

Water Quality Control Plan for the San Diego Basin – Triennial Review

Marine Corps Base Camp Pendleton Comments

Issue 1: Biological Objectives for Water Bodies in the San Diego Region

The goal of developing biological objectives for the attainment of beneficial uses of inland surface waters (perennial, wadeable streams) is a worthy cause. Establishing a general narrative objective such as “Waters of the State shall be of sufficient quality to support native aquatic species without detrimental changes in the resident biological communities” is a good overall objective. This objective would need to be supported by appropriate biological metrics. It is difficult to provide comments on the biological objectives approach at this time because the San Diego Water Board has provided no specific proposal for biological metrics.

The use of actual biological metrics may be superior to chemistry based metrics when making decisions on impairments. However, it is clear from review of background information and current science that we need a better understanding of the biological relationships to water quality, and more robust science, in order to establish numerical measures by which to interpret the narrative objective. These bioassessment measures and metrics for assessing attainment of aquatic life beneficial uses must be clear, objective, reasonable, and proven for the San Diego region to be of widespread and useful application.

Another issue is if there will be biological objectives in addition to chemical objectives. This would increase the regulatory burden on, and cost of compliance to, the regulated community. If, however, biological objectives were to replace TMDLs as the primary tool for maintaining the health of surface waters, this may be a reasonable trade off.

Like most environmental metrics, there are clear cases of both excellent and highly degraded biological systems. The majority of wadeable streams likely fall into a middle ground where thresholds are not so clear. The CEQA scoping document outlines three options for implementation and perhaps the San Diego Water Board should follow a modified Option 2 for now "Adopt biological objectives for protecting high quality streams and preventing further degradation of degraded streams" where the modification should be to focus first on ensuring protection of high quality streams (limit future discharges, surrounding growth, etc.) and then second, work to fix clearly degraded streams. In the meantime, data collection can continue on those streams in the middle to evaluate stressors and potential thresholds. These data can eventually be used to mitigate impairments and inform the San Diego Water Board and stakeholders what steps might help improve a situation.