Short List of Suggested Basin Plan Revisions Developed through the 2011 Basin Plan Review.* The Board may adopt the resolution and proposed short list as is, reject the list, or adopt the list with modifications.

There are two staff positions per year, or two person-years (PYs) per year, to work on basin planning. The proposed short list has six Tier 1 items on which to focus those basin planning resources over the next three years.

In order of estimated PY allocation, these are:

- Refinements to the Contact Water Recreation Beneficial Use (2.4 PYs)
- Comprehensive Policy for Streams, Wetlands & Riparian Areas (2.3 PYs)
- Housekeeping, i.e., mandated work and work to correct/clarify (1.0 PY)
- Water Quality Objective for Trash (0.1 PY)
- Nutrients Objectives in Surface Waters (0.1 PY)
- Seawater Desalination Policy (0.1 PY)

The proposed short list has four Tier 2 items to work on if staff resources allow:

- Municipal and Domestic Supply Beneficial Use for Specific Groundwaters
- Seasonal Variation Water Quality Objectives
- Indirect Potable Reuse and Municipal Reservoirs
- Site Specific Water Quality Objectives in Metals

The proposed short list incorporates the items ranked highest by the stakeholder Triennial Review Advisory Committee (TRAC), and distributes staff resources equally among items intended to make the Basin Plan more "protective" and items intended to make the Basin Plan more "reasonable." The next Basin Plan review is scheduled to be conducted in 2014.

1. Introduction

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has nearly completed its review of the Water Quality Control Plan for the San Diego Basin (Basin Plan). The Basin Plan establishes the water quality standards applicable within the San Diego Region, and periodic review of the Basin Plan is required by state and federal laws.[1] Because federal law requires a review every three years, the Basin Plan review is also referred to as the "triennial review."

The purpose of the review is to identify needed updates and revisions to water quality standards and other elements of the Basin Plan. The product of the review is a "short list" of suggested Basin Plan revisions that are of high priority for staff to work on in the next three years and, as appropriate, address through Basin Plan amendments. The short list includes an estimate of staff resources needed to investigate the suggestion and, if appropriate, amend the Basin Plan. The projection for available staff resources is 2 PYs per year, i.e., 6 PYs over three years.[2]

To formally conclude its Basin Plan review, the San Diego Water Board must adopt a resolution approving the review and the short list of suggested revisions. At its June 8, 2011 meeting, the Board will consider adoption of Resolution No. R9-2011-0047, *Resolution Adopting a Short List of Suggested Basin Plan Revisions Developed through the 2011 Basin Plan Review.*

This staff report presents the proposed short list and describes the process by which the San Diego Water Board conducted its 2011 Basin Plan review.

2. The Short List

The proposed short list is presented in **Table 1**. Staff will work on Tier 1 items using available resources. Staff may work on Tier 2 items if resources allow or if more staff resources become available. A brief description of each item is provided in **Attachment 1**.[3]

The short list is based on the rankings of a stakeholder advisory committee and the professional judgment of senior staff. It includes the suggestions most highly ranked by the Triennial Review Advisory Committee (TRAC), and distributes staff resources equally among suggested revisions intended to make the Basin Plan more "protective" and those intended to make the Basin Plan more "reasonable." The PY allocations of 0.1 are to allow tracking and/or participation in a related State Water Board effort currently underway. Higher PY allocations are to accomplish scoping and preparation/processing of Basin Plan amendments, as appropriate, by the San Diego Water Board.

[1] State law requires basin plans to be periodically reviewed [California Water Code §13240]. Federal law requires water quality standards to be reviewed every three years [Clean Water Act §303(c)(1)].
[2] A person-year (PY) is equivalent to one staff member working full time for one year.
[3] Suggestions that are not on the short list are in Tier 3 for this three-year review cycle.

The PY estimate for the *Comprehensive Policy for Streams, Wetlands & Riparian Areas* is allocated for scoping the four elements slated for initial development and addressing one or more of the elements within the three-year period. The same is true for *Refinements to the Contact Water Recreation Beneficial Use*, which also has four elements. (See Attachment 1 for more detail on the elements.)

Table 1. The "short list" of suggested Basin Plan revisions to work on over the next three years, with estimated PY allocations. Categories are defined more fully in Section 3c below.

Short List of Suggested Basin Plan Revisions Developed through the 2011 Basin Plan Review

Tier 1	~PY
Category P - suggestions intended to make the Basin Plan more "protective"	
Comprehensive Policy for Streams, Wetlands & Riparian Areas	2.3
Water Quality Objective for Trash	0.1
Seawater Desalination Policy	0.1
Category R - suggestions intended to make the Basin Plan more "reasonable"	
Refinements to the Contact Water Recreation Beneficial Use	2.4
Nutrient Water Quality Objectives in Surface Waters	0.1
Category H - "housekeeping" suggestions intended to make the Basin Plan more correct/clear and some mandated work	
Housekeeping	1.0
Total	6.0

Tier 2
Category P - suggestions intended to make the Basin Plan more "protective"
Municipal and Domestic Supply Beneficial Use for Specific Groundwaters
Category R - suggestions intended to make the Basin Plan more "reasonable"
Seasonal Variation Water Quality Objectives
Indirect Potable Reuse in Municipal Reservoirs
Site Specific Objectives for Metals

The adopted short list serves to guide basin planning efforts in the next three years. Note that:

(a) The PY allocations are estimates.
(b) Inclusion of a suggestion on the short list does not necessarily mean that the Basin Plan will be revised. A decision as to whether to proceed with development of a proposed Basin Plan amendment is made after scoping and further investigation by staff. In some circumstances, a more appropriate regulatory mechanism may be chosen.
(c) If work on a suggested revision results in development of a Basin Plan amendment, that amendment will undergo a full, formal public process prior to adoption consideration by the Board.

3. 2011 Basin Plan Review Process

The San Diego Water Board conducted its 2011 Basin Plan review as outlined below.

a. Request for Suggestions

The San Diego Water Board solicited and received suggestions for Basin Plan revisions from the public and staff during two public solicitation periods:

- October 31, 2008 through January 9, 2009, a 70-day period, and
- September 7, 2010 to October 7, 2010, a 30-day period.

Work on the Basin Plan review was temporarily suspended shortly after the close of the first solicitation period, so the second solicitation period was opened to allow for additional suggestions. Staff received approximately 65 submittals during the first solicitation and approximately 35 submittals during the second, with each submittal containing one to several suggestions.

b. Public Workshops 1 and 2

Staff held two public workshops to initiate the Basin Plan review on:

- December 8, 2008, and
- August 5, 2010.

At the first, staff introduced the review and encouraged the public to submit suggestions within the solicitation period. At the second, staff invited stakeholder participation on the Triennial Review Advisory Committee (TRAC). Approximately 45 peopled attended each workshop.

c. Compilation and Categorization of Suggestions

Staff compiled the suggestions received from the public and staff, combining duplicate/similar suggestions. Staff also carried over suggestions received during the prior Basin Plan review (2004) so that those could be reconsidered and prioritized

during the current review. All suggestions were categorized as focusing on either:

- Protection (P),
- Reasonableness (R), or
- Housekeeping (H).

In general:

- P suggestions are intended to make the Basin Plan more protective of water quality and/or beneficial uses;
- R suggestions are intended to make the Basin Plan more reasonable or realistic; and
- H suggestions are mainly editorial in nature and are intended to make the Basin Plan more clear and/or correct. The H category also includes some non-discretionary, mandated work items.[4]

The P and R categories derive from the Porter-Cologne Water Quality Control Act, which requires water quality control plans such as the Basin Plan to be both *protective* and *reasonable*. Overall, the P, R and H categories had 25, 33, and 114 suggestions, respectively (**Attachment 2**).[5]

d. Formation of the Triennial Review Advisory Committee (TRAC)

The San Diego Water Board formed the TRAC to enhance public participation by involving stakeholder representatives in prioritization of suggested changes to the Basin Plan. Interested parties were invited to self-nominate for TRAC membership, and all nominees were selected to be members. The TRAC included representatives from local, state and federal agencies, tribes and non-governmental organizations. A list of TRAC members and a TRAC 'purpose' handout are provided in **Attachment 3**.

e. Prioritization of Suggestions by the TRAC

The TRAC was tasked with prioritizing suggestions in the P and R categories. Prioritization was done over the course of six weeks and three meetings (January 27, March 3, and March 17, 2011). Meetings were held in the San Diego Water Board office and facilitated by a representative of the State Water Board Office of Public Participation.

In three steps, the TRAC developed an ordered list for the top five suggestions in the two categories. Each step entailed individual TRAC members selecting suggestions they consider among the most important from the lists, followed by group decisions as to which suggestions to carry forward to the next step (and which to cut) based on the compiled results. The three steps had increasingly narrow constraints for TRAC

[4] E.g., mandated work related to the Salt/Nutrient Management Plans currently under development pursuant to the State Board Recycled Water Policy (H-72, Attachment 2).

[5] How a suggestion was categorized for this review was, to the best of staff's ability, based on the intent of the submitting party; the categories in no way speak to or dictate the outcome of a possible, future Basin Plan amendment.

member selections (i.e., top 10, top 5, and top 3). A graphic overview of the three-step process and more detail about each step is provided in **Attachment 4**. The TRAC's ordered list for the top five suggestions in the P and R categories is provided in **Attachment 5**.

f. Prioritization of Suggestions by Staff

Staff drew upon the TRAC results when developing the proposed short list. After two meetings of senior staff (March 28 and April 11, 2011), a short list was prepared that consists of:

- TRAC's top-ranked P and top-ranked R suggestions
- TRAC's top five P suggestions, four in Tier 1
- TRAC's top five R suggestions, two in Tier 1
- current statewide efforts that are important to the San Diego Region
- housekeeping

Staff resources were:

- distributed equally between the P and R categories (2.5 PYs each category)
- allocated primarily to non-housekeeping work (5 PYs total)

A comparison of the short list with the TRAC results is provided in **Attachment 6**. The two major work items, *Comprehensive Policy for Streams, Wetlands, and Riparian Areas* and *Refinements to the Contact Water Recreation Beneficial Use* are "compound" suggestions, with four main elements each. For the former, the four elements are a combination of individual suggestions drawn from the TRAC top five (P category). For the latter, the four elements are individual suggestions that the TRAC opted to combine and that, together, were ranked highest by the TRAC (R category).

g. Formal Public Review Period

The proposed short list will be available for public review for a minimum of 45 days, along with a staff report and tentative Resolution No. R9-2011-0047. Staff will provide written and/or oral responses to public comments prior to Board consideration of adoption.

h. Public Workshop 3

Staff will hold a public workshop on May 6, 2011, to give an overview of the Basin Plan review process, describe the proposed short list, answer questions, and encourage submittal of written comments within the formal public review period.

i. Public Hearing

A public hearing before the Board is scheduled for June 8, 2011. The hearing is an opportunity for Board members to hear public comment on the short list and/or any aspect of the Basin Plan review.

j. Board Action

After the public hearing, Board members will consider adoption of tentative Resolution No. R9-2011-0047, adopting a short list of suggested Basin Plan revisions to work on over the next three years. The Board may adopt the resolution and proposed short list as is, reject the list, or adopt the list with modifications.

k. Transmission of Resolution and Record to the State Water Board

After adoption, the San Diego Water Board will transmit a copy of the adopting resolution and complete record of the Basin Plan review to the State Water Board Division of Water Quality, which, in turn, will make the documents available to the U. S. Environmental Protection Agency.

4. New Features of the Review Process

The 2011 Basin Plan review process had three new features:

1. Prioritization within suggestion categories,
2. Stakeholder advisory committee, and
3. Top 10 (Top 5, Top 3) approach.

These features are improvements to the review process. Prioritization within categories enables “apples-to-apples comparisons” and avoids “apples-to-oranges comparisons” that complicated prioritization efforts in the past. More importantly, use of the P and R categories recognizes the Porter-Cologne Water Quality Control Act requirement for water quality control plans, such as the Basin Plan, to be both *protective* and *reasonable*.

The stakeholder advisory committee allows staff to receive stakeholder input prior to preparing a proposed short list for Board consideration. In past reviews, prioritization was done entirely by staff, and public input was received later during the formal public comment period. In the current review, stakeholder representatives on the TRAC assisted in the prioritization process.

A Top 10 (Top 5, Top 3) approach allows stakeholder representatives on the TRAC to bring their own criteria and perspectives to the prioritization process. In the past, staff used a set of staff-defined, scored criteria with a point system and formulas to compute scores used for ranking. The new approach was a straightforward, time-efficient, and reasonably productive approach for use with a relatively large and diverse TRAC.

5. Ideas for the Next Basin Plan Review

TRAC members and staff put forth the following ideas to consider for the next Basin Plan review:

- Prepare guidance for the Basin Plan review and make it available when the next review is initiated.

- When soliciting suggestions, ensure that submittals state specifically why a suggested revision is needed and what benefit would be gained. Such information was not consistently available for all suggestions during the current review.
- Provide source and background data on each of the suggestions for TRAC member review, including which suggestions are being worked on by the State Water Board and/or other agencies.
- Look into other methods for possible use during the TRAC prioritization process (one TRAC member suggested the "SANDAG consensus machine").
- For suggestions that were not included on the short list, allow staff to meet with stakeholders to discuss what is needed in the way of studies or data so that suggestions of particular interest will be in a greater state of readiness when resubmitted for the next review.

6. Staff Recommendation for Board Action

Staff recommends the Board adopt tentative Resolution No. R9-2011-0047 adopting the short list of suggested Basin Plan revisions developed through the 2011 Basin Plan Review.

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Attachment 1
Short List with Suggestion Summaries

Tier 1 To be worked on with existing staff resources	**~PY**
Category P Generally intended to make the Basin Plan more "protective" of water quality and/or beneficial uses	**2.5**
Comprehensive Policy for Streams, Wetlands, and Riparian Areas Develop a comprehensive policy for the protection of streams (including non-perennial), wetlands, and riparian areas. These waters and their beneficial uses have been severely impacted in the past and continue to be threatened. Elements of a comprehensive policy for **scoping and initial development** include, but are not limited to, policies on: a. Mitigation Guidance (P-18) (TRAC Rank 5, 1 of 2) Establish a policy that addresses mitigation, both compensatory (e.g., Clean Water Act §401 Certifications) and punitive (e.g., Cleanup and Abatement Orders, Administrative Civil Liabilities). There is need for guidance as to when destruction of a waterbody is tolerated through permitting or enforcement. Loss of waterbodies, particularly low-order streams, has resulted in unrecoverable losses of beneficial uses and impairments of downstream waterbodies. Without clear guidance, the losses are likely to continue. This is related to the State Water Board proposed Wetland and Riparian Area Protection Policy (WRAPP). Information on the statewide effort is available at: http://www.waterboards.ca.gov/water_issues/programs/cwa401/wrapp.shtml Source: San Diego Water Board b. Clean Water Act § 401 Certification (P-19) (TRAC Rank 5, 2 of 2) Establish a policy for issuing Clean Water Act §401 Certifications. There is need for guidance on minimum requirements for buffers, post-construction BMPs, and compensatory mitigation ratios that take into account cumulative impacts to watersheds. This is related to the State Water Board proposed Wetland and Riparian Area Protection Policy (WRAPP). Link to information on the statewide effort is in 'a' above. Source: UC Reserve System, San Diego Water Board, 2004 Basin Plan Review Issue 22 c. Lagoon mouth opening (P-21) (TRAC Rank 2) Establish a policy for seasonal opening of lagoon mouths. There is need for criteria regarding the conditions under which lagoon mouths should be opened to protect beneficial uses. Source: San Diego Water Board, 2004 Basin Plan Review Issue 30	2.3

d. Dry weather discharge diversion & in-stream treatment (P-22) (TRAC Rank 1)
Establish a policy regarding the treatment of dry-weather discharge via diversion to sanitary sewer or use of in-stream treatment facilities. There is need for guidance as to when diversion and/or in-stream treatment is appropriate.
Source: San Diego Water Board, 2004 Basin Plan Review Issue 33

Elements of a comprehensive policy that are currently underway as **statewide efforts** through the State Water Board, and that the San Diego Water Board will **track/participate in**, are:

e. Development of biological objectives (P-9)
Establish a narrative biological objective such as: "Waters of the State shall be of sufficient quality to support aquatic species without detrimental changes in the resident biological communities." Establish numerical measures by which to interpret the narrative objective (i.e., the Southern California Index of Biotic Integrity). Existing water quality objectives are not adequately protective of aquatic life beneficial uses. A water quality objective for biological condition is critical to restoring and maintaining the biological integrity of the region's waters. This is related to the State Water Board proposed Policy for Biological Objectives for California under development. Information on the statewide effort is available at:
http://www.waterboards.ca.gov/plans_policies/biological_objective.shtml
Source: USEPA Region 9, San Diego Water Board, 2004 Basin Plan Review Issue 26

f. Addition of wetlands beneficial uses (P-3)
Establish new beneficial use categories that reflect wetland functions, e.g., Wetlands Habitat (WET), Natural Water Quality Enhancement (NWQE), and Flood Attenuation (FLD). Identify these as beneficial uses of wetlands, as was done by, e.g., the North Coast Regional Board (Region 1). Existing BU categories do not include some actual functions (beneficial uses) of wetlands. This is related to the State Water Board proposed Wetland and Riparian Area Protection Policy (WRAPP). Link to information on the statewide effort is in 'a' above.
Source: San Diego Water Board

Elements of a comprehensive policy that require **scoping** to determine whether and/or how best to address in a comprehensive policy include, but are not limited to:

g. Water quality objectives for flow (P-10)
h. Control of invasive species (P-13)
i. Discharge prohibition for vernal pools (P-14)
j. Maintenance of natural floodplain function (P-17)
k. Constructed wetlands policy (R-32)

Summaries of elements g-k are provided in **Attachment 2**.

PY estimate is for
- scoping elements a-k to establish the framework of a comprehensive policy;
- investigating initial elements a-d, and addressing one or more of the four within three years; and
- tracking/participating in relevant State Water Board efforts (e, f).

Water Quality Objective for Trash Water Quality Objective for Trash (P-12) (TRAC Rank 4) Establish a water quality objective for trash, or update the current objective for Floating Material to include all trash (and rename "Floating and Non-Floating Material"). The current objective is not adequately protective. This is related to the State Water Board proposed Policy for Trash Control in Waters of the State under development. Information on the statewide effort is available at: http://www.waterboards.ca.gov/plans_policies/docs/trashscoping.pdf Source: San Diego Audubon Society, San Diego Water Board, 2004 Basin Plan Review Issue 28 PY estimate is to track/participate in the ongoing State Water Board effort.	0.1
Seawater Desalination Policy Seawater Desalination Policy (P-20) Establish a policy or implementation provision that addresses impacts associated with coastal seawater desalination plant intakes and discharges. Desalination intakes and discharges represent a significant new threat to coastal waters. This is related to the State Water Board effort to address desalination facilities and brine disposal. Information on the statewide effort is available at: http://www.waterboards.ca.gov/water_issues/programs/ocean/index.shtml Source: Sierra Club, 2004 Basin Plan Review Issue 48 PY estimate is to track/participate in the ongoing State Water Board effort.	0.1
Category R Generally intended to make the Basin Plan more "reasonable" or more realistic	**2.5**
Refinements to the Contact Water Recreation Beneficial Use (REC-1) Investigate and, as appropriate, make refinements to the REC-1 beneficial use to address the following four elements: a. REC-1 in Ocean (R-6) (TRAC Rank 1, 1 of 4) Clarify the area to which REC-1 applies in ocean waters. It may not be appropriate to apply REC-1 bacterial objectives to all marine waters within three nautical miles and all depths and/or to require municipal dischargers of treated wastewater to meet REC-1 bacterial objectives at ocean outfalls. Sources: South Orange County Wastewater Authority, City of Oceanside, Encina Wastewater Authority, City of Escondido, City of San Diego b. Restricted Access REC-1 (R-7) (TRAC Rank 1, 2 of 4) Establish a sub-category of REC-1 for areas with engineered channels and other areas with restricted public access. It may not be appropriate to designate REC-1 in areas where conditions are unsafe and/or public access is restricted.	2.4

Sources: County of Orange, City of San Diego, City of El Cajon, Sweetwater Authority, 2004 Basin Plan Review Issue 12 c. Wildlife Impacted REC-1 (R-8) (TRAC Rank 1, 3 of 4) Establish a sub-category of REC-1 for areas affected by wildlife wastes. It may not be appropriate to apply REC-1 objectives in areas where wildlife wastes make it difficult or impossible for REC-1 fecal indicator bacteria objectives to be met. Source: San Diego Water Board, 2004 Basin Plan Review Issue 12 d. Frequency of Use REC-1 (R-9) (TRAC Rank 1, 4 of 4) Establish tiers of REC-1 based on defined frequency of use designations. It may not be appropriate to apply the same bacterial objectives to both frequently- and infrequently-used waterbodies. Source: City of San Diego, County of Orange, Riverside County Flood Control and Water Conservation District PY estimate is for investigating elements a-d, and addressing one or more of the four within three years.	
Nutrient Water Quality Objectives in Surface Water Nutrient Water Quality Objectives in Surface Water (R-16) (TRAC Rank 3) Establish water quality objectives for nitrogen and phosphorus (biostimulatory substances) that take into account natural background levels, using the Numeric Nutrient Endpoint (NNE) framework to inform the process. [The NNE framework is based on the response of a waterbody to nutrient enrichment (e.g., algal biomass, low dissolved oxygen).] Existing objectives may not adequately reflect a waterbody's response to nutrient input. This is related to the State Water Board proposed NNE framework. Information on the statewide effort is available at: http://californiaestuarinenneproject.shutterfly.com/ Sources: USEPA Region 9, Marine Corps Base Camp Pendleton, Watermaster-Santa Margarita River Watershed, San Diego County Water Authority, San Diego County Farm Bureau, San Diego Integrated Regional Water Management Group, San Diego Water Board, 2004 Basin Plan Review Issue 24 PY estimate is to track/participate in the ongoing State Water Board effort.	0.1
Category H Mainly editorial in nature and intended to make the Basin Plan more clear and/or correct, i.e., "housekeeping." Also some non-discretionary, mandated work items.	**1.0**
Housekeeping Make corrections, updates, text clarifications, and format changes as appropriate, and incorporate them into Basin Plan amendments as opportunities arise. Do mandated work such as that associated with the Salt and Nutrient Management Plans for groundwater basins currently under development pursuant to the State Water Board Water Recycling Policy (H-72). Sources: Numerous	0.7

PY estimate is to complete as many housekeeping items as possible and prepare/process Basin Plan amendments as needed by the mandated work.	
2014 Basin Plan Review Conduct the next Basin Plan review three years from adoption of the current review. Continue the participation of the Triennial Review Advisory Committee (TRAC). PY estimate is to complete the review.	0.3

Tier 2 May be worked on if existing staff resources allow or more resources become available	**~PY**
Category P Generally intended to make the Basin Plan more "protective" of water quality and/or beneficial uses	**0**
Designation/Re-Designation of the Municipal and Domestic Beneficial Use (MUN) in Specific Groundwaters Investigate and, as appropriate, address the following suggestions pertaining to beneficial uses of groundwater: a. MUN in the San Diego Formation (P-2) (TRAC Rank 2, 1 of 2) Identify the San Diego Formation as a deep groundwater aquifer, and designate its beneficial uses, including MUN. The aquifer is a viable drinking water source that underlies parts of the San Diego, Pueblo, Otay and Tijuana watersheds, including some coastal areas previously de-designated as MUN. Source: San Diego Water Board, 2004 Basin Plan Review Issue 23 b. MUN in San Juan Creek (P-1) (TRAC Rank 2, 2 of 2) Designate MUN as a supported beneficial use of groundwater under San Juan Creek and its alluvial valley from Pacific Coast Highway to the ocean. Groundwater in the area is a viable source of drinking water in a coastal area previously de-designated as MUN. Re-designation of MUN will protect the South Orange County Desalination Project planned reliance on slant wells, and will facilitate cleanup of contaminated sites to protect this source of domestic water supply. Source: Municipal Water District of Orange County	

Category R Generally intended to make the Basin Plan more "reasonable" or more realistic	**0**
Seasonal Variation Water Quality Objectives Seasonal Variation Water Quality Objectives (R-12) (TRAC Rank 2) Establish water quality objectives that take into account seasonal flow conditions, setting different objectives for high and low flow conditions, i.e., wet weather and dry weather. Some water quality objectives are not met under natural background conditions under some flow conditions (e.g., bacteria, phosphorus, TSS and turbidity). Source: City of Laguna Niguel, County of Orange, Riverside County Flood Control and Water Conservation District, City of San Diego, 2004 Basin Plan Review Issue 59	
Indirect Potable Reuse and Municipal Reservoirs Indirect Potable Reuse and Municipal Reservoirs (R-22) (TRAC Rank 4) Establish an implementation provision or variance from certain water quality objectives for municipal reservoirs to promote potable reuse. Treated wastewater for indirect potable reuse does not meet water quality objectives for several constituents, and clarification is needed as to how compliance with water quality objectives will be interpreted in the context of indirect potable reuse supplies into drinking water reservoirs. Source: San Diego Water Board, Surfrider Foundation San Diego Chapter	
Site Specific Objectives for Metals Site Specific Objectives for Metals (R-15) (TRAC Rank 5) Establish site-specific objectives for copper (and other metals such as nickel and zinc) for use instead of those in the California Toxics Rule. Nationwide criteria in the California Toxics Rule may be too stringent; Biotic Ligand Model and Water Effects Ratio suggest less stringent water quality objectives are protective. Source: American Chemet, City of San Diego	

Attachment 2
Full List of Suggestions (Unprioritized)

Key to Abbreviations

Beneficial Uses:

BIOL: preservation of biological habitats of special significance
COLD: cold freshwater habitat
COMM: commercial and sport fishing
EST: estuarine habitat
GWR: ground water recharge
MAR: marine habitat
MUN: municipal and domestic water supply
NAV: navigation
RARE: rare, threatened or endangered species
REC1: contact water recreation
REC2: non-contact water recreation
SPWN: spawning, reproduction and/or early development
WARM: warm freshwater habitat
WILD: wildlife habitat

Other:

BU - Beneficial Use
WQO - Water Quality Objective
TSS - Total Suspended Solids
TDS - Total Dissolved Solids
N - Nitrogen
P - Phosphorus
MCL - Maximum Contaminant Level
HBCL - Health-Based Cleanup Levels
CAO - Cleanup and Abatement Order
ACL - Administrative Civil Liability

P List (Unprioritized)

Suggestions on this list are categorized as making the Basin Plan more "Protective" (P). They were considered for prioritization by the Triennial Review Advisory Committee (TRAC). The summaries under Suggested Action are paraphrased by staff from submitted suggestions.

#	Name	Suggested Action (and rationale from suggestion source)	Surface / Ground
P-1	MUN in San Juan Creek	Designate MUN as a supported BU in San Juan Creek and its alluvial valley from Pacific Coast Highway to the ocean. The MUN designation will protect the South Orange County Desalination Project planned reliance on slant wells, and will facilitate cleanup of contaminated sites to protect this source of domestic water supply. Source: Municipal Water District of Orange County	G
P-2	MUN in San Diego Formation	Identify the San Diego Formation as a deep groundwater aquifer, and designate its BUs, including MUN. The aquifer is a viable drinking water source that underlies parts of the San Diego, Pueblo, Otay and Tijuana watersheds, including some coastal areas previously de-designated as MUN. Source: San Diego Water Board, 2004 Basin Plan Review Issue 23	G
P-3	Wetlands BUs	Establish new BU categories that reflect wetland functions, e.g., Wetlands Habitat (WET), Natural Water Quality Enhancement (NWQE), and Flood Attenuation (FLD). Identify these as BUs of wetlands, as done by the North Coast Regional Board (Region 1). Existing BU categories do not include some actual functions (beneficial uses) of wetlands. Source: San Diego Water Board	S
P-4	Non-REC Water Contact BU	Establish a BU for non-recreational water contact. Existing BUs do not protect non-recreational water contact, e.g., by military and Coast Guard personnel, underwater hull cleaners, commercial divers, and others who engage in various non-recreational activities. Source: San Diego Water Board	S
P-5	PCP WQO	Revise the WQO for Pentachlorophenol (PCP) to protect early life-stage salmonids (per USEPA recommendation, November 14, 2007). Existing WQO is not adequately protective. Source: US EPA Region 9	S
P-6	Un-ionized Ammonia WQO	Revise the WQO for un-ionized ammonia from the current single number to a formula. Existing WQO may not be adequately protective because un-ionized ammonia levels vary with temperature, pH, and salinity. Source: San Diego Water Board	S
P-7	Chloride WQO	Revise the WQO for chloride to be consistent with USEPA criteria, or provide an antidegradation analysis to justify a chloride WQO based on ambient water. Existing WQO is not adequately protective. Source: US EPA Region 9, 2004 Basin Plan Review Issue 11	S,G

P-8	WQOs for Steelhead Protection	Revise the WQOs for dissolved oxygen, temperature, and toxicity as appropriate to protect steelhead. Existing WQOs are not adequately protective. Source: Clean Water Now & Aliso Creek Steelhead, San Diego Water Board	S
P-9	WQO for Biological Condition	Establish a narrative biological objective such as: "Waters of the State shall be of sufficient quality to support aquatic species without detrimental changes in the resident biological communities." Establish numerical measures by which to interpret the narrative objective (i.e., the Southern California Index of Biotic Integrity). Existing WQOs are not adequately protective of aquatic life BUs. A WQO for biological condition is critical to restoring and maintaining the biological integrity of the region's waters. Source: San Diego Water Board, US EPA Region 9, 2004 Basin Plan Review Issue 26	S
P-10	WQO for Flow	Establish WQO(s) for flow to protect BUs from negative impacts due to hydromodification and help maintain natural flow regimes. Existing WQOs are not adequately protective. Source: San Diego Water Board, 2004 Basin Plan Review Issue 53	S
P-11	WQO for Chlorine	Establish a WQO for chlorine as necessary for the protection of aquatic life. Existing WQOs are not adequately protective. Source: California Department of Fish and Game, San Diego Water Board, US EPA Region 9, 2004 Basin Plan Review Issue 16	S
P-12	WQO for Trash	Establish a WQO for trash; or update the WQO for Floating Material to include all trash and rename "Floating and Non-Floating Material". Existing WQOs are not adequately protective. Source: San Diego Audubon Society, San Diego Water Board	S
P-13	Invasive Species Control	Establish a control on invasive species, e.g., a narrative or numeric WQO, or a discharge prohibition. Current Basin Plan is not adequately protective. Sources: Recreational Boaters of California, San Diego Water Board, 2004 Basin Plan Review Issue 54	S
P-14	Discharge Prohibition for Vernal Pools	Prohibit discharges to vernal pools. Most vernal pools in the SD region have been destroyed; since, for all practical purposes, vernal pools have no assimilative capacity, a discharge prohibition is necessary to protect them. Sources: Sierra Club, San Diego Water Board	S
P-15	Airport Prohibition	Prohibit airports in state waters. Airports on or in state waters severely degrade and/or destroy the BUs of those waters. Source: San Diego Water Board	S
P-16	Stormdrain Runoff Elimination	Develop a stormdrain management system that calls for the elimination of stormdrain discharge/outfall to the ocean. Stormdrain runoff carries pollutants to the ocean during rain events and causes beach closures. Source: Surfrider Foundation, San Diego Chapter	S
P-17	Natural Floodplain Function	Add implementation measures that require development in a floodplain to maintain the natural floodplain functions of infiltration and pollutant removal. Existing Basin Plan does not adequately address. Source: San Diego Audubon Society	S,G

P-18	Mitigation Guidance	Establish a policy that addresses mitigation, both compensatory (e.g., Clean Water Act §401 Certifications) and punitive (e.g., CAOs, ACLs). There is need for guidance as to when destruction of a waterbody is tolerated through permitting or enforcement. Loss of waterbodies, particularly low-order streams, has resulted in unrecoverable losses of BUs and impairments of downstream waterbodies. Without clear guidance, the losses are likely to continue. Source: San Diego Water Board	S
P-19	Policy - 401 Certification	Establish a policy for issuing Clean Water Act §401 Certifications. There is need for guidance on minimum requirements for buffers, post-construction BMPs, and compensatory mitigation ratios that take into account cumulative impacts to watersheds. Source: UC Reserve System, San Diego Water Board, 2004 Basin Plan Review Issue 22	S
P-20	Seawater Desalination Impacts Policy	Establish a policy or implementation provision that addresses impacts associated with coastal seawater desalination plant intakes and discharges. Neither existing Basin Plan nor statewide policies/plans adequately address. Source: Sierra Club, 2004 Basin Plan Review Issue 48	S
P-21	Lagoon Mouth Opening Policy	Establish a policy for seasonal opening of lagoon mouths. There is need for criteria regarding the conditions under which lagoon mouths should be opened to protect BUs. San Diego Water Board, 2004 Basin Plan Review Issue 30	S
P-22	Dry Weather Discharge Policy	Establish a policy regarding the treatment of dry-weather discharge via diversion to sanitary sewer and use of in-stream treatment facilities. There is need for guidance as to when diversion and/or in-stream treatment is appropriate. Source: San Diego Water Board, 2004 Basin Plan Review Issue 33	S
P-23	Pollution Prevention Policy	Establish a policy for pollution prevention. Prevention is the most effective and cost effective approach. Source: Environmental Health Coalition, San Diego Water Board, 2004 Basin Plan Review Issue 20	S,G
P-24	Precautionary Principle Policy	Establish a policy for decision making based on the precautionary principle. Precautionary measures should be taken, even if some cause and effect relationships are not understood. Source: Environmental Health Coalition, 2004 Basin Plan Review Issue 20	S,G
P-25	Emerging Contaminants Policy	Establish a policy to address emerging contaminants. Prevalence of many new chemical pollutants is increasing, and they pose health risks to humans and aquatic life. Source: San Diego Water Board	S,G

R List (Unprioritized)

Suggestions on this list are categorized as making the Basin Plan more "Reasonable" (R). They were considered for prioritization by the Triennial Review Advisory Committee (TRAC). The summaries under Suggested Action are paraphrased by staff from submitted suggestions.

#	Name	Suggested Action (and rationale from suggestion source)	Surface / Ground
R-1	Chollas Creek BUs	Evaluate BUs in Chollas Creek; consider de-designation of WARM and WILD. Much of the creek is channelized or underground; WARM and WILD do not appear to be supported. Source: City of San Diego, 2004 Basin Plan Review Issue 44	S
R-2	Salt Creek BUs	Evaluate BUs in the Salt Creek area (Otay Valley, HU 910.20); consider de-designation of MUN and AGR from the site of the former Omar Class I hazardous waste storage facility. TDS levels are high at the site, and an adjacent area was excepted from MUN in 1988. Source: Otay Mesa Ventures II, LLC; 2004 Basin Plan Review Issue 46	G
R-3	Shallow Urban Groundwater BUs	Evaluate BUs of shallow, brackish, "urban" groundwater; consider de-designation of BUs. Such waterbodies do not meet the definition of an aquifer. Source: Environmental Business Solutions, 2004 Basin Plan Review Issue 45	G
R-4	San Luis Rey BUs	Evaluate BUs in the San Luis Rey watershed; add BU for ground water recharge (GWR). There may be plans to enhance and develop groundwater resources for additional municipal supply. Source: City of Oceanside, San Luis Rey Municipal Water District, 2004 Basin Plan Review Issue 32	S,G
R-5	Tiered Aquatic Life BUs	Establish tiered aquatic life BUs that take into account the condition of a waterbody and specify the highest attainable water quality for the waterbody; develop corresponding WQOs to support the tiered BUs. Some existing BU designations may no longer appropriate. Tiered BUs establish realistic water quality goals in urban streams. Source: City of San Diego, Industrial Environmental Association, San Diego Water Board	S
R-6	REC-1 in Ocean	Evaluate and clarify the area to which REC-1 applies in ocean waters. Limit applicability of REC-1 to waters within 1,000 feet of shore and the 30 foot depth contour, and waters within the La Jolla and Point Loma kelp beds. It may not be appropriate to apply REC-1 bacterial objectives to all marine waters within three nautical miles and all depths and/or to require municipal dischargers of treated wastewater to meet the REC-1 bacterial objectives. Sources: South Orange County Wastewater Authority; City of Oceanside; Encina Wastewater Authority; City of Escondido; City of San Diego	S

R-7	Restricted Access REC-1	Evaluate REC-1 in areas with engineered channels and other areas with restricted public access. REC-1 should not be identified as a BU in some flood control areas and some drinking water supply reservoirs because conditions are unsafe and/or public access is restricted or not allowed. Sources: County of Orange, City of San Diego; City of El Cajon; Sweetwater Authority, 2004 Basin Plan Review Issue 12	S
R-8	Wildlife Impacted REC-1	Establish a sub-category of REC-1 for areas affected by wildlife wastes. Wildlife wastes make it difficult or impossible for REC-1 fecal indicator bacteria objectives to be met in these areas. Source: San Diego Water Board, 2004 Basin Plan Review Issue 12	S
R-9	Frequency of Use REC-1	Establish tiers of REC-1 based on defined frequency of use designations. It may not be appropriate to apply the same bacterial objectives to both frequently- and infrequently-used waterbodies. Source: City of San Diego, County of Orange, Riverside County Flood Control and Water Conservation District	S
R-10	Turbidity WQO	Evaluate the WQO for turbidity, and modify to take into account natural processes and background conditions. Existing objective often is not met, even in reference streams. Source: Riverside County Flood Control and Water Conservation District	S,G
R-11	Flouride WQO	Evaluate the flouride WQO, and modify to take into account fluoridation. Existing objective is based on irrigation limits and is inconsistent with (more stringent than) the human health-based MCL. The addition of flouride to water will make it difficult for wastewater plants to meet the existing WQO. Source: Metropolitan Water District of Southern California, San Diego Water Board, 2004 Basin Plan Review Issue 17	S,G
R-12	Seasonal Variation WQOs	Establish WQOs that take into account seasonal flow conditions, setting different objectives for high and low flow conditions (i.e., wet weather and dry weather). Some WQOs are not met under natural background conditions under some flow conditions (e.g., bacteria, phosphorus, TSS and turbidity). Source: County of Orange, City of Laguna Niguel, Riverside County Flood Control and Water Conservation District, City of San Diego, 2004 Basin Plan Review Issue 59	S
R-13	Dissolved Oxygen WQO for Enclosed Bays and Estuaries	Evaluate the WQO for dissolved oxygen as it applies to Enclosed Bays and Estuaries. Consider site-specific dissolved oxygen WQOs for various ecoregions (e.g., in San Diego Bay). It may not be appropriate to apply the WQO for Inland Surface Waters to Enclosed Bays and Estuaries, or the same WQO for all areas of the bay. Source: US EPA Region 9, San Diego Water Board, Marine Corps Base Camp Pendleton AC/S Environmental Security, 2004 Basin Plan Review Issue 9	S
R-14	WQOs for Sweetwater and Loveland Reservoirs	Establish site-specific WQOs for aluminum, dissolved oxygen, and pH that take into account naturally occurring levels. Existing objectives are too stringent and/or inappropriate. Source: Sweetwater Authority	S

R-15	Site Specific Objectives for Metals	Establish site-specific objectives for copper (and other metals such as nickel and zinc) for use instead of those in the California Toxics Rule (CTR). Nationwide criteria in the California Toxics Rule (CTR) may be too stringent; Biotic Ligand Model (BLM) and Water Effects Ratio (WER) suggest less stringent WQOs are protective. Source: American Chemet, City of San Diego	S
R-16	Nutrient WQOs in Surface Water	Establish WQOs for nitrogen and phosphorus (biostimulatory substances) that take into account natural background levels, using the Numeric Nutrient Endpoint (NNE) framework to inform the process. [The NNE framework is based on the response of a waterbody to nutrient enrichment (e.g., algal biomass, low dissolved oxygen).] Existing objectives are not realistic. Existing WQOs may not adequately reflect a waterbody's response to nutrient input. Sources: USEPA Region 9; Marine Corps Base Camp Pendleton; Watermaster, Santa Margarita River Watershed; San Diego County Water Authority; San Diego County Farm Bureau; San Diego Integrated Regional Water Management Group; San Diego Water Board, 2004 Basin Plan Review Issue 24	S
R-17	Nutrient WQOs in Groundwater	Develop site-specific WQOs for nutrients in high-priority groundwater basins, using the Salt and Nutrient Management Plans currently under development by regional stakeholders pursuant to the State Water Board Recycled Water Policy to inform the process. Existing objectives are not realistic. Sources: San Diego Water Board, 2004 Basin Plan Review Issue 10	G
R-18	TDS WQO	Evaluate the TDS WQOs for surface and groundwater, and modify to take into account the TDS levels in background conditions and imported water. Existing objective is not realistic and not well aligned with background conditions. Imported water frequently exceeds the WQO for TDS prior to entry into reservoirs. Source: City of Santee, City of San Diego, City of Oceanside, Sweetwater Authority, County of San Diego, US EPA Region 9, 2004 Basin Plan Review Issue 11	S,G
R-19	Regionwide TDS and Nutrient Management Plan	Develop a region-wide TDS and Nutrient Management Plan to address impacts from recycled and imported waters on both ground and surface waters. Revise the Basin Plan as necessary to implement the plan. A comprehensive plan is needed to address both recycled and imported water, and both ground and surface water. Such a plan would go beyond the "Salt/Nutrient Management Plan" for each groundwater basin required by the State Water Board Recycled Water Policy, and would provide the most cost effective BU protection and attainment. Source: County of San Diego, US EPA Region 9, San Diego County Water Authority, San Diego Integrated Regional Water Management (IRWM) Program, 2004 Basin Plan Review Issue 11	S,G
R-20	TDS WQO in the Lower Ysidora HSA	Determine if the area in which the TDS WQO does not apply can be extended to further east of its current boundary at Interstate 5. (Santa Margarita HU, Lower Ysidora HAS near the ocean.) Applying the TDS objective to areas influenced by the Pacific Ocean but east of the current boundary prevents the use of reclaimed water. Source: Marine Corps Base Camp Pendleton AC/S Environmental Security	G

R-21	Imported Water in Municipal Reservoirs	Establish an implementation provision or variance from certain WQOs for municipal reservoirs that takes into account the quality of imported water. Imported water does not meet WQOs for several constituents prior to entry into local reservoirs. Source: San Diego Water Board	S
R-22	Indirect Potable Reuse and Municipal Reservoirs	Establish an implementation provision or variance from certain WQOs for municipal reservoirs to promote potable reuse. Treated wastewater for indirect potable reuse does not meet WQOs for several constituents. Source: Surfrider Foundation–San Diego Chapter, San Diego Water Board	S
R-23	Indirect Potable Reuse and Groundwater	Establish an implementation policy or variance from certain WQOs to facilitate storage of indirect potable reuse supplies in groundwater basins. Treated wastewater for potable reuse does not meet WQOs for several constituents. Source: San Diego Water Board	G
R-24	Iron and Manganese WOQs in Groundwater	Evaluate WQOs for iron and manganese to determine if they can be modified or removed, and/or establish implementation provisions that promote the use of recycled water within the region (e.g., for irrigation). Existing WQOs for iron and manganese are too stringent and do not accommodate the expanded use of recycled wastewater. Source: San Diego County Water Authority, City of Escondido, Leucadia Water District, City of Carlsbad, City of San Diego, Encina Wastwater Authority, Marine Corps Base Camp Pendleton AC/S Environmental Security	G
R-25	All BUs and WQOs in Groundwater	Evaluate all BUs and WQOs for groundwater to determine if any can be modified or removed to facilitate the use of recycled water. Existing standards do not facilitate the use of recycled water. Source: San Diego Water Board	G
R-26	All BUs and WQOs	Evaluate all BUs and WQOs using factors in California Water Code section 13241. Update all based on current science and monitoring. Some factors may not have been considered when establishing BUs and WQOs, especially with respect to regulation of nonpoint sources. BUs based on decades-old assumptions may be over-conservative. Protection of certain BUs under certain conditions (e.g., imported water) is unreasonable and a waste of resources. Source: City of San Diego, City of Santee, Construction Industry Coalition on Water Quality, County of Orange, 2004 Basin Plan Review Issue 60	S,G
R-27	Potential BUs	Evaluate current 'Potential' BU designations to determine if they conform to 'Most Probable Future Use' BUs as defined in California Water Code section 13241. BU designations may not be consistent with current legal standards. Source: City of San Diego, City of Santee, Coalition on Water Quality, County of Orange, 2004 Basin Plan Review Issue 61	S,G
R-28	Translators for San Diego Bay	Develop site specific translators for San Diego Bay for copper, nickel and zinc. [Translators are not WQOs; they are used to convert receiving water numeric objectives (e.g., dissolved Cu form) to numeric effluent limits (total Cu form).] Even when waters in San Diego Bay appear to meet the WQO, the standard nationwide translator provided in the California Toxics Rule (CTR) results in a low effluent limit that is difficult for dischargers to comply with. Source: San Diego Water Board	S

R-29	Waiver for On-site Treatment Systems	Amend Conditional Waiver No.1 (Discharges from On-site Disposal Systems) to include criteria for advanced treatment systems for domestic wastewater. Covering advanced treatment systems under the waiver allows deferral of regulation of such systems to the Counties and simplifies the application process for property owners proposing such systems. Source: San Diego Water Board	G
R-30	Septic Tank Nitrate Exemption	Establish an implementation provision that exempts septic tank owners from WQOs for nitrates in groundwater. Standard septic tanks cannot meet the nitrate objectives and additional treatment to remove nitrate is costly. Source: San Diego Water Board	G
R-31	Prioritization Policy	Establish a policy for the prioritization of surface and groundwaters and water quality problems for planning purposes. Prioritization will ensure that limited funding is directed to the most critical problems and threats. Source: City of San Diego, San Diego Water Board	S,G
R-32	Constructed Wetlands Policy	Establish a policy for applicability of water quality standards to constructed wetlands. There is need for clarification regarding the regulation of constructed wetlands. Source: San Diego Water Board, 2004 Basin Plan Review Issue 34	S
R-33	Atmospheric Deposition Policy	Establish a policy that takes into consideration the levels of pollutants in surface waters due to atmospheric deposition, and includes a framework for coordination with agencies responsible for air quality. There is need for guidance on atmospheric deposition, particularly in context of stormwater permit compliance and TMDLs. Source: City of San Diego, San Diego Water Board	S

H List (Unprioritized)

Suggestions on this list are categorized as "Housekeeping" (H). The Triennial Review Advisory Committee (TRAC) was not asked to prioritize these; the suggestions will be evaluated/prioritized by staff and, as appropriate, incorporated into Basin Plan Amendments as opportunities arise. Some summaries under Suggested Action are paraphrased by staff from submitted suggestions and some are verbatim.

#	Suggested Action	Chapter	Type
	General		
H-1	Number the parts, sections, and subsections (e.g., 1.A.i.a)	Gen	Format
H-2	Put the Implementation chapter after the Plans and Policies chapter since the Implementation chapter should be about, among other things, implementing applicable plans and policies.	Gen	Format
H-3	Add links in the on-line version, especially to statutes, regulations, plans, policies, resolutions, and orders.	Gen	Format
H-4	Move TMDLs out of chapters into appendices.	Gen	Format
H-5	Put Basin Plan version number or date on footer so you know if you have the current version.	Gen	Format
H-6	Change from two-column to one-column format.	Gen	Format
H-7	Incorporate by reference relevant information/requirements from other sources (e.g., Endangered Species Act, State Water Board, MCLs).	Gen	Format
H-8	Replace the current big map with one that gives primary emphasis to water features and hydrologic boundaries.	Gen	Clarification
H-9	Take out information that is more detailed than necessary to avoid having information in the Basin Plan that is out-of-date (e.g., the number of certain types of facilities or permits and/or the owners/operators of certain facilities - all of which can and do change) .	Gen	Clarification
H-10	Add an appendix for Basin Plan amendments.	Gen	Clarification
H-11	Review and revise the Basin Plan to ensure that it is well organized, clear, easy to use, and easy to understand. The Basin Plan should be arranged and written so that different readers (Board members, staff, dischargers, environmental scientists, geologists, engineers, attorneys, etc.) are all likely to reach the same conclusion about what the Basin Plan says and means and are able to find all the information in the Basin Plan that is pertinent to a particular topic. Information pertinent to a particular topic should be consolidated into fewer places in the Basin Plan. Cross references, links, and a good index would help readers find information pertinent to a particular topic where such information is in different places in the Basin Plan.	Gen	Clarification
	Chapter 1. Introduction		
H-12	Update Table 1-1 “Population Projections….” The first year in the table is prior to the 1994 date of the Basin Plan; only one is a projection beyond the current date of 2010. Cite the source of population figures. Round off population figures. Add population projections for years beyond 2015. Add past population figures because past and projected population figures help explain the demands for and stresses on beneficial uses of waters in the region and the state as a whole and the need to protect and restore beneficial uses.	Intro	Update

H-13	Make the following changes to the Basin Plan Amendment Process section: (a) Change "A proposed standard revision to a statewide plan or…" to "A proposed revision of a standard in a statewide plan or…."; (b) Change "If the standard revision is disapproved…." to "If a proposed revision of a standard is disapproved…."; (c) In (12)(c): change "growth" to "outgrowth" (e.g., see (12)(b)); (d) In endnote 9 - identify the source of the definition (or simply say "BMPs are….").	Intro	Update
H-14	Revise and update Chapter 1 to reflect current conditions, priorities and regulations applicable to the San Diego Region.	Intro	Clarification
H-15	Update descriptions of the region, Hydrologic Units, and waters. Descriptions are out-of-date, incomplete, incorrect, and/or otherwise need improvement.	Intro	Clarification
H-16	Reword the section on function of the Basin Plan to remove the discussion of the Regional Board's goal to achieve balance between competing needs of mankind for water of varying quality. (p. 1-1)	Intro	Clarification
H-17	Add definitions for Ocean waters, Enclosed Bays and Estuaries, Coastal Lagoons.	Intro	Clarification
H-18	Identify wetlands as waters of the State.	Intro	Clarification
H-19	Include as a goal of the Basin Plan: preventing negative impacts to the Pacific Ocean from surface waters (e.g., trash)	Intro	Clarification
H-20	Acknowledge ocean acidification as a concern in the Basin Plan.	Intro	Clarification
H-21	Include a discussion of the threshhold the Basin Plan is trying to achieve, and the environmental indicators, regional benchmarks, and environmental results that indicate how each measure contributes to meeting the goals of the Basin Plan.	Intro	Clarification
H-22	Make sure the process for evaluation and ranking of projects during the Triennial Review is easily understood.	Intro	Clarification
	Chapter 2. Beneficial Uses		
H-23	Correct Table 2-2 (page 230) by changing POW to REC-2 in 903.11, 903.12, 903.13, 903.14, and 903.16. Hydropower Generation (POW) was mistakenly added instead of Non-contact Recreation (REC-2). This was a publishing error when the new electronic version was released. The older printed version of the Basin Plan (dated September 8, 1994) correctly shows REC-1 and REC-2 beneficial uses.	BU	Correction
H-24	Change "…the constitutional prohibition of waste and unreasonable waste of water." To "…the constitutional prohibition of waste and unreasonable use of water." The language in (6) under "Beneficial Use Designation under the Porter-Cologne Water Quality Control Act" (p.2-2) does not accurately reflect the state constitution.	BU	Correction
H-25	Correct spelling and names in Table 2.2 (seven changes).	BU	Correction
H-26	Identify/update beneficial uses associated with national wildlife refuges, state marine protected areas, ecological reserves, critical habitats, natural community conservation areas (MSCP, MHCP), and special status species (e.g., steelhead).	BU	Update
H-27	Identify/update beneficial uses associated with enclosed coastal waters.	BU	Update
H-28	Identify/update beneficial uses associated with areas where there is fishing (apply COMM and REC-1 to all areas where there is fishing).	BU	Update
H-29	Identify vernal pools as waters of the state and identify their beneficial uses.	BU	Update
H-30	Identify (a) drinking water supply reservoirs, (b) floodplains, and (c) ponds, lakes, and impoundments not used for drinking water that are waters of the state and identify their beneficial uses.	BU	Update

H-31	Incorporate recommendations of the State Water Board's California Shellfish Harvesting Workgroup: refine the definition of SHELL so that it protects recreational harvesting only, and protect commercial harvesting under related beneficial uses as appropriate (COMM, AQUA, and MARI). This refinement would support the San Diego Water Board's use of the Reference System and Antidegradation Approach for the SHELL beneficial uses in the context of future Bacteria TMDLs.	BU	Update
H-32	Rearrange list of bays and harbors and HSAs from North to South in Coastal Waters table.	BU	Format
H-33	Move Table 2-3 Beneficial Uses of Coastal Waters after the Beneficial Use tables for stream systems, reservoirs, and lakes, ponds, etc. and renumber accordingly.	BU	Format
H-34	List species by habitat in Table 2-1 (e.g., put the whales together) and change "habitat remarks" to "habitat."	BU	Format
H-35	Indicate, under the text for Ocean Waters, how far offshore waters of the state extend and from what line (MLLW, MHHW, or other)	BU	Clarification
H-36	Clarify the exceptions to the "Sources of Drinking Water" Policy. SWRCB Resolution No. 88-63 required all waters of the State to be designated with the MUN beneficial use unless they met certain criteria for an exception. The San Diego Water Board has identified these waters that are exempt from the MUN beneficial use with a + in the Basin Plan beneficial use tables. The Basin Plan states that although these waters are not protected for the MUN beneficial use and other associated water quality objectives, they are still protected under other beneficial uses and water quality objectives as well as the antidegradation policy and other environmental laws and regulations.	BU	Clarification
H-37	Clarify and improve the beneficial use designations for stream systems labeled Inland Surface Waters as follows: (A) add figure(s) / diagram(s) showing interconnections between main stream and tributaries and between HUs, HAs & HSAs, (B) add a table of alphabetically listed stream names in addition to the current table listed by HUs/HAs/HSAs, (C) consider deleting stream names and simply identifying beneficial uses by HAs, and (D) match nomenclature between map and tables.	BU	Clarification
H-38	Add, under the text for Inland Surface Waters, a subheading with the text for Reservoirs and Lakes since they are also inland surface waters and put text specific to streams under a new subheading of "Stream Systems." Also, change "PRO" to "PROC" in the text.	BU	Clarification
H-39	Under Coastal Waters, reorganize and add / revise text as needed to point out and clarify overlap between, common features of, and distinctions between stream mouths, estuaries, lagoons, enclosed bays, and harbors in the San Diego Region (e.g., based on tidal exchange, salinity, navigability of mouth, etc.; both bays are estuaries; not all estuaries are bays; all lagoons are estuaries; not all estuaries are lagoons, etc.). Add text saying that names are not necessarily descriptive and/or do not necessarily enable appropriate categorization. Clarify definition of Coastal Waters and what beneficial uses and objectives apply so it is clear that the Ocean Plan does not apply to San Diego Bay.	BU	Clarification

H-40	Under Enclosed Bays, change the title to “Enclosed Bays and Harbors” and revise text accordingly. Note that San Diego Bay and Mission Bay were natural bays (and natural estuaries) with extensive anthropogenic modifications. In contrast, Dana Point Harbor, Del Mar Boat Basin, and Oceanside Harbor are entirely anthropogenic and were not natural bays. Revise the description because “enclosed bays are indentations along the coast” is not a good description of bays in the San Diego Region. The text should also note that San Diego Bay and Mission Bay are also estuaries.	BU	Clarification
H-41	Under Estuaries, change to “Estuaries, Lagoons, and Stream Mouths.” Add text to note that San Diego Bay and Mission Bay are estuaries as well as enclosed bays. In the first paragraph, change “Estuaries means waters….” To “Estuaries are waters….” In the second paragraph, change “Beneficial uses for these coastal waters provide habitat for ….” To “These coastal waters provide habitat for….” In the second paragraph, change “Coastal waters in the San Diego Region have as many as fourteen designated beneficial uses.” To “Coastal waters in the San Diego Region have many beneficial uses.”	BU	Clarification
H-42	Under Reservoirs and Lakes, change heading to something more generic and make this a subsection of “Inland Surface Waters.” It now is a separated from “Inland Surface Waters” by “Coastal Waters.” Refer to drinking water supply reservoirs generically and by name as reservoirs, not lakes. Add text to include all types of “standing” fresh water bodies in the San Diego Region such as drinking water supply reservoirs, reservoirs not used for drinking water supply, other artificial impoundments, natural (or formerly natural) lakes and ponds, vernal pools, etc. Consider identifying primary sources of water for all drinking water reservoirs, including inter-reservoir water transfers.	BU	Clarification
H-43	Under Ground Waters, the fourth paragraph, first sentence is unclear. Reword for clarity.	BU	Clarification
H-44	Change the name from Mouth of San Diego River to San Diego River Estuary.	BU	Clarification
H-45	Change title of Table 2-2, Beneficial Uses of Inland Surface Waters, to “Beneficial Uses of Stream Systems.”	BU	Clarification
H-46	Clarify what the GWR beneficial uses means and to what kind of water(s) it applies.	BU	Clarification
H-47	Explain special protections for BIOL, if any.	BU	Clarification
H-48	Provide names of Hydrologic Unit for inland surface waters in Table 2-2.	BU	Clarification
	Chapter 3. Water Quality Objectives		
H-49	Correct the table under the discussion of percent sodium in the new electronic Basin Plan. It was copied incorrectly. Class III should say >70-75% instead of 0-75%.	WQO	Correction
H-50	Add the following text that was inadvertently omitted from the 1994 Basin Plan revisions: "Controllable water quality factors shall conform to the water quality objectives contained herein. When other factors result in the degradation of water quality beyond the levels or limits established herein as water quality objectives, then controllable factors shall not cause any degradation of water quality. Controllable water quality factors are those actions, conditions, or circumstances resulting from man's activities that may influence the quality of the waters of the State and that may be reasonably controlled."	WQO	Correction

H-51	Update Maximum Contaminant Levels (MCLs).	WQO	Update
H-52	Update Chapter 3 to conform with drinking water regulations contained in the updated Title 22.	WQO	Update
H-53	Reorganize Designated Water Quality Objectives into the following sections:1) General Antidegradation Objective, 2) Ocean Waters, 3) Other Coastal Waters (Harbors, Enclosed Bays, Lagoons, Estuaries, and Stream Mouths), 4) Inland Surface Waters, and 5) Ground Waters.	WQO	Format
H-54	Make the actual objectives stand out more clearly from discussions of the parameters. Consider putting such discussions in a separate section from the actual objectives.	WQO	Format
H-55	Change the title of Table 3-2 to “Numerical Water Quality Objectives for Inland Surface Waters” and make sure all the objectives are in the table.	WQO	Format
H-56	Change the title of Table 3-3 to “Numerical Water Quality Objectives for Ground Waters” and make sure all the objectives are in the table.	WQO	Format
H-57	Add a table entitled “Numerical Water Quality Objectives for Coastal Waters” and make sure all the objectives are in the table.	WQO	Format
H-58	Move Tables 3-2 and 3-3 to the end of the chapter. The tables are currently in the middle of the text.	WQO	Format
H-59	Reword the WQO for pH in inland surface waters, enclosed bays and estuaries; reword for clarity like the pH objective for ocean waters.	WQO	Clarification
H-60	Change “nor” to “or” in the WQO for radioactivity.	WQO	Clarification
H-61	Change “Waters shall not contain suspended and settleable solids….” to “Waters shall not contain suspended or settleable solids….” in the WQO for suspended and settleable solids.	WQO	Clarification
H-62	Reword the biostimulatory substance WQO for clarity. Define standing or flowing body (this is a point of ambiguity in lagoons). Replace phrases like "desired goal" and "appears to be" with more definitive language.	WQO	Clarification
H-63	Clarify how the WQO for dissolved oxygen (DO) applies to inland surface water and enclosed bays and estuaries. The existing WQO for DO appears to apply only to inland surface waters. It is ambiguous regarding enclosed coastal waters like San Diego Bay, Agua Hedionda, etc.	WQO	Clarification
H-64	Clarify the application and implementation of the toxicity WQO, particularly with regard to numeric effluent limits.	WQO	Clarification
H-65	Change the subtitles for the last three sections in Chapter 3 - they are confusing.	WQO	Clarification
H-66	Review the WQO for indicator bacteria and clarify which objectives apply to which receiving waters and under what conditions, and how compliance will be determined.	WQO	Clarification
H-67	Clarify the bacteria objectives: standardize terms (i.e., log mean, average, median, coliform/total coliform); clarify number of samples needed to calculate a 30-day objective; clarify whether the E.coli and Enterococcus values are objectives or guidance; define "Steady State" and "Maximum" for the E.coli and Enterococcus values; clarify that the WQO for Bays and Estuaries is a "total" coliform objective, and that it is to support recreation.	WQO	Clarification
H-68	Clarify WQO for nitrate (45, 10, 5 mg/l). Determine if nitrate objective should be expressed as nitrite, total nitrogen, nitrate or combination of the three.	WQO	Clarification
H-69	Reference California Toxics Rule (CTR) and include explanatory language.	WQO	Clarification

	Chapter 4. Implementation		
H-70	Add missing parenthesis under National Pollutant Discharge Elimination System. It should read ("NPDES requirements" or "NPDES permits"). (p.4-8)	Imp	Correction
H-71	Add several lines of text that were accidentally dropped from the Community Sewerage Systems section (page 4-30). The last sentence doesn't make sense because it contains fragments of two sentences. The last sentence should read: "(1) serve dwellings involving more than five family units in a single project or (2) dispose of domestic waste from commercial or industrial projects with a design flow of more than 1200 gallons per day. The deferral will apply if the project proponent demonstrates to the satisfaction of the appropriate county health officers that the following conditions are met:"	Imp	Correction
H-72	Review/incorporate the "Salt/Nutrient Management Plan" for each groundwater basin in the region. The plans are currently under development by stakeholders pursuant to the State Water Board's Recycled Water Policy. The policy requires stakeholders to submit the plans to the Regional Board by May 14, 2014 (two-year extension possible). The policy requires the Regional Board to review the plans and, within one year of receipt of a plan, consider for adoption revised implementation plans for basins where WQOs for salts or nutrients are not met, or are threatening to not be met. Link to State Water Board Recycled Water Policy: http://www.waterboards.ca.gov/water_issues/programs/water_recycling_policy/docs/recycledwaterpolicy_approved.pdf	Imp	Mandatory
H-73	Revise Table 4-6 of the Basin Plan to include current water reclamation projects or remove table since projects keep changing.	Imp	Update
H-74	Change the name of the SLIC (Spills, Leaks, Investigation, and Cleanup) Program to the SCP (Site Cleanup Program). The Site Cleanup Program (SCP) name should replace the Spills, Leaks, Investigation, and Cleanup (SLIC) name throughout the Basin Plan.	Imp	Update
H-75	Ensure that references to the general NPDES permits that regulate discharges of extracted groundwater to surface waters is for the current general NPDES Permits in effect: (a) Order No. R9-2007-0034, CAG919001 for discharges of groundwater to San Diego Bay (b) Order No. R9-2008-0002, CAG919002 for discharges of groundwater to surface waters in Region 9, except for San Diego Bay.	Imp	Update
H-76	Update the Cleanup and Abatement Policy to reflect new laws concerning options (e.g., brownfields, electronic reporting).	Imp	Update
H-77	Update Basin Plan with State Water Board's Onsite Wastewater Treatment Systems Policy.	Imp	Update
H-78	Update Basin Plan with State Water Board's Recycled Water Policy, and revise reclamation sections to reflect the new policy.	Imp	Update
H-79	Update Basin Plan text on nonpoint source regulation to reflect the State Water Board's NPS control policy.	Imp	Update
H-80	Move the WDR waivers in a separate document and have the Basin Plan refer to that document. This would avoid the need for a Basin Plan amendment with each 5-year waiver update.	Imp	Format
H-81	Put the discharge prohibitions in a separate chapter for ease of reference.	Imp	Format
H-82	Add introductory text to Chapter 4 to accommodate incorporation of TMDLs into the Basin Plan.	Imp	Clarification

H-83	Update Basin Plan text to reflect the current requirements outlined in the recently modified NPDES municipal storm water permits (MS4 permits). Existing Basin Plan text must be expanded to make clear that MS4 permits require dischargers to meet water quality standards in addition to reducing pollutants to the maximum extent practicable.	Imp	Clarification
H-84	Update language regarding the NPDES construction storm water program to clarify recent permit changes and provide new information on current Phase II regulations.	Imp	Clarification
H-85	Update Basin Plan section on Dairies to reflect the 2008 USEPA final Concentrated Animal Feeding Operation (CAFO) Regulations.	Imp	Clarification
H-86	Update and revise Basin Plan text pertaining to the Discharges of Waste to Land to reflect new regulations under Title 27, California Code of Regulations.	Imp	Clarification
H-87	Clarify language in Chapter 4 that incorrectly refers to waste discharge requirements (WDRs) as "permits." Correct language that refers to discharges as being "authorized" by a WDR.	Imp	Clarification
H-88	Update the discussion of Steam Electric Power Plants. The text should mention discharges of chlorine. Chlorine is used as a biocide that power plants use to kill marine organisms in the cooling water piping and is released to the marine environment.	Imp	Clarification
H-89	Improve public noticing for Chapter 4 TMDL language (better noticing for public review and comment).	Imp	Clarification
H-90	Re-evaluate and update the marina information in Chapter 4 in light of the Regional Harbor Monitoring Program and the statewide General Marina Permit.	Imp	Clarification
H-91	In the section on Marinas, the first paragraph after bullets is unclear. Reword this section for clarity. (p. 4-49)	Imp	Clarification
H-92	The section on Marinas should mention anti-fouling paint (as mentioned under the sections on Vessels and Boatyards). Alternatively, the section on vessels and marinas could be reorganized. (p. 4-49 & following)	Imp	Clarification
H-93	Provide some indication of needs / visions / goals / plans / rationale / directions / steps for San Diego Water Board actions in the future. Some of the text in this chapter seems to simply describe what the San Diego Water Board has done / is doing without explanation or justification. (e.g., see p. 4-80 “No Numeric Effluent Limits”)	Imp	Clarification
H-94	Rework TMDL section and text.	Imp	Clarification
H-95	Include new sections on: (a) Regional Priorities and how they shape work activities, (b) Link between land use decisions and water quality consequences, (c) Need to educate local agencies on this link and hold agencies responsible, (d) Need to protect physical and biological integrity of water resources in addition to chemical.	Imp	Clarification
H-96	Add a discussion to emphasize protection of beneficial uses, not just protection of water quality.	Imp	Clarification
H-97	Update the text to reflect implementation of Federal storm water regulations.	Imp	Clarification
H-98	Identify fish farming in coastal waters as an activity with impacts to marine life and address the regulation of pollutants generated. [Large-scale fish farms in coastal waters have been proposed.]	Imp	Clarification
H-99	Identify seawater desalination plants as sources of industrial waste (e.g., Table 4-2).	Imp	Clarification
H-100	Clarify when and where ground water assimilative capacity and surface water mixing zones are applied	Imp	Clarification

H-101	Clarify that dilution credits and mixing zones are not applicable at this time. San Diego Bay does not have adequate flushing and many WQOs are not being achieved, and there is no assimilative capacity for certain constituents.	Imp	Clarification
H-102	Incorporate the Regional Board's Watershed Management Chapter in the Basin Plan.	Imp	Clarification
H-103	Update the Sediment and Erosion Policy to include guidance on turbidity. The existing Basin Plan does not address how turbidity standards are implemented and enforced. Also, remove outdated information no longer relevant with the implementation of the Federal storm water regulations.	Imp	Clarification
H-104	Include a reference to the USEPA Whole Effluent Toxicity (WET) test protocol.	Imp	Clarification
H-105	Add text to recognize emerging pollutants, their threats, and how we'll regulate them.	Imp	Clarification
	Chapter 5. Plans and Policies		
H-106	Update Basin Plan to include State Water Board adopted plans and policies with associated text, and Regional Board adopted resolutions as appropriate.	P+P	Update
H-107	Add a list of Basin Plan amendments with resolution numbers.	P+P	Update
H-108	In Ch 5 under Ocean Plan...Pg 5-9 last sentence in first paragraph says: "OP applies to all point source discharges to the ocean...." It should be corrected to say: "OP applies to all point and nonpoint source discharges...." This is the latest per the (recently OAL approved) 2009 Amendments to Ocean Plan.	P+P	Update
H-109	Change the Basin Plan wording to more accurately reflect the Enclosed Bays and Estuaries Policy wording. The Basin Plan says "The policy lists principles of management that include the State Water Board's desire to phase out all discharges of municipal wastewaters and industrial process waters (exclusive of cooling waters) to enclosed bays and estuaries as soon as practicable." The Bays and Estuaries Policy says "It is the policy of the State Board that the discharge of municipal wastewaters and industrial process waters (exclusive of cooling waste discharges) to enclosed bays and estuaries, other than the San Francisco Bay-Delta system, shall be phased out at the earliest practicable date. Exceptions to this provision may be granted by a Regional Board only when the Regional Board finds that the wastewater in question would consistently be treated and discharged in such a manner that it would enhance the quality of receiving waters above that which would occur in the absence of the discharge."	P+P	Update
	Chapter 6. Surveillance, Monitoring and Assessment		
H-110	Consolidate and supplement text in the Surveillance, Monitoring and Assessment chapter. Include the need for a comprehensive, coordinated, and cost effective regional integrated monitoring and reporting, including ambient and compliance monitoring and reporting.	Mon	Clarification
H-111	Reevaluate regulatory programs and priorities based on ambient monitoring and reporting results.	Mon	Clarification
H-112	Add agency performance standards linked to ambient monitoring and reporting results.	Mon	Clarification
H-113	Add a discussion on the need to monitor deep ground water basins.	Mon	Clarification
H-114	Add text to describe the Surface Water Ambient Monitoring Program (SWAMP).	Mon	Clarification

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Attachment 3
TRAC Member List and 'Purpose' Handout

Triennial Review Advisory Committee (TRAC)
2011 Member List

	Name	Organization
1	Adriany, John	San Diego Port Tenants Association
2	Beresford, John (John Parada)	La Jolla Band of Luiseno Indians
3	Brown, Gary	San Diego City/County Management Assoc.
4	Carr, Amanda	County of Orange
5	Crooks, Jeff	National Oceanic Atmospheric Administration
6	Dawson, Clark	EverFlow Resources, Inc
7	Doyle, Kelly	Rick Engineering
8	Driscoll, Jan (Dan Johnson)	Industrial Environmental Association
9	Foley, Mary Jane	Municipal Water District of Orange County
10	Gordon, Brian	US Navy
11	Hagerty, Shawn	City of Santee
12	Holman, Karen (David Merk)	Port of San Diego
13	Hutsel, Rob	San Diego River Park Foundation
14	Jungreis, Jeremy (Khalique Khan)	US Marine Corps Base Camp Pendleton
15	Kolb, Ruth	City of San Diego - Storm Water
16	Kovecses, Jen	San Diego Coastkeeper
17	Larson, Eric	San Diego County Farm Bureau
18	Lin, Cindy	US Environmental Protection Agency
19	Louck, Perry	Upper Santa Margarita River IRWM
20	McKirnan, Dan (Art Coe)	Environmental Health Coalition
21	McPherson, Sheri (Cathy Pieroni)	San Diego IRWM
22	Meyer, Steve	City of San Diego - Wastewater
23	Pappas, Johnny	San Diego Surfrider
24	Pasek, Jeff	City of San Diego - Water Supply
35	Peugh, Jim	San Diego Audubon
36	Phillips, Clay	City of Escondido
37	Purohit, Joe	Ecolayers
38	Rosales, Tom	South Orange County Wastewater Authority
39	Roy, Toby	San Diego County Water Authority
30	Schiff, Ken	So. Cal. Coastal Water Research Project
31	Schmidt, Martin	Environs
32	Shetler, Mike	County of Riverside
33	Snyder, Todd	County of San Diego
34	Thoms, Marilyn	Orange County IRWM
35	Trimble, Kent	San Diego Regional Chamber of Commerce
36	Uhley, Jason (Amy McNeill)	Riv. Co. Flood Control & Water Conservation Dist.
37	Umphries, Mark	Helix Water District

Triennial Review Advisory Committee (TRAC)
Purpose, Role and Reminders[6]

California Regional Water Quality Control Board, San Diego Region
(San Diego Water Board)

Purpose of the TRAC

- To enhance public participation by involving stakeholder representatives in prioritization of suggested changes to the Basin Plan.

Role of the TRAC

- TRAC members will prioritize suggested changes to the Basin Plan, with the aim of identifying the few that are most important to pursue over the next three years. The Board will be informed of the outcome of the TRAC prioritization effort.

- San Diego Water Board staff will consider the outcome of the TRAC effort in preparing a recommended short list of priority suggestions to release for formal public comment and, ultimately, to present to the Board to consider for adoption.

Friendly Reminders

- Please keep in mind that the TRAC process is new and somewhat experimental.

- Please attend the scheduled meetings or send an informed alternate if you must miss a meeting. The TRAC process will entail two or three facilitated meetings over the next two months. Participation is limited to TRAC members and alternates.

- Please prioritize suggestions using the summaries provided by San Diego Water Board staff and understand that the TRAC process is not intended to include in-depth description or discussion of specific suggestions.

- Please complete the 'homework' in the time and manner requested by Water Board staff; the TRAC process must be completed quickly.

- Please use common courtesy, respect differing perspectives, be patient, and give everyone the opportunity to participate.

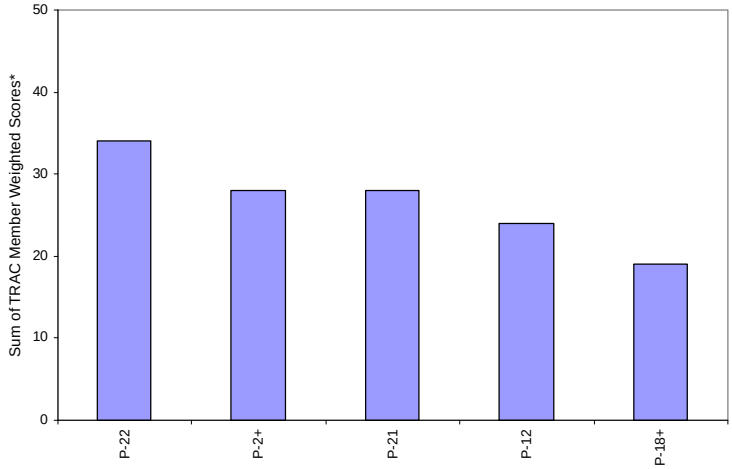
- Please know that the San Diego Water Board greatly appreciates your interest in the Basin Plan review and your willingness to serve on the TRAC. Thank you!

[6] Handout provided to TRAC members at the first meeting.

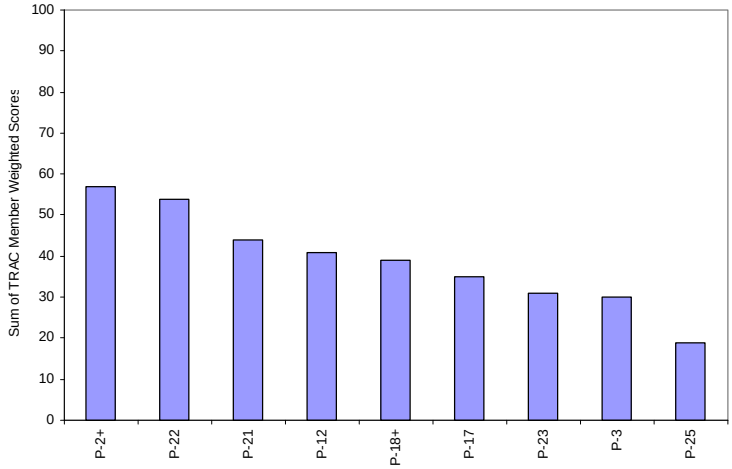
Attachment 4
TRAC Process Overview

A. Graphic overview of Steps 1-3 for the P category. [7]

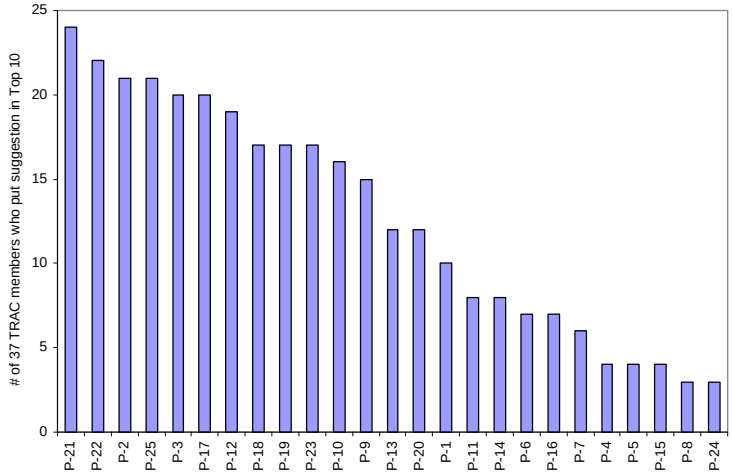
Step 3



Step 2



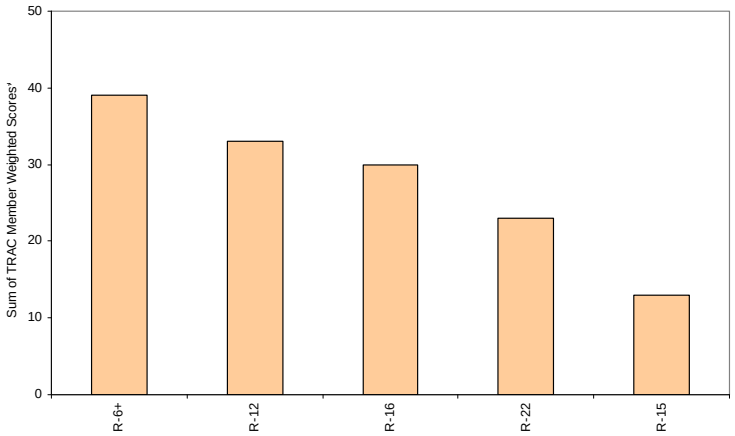
Step 1



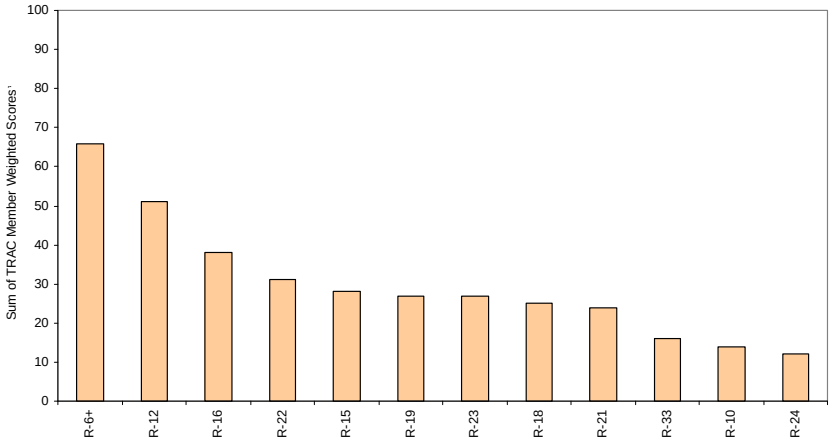
[7] P suggestions are generally intended to make the Basin Plan more "protective." Suggestion numbers correspond to those in Attachment 2.

B. Graphic overview of Steps 1-3 for the R category.[8]

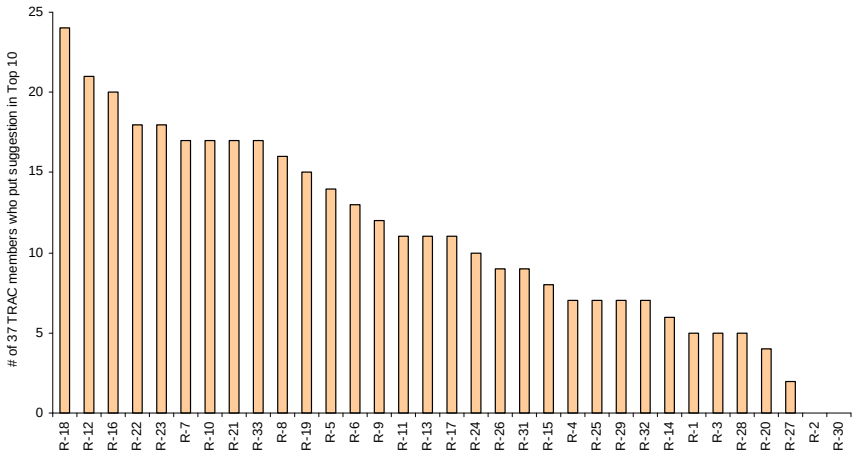
Step 3



Step 2



Step 1



[8] R suggestions are generally intended to make the Basin Plan more "reasonable." Suggestion numbers correspond to those in Attachment 2.

C. Summary of Steps 1-3

The Triennial Review Advisory Committee (TRAC) developed an ordered list for the top five suggestions in the P and R categories as described below.

Step 1 - Top 10 selections

- At the first meeting, staff provided unprioritized P and R lists, and asked that each TRAC member independently select 10 suggestions from each that he/she considers most important for the San Diego Water Board to address in the near future.[9]
- Members had two weeks before submitting their top 10 lists (with selections in no particular order) to staff via email. Staff compiled the selections and sent the compilations to members prior to the second meeting.
- The Step 1 results gauged interest in the 25 P and 33 R suggestions, and provided the basis for Step 2.

Step 2 - Top 5 selections

- At the second meeting, the TRAC chose to
  - combine some related suggestions;
  - cut the P list from 25 to 9 suggestions,
  - cut the R list from 33 to 12 suggestions, and, as the next step
  - have each member select a top 5, in order of preference, from each shortened list.
- Members had one week before submitting their top 5 lists (with selections in order of preference) to staff via email.[10] Staff compiled the selections using weighted scores to account for order of preference, and sent the compilations to members prior to the third meeting.
- The Step 2 results provided the basis for Step 3.

Step 3 - Top 3

- At the final meeting, the TRAC chose to
  - cut the shortened P list further, from 9 to 5 suggestions,
  - cut the shortened R list further, from 12 to 5 suggestions, and
  - have each member select a top 3, in order of preference, from each shortened list.
- Members in attendance gave their selections (with selections in order of preference) to staff before leaving. Staff compiled the selections, again using weighted scores to account for order of preference, and sent the compilations to TRAC members.
- The Step 3 results served as TRAC's final ordering of the top five P and R suggestions.

[9] The suggestion lists provided to the TRAC differ slightly to those in Attachment 2 of this staff report (the latter has fewer columns and provides suggestion sources). Lists provided to the TRAC are available at: http://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/tri_review.shtml

[10] Because some TRAC members requested more information about the suggestions, staff provided the group with more detailed information about the 9 P and 12 R suggestions being considered in Step 2; staff provided the full text and suggestion descriptions as submitted to the San Diego Water Board by the public and/or staff.

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Attachment 5
TRAC Results

The TRAC's ordered list for the top five suggestions in the P and R categories. Note that (a) some suggestions were combined by the TRAC during the prioritization process, as indicated by multiple suggestion numbers in parentheses[11], and (b) two items in Category P were 'tied' for rank 2

Category P[12]

1	Dry Weather Discharge Policy (P-22)
2 (tied)	MUN in Select Areas (P-1 and P-2)
2 (tied)	Lagoon Mouth Opening Policy (P-21)
4	Water Quality Objective for Trash (P-12)
5	Mitigation Guidance (P-18 and P-19)

Category R[13]

1	REC-1 Refinements (R-6, R-7, R-8, and R-9)
2	Seasonal Variation Water Quality Objectives (R-12)
3	Nutrient Water Quality Objectives in Surface Water (R-16)
4	Indirect Potable Reuse and Municipal Reservoirs (R-22)
5	Site Specific Objectives in Metals (R-15)

[11] Suggestion numbers correspond to those in **Attachment 2**.
[12] P suggestions are generally intended to make the Basin Plan more "protective."
[13] R suggestions are generally intended to make the Basin Plan more "reasonable."

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Attachment 6
How the Short List Includes the TRAC Results

Category P[14]

TRAC Result		On short list as	
Suggestion	TRAC Rank	Tier	Proposed work level
Dry Weather Discharge Policy (P-22)	1	1	Major work item; an element of the Comprehensive Policy for Streams, Wetlands & Riparian Areas
MUN in Select Areas (P-1 and P-2)	2	2	To work on if resources allow
Lagoon Mouth Opening Policy (P-21)	2	1	Major work item; an element of the Comprehensive Policy for Streams, Wetlands & Riparian Areas
Water Quality Objective for Trash (P-12)	4	1	Minor work item; related to a State Board effort
Mitigation Guidance (P-18 and P-19)	5	1	Major work item; elements of the Comprehensive Policy for Streams, Wetlands & Riparian Areas and related to a State Board effort

Category R[15]

TRAC Result		On short list as	
Suggestion	TRAC Rank	Tier	Proposed work level
REC-1 Refinements (R-6, R-7, R-8, and R-9)	1	1	Major work item; elements of Refinements to the Contact Water Recreation Beneficial Use
Seasonal Variation Water Quality Objectives (R-12)	2	2	To work on if resources allow
Nutrient Water Quality Objectives in Surface Water (R-16)	3	1	Minor work item; related to a State Board effort
Indirect Potable Reuse and Municipal Reservoirs (R-22)	4	2	To work on if resources allow
Site Specific Objectives in Metals (R-15)	5	2	To work on if resources allow

[14] P suggestions are generally intended to make the Basin Plan more "protective."
[15] R suggestions are generally intended to make the Basin Plan more "reasonable."