



REGULATORY WORK GROUP REPORT

Potential Opportunities for Collaboration:

**San Diego IRWM Program &
Regional Water Quality Control Board**

**INTEGRATED REGIONAL
WATER MANAGEMENT (IRWM) PLAN
2013 Update**



FINAL DRAFT

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ABBREVIATIONS AND TERMS

Basin Plan.....	<i>Water Quality Control Plan for the San Diego Region</i>
CAA	Cleanup and Abatement Account
CWA	Clean Water Act
DWR	State of California Department of Water Resources
EPA	United States Environmental Protection Agency
IRWM.....	San Diego Integrated Regional Management
NA	not applicable
NNE	Nutrient Numeric Endpoint
Practical Vision	Strategic planning document being developed by the RWQCB
RAC.....	IRWM Regional Advisory Council
RWMG	IRWM Regional Water Management Group
RWQCB	California Regional Water Quality Control Board, San Diego Region
SEP	Supplemental Environmental Project
SNMP	Salt and Nutrient Management Plan
SSOs	site-specific water quality objectives
State Board	State Water Resources Control Board
303(d)	Section 303(d) of the Clean Water Act (impaired water)
TMDL	Total Daily Maximum Load
TRAC	Basin Plan Triennial Review Advisory Committee
Work Group.....	IRWM Regulatory Work Group



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Category	Organization	Representative ¹
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Stormwater Management	City of Encinitas ^{2,3}	Crystal Najera
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	San Diego Coastkeeper	Travis Pritchard
	San Diego County Farm Bureau	Eric Larsen
Federal Agencies:	U.S. Marine Corps Base Camp Pendleton ⁴	Jeremy Jungreis
Regulatory Agencies:	Regional Water Quality Control Board	Jeremy Haas Bruce Posthumus

- 1 Representatives who participated in one or more IRWM Regulatory Work Group workshops.
- 2 Agency is also a stormwater copermittee.
- 3 Organization that participates in the San Diego Region Municipal Stormwater Copermittees Management Committee.
- 4 U.S. Marine Corps Base Camp Pendleton also is a water, wastewater, and recycled water agency.

EXECUTIVE SUMMARY

IRWM Program. The San Diego Integrated Regional Water Management (IRWM) Program is an interdisciplinary effort of San Diego Region water management organizations and stakeholders to enable the San Diego Region to apply for grants issued under the State of California IRWM Grant Program. The IRWM Program covers an area within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB), a state agency with responsibilities for establishing and enforcing state and federal water quality standards. The current San Diego IRWM Plan was adopted in 2007, and in part:

- establishes an IRWM Plan mission and objectives that define the Region's water management needs,
- identifies general water management strategies for attaining the goals and objectives, and
- implements a screening process for identifying, prioritizing, and funding water management projects, programs, and plans that help achieve the IRWM goals and objectives.

The San Diego IRWM Program is led by a Regional Water Management Group (RWMG) comprised of the San Diego County Water Authority, City of San Diego, and County of San Diego. IRWM Program guidance is provided by a Regional Advisory Committee (RAC) comprised of a diverse array of regional water management and environmental organizations.

Work Group and Purpose of Report. An effort is currently underway to update the 2007 IRWM Plan. Recognizing the similarity of missions and objectives between the IRWM Program and RWQCB, one of the tasks identified within the IRWM Plan update is to identify means for the IRWM Program to collaborate with and support the RWQCB in regional efforts to maintain and enhance water resources. To this end, a Regulatory Work Group (hereinafter Work Group) that represents a broad range of stakeholder interests has been organized to evaluate potential opportunities for IRWM and RWQCB collaboration to achieve mutual water quality protection and water management goals. Work Group input was provided through a series of facilitated workshops. The purpose of this report is to present the findings and recommendations of the Work Group on potential opportunities for IRWM and RWQCB collaboration.

Desired Outcomes of IRWM/RWQCB Collaboration. The following general approach was utilized by the Work Group to identify potential IRWM and RWQCB collaborative opportunities:

1. Identify potential issues of mutual interest to the IRWM Program and RWQCB.
2. Prioritize the potential issues of interest to identify issues with strong and broad Work Group support and identify desired outcomes for IRWM/RWQCB collaboration.
3. Identify IRWM Program assets and identifying potential collaborative measures that could be undertaken to achieve the desired outcomes.

After identifying, assessing, and prioritizing potential issues of IRWM and RWQCB interest, the Work Group selected the following desired outcomes for IRWM/RWQCB collaboration:

Desired Outcome No. 1: Support Science-Based Basin Plan Objectives. Support the RWQCB triennial review process and RWQCB programs and efforts to update science-based assessments of relations between Basin Plan objectives and beneficial use protection.

Desired Outcome No. 2: Support Science-Based Impaired Water Listings and Compliance. Support RWQCB programs and efforts to (1) update impaired water listings that are based on science and robust data and (2) achieve water quality compliance and protect beneficial uses.

Desired Outcome No. 3: Support Prioritization of Habitat Restoration Needs and Opportunities. Support the RWQCB in implementing a process for prioritizing wetlands and riparian habitat restoration needs and opportunities, and coordinate with resource agencies to address regional restoration needs and issues.

Recommended Early Action Items and IRWM Plan Update Actions. The Work Group recognized that IRWM/RWQCB collaboration will involve an ongoing process. Actions recommended for immediate implementation (deemed "early action items") and IRWM Plan update actions are presented as a means of initiating IRWM/RWQCB collaboration efforts toward achieving the three designated outcomes.

Additional follow-up actions are recommended for consideration after implementation of the early action items and IRWM Plan update. Early action items and IRWM Plan update actions recommended to initiate IRWM/RWQCB collaboration are summarized in Table EX-1.

**Table EX-1
Summary of Recommended IRWM/RWQCB Collaboration
Early Action Items and IRWM Plan Update Actions**

<p>Recommended Overarching Action Items to Facilitate Desired Outcome Nos. 1, 2, and 3:</p> <ul style="list-style-type: none"> • Assign an IRWM liaison to the RWQCB • Provide the RWQCB with periodic IRWM progress reports for inclusion in Executive Officer reports to the RWQCB • Monitor development of the RWQCB Practical Vision • Coordinate with RWQCB to ensure consistency between IRWM Plan and RWQCB Practical Vision
<p>Recommended Early Action Items to Facilitate Desired Outcome No. 1:</p> <ul style="list-style-type: none"> • Convene caucus of IRWM stakeholders to: <ul style="list-style-type: none"> • review existing RWQCB Basin Plan triennial review priorities, allocated RWQCB resources, and schedules • identify additional Basin Plan review priorities of interest to IRWM stakeholders • determine IRWM stakeholder interest in supporting and coordinating with the RWQCB to address additional Basin Plan review priorities • Convene workshop between RWQCB and IRWM stakeholders to discuss: <ul style="list-style-type: none"> • Basin Plan modification priorities identified by IRWM stakeholders • research, data collection, data management, data assessment, and resource needs required to support science-based evaluation of the additional Basin Plan priorities
<p>Recommended Early Action Items to Facilitate Desired Outcome No. 2:</p> <ul style="list-style-type: none"> • Convene caucus of IRWM stakeholders to: <ul style="list-style-type: none"> • review the existing RWQCB 303(d) listings • identify 303(d) listings that may warrant reevaluation or reclassification • determine IRWM stakeholder interest in supporting RWQCB reassessment or reclassification of the identified 303(d) listings of concern • Convene workshop with RWQCB and IRWM stakeholders to discuss: <ul style="list-style-type: none"> • 303(d) receiving waters that may warrant reevaluation or reclassification • potential IRWM projects or actions that could improve water quality and attain water quality objectives • potential alternative means to traditional TMDLs to achieve water quality objectives • research, data collection, data management, data assessment, and resources required for science-based reevaluation or reclassification for the identified 303(d) listings of concern
<p>Recommended Early Action Items to Facilitate Desired Outcome No. 3:</p> <ul style="list-style-type: none"> • Convene workshop with RWQCB to discuss potential means to: <ul style="list-style-type: none"> • identify, coordinate, and prioritize restoration needs and opportunities • develop an action plan for creating and maintaining a habitat restoration needs and opportunities priority list • coordinate IRWM Program support with the RWQCB SEP process and other compensatory mitigation programs • Convene meeting with resource agencies to discuss needs and opportunities for improving coordination of ecosystem restoration, channel maintenance and invasive species removal
<p>Recommended IRWM Plan Update Actions:</p> <ul style="list-style-type: none"> • Acknowledge priority themes from the RWQCB Practical Vision in the updated IRWM Plan • Update IRWM Plan and modify project funding screening and scoring criteria to encourage projects that target Desired Outcome Nos. 1, 2, or 3

Section 1

INTRODUCTION

1.1 Integrated Regional Water Management (IRWM) Plan

IRWM Program. The San Diego Integrated Regional Water Management (IRWM) Program is an interdisciplinary effort of San Diego Region water management organizations and stakeholders to enable the San Diego Region to apply for grants issued under the IRWM Grant Program administered by the State of California Department of Water Resources (DRW) and State Water Resources Control Board (State Board). The IRWM Program addresses water management issues in the portion of San Diego County that is tributary to the Pacific Ocean, and is one of three IRWM programs within the jurisdiction of the San Diego Regional Water Quality Control Board (RWQCB).

The San Diego IRWM Program is led by a Regional Water Management Group (RWMG) comprised of the San Diego County Water Authority, City of San Diego, and County of San Diego. IRWM Program guidance is provided by a Regional Advisory Committee (RAC) comprised of a diverse array of regional water management and environmental organizations. The RWQCB, U.S. Bureau of Reclamation, and representatives from the other two IRWM programs in the San Diego Region (south Orange County and south Riverside County) serves as an advisory representatives to the RAC.

Existing IRWM Plan. The current San Diego IRWM Plan was adopted by the respective RWMG agencies in 2007, and establishes water management goals and IRWM procedures for attaining the goals. The 2007 IRWM Plan:

- presents and evaluates the Region’s complex groundwater and surface water management issues, challenges, and conflicts,
- establishes an IRWM Plan mission and objectives that define the Region’s water management needs,
- identifies general water management strategies for attaining the goals and objectives,
- evaluates governance structures for San Diego IRWM planning,
- develops a transparent screening process for identifying and prioritizing water management projects, programs, and plans that help achieve the IRWM goals and objectives,
- evaluates stakeholder outreach needs,
- assesses regional data management programs and needs, and
- establishes a program for monitoring and measuring program success.

Program Funding. The IRWM Program provides a regional mechanism for evaluating, prioritizing, and allocating resources to optimize attainment of the Region's water management goals and objectives. Using the screening and prioritization processes established as part of the 2007 IRWM Plan, the San Diego IRWM program by June 2012 had allocated approximately \$34 million in grants for San Diego Region water resources and environmental protection projects consistent with achieving the IRWM Plan goals and objectives.

1.2 Potential for IRWM/RWQCB Collaboration

Influence of RWQCB on Regional Water Planning. The RWQCB regulates water quality within the San Diego Region, and RWQCB requirements and actions are of critical importance in influencing water resources management and IRWM activities within the Region. As set forth in the Porter-Cologne Water Quality Control Act (Division 7, *California Water Code*), the primary responsibility of the San Diego RWQCB is to protect the quality of groundwater and surface water within the San Diego Region by:

- formulating and adopting water quality standards and plans for the Region's groundwater and surface water bodies, and
- prescribing and enforcing requirements on waste discharges or threatened waste discharges to groundwaters or surface waters.

Through powers delegated by the U.S. Environmental Protection Agency (EPA), the RWQCB is also responsible for establishing water quality standards for surface waters, regulating discharges to surface waters, and assessing conformance with the standards pursuant to regulations established under the federal Clean Water Act (CWA).

RWQCB Resource Needs. The RWQCB regulatory mandates are wide-ranging, and the RWQCB's ability to respond or address regional water quality issues is dependent on available funding and resources. While RWQCB regulatory mandates have expanded over the years, resources available to the RWQCB has not kept pace with the expansion of these regulatory responsibilities. As a result, the RWQCB utilizes its limited resources to address what it deems to represent the highest priority regional water resource protection needs.

The IRWM Program is, in essence, a stakeholder-driven resource allocation process. In areas where IRWM and RWQCB goals and responsibilities are compatible, the potential exists for resources provided through the IRWM Program to assist the RWQCB in addressing a greater range of water quality issues and priorities. In addition to potential funding through the IRWM's funding apparatus, the IRWM governance structure (RWMG and RAC) allows for stakeholder coordination or outreach which could assist the RWQCB in developing and achieving its priorities and goals.

Potential Benefits to IRWM Stakeholders. RWQCB standards and requirements may significantly influence water resources management projects or activities of IRWM stakeholders. As a result, IRWM stakeholders could potentially derive significant benefit from collaboration with the RWQCB to address the Region's water quality protection and water resource management needs. Potential benefits to IRWM stakeholders from IRWM/RWQCB collaboration may include:

- improved RWQCB understanding of IRWM stakeholder issues,
- improved stakeholder understanding of RWQCB issues and responsibilities,
- improved RWQCB ability to effectively address regional water quality issues and standards,
- increased RWQCB input in support of the IRWM planning and resource allocation process,
- improved regional coordination of water resources protection and management, and
- improved regional coordination of data collection and evaluation.

1.3 Purpose of Report

IRWM Plan Update. The RWMG and RAC are currently engaged in an effort to update the 2007 IRWM Plan. Recognizing the similarity of missions and objectives between the IRWM Program and RWQCB, one of the tasks identified within the IRWM Plan update is to identify means for the IRWM Program to collaborate with and support the RWQCB in regional efforts to protect and enhance San Diego Region water resources.

Formation of Regulatory Work Group. To this end, the RWMG and RAC organized a Regulatory Work Group (hereinafter Work Group) that represented a broad range of stakeholder interests which mirrored the composition of the RAC. Organizations represented within the Work Group included:

- RWQCB staff,
- non-government organizations that represent resource protection, floodplain management, environmental justice, and agriculture,
- water and recycled water agencies, and
- stormwater agencies.

Objectives of the Work Group included:

- serving as an ideas forum or “think tank” to develop suggestions on how the IRWM Program and RWQCB can collaborate to more effectively address regional water issues, and
- providing direction in the preparation of an issues paper (Work Group Report) that summarizes potential IRWM and RWQCB collaborative opportunities and identifies recommended actions to pursue sensible collaborative opportunities.

Report Objectives. The purpose of this report is to present the findings and recommendations of the Work Group on potential opportunities for IRWM and RWQCB collaboration. Additional objectives of this report are to (1) provide input into the San Diego IRWM Plan update, and (2) stimulate agency interest and discussion in taking advantage of the suggested potential collaborative opportunities.

Recommendations on potential IRWM and RWQCB collaborative opportunities are presented herein for the consideration of the RWMG, RAC, and RWQCB, and are not binding on any organization.

Work Group Approach. Work Group input was provided through a series of five organized and facilitated workshops. Table 1-1 summarizes the focus of the five workshops. A technical team led by RMC Water and Environmental supported the Work Group effort. Technical team responsibilities included:

- coordinating with the Work Group chair to establish workshop agendas,
- organizing Work Group directives and input into draft support documents for group review,
- facilitating Work Group meetings, and
- preparing draft and revised versions of the Work Group Report for the consideration, revision, and approval of the Work Group.

**Table 1-1
Summary of Regulatory Work Group Approach and Workshops**

Workshop	Work Group Focus
No. 1	<ul style="list-style-type: none"> • Review Work Group objectives • Establish Work Group ground rules and select Work Group chair and co-chair • Review IRWM and RWQCB issues and needs
No. 2	<ul style="list-style-type: none"> • Review RWQCB priority themes • Identify issues of common interest between the IRWM Program and RWQCB
No. 3	<ul style="list-style-type: none"> • Organize and prioritize issues of common IRWM/RWQCB interest • Solicit ideas on potential strategies for addressing the issues of interest
No. 4	<ul style="list-style-type: none"> • Identify desired outcomes to be achieved by IRWM/RWQCB collaboration • Provide directional input on implementation strategies and action plans for achieving the desired outcomes • Provide directional input on the preparation of the Work Group report
No. 5	<ul style="list-style-type: none"> • Review desired outcomes and recommended implementation actions • Review and comment on the draft Work Group Report

Section 2

PRIORITY ISSUES AND OUTCOMES

2.1 Work Group Approach

Regulatory Agency Influence on IRWM Planning. The Work Group acknowledged that a number of regulatory agencies (see Table 2-1) influence IRWM Planning. State and federal resource agencies are involved in flood management, environmental protection, and endangered species protection. Health agencies are involved in regulating water supply, recycled water use, and environmental water quality.

Table 2-1
Summary of Key Regulatory Agencies that Influence IRWM Planning

Category	Agency
Resource Agencies	<ul style="list-style-type: none"> • U.S. Army Corps of Engineers • U.S. Fish and Wildlife Service • U.S. National Oceanographic and Atmospheric Administration Fisheries Service • California Department of Fish and Wildlife • California Coastal Commission
Health Agencies	<ul style="list-style-type: none"> • California Department of Public Health • County of San Diego Department of Environmental Health
Water Quality	<ul style="list-style-type: none"> • RWQCB • State Water Resources Control Board (State Board) • U.S. Environmental Protection Agency (EPA)

Focus on RWQCB Collaboration. Potential benefits of IRWM collaboration with resource and health agencies are limited by the narrow focus, restricted regulatory mandates, and staff-dependent decision-making processes of the agencies. The RWQCB purview, on the other hand, extends over a broad range of IRWM planning activities. Additionally, the RWQCB consults with the resource agencies, health agencies, EPA, and State Board in establishing San Diego Region water quality standards and permit requirements. In addition to these reasons, the Work Group agreed to focus on potential IRWM and RWQCB collaboration, noting that special and wide-ranging opportunities and benefits exist for RWQCB and IRWM collaboration, in part because:

- the IRWM Program and RWQCB each focus on issues specific to the San Diego Region,
- parallels exist in the water quality protection goals of the IRWM Program and RWQCB,

- the IRWM Program and RWQCB operate under open processes that encourages public participation and stakeholder input,
- the RWQCB enjoys flexibility in establishing water quality standards that are specific to the water quality and beneficial use protection needs of the San Diego Region,
- resources are not available to allow the RWQCB to adequately address all regional issues of importance and the RWQCB must allocate the limited resources to the highest priority issues, and
- opportunities exist for the IRWM Program to assist in addressing the RWQCB resource limitations.

General Approach. The following general approach was utilized by the Work Group to identify IRWM and RWQCB collaborative opportunities and implementation recommendations:

1. Identify potential issues of mutual interest to the IRWM Program and RWQCB.
2. Prioritize the potential issues of interest to identify issues with strong and broad Work Group support, and identifying desired outcomes for IRWM/RWQCB collaboration.
3. Identify IRWM Program assets and identify potential collaborative measures that could be undertaken to achieve the desired outcomes.
4. Identify a recommended "early action plan" to implement collaborative measures that appear to offer strong benefits and can readily be implemented.
5. Identify IRWM Plan updates recommended to support the desired outcomes of IRWM/RWQCB collaboration.

2.2 Potential Issues of IRWM/RWQCB Interest

IRWM Objectives and RWQCB Priority Themes. As a first step in assessing potential collaborative opportunities between the IRWM Program and RWQCB, the Work Group reviewed RWQCB priorities and IRWM Program objectives. Table 2-2 (page 2-3) presents a summary of missions and objectives of the RWQCB and IRWM Program.

The RWQCB regularly establishes strategic plans which set forth RWQCB priorities and intended future direction. The most recent RWQCB strategic planning was presented in "The Regionalization of the SWRCB Strategic Plan" (revised July 2005). The RWQCB is in the process of addressing updated strategic objectives in the development of the RWQCB's "Practical Vision". While the RWQCB Practical Vision is in the development phase and a draft has not yet been distributed for public review and comment, Regional Board staff presented key priority themes (see Table 2-2) to the Work Group that are expected to be emphasized within the Practical Vision document. In presenting these priority themes, RWQCB staff also advised that IRWM and RWQCB collaboration should be directed toward the shared IRWM/RWQCB goals of improving water quality and environmental conditions.

Table 2-2
Summary of IRWM Plan and RWQCB Missions and Objectives

RWQCB	IRWM Plan
<p>Mission:</p> <p>Preserve and enhance the quality of California’s water resources and to ensure their proper allocation and efficient use for the benefit of present and future generations.</p>	<p>Mission:</p> <p>To develop and implement an integrated strategy to guide the San Diego Region toward protecting, managing, and developing reliable and sustainable water resources. Through a stakeholder-driven process and adaptive process, the Region can develop solutions to water-related issues and conflicts that are economically and environmentally preferable, and that provide equitable resource protection for the entire Region.</p>
<p>Priority Themes¹</p> <ul style="list-style-type: none"> • Support recovery of wetlands and riparian areas • Ensure the health of ground and surface waters • Support sustainable local water supplies • Effective monitoring and assessment • Effective public communication and stakeholder input 	<p>2007 IRWM Plan Objectives²</p> <ul style="list-style-type: none"> • Maximize stakeholder/community involvement and stewardship • Effectively obtain, manage, and assess water resource data and information • Further the scientific and technical foundation of water management • Develop and maintain a diverse mix of water resources • Construct, operate, and maintain a reliable infrastructure system • Reduce the negative effects on waterways and watershed health caused by hydromodification and flooding • Effectively reduce sources of pollutants and environmental stressors • Protect, restore and maintain habitat and open space • Optimize water-based recreational opportunities

1 Priority themes identified by RWQCB staff as being presented within the current draft RWQCB "Practical Vision", which sets forth the RWQCB's proposed strategic plan for the next five years.

2 Objectives identified in 2007 San Diego Region IRWM Plan.

As shown in Table 2-2, strong parallels exist between the RWQCB priority themes and objectives established in the 2007 IRWM Plan. Work Group Workshop Nos. 2 and 3 focused on exploring and identifying issue of common interest between the RWQCB and IRWM program. Potential issues of mutual interest identified in the workshop can be grouped into the following five categories:

- I. *Enhancing Communication and Stakeholder Input*
- II. *Basin Plan Support*
- III. *303(d)/TMDL Support*
- IV. *Effective Data Management and Assessment*
- V. *Restoration and Mitigation Support*

I. Enhancing Communication and Stakeholder Input. The RWQCB priority themes and IRWM Plan objectives each emphasize public communication and stakeholder input. The Work Group identified a number of potential issues of mutual IRWM/RWQCB interest related to communication and stakeholder input, including:

- I.A Improve top-level communication between the IRWM Program and RWQCB.
- I.B Educate permittees on RWQCB issues.

- I.C Improve understanding of RWQCB staff of issues facing permittees.
- I.D Ensure stakeholder input to State Board and EPA on San Diego Region issues.
- I.E Enhance stakeholder awareness of RWQCB issues, priorities, and decisions.
- I.F Improve coordination between IRWM resources and RWQCB resource needs.
- I.G Improve coordination between the San Diego RWQCB and IRWM Program and other state regions.

Appendix B presents the rationale for IRWM and RWQCB interest in improving communication in these areas.

II. Basin Plan Support. RWQCB water quality standards, implementation policies, and requirements are established within the Basin Plan. The Basin Plan affects all areas of water quality regulation within the San Diego Region, and is of critical importance in influencing water resources management in the Region.

CWA Section 303(c) and the Porter-Cologne Act require the RWQCB to update the Basin Plan a minimum of every three years, but many of the Basin Plan water quality objectives and implementation policies date to the original 1975 version of the Basin Plan. The most recent Basin Plan triennial review process was completed in 2011, and included significant stakeholder involvement through a Triennial Review Advisory Committee (TRAC). An IRWM representative served on the 2011 TRAC. The RWQCB's 2011 triennial review process (see Attachment A) identified a wide array of potential Basin Plan modifications or evaluations to consider, but concluded that only a fraction of the modifications could be addressed due to limited RWQCB resources.¹

The Work Group acknowledged the overarching importance of the Basin Plan in almost all areas of regional water management, and identified a number of potential issues of mutual IRWM/RWQCB interest, including:

- II.A Address the lack of RWQCB staff resources to assess prioritized Basin Plan modifications.
- II.B Update scientific assessments of relations between Basin Plan objectives and beneficial use protection.
- II.C Develop outcome-based biological objectives to protect beneficial uses.

¹ 2011 Review of the Water Quality Control Plan for the San Diego Basin (Basin Plan) Final Staff Report (RWQCB, 2011) identified 25 potential Basin Plan modification efforts to make the Basin Plan more protective, and 33 to make the Basin Plan more reasonable. (See Appendix A) The staff report, however, concluded that only 6.0 personnel-years were available to address Basin Plan issues, and that only six of the Basin Plan modification efforts could be addressed under the anticipated resources.

- II.D Enhance stakeholder input to the Basin Plan modification process.
- II.E Support development of Salt and Nutrient Management Plans (SNMPs) required under the State Board's Recycled Water Policy.²
- II.F Update the Basin Plan to account for seasonal or flow-based water quality protection needs.
- II.G Update the Basin Plan to promote and accommodate indirect potable reuse.

Appendix B presents the rationale for IRWM and RWQCB interest in the above Basin Plan issues. Each of the identified issues of interest support and address the RWQCB priority themes of (1) ensuring the health of ground and surface waters, and (2) supporting sustainable local water supplies. The identified issues of potential interest also reflect the lack of existing RWQCB staff resources to address and evaluate important Basin Plan modifications.

III. 303(d)/TMDL Support. Under delegated authority from EPA, the RWQCB is responsible for implementing provisions of Section 303(d) of the Clean Water Act (CWA). Pursuant to CWA Section 303(d), the RWQCB identifies surface waters not complying with applicable water quality standards (impaired waters), and establishes priorities and schedules for the preparation Total Daily Maximum Load (TMDL) and waste load allocations required to attain and maintain the standards. The RWQCB is required to update the 303(d) impaired water body list a minimum of every two years.

Work Group attention focused on how impaired water 303(d) listings and TMDL schedules can affect significantly affect regional water management. The Work Group acknowledged that federal regulations and State Board policy establish significant constraints under which the RWQCB must operate in addressing 303(d) impaired water listings. Within the constraints within which the RWQCB must operate, however the Work Group identified a series of potential issues of interest related to 303(d) listing, 303(d) delisting, and TMDLs, including:

- III.A Enhance stakeholder input to the 303(d) listing process.
- III.B Reevaluate appropriateness of including imported water storage reservoirs in the 303(d) listings.
- III.C Ensure that existing and proposed 303(d) listings are based on science and robust data.
- III.D Assess the potential for streamlining the 303(d) delisting process.

² The State Board's 2009 Recycled Water Policy requires RWQCBs to support recycled water use and develop SNMPs for each California groundwater basin by 2014 (or by 2016 with approved extensions). The SNMP evaluations would assess salinity management opportunities to be considered in managing water quality within each groundwater basin, and would allow for a determination of whether existing Basin Plan groundwater quality objectives are appropriate for protecting beneficial uses.

Appendix B presents the rationale for IRWM and RWQCB interest in the 303(d)/TMDL issues of interest. Each of the identified issues of interest support the RWQCB priority themes of ensuring the health of ground and surface waters and supporting sustainable local water supplies.

IV. Effective Data Management and Assessment. RWQCB staff cited effective monitoring and assessment as a RWQCB priority theme to be addressed in the RWQCB Practical Vision. The IRWM Plan also includes an objective related to effective monitoring and assessment.

Effective monitoring and assessment has been the focus of the RWQCB's development of a regional monitoring and assessment framework³ that focuses on reducing discharger-based "end-of-pipe" monitoring in favor of a question-driven regional water body-based monitoring and assessment program. The water body-based monitoring and assessment program would be directed toward assessing the health of water bodies, identifying the causes of adverse conditions, and evaluating the effectiveness of management actions.

The Work Group expressed support for this ongoing RWQCB regional monitoring effort, and identified the following issues of mutual IRWM/RWQCB interest in achieving this goal:

- IV.A Improve standardization of data collection and assessment.
- IV.B Eliminate disincentives for data collection and transfer.
- IV.C Eliminate duplicative data collection, management, and assessment efforts.
- IV.D Ensure that collected data are useful and effectively analyzed, and focus on question-driven issues.

Appendix B presents the rationale for IRWM and RWQCB interest in these data management and assessment issues.

V. Habitat Restoration and Recovery. The RWQCB priority themes and IRWM Program goals each focus on wetlands and riparian habitat restoration, recovery, and protection. Work Group participants identified the following potential issues of interest that could help support the mutual RWQCB and IRWM objectives of effective habitat protection and restoration:

- V.A Streamline permitting requirements for stormwater system maintenance (both routine and emergency maintenance), invasive species removal, and ecosystem restoration.
- V.B Prioritize regional restoration and habitat protection needs.

³ As set forth in the Regional Board's "A Framework for Monitoring and Assessment in the San Diego Region (Working Draft, May 2012). Available at: www.srwc.ca.gov/sandiego/board_info/agendas/2012/jun/item9/eosr0612MonitoringFramework.SD1.pdf

- V.C Improve IRWM support for cleanup and abatement efforts.
- V.D Identify and pre-approve Supplemental Environmental Projects (SEPs) that achieve mutual RWQCB and IRWM goals.
- V.E Develop and maintain mitigation banks.
- V.F Improve coordination between Cleanup and Abatement (CAA) funding and funding/support for SEPs.

Appendix B summarizes the Work Group rationale for these issues of interest.

2.3 Desired Outcomes of IRWM/RWQCB Collaboration

Work Group Prioritization Exercise. Work Group Workshop No. 3 focused on organizing and prioritizing the potential issues of mutual IRWM/RWQCB interest. As part of the workshop, a three-step prioritization exercise was conducted in which Work Group members participated in:

- a polling exercise to determine which of the potential issues of interest received strong and broad Work Group support,
- follow-up discussion to determine if any of the issues of interest should be refined or combined, and
- a final Work Group exercise to identify which of the issues of potential interest are deemed to represent the highest importance for potential RWQCB and IRWM collaboration.

Prioritization of Issues of Interest. Through this process, the Work Group identified a priority issue of interest from each of the five issue categories. Results of the prioritization exercise are summarized in Table 2-3 (page 2-8).

Focus on Desired Outcomes. After reviewing the priority issues of interest (see Table 2-3), the Work Group agreed that:

- communication and data management represented tools or processes to achieve desired outcomes, and
- the IRWM/Regional Board collaborative effort should focus on "desired outcomes" where the IRWM Program can play a role to support both the RWQCB's stated priority themes and the IRWM Program mission and goals.

Table 2-3
Summary of Work Group Priority Issues of Interest

Priority Issue of Interest	Basis of Work Group Support for Issue of Interest
<p>I. Communication and Stakeholder Input Improve understanding between regulators and stakeholders.</p>	<ul style="list-style-type: none"> • Belief that permittees could better understand RWQCB issues and the RWQCB could better understand stakeholder issues. • Acknowledgement that both the RWQCB and IRWM program already promote stakeholder input and water quality understanding, and that the RWQCB participates in RAC meetings and RAC workshops. • Acknowledgement that RWQCB has implemented stakeholder input processes for 303(d) listings and Basin Plan modifications.
<p>II. Basin Planning Update scientific assessments of relations between Basin Plan objectives and beneficial use protection, including addressing seasonal and flow-dependent beneficial use protection needs.</p>	<ul style="list-style-type: none"> • Strong and broad Work Group support for an initiative to develop outcome-based objectives that scientifically relate water quality objectives to beneficial use protection needs. • Development of outcome-based objectives is in keeping with stated RWQCB priorities of ensuring the health of ground and surface waters and developing sustainable water supplies. • Acknowledgement that the RWQCB and State Board are working toward the development of outcome-based biological objectives. • Acknowledgement that additional RWQCB resources will be required to take on the challenge of developing outcome-based objectives, and that the IRWM Program could provide resources. • Recognition that sensible science-based Basin Plan modifications may be required to support and promote recycled water use, imported raw water storage, and indirect potable reuse. • Recognition that additional resources may be necessary to develop SNMPs required under the State Recycled Water Policy. • Belief that "one-size-fits-all" objectives may not be protective of beneficial uses, and that beneficial use protection needs may vary with season or with streamflow.
<p>III. 303(d)/TMDL Support Ensure 303(d) listings are based on science and robust data.</p>	<ul style="list-style-type: none"> • EPA regulations and State implementation policies establish processes and statistical methodology for listing and delisting 303(d) constituents, and stakeholder input must work within the constraints of this methodology. • 303(d) listings for imported water reservoirs are not consistent with regional water management needs and may constrain the RWQCB and regional water agencies from implementing indirect potable reuse as a sustainable source of potable supply. • Establishing appropriate science-based Basin Plan water quality objectives that are consistent with regional water management needs and beneficial uses can support the process for ensuring that 303(d) listings are also science-based.
<p>IV. Effective Data Collection and Management Ensure that collected data are useful and effectively analyzed.</p>	<ul style="list-style-type: none"> • Work Group consensus is in keeping with the stated RWQCB priority of developing a revised framework for regional monitoring and assessment. • Strong Work Group support exists for the regional outcome-based monitoring strategy proposed by the RWQCB.
<p>V. Habitat Restoration and Recovery Regional coordination and prioritization of restoration needs and opportunities.</p>	<ul style="list-style-type: none"> • Regional coordination and prioritization of restoration needs and opportunities is in keeping with the RWQCB priority of promoting habitat restoration and recovery. • Stormwater channel maintenance and invasive species removal are critical activities that can benefit the Region's water quality and habitat objectives while addressing public safety concerns. • Strong and broad Work Group support exists for IRWM Program collaboration with resource agencies and the RWQCB to identify restoration priorities and opportunities. • Acknowledgement that this effort could lead to the development of pre-approved Supplemental Environmental Projects (SEPs) that are in keeping with prioritized regional restoration needs.

Desired Outcomes and Rationale. The Work Group selected the following desired outcomes for IRWM/RWQCB collaboration:

Desired Outcome No. 1: Support Science-Based Basin Plan Objectives. Support the RWQCB triennial review process and RWQCB programs and efforts to update science-based assessments of relations between Basin Plan objectives and beneficial use protection.

Desired Outcome No. 2: Support Science-Based Impaired Water Listings and Compliance. Support RWQCB programs and efforts to (1) update impaired water listings that are based on science and robust data and (2) achieve water quality compliance and protect beneficial uses.

Desired Outcome No. 3: Support Prioritization of Habitat Restoration Needs and Opportunities. Support the RWQCB in implementing a process for prioritizing wetlands and riparian habitat restoration needs and opportunities, and coordinate with resource agencies to address regional restoration needs and issues.

Table 2-4 summarizes how the desired outcomes identified by the Work Group parallel the priority themes being addressed within the RWQCB Practical Vision.

**Table 2-4
Conformance of Work Group Desired Outcomes with RWQCB Priority Themes**

RWQCB Practical Vision Priority Theme	Desired Outcome for IRWM/RWQCB Collaboration		
	1. Basin Plan Support Support the RWQCB triennial review process and RWQCB programs and efforts to update science-based assessments of relations between Basin Plan objectives and beneficial use protection	2. Impaired Water Support and Compliance Support RWQCB programs and efforts to (1) update impaired water listings that are based on science and robust data and (2) achieve water quality compliance and protect beneficial uses	3. Habitat Restoration Support Support the RWQCB in implementing a process for prioritizing wetlands and riparian habitat restoration needs and opportunities, and coordinate with resource agencies to address regional restoration needs and issues
Innovative restoration			●
Ensure health of ground and surface waters	●	●	●
Supporting sustainable local water supplies	●	●	
Effective monitoring and assessment	●	●	●
Effective public communication and stakeholder input	●	●	●

Desired Outcome No. 1: Support Science-Based Basin Plan Objectives. Basin Plan support was cited by the Work Group as a key potential area for IMWM/RWQCB collaboration. The Work Group noted that the development of scientific based water quality objectives (see R-26 in Appendix A) was considered as part of the most recent RWQCB Basin Plan triennial review process, but was not given a top priority within the most recent triennial review. The Work Group also noted, however, that ensuring the scientific basis of Basin Plan water quality objectives is a key concept embedded within the RWQCB's priority themes of ensuring the health of ground and surface waters and supporting sustainable local water supplies.

Resources provided through the IRWM Program could allow the RWQCB to more rapidly address Basin Plan triennial review priorities that involve scientific assessment of Basin Plan water quality objectives. For example, IRWM Program resources may allow the RWQCB to address a range of Basin Plan issues related to supporting sustainable local water supplies, including:

- developing a Basin Plan policy and water quality objectives consistent with supporting indirect potable reuse and other sustainable supplies,
- developing Basin Plan objectives consistent with SNMPs prepared pursuant to the State's Recycled Water Policy, and
- evaluating the appropriateness of flow-dependent or season-dependent water quality objectives.

Precedent exists for coordination between the IRWM Program and RWQCB to evaluate science-based Basin Plan water quality objectives. A current IRWM-funded effort is underway to address Basin Plan Modification R-16, which addresses nutrient objectives based on the Numeric Nutrient Endpoint (NNE) framework (see Appendix A). The project, led by the County of San Diego with support from an array of Santa Margarita River watershed stakeholders, involves IRWM funding support for river monitoring, modeling, and data evaluation to support site-specific NNE objectives for the lower Santa Margarita River basin and estuary. The project also involves funding a RWQCB staff position to support RWQCB review of NNE-based site-specific nutrient objectives.

Desired Outcome No. 2: Support Science-Based Impaired Water Listings and Compliance. The Work Group noted the importance of the ongoing RWQCB programs to evaluate Basin Plan compliance, update 303(d) impaired water listings, and pursue TMDLs to achieve compliance. To support the RWQCB's priority themes of ensuring the health of ground and surface waters and supporting sustainable water supplies, IRWM Program support could allow the RWQCB to allocate resources to enhance efforts to address such 303(d)-related issues as:

- developing a Basin Plan policy regarding the 303(d) listing of potable water reservoirs,
- reclassifying 303(d) listings for potable water reservoirs to support indirect potable reuse, imported water storage, and sustainable local supply,
- resolving existing 303(d) listings and scheduled TMDLs through the development of site-specific objectives that support beneficial uses, and
- supporting projects and actions that improve water quality, protect beneficial uses, and attain Basin Plan water quality objectives.

Desired Outcome No. 3: Support Prioritization of Habitat Restoration Needs and Opportunities.

The Work Group noted that habitat preservation, ecosystem restoration, and supporting the recovery of wetlands and riparian habitats represent significant IRWM Program and RWQCB objectives, and strong and broad Work Group support existed for supporting such efforts. In particular, the Work Group noted the potential for the IRWM Program to support the RWQCB's habitat recovery priorities through assisting the RWQCB in:

- developing and maintain a list of wetlands and riparian habitat restoration needs and opportunities, and
- coordinating use of the RWQCB SEP process or other compensatory mitigation programs to support priority wetlands and riparian habitat restoration and recovery efforts.

In discussing Desired Outcome No. 3, a number of work group participants also noted the need for fostering improved coordination among resource agencies (e.g. U.S. Fish & Wildlife Service, U.S. Army Corps of Engineers, California Department of Fish and Wildlife) to better and more efficiently achieve joint IRWM Program and RWQCB habitat restoration and recovery goals.

Section 3

RECOMMENDED COLLABORATIVE STRATEGIES

3.1 Potential IRWM Support Mechanisms

RWQCB Support Needs. In recognition of the limited available RWQCB resources and staffing, collaboration between the RWQCB and IRWM Program may be most useful to the RWQCB in areas where such collaboration:

- assists the RWQCB in executing their statutory responsibilities and in complying with state and federal mandates,
- results in increased regulatory resources or efficiency,
- does not result in increased RWQCB staff workloads,
- assists the RWQCB in stakeholder involvement,
- assists the RWQCB in prioritizing and addressing regional water quality problems, and
- generates measurable outcomes that demonstrate conformance with applicable water quality standards, requirements and policies.

IRWM Program Support Assets. The Work Group recommended that potential IRWM/Regional Board collaborative strategies be identified and organized around the assets or benefits that the IRWM Program can provide. As an initial step to identifying potential IRWM/RWQCB collaborative opportunities, the Work Group in Workshop No. 4 identified the following four areas where the IRWM Program can offer support to the RWQCB:

Vision and Advocacy. In establishing regional water management goals and promoting integrated solutions to regional water management issues, the IRWM Program process provides regional leadership, coordination, advocacy, and vision.

Technical Expertise. RWMG and RAC organizations offer a wide variety of technical expertise in regional water management and water quality issues.

Stakeholder Coordination. The stakeholder-driven IRWM Program and its governance structure focus on stakeholder identification, outreach and input, including targeted outreach to disadvantaged communities and tribes. Additionally, the IRWM stakeholders are (1) tasked

with approaching water management issues from a regional perspective, and (2) encouraged to seek coordinated and integrated solutions to the management issues.

Project Funding. The IRWM Program provides a regional mechanism for evaluating, prioritizing, and allocating Proposition 50 and Proposition 84 funding to optimize attainment of the Region's water management goals and objectives.

Approach. For purposes of identifying potential IRWM/RWQCB collaborative opportunities, the Work Group recognizes that collaborative actions may include:

- Overarching actions to support the IRWM/RWQCB collaboration process and support all desired outcomes.
- Actions directed toward support of Desired Outcome No. 1 (Support the RWQCB triennial review process and RWQCB programs and efforts to update science-based assessments of relations between Basin Plan objectives and beneficial use protection.)
- Actions directed toward support of Desired Outcome No. 2 (Support RWQCB programs and efforts to (1) update impaired water listings that are based on science and robust data and (2) achieve water quality compliance and protect beneficial uses.)
- Actions directed toward support of Desired Outcome No. 3 (Support the RWQCB in implementing a process for prioritizing wetlands and riparian habitat restoration needs and opportunities, and coordinate with resource agencies to address regional restoration needs and issues.)

Action Items and Follow-Up Actions. The Work Group also recognized that IRWM/RWQCB collaboration will involve an ongoing process. Actions recommended for immediate implementation (deemed "early action items") and IRWM Plan update actions are presented as a means of initiating IRWM/RWQCB collaboration efforts toward achieving the three designated outcomes. Additional follow-up actions are recommended for consideration after implementation of the early action items and IRWM Plan update.

3.2 Recommended Action Plan to Achieve Desired Outcomes

Recommended Overarching Support Actions. The IRWM Program structure provides opportunity within a stakeholder-driven environment for the development and advocacy of integrated solutions to San Diego Region water management issues that achieve multiple IRWM Plan objectives and RWQCB priority themes. Pursuing and promoting IRWM/RWQCB collaboration in achieving the desired outcomes, in part, will be dependent on:

- improving ongoing communication between the IRWM Program and RWQCB, and
- ensuring consistency between the updated IRWM Plan and RWQCB Practical Vision.

Table 3-1 (page 3-3) presents early actions items, IRWM Plan update actions, and potential follow-up actions recommended by the Work Group to achieve the overarching objectives of improving IRWM/RWQCB communication and seeking opportunities for consistency between the IRWM Plan and RWQCB Practical Vision. Table 3-1 also indicates the types of IRWM Program assets involved in supporting the recommended actions.

Table 3-1
Recommended Overarching Actions to Support IRWM/RWQCB Collaboration

Objective to Facilitate Desired Outcomes	Recommended Overarching Support Actions to Achieve Desired Outcomes		
	Recommended Early Action Item	Recommended IRWM Plan Update Action	Potential Follow-Up Action
Improve communication between the IRWM Program and RWQCB	Vision & Advocacy / Stakeholder Communication		
	<ul style="list-style-type: none"> Assign an IRWM liaison to the RWQCB Provide RWQCB with periodic IRWM progress report for inclusion in Executive Officer reports to the RWQCB 	NA	<ul style="list-style-type: none"> Organize informational workshops, discussion sessions, or seminars that allow RWQCB staff to educate stakeholders on regulatory issues or allow stakeholders/agencies to educate the RWQCB on stakeholder issues.
Ensure consistency between IRWM Plan and RWQCB Practical Vision	Vision & Advocacy / Stakeholder Communication		
	<ul style="list-style-type: none"> Monitor development of RWQCB Practical Vision Coordinate with RWQCB to ensure consistency between IRWM Plan and RWQCB Practical Vision 	<ul style="list-style-type: none"> Incorporate priority themes from RWQCB Practical Vision into updated IRWM Plan 	<ul style="list-style-type: none"> Organize IRWM/RWQCB Coordination Group to periodically meet to discuss water quality and water management issues of mutual interest and RWQCB water quality protection priorities

As noted, overarching actions recommended in Table 3-1 would support each of the three desired IRWM/RWQCB collaborative outcomes. Early action items and IRWM Plan update actions are recommended for immediate consideration and implementation. Potential follow-up actions are recommended for IRWM and RWQCB consideration once the early action items are completed.

Recommended Actions to Support Desired Outcome No. 1. Desired Outcome No. 1 focuses on supporting the RWQCB triennial review process and RWQCB programs and efforts to update science-based scientific assessments of relations between Basin Plan objectives and beneficial use protection. Included as part of this desired outcome is the assessment of the appropriateness of flow-based or seasonal objectives.

The 2011 Basin Plan triennial review (see Appendix A) concluded that existing RWQCB resources are available to assess outcome-based biological objectives (P-9) and NNE-based nutrient objectives (R-16). The triennial review concluded that existing RWQCB resources were not available within the next two years to assess:

- water quality objectives for flow (P-10),
- flow-based or seasonal-based water quality objectives (R-12),
- objectives in imported water storage reservoirs (R-21),
- objectives to support indirect potable reuse (R-22 and R-23), and
- other objectives that may require assessment based on updated data and science (R-26).

The Work Group acknowledged that additional resources may allow the RWQCB to address a number of Basin Plan modifications identified within the 2011 triennial review that scientifically address relations between water quality and beneficial uses. Further, the Work Group noted that supplemental RWQCB resources may allow other Basin Plan modification efforts (over and above those assessed in the 2011 triennial review) to be considered and funded.

The Work Group identified the following objectives for facilitating Desired Outcome No. 1 in order to support the ongoing RWQCB process for scientific update of Basin Plan water quality objectives:

- identify science-based Basin Plan modifications that may warrant higher priority than provided in the 2011 RWQCB triennial review,
- identify research, data collection, data management, data assessment, and resources required to support the RWQCB's process for science-based evaluation of the prioritized Basin Plan objectives, and
- support and secure funding for research, data collection, data management, data assessment and resources required to support the RWQCB's process for science-based evaluation of the prioritized Basin Plan objectives.

Table 3-2 (page 3-5) presents early action items, IRWM Plan update actions, and potential follow-up actions recommended by the Work Group to achieve objectives required to facilitate Desired Outcome No. 1. Table 3-2 also indicates the types of IRWM Program assets involved in supporting the recommended actions. As shown in Table 3-2, as a recommended early action item to support Desired Outcome No. 1, an initial caucus of IRWM stakeholders would be convened to:

- review existing RWQCB Basin Plan triennial review priorities, allocated RWQCB resources, and schedules,
- identify additional Basin Plan review priorities of interest to IRWM stakeholders, and
- determine IRWM stakeholder interest in coordinating with and supporting the RWQCB to address the additional identified Basin Plan review priorities.

Table 3-2
Recommended IRWM/RWQCB Collaborative Actions to Support Desired Outcome No. 1
Support Science-Based Basin Plan Objectives

Objective to Facilitate Desired Outcome	Recommended Actions to Achieve Desired Outcome No. 1		
	Recommended Early Action Item	Recommended IRWM Plan Update Action	Potential Follow-Up Action
Identify science-based Basin Plan modifications that may warrant higher priority than provided in 2011 triennial review	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene caucus of IRWM stakeholders to (1) review existing RWQCB Basin Plan triennial review priorities, allocated RWQCB resources, and schedules, (2) identify additional Basin Plan review priorities of interest to IRWM stakeholders, and (3) determine IRWM stakeholder interest in supporting the RWQCB to address the additional Basin Plan review priorities Convene workshop between RWQCB and IRWM stakeholders to discuss Basin Plan modification priorities identified by IRWM stakeholders 	NA	NA
Identify research, data collection, data management, data assessment, and resources required to support the RWQCB's process for science-based evaluation of the prioritized Basin Plan objectives	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene workshop with RWQCB and IRWM stakeholders to discuss research, data collection, data management, data assessment, and resources required to address identified objectives that warrant scientific update or development of site-specific objectives 	NA	<ul style="list-style-type: none"> Identify specific projects that address scientific update of Basin Plan objectives Identify parties that would conduct identified research, data collection, and scientific assessment Convene expert/stakeholder workshop with RWQCB to evaluate regional monitoring framework progress and identify monitoring and database requirements to support Basin Plan scientific update
Support and secure funding required for research, data collection, data management, data assessment and resources required to support the RWQCB's process for science-based evaluation of the prioritized Basin Plan objectives	Project Funding		
	NA	<ul style="list-style-type: none"> Update IRWM Plan and modify project funding screening criteria to encourage data collection, data management, or data assessment projects that support the development of science-based Basin Plan objectives or site-specific objectives 	<ul style="list-style-type: none"> Prepare IRWM funding applications for research, data collection, and scientific update of Basin Plan objectives IRWM approval of funds for research, data collection, and scientific update of Basin Plan objectives

If IRWM stakeholders identify science-based Basin Plan objectives basin objectives that warrant IRWM resources and priority action, a workshop could be scheduled between IRWM stakeholders and RWQCB staff to discuss:

- Basin Plan modification priorities identified by IRWM stakeholders,
- research, data collection, data management, data assessment, and resources required to support scientific evaluation of the additional Basin Plan priorities, and
- proposed actions by the RWQCB and IRWM stakeholders required to support evaluation of the additional Basin Plan priorities.

Recommended IMWM Plan update actions include modifying IRWM Plan funding screening and scoring criteria to encourage IRWM funding for research and development of science-based water quality objectives that support RWQCB priority themes and IRWM Program goals.

Recommended Actions to Support Desired Outcome No. 2. Desired Outcome No. 2 focuses on supporting RWQCB programs and efforts to (1) update impaired water listings that are based on science and robust data and (2) achieve water quality compliance and protect beneficial uses.

Within the procedural constraints established within EPA and State Board regulations, the Work Group's intent in formulating Desired Outcome No. 2 is to ensure that 303(d) listings are based on science, robust data, and are reflective of water quality impairment and protection needs. The Work Group acknowledged that scientific update of Basin Plan objectives may influence 303(d) listings and water quality protection needs, particularly in instances where SSOs are developed as part of Basin Plan updates or in parallel with development of TMDLs.

While the Work Group did not focus on any particular receiving water or 303(d) listings that warranted scientific update, the Work Group noted that an update of Basin Plan policies to address imported water storage or indirect potable reuse may influence 303(d) listings for a number of the Region's potable water reservoirs. The Work Group also expressed concerns that some 303(d) listings may have proceeded and been approved on the basis of limited data sets or data skewed to particular flow or time-of-year conditions.

To facilitate Desired Outcome No. 2 and support the RWQCB process for 303(d) evaluations, IRWM/RWQCB collaborative objectives include:

- identify existing 303(d) listings that may warrant re-evaluation or re-classification on the basis of limited data, out-of-date data, or non-representative data,

- identify projects or processes that could improve water quality of 303(d) listed waters and attain water quality objectives,
- identify research, data collection, data management, data assessment, and resources required to support the RWQCB's process for science-based evaluation of the prioritized 303(d) listings, and
- support and secure funding for research, data collection, data management, data assessment, and resources required to support the RWQCB's process for science-based evaluation of the prioritized 303(d) listings.

Table 3-3 (page 3-8) presents early action items, IRWM Plan update actions, and potential follow-up actions recommended by the Work Group to achieve objectives required to facilitate Desired Outcome No. 2. Table 3-3 also indicates the types of IRWM Program assets involved in supporting the recommended actions. As a recommended initial early action item to support Desired Outcome No. 2, a caucus of IRWM stakeholders would be convened to:

- review the current RWQCB 303(d) lists,
- identify 303(d) listings that may conflict with IRWM goals and may warrant scientific update or re-classification, and
- determine IRWM stakeholder interest in coordinating with and supporting RWQCB reassessment or reclassification of the identified 303(d) listings of concern.

If IRWM stakeholders identify 303(d) listings that may warrant update, a workshop could be scheduled between the IRWM stakeholders and RWQCB staff to discuss:

- 303(d) receiving waters identified by IRWM stakeholders that may warrant reevaluation or reclassification,
- potential IRWM projects or actions that could improve water quality and attain water quality objectives,
- potential alternatives to traditional TMDLs for attaining water quality objectives,
- data collection, data management, data assessment, and resources required to reevaluate or reclassify the identified priority 303(d) listings, and
- proposed actions by the RWQCB and IRWM stakeholders required support reevaluation or reclassification of the identified 303(d) listings.

Recommended IRWM Plan update actions include modifying IRWM Plan funding screening and scoring criteria to encourage projects that support science-based data collection, data management, and data assessments for reevaluating or reclassifying impaired water 303(d) listings.

Table 3-3
Recommended IRWM/RWQCB Collaborative Actions to Support Desired Outcome No. 2
Support Science-Based Impaired Water Listings and Compliance

Objective to Facilitate Desired Outcome	Recommended Actions to Achieve Desired Outcome No. 2		
	Recommended Early Action Item	Recommended IRWM Plan Update Action	Potential Follow-Up Action
Identify existing 303(d) listings that may warrant re-evaluation or re-classification	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene caucus of IRWM stakeholders to (1) review existing 303(d) listings, (2) identify 303(d) listings that may warrant reevaluation or reclassification, and (3) determine IRWM stakeholder interest in supporting RWQCB reassessment or reclassification of the identified 303(d) listings of concern. Convene workshop with RWQCB and IRWM stakeholders to discuss 303(d) receiving waters that may warrant reevaluation or reclassification in order to better support IRWM goals and RWQCB Practical Vision priorities 	NA	NA
Identify projects or actions that could improve water quality of 303(d) listed waters and attain water quality objectives	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene workshop with RWQCB and IRWM stakeholders to identify (1) projects that could improve water quality of 303(d) listed waters and (2) alternative means to traditional TMDLs to achieve water quality objectives 	NA	[see Project Funding]
Identify research, data collection, data management, data assessment, and resources required to support the RWQCB's process for science-based evaluation of the prioritized 303(d) listings	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene workshop with RWQCB and IRWM stakeholders to discuss data collection, data management, data assessment and resources required to reevaluate or reclassify 303(d) listings 	NA	<ul style="list-style-type: none"> Identify parties that would conduct identified monitoring and data evaluation Convene expert/stakeholder workshop with RWQCB to evaluate regional monitoring framework progress and identify monitoring and database requirements to support scientific assessment of 303(d) listings
Support and secure funding for research, data collection, data management, data assessment, and resources required to support the RWQCB's process for science-based evaluation of the prioritized 303(d) listings	Project Funding		
	NA	<ul style="list-style-type: none"> Update IRWM Plan and modify project funding screening criteria to encourage data collection, data management, or data assessment projects that support science-based 303(d) reevaluation or reclassification efforts 	<ul style="list-style-type: none"> Prepare IRWM funding applications for research, data collection, and/or data assessments to support science-based 303(d) listings IRWM approval of funds for research, data collection, and scientific update of Basin Plan objectives

Recommended Actions to Support Desired Outcome No. 3. Desired Outcome No. 3 focuses on supporting the RWQCB in implementing a process for prioritizing wetlands and riparian habitat restoration needs and opportunities, and coordinating with resource agencies to address regional restoration needs and issues.

The Work Group acknowledged the potential difficulty in organizing a regional restoration or coordination effort, but strong and broad Work Group support existed for IRWM and RWQCB collaboration to promote an effort to coordinate and prioritize restoration and mitigation opportunities. Additionally, while RWQCB staff did not express interest in (or indicate available resources for) maintaining a pre-approved SEP list, the Work Group noted potential value in the IRWM Program pursuing opportunities with RWQCB staff for enhancing restoration opportunities through the use of SEPs or other compensatory mitigation programs.

The following facilitating objectives were identified by the Work Group for supporting Desired Outcome No. 3:

- develop and maintain a list of wetlands and riparian habitat restoration needs and opportunities,
- evaluate potential opportunities for coordinating the RWQCB SEP process and/or other compensatory mitigation programs to fund and promote prioritized wetlands and riparian habitat restoration and recovery efforts, and
- support and secure funding for wetlands and riparian habitat restoration and recovery efforts.

Table 3-4 (page 3-10) presents early action items, IRWM Plan update actions, and follow-up actions recommended by the Work Group to achieve objectives required to facilitate Desired Outcome No. 3. Table 3-4 also indicates the types of IRWM Program assets involved in supporting the recommended actions.

Initial recommended early action items focus on meeting with stakeholders and regulatory agencies to assess and promote opportunities for coordinating stormwater system maintenance, invasive species removal, and regional restoration and mitigation efforts.

Additional Resource Agency Coordination. In addition to the above-listed facilitating objectives for Desired Outcome No. 3, a number of work group participants also noted the need for fostering improved coordination among resource agencies to better and more efficiently achieve joint IRWM Program and RWQCB habitat restoration and recovery goals.

The Work Group noted that a number of resource agencies (including the RWQCB) are involved in reviewing and approving restoration, stormwater system maintenance, and invasive species removal. Work Group participants further noted that restoration, invasive species removal, or stormwater system maintenance efforts may be complicated by conflicting requirements from the range of resource agencies for which approval is required.

Table 3-4
Recommended IRWM/RWQCB Collaborative Actions to Support Desired Outcome No. 3
Support Prioritization of Habitat Restoration Needs and Opportunities

Objective to Facilitate Desired Outcome	Recommended Actions to Achieve Desired Outcome No. 3		
	Recommended Early Action Item	Recommended IRWM Plan Update Action	Potential Follow-Up Action
Develop and maintain a list of wetlands and riparian habitat restoration needs and opportunities	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene meeting with regulators and IRWM stakeholders to discuss: <ul style="list-style-type: none"> means of identifying, coordinating, and prioritizing restoration needs and opportunities a potential action plan for developing and maintaining a habitat restoration needs and opportunities priority list 	NA	<ul style="list-style-type: none"> Organize regional work group to (1) coordinate with stakeholders and resource agencies, (2) evaluate regional restoration needs, opportunities, and priorities, (3) develop a draft restoration priorities list, (4) vet the priorities list through the RWQCB and resource agencies, and (5) periodically review and revise the list
Evaluate potential opportunities for coordination of the RWQCB SEP process and other compensatory mitigation programs to support and promote habitat restoration and recovery	Technical Expertise / Stakeholder Communication		
	<ul style="list-style-type: none"> Convene meeting with RWQCB to assess means for coordinating IRWM Program support with the RWQCB SEP process and other compensatory mitigation programs 	NA	NA
Support and secure funding for wetlands and riparian habitat restoration and recovery efforts	Project Funding		
	NA	<ul style="list-style-type: none"> Update IRWM Plan and modify project funding screening criteria to encourage projects that (1) coordinate with stakeholders and resource agencies to evaluate regional restoration needs, opportunities, and priorities, (2) develop a draft restoration priorities list, (3) obtain resource agency approval of the list, and/or (4) maintain and update the priorities list 	<ul style="list-style-type: none"> Prepare IRWM funding applications to provide resources for funding a regional restoration prioritization efforts IRWM approval of funds for regional restoration prioritization effort

Within the constraints allowed within the regulations under which each of the resource agencies operate, some Work Group members expressed a desire to initiate dialogue with resource agencies to discuss opportunities for regional coordination that may help to minimize agency conflicts and facilitate (if not streamline) agency approval of regional programmatic permits for stormwater system maintenance and invasive species removal.

While the Work Group did not achieve consensus on promoting such coordination or streamlining efforts, some Work Group members expressed interest in pursuing this concept. To pursue this concept, the Work Group noted that interested stakeholders could convene a meeting with regulators to identify and discuss opportunities for (1) improving resource agency coordination, and (2) exploring means for regional programmatic permitting of invasive species removal, routine and emergency stormwater system maintenance, and ecosystem restoration.

3.3 Implementation Plan Summary

Recommended Early Action Items. Table 3-5 (page 3-12) summarizes recommended early action items to initiate IRWM/RWQCB collaboration. Each of the recommended early action items can be immediately implemented upon RWMG and RAC approval and involve minimal costs.

Recommended IRWM Plan Update Actions. Table 3-6 (page 3-13) summarizes recommended IRWM Plan update actions to support the designated desired outcomes of IRWM/RWQCB collaboration. As shown in Table 3-6, recommended IRWM Plan updates include:

- incorporating the priority themes of the RWQCB Practical Vision, and
- modifying project screening and scoring criteria to encourage projects consistent with the designated desired outcomes of IRWM/RWQCB collaboration.

**Table 3-5
Summary of Recommended Early Action Items
to Achieve Desired Outcomes of IRWM/RWQCB Collaboration**

Objective to Facilitate Desired Outcome	Recommended Early Action Item: IRWM/RWQCB Collaboration	Desired Outcome that is Supported by Proposed Early Action Item		
		1. Basin Plan Support	2. Impaired Water Support	3. Prioritize Habitat Restoration Needs
Overarching Actions to Achieve Desired Outcome Nos. 1, 2, and 3				
Improve communication between the IRWM Program and RWQCB	• Assign IRWM representative as RWQCB liaison	●	●	●
	• Provide RWQCB with periodic IRWM progress reports for inclusion in Executive Officer reports to the RWQCB	●	●	●
Desired Outcome No. 1: Support Science-Based Basin Plan Objectives				
Ensure consistency between IRWM Plan and RWQCB Practical Vision	• Monitor development of RWQCB Practical Vision	●	●	●
	• Coordinate with RWQCB to ensure consistency between IRWM Plan and RWQCB Practical Vision	●	●	●
Identify science-based Basin Plan modifications that may warrant higher priority than provided in 2011 triennial review	<ul style="list-style-type: none"> • Convene caucus of IRWM stakeholders to review Basin Plan triennial review priorities and identify Basin Plan objectives that may warrant higher priority or scientific evaluation • Convene workshop with RWQCB and stakeholders to discuss means for coordinating and supporting the identified Basin Plan priorities 	●	●	
Identify research, data and or resources required to support scientific update of Basin Plan objectives	• Convene workshop with RWQCB and stakeholders to discuss research, data collection, data management, data assessment, and resources required to address identified objectives that warrant scientific update	●	●	
Desired Outcome No. 2: Support Science-Based Impaired Water Listings and Compliance				
Identify existing 303(d) listings that may warrant reevaluation or reclassification	<ul style="list-style-type: none"> • Convene caucus of IRWM stakeholders to review 303(d) listings and identify listings that may warrant update • Convene workshop with RWQCB and stakeholders to discuss means for coordinating and supporting review of the identified 303(d) listings 		●	
Identify research, data, and resources required to support 303(d) re-evaluation or re-classification	• Convene workshop with RWQCB and stakeholders to discuss data collection, data management, data assessment, and resources required to reevaluate or reclassify 303(d) listings	●	●	●
Desired Outcome No. 3: Support Prioritization of Habitat Restoration Needs and Opportunities				
Assess and promote resource agency interest in regional restoration prioritization	• Convene initial meeting with regulators and stakeholders to discuss means of identifying, coordinating, and prioritizing restoration opportunities			●
Evaluate potential opportunities for coordination of the RWQCB SEP process and other compensatory mitigation programs	• Convene meeting with RWQCB to assess means for coordinating IRWM Program support with the RWQCB SEP process and other compensatory mitigation programs			●

**Table 3-6
Summary of Recommended IRWM Plan Update Actions
to Achieve Desired Outcomes of IRWM/RWQCB Collaboration**

Objective to Facilitate Desired Outcome	Recommended IRWM Plan Update Action: IRWM/RWQCB Collaboration	Desired Outcome that is Supported by Proposed IRWM Plan Update Action		
		1. Basin Plan Support	2. Impaired Water Support	3. Prioritize Habitat Restoration Needs
Overarching Actions to Achieve Desired Outcome Nos. 1, 2, and 3				
Ensure consistency between IRWM Plan and RWQCB Practical Vision	<ul style="list-style-type: none"> Incorporate priority themes from RWQCB Practical Vision into updated IRWM Plan 	●	●	●
Desired Outcome No. 1: Support Science-Based Basin Plan Objectives				
Support and secure funding required for research, data collection, data management, data assessment, and resources required to support scientific update of Basin Plan objectives	<ul style="list-style-type: none"> Update IRWM Plan and modify project funding screening criteria to encourage data collection, data management, or data assessment projects that support the development of science-based Basin Plan objectives or site-specific objectives 	●	●	
Desired Outcome No. 2: Support Science-Based Impaired Water Listings and Compliance				
Support and secure funding required for data collection, data management, data assessment, and resources required to support science-based 303(d) evaluations	<ul style="list-style-type: none"> Update IRWM Plan and modify project funding screening criteria to encourage data collection, data management, or data assessment projects that support science-based 303(d) reevaluation or reclassification efforts. 		●	
Desired Outcome No. 3: Support Prioritization of Habitat Restoration Needs and Opportunities				
Support and secure funding for wetlands and riparian habitat restoration and recovery efforts	<ul style="list-style-type: none"> Update IRWM Plan and modify project funding screening criteria to encourage projects that (1) coordinate with stakeholders and resource agencies to evaluate regional restoration needs, opportunities, and priorities, (2) develop a draft restoration priorities list, (3) obtain resource agency approval of the list, and/or (4) maintain and update the priorities list 		●	●

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Appendix A
2011 Basin Plan
Triennial Review Priorities

**Table A-1
Unprioritized "P" List
2011 Basin Plan Triennial Review - Suggestions to Make the Basin Plan More Protective**

No.	Description	Category of Water Body		Triennial Review Priority and Ranking	
		Ground-water	Surface Water	TRAC Rank ¹	Assigned Tier ²
P-1	Designate Municipal Supply (MUN) as a beneficial use of San Juan Creek		X	2	1
P-2	Designate Municipal Supply (MUM) as a beneficial use of the San Diego Formation	X		2	2
P-3	Establish new beneficial use subcategories for Wetlands Habitat (WET), Natural Water Quality Enhancement (NWQE), and Flood attenuation (FLD)		X		1 ³
P-4	Establish a beneficial use for non-recreational (e.g. commercial/military) water contact		X		
P-5	Establish objective for pentachlorophenol		X		
P-6	Revise unionized ammonia objective to a formula dependent on temperature, pH and salinity		X		
P-7	Revise chloride water quality objective		X		
P-8	Revise objectives for dissolved oxygen, temperature and toxicity to protect steelhead		X		
P-9	Establish water quality objectives for biological (e.g. Index of Biotic Integrity)		X		1 ³
P-10	Establish water quality objectives for flow to maintain natural flow regimes		X		
P-11	Establish water quality objective for chrome to protect aquatic life		X		
P-12	Establish a water quality objective for trash		X	4	1 ³
P-13	Establish objective to control invasive species		X		
P-14	Prohibit discharges to vernal pools		X		
P-15	Prohibit airports in or on state waters		X		
P-16	Eliminate storm drain discharges to the ocean		X		
P-17	Establish implementation measures to maintain natural floodplain infiltration		X		
P-18	Establish policy that addresses compensatory and punitive mitigation.		X	5	1
P-19	Establish minimum 401 certification requirements (e.g. buffers, BMPs, mitigation)		X	5	1
P-20	Establish sea water desalination policy		X		1 ³
P-21	Establish policy requiring seasonal opening of coastal lagoon mouths.		X	2	1
P-22	Establish policy for treatment and diversion of low-flow runoff		X	1	1
P-23	Establish policy for pollution prevention	X	X		
P-24	Establish decision making policy based on precautionary principle	X	X		
P-25	Establish policy to address emerging contaminants.	X	X		

1 Ranking developed by Triennial Review Advisory Committee (TRAC)

2 Tier 1 indicates priorities that can be addressed by existing RWQCB staff resources. Tier 2 indicates additional items that would be addressed if sufficient RWQCB staff resources become available.

3 Comprehensive statewide policy review is currently underway with the State Water Resources Control Board

Table A-2
Unprioritized "R" List
2011 Basin Plan Triennial Review - Suggestions to Make the Basin Plan More Reasonable

No.	Description	Category of Water Body		Triennial Review Priority and Ranking	
		Ground-Water	Surface Water	TRAC Rank ¹	Assigned Tier ²
R-1	Evaluate appropriateness of COLD and WILD beneficial use designations in Chollas Creek		X		
R-2	Evaluate appropriateness of MUN and AGR beneficial uses in Salt Creek		X		
R-3	Consider redesignation of beneficial uses for shallow briny coastal aquifers	X			
R-4	Evaluate beneficial uses in San Luis Rey watershed and add Groundwater Recharge (GWR) as a beneficial use	X			
R-5	Establish tiered aquatic life beneficial uses based on condition and attainability		X		
R-6	Clarify where body contact recreation (REC-1) uses apply within state-regulated ocean waters		X	1	1
R-7	Evaluate appropriateness of REC-1 beneficial use in areas with controlled public access		X	1	1
R-8	Establish sub-category for REC-1 areas impacted by bacteriological loads from wildlife waste			1	1
R-9	Establish tiers of REC-1 designations based on degree of public contact		X	1	1
R-10	Evaluate water quality objective for turbidity		X		
R-11	Evaluate water quality objective for fluoride and consider effects of mandated fluoridation	X	X		
R-12	Establish water quality objectives based on seasonal flow variations		X	2	2
R-13	Evaluate water quality objectives for dissolved oxygen in enclosed bays and estuaries		X		
R-14	Evaluate water quality objectives for aluminum, pH, and dissolved oxygen in Sweetwater and Loveland Reservoir		X		
R-15	Replace California Toxics Rule objectives for metals with site-specific objectives		X	5	2
R-16	Develop water quality objectives for nitrogen and phosphorus based on natural background levels and the Numeric Nutrient Endpoint (NNE) framework		X	3	1
R-17	Develop groundwater quality objectives for nutrients on the basis of salt and nutrient management plans	X			
R-18	Evaluate TDS water quality objectives to take into account natural background conditions and imported water quality	X	X		
R-19	Develop region-wide salt and nutrient management plan to address effects of recycled water and imported water use	X			
R-20	Assess appropriateness of TDS groundwater objectives in the Lower Ysidora basin	X			
R-21	Establish variance or policy that addresses implementation of objectives in imported water storage reservoirs		X		
R-22	Establish variance or policy that addresses implementation of indirect potable recharge to reservoirs		X	4	2
R-23	Establish variance or policy that addresses implementation of indirect potable recharge to groundwater basins	X			
R-24	Evaluate appropriateness of iron and manganese water quality objectives for groundwaters	X			
R-25	Evaluate appropriateness of beneficial use designations for groundwater basins to facilitate recycled water use	X			
R-26	Evaluate water quality objectives and beneficial use designations using updated data and science	X	X		
R-27	Evaluate conformance of "potential beneficial use" with state-mandated "most probable future use" designations	X	X		
R-28	Develop copper, nickel, and zinc translators for San Diego Bay to identify ratio of dissolved:total metals		X		
R-29	Amend conditional waiver for onsite disposal systems to include advance treatment systems	X			
R-30	Exempt septic tank discharges from the Basin Plan nitrate water quality objective	X			
R-31	Establish policy to direct limited RWQCB resources to address most critical threats	X	X		
R-32	Establish policy addressing applicability of water quality objectives to constructed wetlands		X		
R-33	Establish policy that addresses atmospheric deposition and required coordination with air quality regulation		X		

¹ Ranking developed by Triennial Review Advisory Committee (TRAC).

² Tier 1 indicates priorities that can be addressed by existing RWQCB staff resources. Tier 2 indicates additional items that would be addressed if sufficient RWQCB staff resources become available.

Attachment B

***Summary of Potential Issues of Interest
IRWM/RWQCB Collaboration Opportunities***



Table B-1
Potential Issues of Interest:
I. Effective Communication and Stakeholder Input

Issue of Interest Identified by Work Group	Basis of Work Group Support for Issue of Interest
I.A Achieve top-level coordination and communication between the IRWM Program and RWQCB	<ul style="list-style-type: none"> • Existing and past staff-level coordination between the IRWM Program and RWQCB is acknowledged by the Work Group as beneficial. • Participation of RWQCB staff and RWQCB Board Member George Loveland in the RAC is acknowledged as beneficial. • Belief that not all RWQCB members are fully informed of the IRWM Program or potential IRWM program benefits. • Belief that continued high-level coordination between the RAC and RWQCB is beneficial to both organizations.
I.B Ensure that RWQCB staff and Board members better understand issues faced by permittees	<ul style="list-style-type: none"> • Belief that RWQCB staff and Board members could benefit from enhanced understanding of compliance, monitoring, and economic issues faced by permittees.
I.C Ensure that permittees better understand RWQCB requirements	<ul style="list-style-type: none"> • Belief that permittees would benefit from enhanced understanding of RWQCB regulatory mandates, procedures, and priorities.
I.D Improve coordination with State Board and EPA technical staff	<ul style="list-style-type: none"> • Recognition that RWQCB routinely confers with EPA and the State Board on issues related to CWA regulation or interpretation of water quality plans. • Belief that EPA and State Board staff understanding of issues would be enhanced with improved San Diego Region stakeholder input.
I.E Enhanced public input and public awareness of RWQCB issues	<ul style="list-style-type: none"> • Belief that San Diego Region water management stakeholders not directly involved in wastewater discharges may not understand RWQCB influence on regional water management issues.
I.F Ensure that IRWM funding proposals are in line with authorized RWQCB staffing	<ul style="list-style-type: none"> • Recognition that providing the RWQCB with additional resources may not in itself be sufficient, unless this is accompanied by State authorization of RWQCB staffing levels commensurate with the available resources.
I.G Improved communication with statewide IRWM efforts	<ul style="list-style-type: none"> • Belief that other IRWM programs within the State may face some of the same regulatory issues as the San Diego Region, and that coordination among the regions could benefit both the IRWM programs and RWQCBs.

Table B-2
Potential Issues of Interest:
II. Basin Planning Support

Issue of Interest Identified by Work Group	Basis of Work Group Support for Issue of Interest
II.A Lack of RWQCB staff resources to address prioritized Basin Plan modifications	<ul style="list-style-type: none"> • Acknowledgment that existing RWQCB resources allow for only 6.0 personnel years to address Basin Plan issues during the next three years, and that only a few of the high-priority Basin Plan modification issues can be addressed. • Belief that additional resources could allow the RWQCB to tackle additional priority Basin Planning issues.
II.B Need to update scientific assessments of relations between Basin Plan objectives and beneficial use protection	<ul style="list-style-type: none"> • Belief that Basin Plan objectives should be based on valid impacts thresholds and verifiable cause-and-effect relations between water quality and beneficial use protection needs. • Concerns that Basin Plan objectives derived from secondary (aesthetic) drinking water standards may not be appropriate.
II.C Development of biological objectives	<ul style="list-style-type: none"> • Acknowledgment that State Board and RWQCB development of biological objectives would allow focus on environmental improvement and outcome-based objectives, rather than compliance with numerical water quality values which may not be protective of beneficial uses.
II.D Increased stakeholder input to Basin Plan modification process	<ul style="list-style-type: none"> • Recognition that the recent RWQCB triennial review process focused on receiving stakeholder input from a wide variety of San Diego Region water management interests. • Belief that the RWQCB triennial review process could benefit from continued and enhanced stakeholder input.
II.E Salt and Nutrient Management Plans (SNMPs)	<ul style="list-style-type: none"> • Acknowledgement that past coordination between the RWQCB and San Diego Region stakeholders was instrumental in developing San Diego Region SNMP guidelines. • Belief that the IRWM Program and IRWM Plan may represent effective support mechanisms for SNMPs required under the State of California Recycled Water Policy.
II.F Update water quality objectives to account for seasonal water quality protection needs	<ul style="list-style-type: none"> • Belief that one-size-fits-all water quality objectives may not be fully protective of beneficial uses, and that seasonal variation and flow-related factors may be important in assessing water quality protection thresholds and water quality protection needs.
II.G Promote Indirect Potable Reuse (IPR)	<ul style="list-style-type: none"> • Acknowledgement that RWQCB support of indirect potable reuse/reservoir augmentation has been encouraging to implementing agencies. • Recognition that modification of existing RWQCB Basin Plan objectives or implementation policies may be required to foster development of indirect potable reuse/reservoir augmentation.

**Table B-3
Potential Issues of Interest:
III. 303(d)/TMDL Support**

Issue of Interest Identified by Work Group	Basis of Work Group Support for Issue of Interest
III.A Increased stakeholder input to 303(d) listing process and TMDL scheduling	<ul style="list-style-type: none"> • Recognition that the recent RWQCB 303(d) review process incorporated stakeholder input from a wide variety of San Diego Region water management interests. • Belief that the RWQCB 303(d) review process could benefit from continued and enhanced stakeholder input.
III.B Evaluate listing of imported water reservoirs on 303(d) list	<ul style="list-style-type: none"> • Belief that 303(d) listings may not be appropriate for surface reservoirs that are primarily comprised of stored imported water. • Belief that TMDLs should not be required for imported water reservoirs that exceed water quality objectives based on secondary (aesthetic) drinking water standards.
III.C Ensure that 303(d) listings are based on science and robust data	<ul style="list-style-type: none"> • Belief that 303(d) listings should be based on robust and representative data bases that indicate impairment to beneficial uses. • Beliefs that site-specific objectives may be appropriate for some watercourses on the 303(d) list. • Belief that 303(d) listings should be based on a scientific evaluation of cause and effect relations between water quality and beneficial use impairment.
III.D Streamline the 303(d) delisting process	<ul style="list-style-type: none"> • Belief that the burden of proof for the 303(d) delisting process is greater than for 303(d) listing.

**Table B-4
Potential Issues of Interest:
IV. Effective Data Management and Assessment**

Issue of Interest Identified by Work Group	Basis of Work Group Support for Issue of Interest
IV.A Lack of standardization of data collection	<ul style="list-style-type: none"> • Concerns that lack of standardization between individual compliance monitoring programs and regional monitoring efforts hinders proper assessment of collected data.
IV.B Allow for expansion of data transfer without using data against agencies	<ul style="list-style-type: none"> • Concerns that agencies have disincentive to perform additional monitoring, as receiving water data made available by stakeholders or agencies may result in 303(d) listings or more stringent requirements.
IV.C Duplicative data collection efforts	<ul style="list-style-type: none"> • Concerns that point-source compliance monitoring, non-point source compliance monitoring, and regional monitoring and research efforts conducted by various agencies may result in duplicative monitoring.
IV.D Ensure that collected data are useful and effectively analyzed	<ul style="list-style-type: none"> • Recognition that RWQCB regional monitoring framework is directed toward addressing the issue of effective data management and assessment. • Concerns that some collected data may not be useful in assessing compliance or impacts to beneficial uses. • Concerns that collected data are not always effectively assessed to evaluate compliance or impacts to beneficial uses.

Table B-5
Potential Issues of Interest:
V. Restoration and Mitigation Support

Issue of Interest Identified by Work Group	Basis of Work Group Support for Issue of Interest
V.A Improved streamlining of permit process to remove invasive species or flood channel vegetation	<ul style="list-style-type: none"> • Multiple agencies involved in approving invasive species removal in flood channels. • Concerns that agencies seeking to clear floodways are sometimes faced with conflicting requirements from differing regulatory agencies.
V.B Regional prioritization of restoration needs and opportunities	<ul style="list-style-type: none"> • Regional prioritization would be useful in guiding agencies in restoration efforts. • Belief that coordinated regional habitat restoration efforts could provide for greater environmental benefit.
V.C Cleanup and Abatement Support	<ul style="list-style-type: none"> • Belief that IRWM support of cleanup and abatement efforts could enhance conformance with Basin Plan objectives and protect beneficial uses.
V.D Development of pre-approved SEPs (Supplemental Environmental Projects)	<ul style="list-style-type: none"> • Belief that a pre-approved list of SEPs that are endorsed by the RWQCB would be useful to ensure that local enforcement monies are directed toward effective restoration and mitigation.
V.E Development of mitigation banks	<ul style="list-style-type: none"> • Acknowledgement that a number of regional mitigation banks have been established. • Belief that additional habitat-specific or centralized mitigation banks could assist regional agencies in water management decisions.
V.F Align IRWM funding, Cleanup and Abatement Account (CAA) funding, and funding/support for Supplemental Environmental Projects (SEPs)	<ul style="list-style-type: none"> • Belief that IRWM funding needs could be coordinated with funding support for SEPs or CAA funding.