

California Regional Water Quality Control Board
San Diego Region

2018 Triennial Review of the
Water Quality Control Plan for the San Diego Basin
Draft Staff Report and Prioritized List

For Public Review and Comment

June 22, 2018



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Introduction

The *Water Quality Control Plan for the San Diego Basin* (Basin Plan) designates beneficial uses for water bodies in the San Diego Region and establishes water quality objectives and implementation plans to protect those beneficial uses. State and federal laws require periodic review of the Basin Plan.¹ Because federal law requires review every three years, the Basin Plan review is also referred to as the “triennial review.”

The purpose of this document is to communicate and provide discussion for feedback from the public on the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) triennial review process and on the San Diego Water Board’s highest priority basin planning issues to be pursued in the next three years.

The purpose of the triennial review is to identify necessary updates and revisions to water quality standards and other elements of the Basin Plan. The triennial review assists the San Diego Water Board identify priority issues that may be addressed through subsequent Basin Plan amendment projects. It also reaffirms those portions of the Basin Plan where no potential changes are identified. The result of the triennial review is a prioritized list of projects that will be investigated further and, where appropriate, addressed through the adoption of Basin Plan amendments.

The San Diego Water Board initiated its 2018 triennial review of the Basin Plan (Triennial Review) on [March 23, 2018](#) by opening a 54-day public solicitation period and a workshop notice. The San Diego Water Board prepared a preliminary list of proposed Basin Plan projects for consideration in the 2018 Triennial Review and invited the public to comment on the preliminary list and to submit their own ideas for potential basin planning projects. A public workshop was held on May 9, 2018, where interested stakeholders had the opportunity to provide comments during the workshop. Written comments that were received during the comment period were considered in drafting the prioritized list included at the end of this document.

¹ State law requires basin plans to be periodically reviewed [Water Code §13240]. Federal law requires water quality standards to be reviewed every three years [Clean Water Act §303(c)(1)].

This draft prioritized list will be available to the public for a 45-day comment period beginning in late June 2018. A response to comments document will be prepared to address written comments received during the second comment period. To conclude the Triennial Review, a hearing will be held in the fall of 2018 to consider adoption of a final prioritized list. The priority projects list represents the San Diego Water Board's most important basin planning issues that also support the goals of the San Diego Water Board's [Practical Vision](#). The adopted prioritized list will guide basin planning work over the next three years.

The Porter-Cologne Water Quality Control Act requires water quality control plans, such as the Basin Plan, be both protective and reasonable.² Thus, the preliminary projects are categorized as focusing on the following three areas:

- **Protection (P)**
P projects are intended to make the Basin Plan more protective of water quality and/or beneficial uses.
- **Reasonableness (R)**
R projects are intended to make the Basin Plan goals more reasonable or attainable while being protective.
- **Housekeeping (H)**
H projects are mainly editorial in nature intended to make clarifications, updates, and corrections to the Basin Plan where necessary. The H category also includes some obligatory Basin Plan updates triggered by State or federal actions. H category changes have no regulatory effect and do not impose new requirements on the regulated community.

San Diego Water Board Practical Vision – Healthy Waters, Healthy People

The Practical Vision is a strategy adopted in 2013 that focuses the San Diego Water Board's limited resources to achieve our region's highest priorities and goals for healthy waters over a seven-year period. The Practical Vision furthers our agency's mission to protect, enhance and restore the quality of California waters in the San Diego Region so that our communities can use and enjoy these waters. It sets a plan to achieve healthy waters through collaboration, reliance on the latest science, prioritization of issues and actions, and prudent use of our authorities in service to the people of California.

² [Water Code §13241](#)

The Practical Vision identifies critical factors necessary to achieve healthy waters throughout the San Diego Region using our core values of leadership, stewardship, communication, and transparency. The San Diego Water Board will prioritize Basin Plan amendment projects that align with our values and the Practical Vision.

Each of the proposed project descriptions indicate which of the Practical Vision chapter(s) that it supports. Additional information on the San Diego Water Board's Practical Vision can be found at:

http://www.waterboards.ca.gov/sandiego/water_issues/Practical_Vision.

Basin Plan Triennial Review Process

Federal law³ requires a review of water quality standards at least once every three years. Water quality standards consist of beneficial use designations, water quality criteria (referred to as water quality objectives in California) necessary to protect those uses, and an anti-degradation policy. In addition, State law⁴ requires Basin Plans be periodically reviewed and revised if necessary. The last Basin Plan Triennial Review was conducted in [2014](#).

The 2018 Basin Plan Triennial Review process includes a [preliminary issues report](#), [public workshop](#), comment period, and a public hearing. To formally conclude its Basin Plan review, the San Diego Water Board must adopt a resolution approving the review and a prioritized list of Basin Plan projects. Placing a project on the priority list will prompt San Diego Water Board staff to investigate the need and appropriateness for a Basin Plan amendment to meet agency goals. Depending on the outcome of the investigation, a Basin Plan amendment may or may not be developed and adopted.

The San Diego Water Board is allocated limited personnel years (PYs)⁵ annually to administer the Basin Plan program, which includes implementing Triennial Review projects. The current projection for available staff resources to implement the 2018 triennial review projects is two (2) PYs per year.

³ [Clean Water Act §303\(c\)\(1\)](#)

⁴ [California Water Code §13240](#)

⁵ A personnel-year (PY) is equivalent to one staff member working full time for one year.

Prioritized List for 2018 Triennial Review

The San Diego Water Board has prepared the following draft prioritized list of projects for consideration in the 2018 Triennial Review. In developing this list, staff considered projects identified in the 2013 Practical Vision, projects identified on the preliminary list for the 2018 Basin Plan Triennial Review, public input, projects that address challenges, obstacles, or opportunities arising since the 2014 review, and the following criteria:

- Protection and Restoration – The project advances the mission of protecting and restoring healthy waters in the San Diego Region.
- Reasonable and Efficient – The Water Board has or can leverage resources (e.g., expertise, technology, and data) that are able to achieve the project goals within the timeframe. The project advances the San Diego Water Board's goal of ensuring limited resources are put to the best possible use.
- Community Involvement – The project is of high public interest and is appropriately addressed through a Basin Plan amendment.

The draft prioritized list represents water quality issues that are important to the San Diego Water Board and are consistent with the Practical Vision.

Project 1: Tijuana River Valley Water Quality Restoration

Type of Action:

Develop Total Daily Maximum Loads (TMDLs) with implementation plans for REC-1 and solid waste.

Category:

Protective.

Staff Recommendation:

Develop TMDLs to restore impaired waters in the Tijuana River Valley.

Discussion:

The proposed project is to advance the restoration of and maintain the chemical, physical, and biological integrity of the Tijuana River and coastal waters of the San Diego Region. The goal is to develop TMDLs to address solid waste and the impairments of contact recreation or REC-1 beneficial uses. The TMDL development process includes establishing a stakeholder group, technical analyses to identify numeric targets, pollutant load reductions, and evaluation of potential management actions. Although the Tijuana River and its estuary are impaired for many pollutants, implementation plans focused on solid waste and protecting REC-1 beneficial uses are likely to also address many other pollutants. The primary focus will be elimination of human waste and human health risks to those working or living in or near the stream banks.

Practical Vision:

- Chapter 1 – [Strategizing for Healthy Waters](#)
- Chapter 2 – [Monitoring and Assessment](#)
- Chapter 3 – [Recovery of Stream, Wetlands, and Riparian Systems](#)
- Chapter 4 – [Proactive Public Outreach and Communication](#)
- Chapter 5 – [Strategy for Achieving a Sustainable Local Water Supply](#)

Project 2: Biological Objectives for Water Bodies in the San Diego Region

Type of Action:

Review Water Quality Objectives and Implementation/Policy.

Category:

Protective and Reasonable.

Staff Recommendation:

Continue to develop targeted biological water quality objectives for the attainment of beneficial uses of surface waters.

Discussion:

The initial phase of this 2018 Triennial Review project will complete the 2014 Triennial Review priority project to develop biological objectives for perennial streams, and then develop a second phase to identify additional water body types for which available science would support biological objectives.

The San Diego Water Board released an administrative draft technical report and proposed Basin Plan amendment to incorporate biological objectives for perennial streams in January 2018 and held a public workshop on February 14, 2018. A formal public comment period, external peer review, and a public hearing are tentatively scheduled to occur between July and December 2018. Additional necessary actions for the 2018 Triennial Review project include approvals from the State Water Resources Control Board, Office of Administrative Law, and United States Environmental Protection Agency.

The focus of the second phase of the 2018 project will be to evaluate the latest science and develop appropriate metrics to measure the integrity of highly intermittent and ephemeral streams.

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- Chapter 5 – [Strategy for Achieving a Sustainable Local Water Supply](#)

Project 3: Contact Water Recreation (REC-1) Water Quality Objectives

Type of Action:

Review Water Quality Objectives and/or Implementation Plan.

Category:

Protective and Reasonable.

Staff Recommendation:

Pursue recommendations from the 2014 Triennial Review project to improve evaluation, protection, and restoration of the REC-1 beneficial use.

Discussion:

The goals of the REC-1 project will focus on continued prioritization of REC-1 impairments and threats by addressing human sources of fecal contamination. Staff will continue to work collaboratively with the stakeholder group, evaluate and revise existing permits (as appropriate), and update and/or participate in monitoring and assessment programs to implement the latest scientific advancements to identify specific pathogen indicators and measurement methodologies.

Potential action items for this Triennial Review cycle that may require a Basin Plan amendment include editorial changes to the bacteria section in Chapter 3 of the Basin Plan to update listed impaired shoreline segments, and to make language consistent with statewide criteria for bacteria once the State Water Resources Control Board has updated the Water Quality Control Plans for Inland Surface Waters, Enclosed Bays and Estuaries of California, and for Ocean Waters of California. Additional revisions may include updates to existing TMDLs in response to the State Water Board's action, consideration of improved local implementation actions, evaluation of the reference condition approach, and/or improved scientific advances regarding indicators or conditions.

Practical Vision:

- Chapter 1 – [Strategizing for Healthy Waters](#)
- Chapter 2 – [Monitoring and Assessment](#)
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- Chapter 5 – [Strategy for Achieving a Sustainable Local Water Supply](#)

Project 4: Climate Change Readiness: Sustainable Local Water Supply

Type of Action:

Review Beneficial Uses, Water Quality Objectives, Implementation Plans/Policies.

Category:

Protective and Reasonable.

Staff Recommendation:

Evaluate and possibly revise water quality objectives (WQOs) for Total Dissolved Solids (TDS) in specific groundwater basins for continuing and expanding recycled water uses.

Discussion:

The San Diego Water Board's Practical Vision goal of supporting a sustainable local water supply through local use of recycled water can offset periods of drought brought on by climate change. Consequently, one of the Board's top climate change goals is to increase local water supply via effective water conservation and enhanced water recycling. Unreasonably stringent WQOs for TDS can hinder the expansion of recycled water use due to high costs associated with treatments used to remove salts.

The proposed project is to evaluate and possibly revise WQOs for TDS in specific groundwater basins to continue and expand recycled water use. The proposed project may evaluate data provided by the South Orange County Wastewater Authority (SOCWA) to raise the groundwater WQOs for TDS in the Upper and Middle Trabuco, and Middle San Juan hydrologic subareas. Other potential revisions include updates to the Recycled Water (Water Reclamation) requirements in the Basin Plan. For San Diego County, the San Diego Water Board previously endorsed the concept in at least 19 specific basins, described in the "[Guidelines for Salinity / Nutrient Planning in the San Diego Region](#)" ([Resolution No. R9-2010-0125](#)) on [November 10, 2010](#). Other potential Basin Plan issues to be reviewed related to recycled water include the applicability of beneficial uses and water quality objectives in reservoirs. This may lead to development of recommendations for the safe storage of recycled water in reservoirs.

San Diego Water Board staff resources available to evaluate this project are extremely limited and are not expected to be sufficient to lead and complete this project within the next three years. A collaborative approach with SOCWA and the San Diego County Water Authority will be sought to leverage resources before this project advances.

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- Chapter 1 – [Strategizing for Healthy Waters](#)
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Project 5: Clean Water Act Section 304(a) Criteria Recommendations

Type of Action:

Review Water Quality Objectives.

Category:

Protective and Reasonable.

Staff Recommendation:

Evaluate USEPA recommended water quality criteria and identify any necessary revisions to the Basin Plan.

Discussion:

USEPA provides guidance for States to establish water quality standards for controlling discharges of pollutants into waters of the U.S. The result is a compilation of national recommended water quality criteria for the protection of aquatic life and human health for pollutants in waters of the U.S. Revisions to the federal regulations⁶ require that States consider updating water quality standards with new or updated recommended criteria published by USEPA. However, States are not required to adopt new or updated criteria into water quality control plans such as the Basin Plan. If water quality standards are not updated with the latest recommended criteria published by USEPA, then an explanation must be provided when the results of the triennial review are submitted to USEPA.

During this triennial review cycle the San Diego Water Board will review the updated criteria in comparison to existing criteria in the Basin Plan. Based on consideration of our [key beneficial uses and key areas](#) the criteria will be evaluated to decide which, if any, will be updated in the next triennial review cycle. Many of the criteria are incorporated into other statewide plans such as the [Ocean Plan](#), or the [California Toxics Rule](#) that are used in determining enforceable water quality standards in the San Diego Region.

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⁶ [40 CRF Part 131\(c\)](#)

Project 6: Editorial Revisions, Minor Clarifications or Corrections

Type of Action:

Implement Editorial Updates.

Category:

Housekeeping.

Staff Recommendation:

Identify necessary non-regulatory or mandated revisions to the Basin Plan.

Discussion:

The proposed project is to amend and make editorial non-regulatory changes that clarify, update, or eliminate outdated paragraphs, tables, figures, references, and correct other minor errors in the Basin Plan. These changes are necessary for clarity, and to ensure that the public is informed about the latest requirements to protect water quality. Corrections, clarifications, and general formatting changes are without regulatory effect. They do not alter or impose any new requirements on the regulated community. They simply improve the overall readability and utility of the Basin Plan.

The Basin Plan is a dynamic, rather than fixed, document. It requires periodic updates to maintain and ensure that the information in it is current. The Basin Plan should also be amended to include obligatory Basin Plan updates triggered by State or federal actions.

Practical Vision:

- Chapter 1 – [Strategizing for Healthy Waters](#)
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