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Amber Baylor

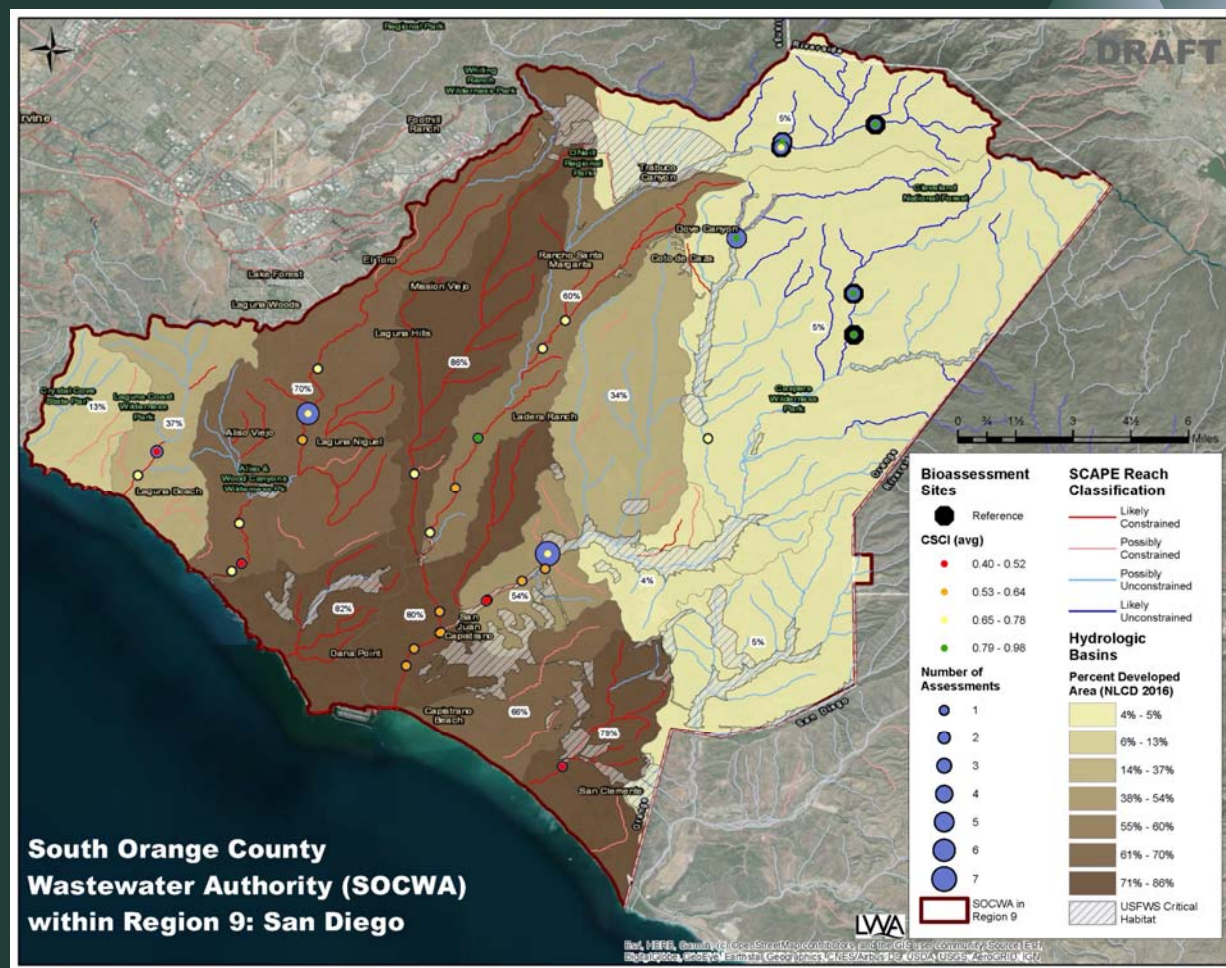
SOCWA

November 2020



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- The SDRWQCB is seeking to incorporate Biological Quality Objectives into their Basin Plan, subject to antidegradation policies pointing to insufficient chemical parameters on 303d list.
- Relevant for SOCWA PC12 Members.
- CSCI is a combined statistical prediction tool based on 90<sup>th</sup> percentile of reference condition that is used to support the Biological Quality Objectives.
- There are 32 bioassessment sites in the SOCWA service area.
- For 24 sites, bioassessment data existed for only 1 instance.
- Site bioassessment dates range from 1998 to 2015; unclear what data will be used for antidegradation baseline.
- SCAPE model tool, developed for the San Gabriel watershed is another screening tool for screening purposes.



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### Use of a Watershed Monitoring Plan Instead of a Biological Objective

Multiple commenters in the San Juan hydrologic unit suggested the use of a stakeholder driven watershed monitoring and assessment plan to evaluate receiving water condition and guide San Diego Water Board actions.

Response: While the San Diego Water Board is supportive of stakeholder-driven monitoring and assessment, such an approach would not meet the goals of the Stream Biological Objective. A monitoring-only effort would not alleviate the need for the San Diego Water Board to address all 303(d) listed chemical parameters through the use of total maximum daily loads (TMDLs) and TMDL alternatives. Rather, the lack of a Stream Biological Objective would maintain challenges to the effective identification of specific pollutants and pollution resulting in beneficial use impairment, thus stalling regulatory and planning actions to prioritize restoration and permitting actions. The Stream Biological Objective will also provide a basis for the evaluation of the appropriateness of current chemistry water quality objectives, potentially facilitating the development of site-specific chemical objectives where appropriate. In addition, the use of a Stream Biological Objective will provide for better protection of high quality waters.

While not a focus of the comment, it should be noted that the revisions to the proposed BPA at Chapter 4 included a reference to the appropriateness of using a watershed approach for Stream Biological Objective implementation, consistent with existing Basin Plan language. The use of a watershed-based monitoring plan to implement the Stream Biological Objective would be consistent with section 4-99 in the current Basin Plan.

### Impaired Water Bodies

Listing a water body as impaired in California is governed by the [Water Quality Control Policy for developing California's Clean Water Act Section 303\(d\) Listing Policy](#). The State and Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards. This biennial assessment is required under Section 303(d) of the [Federal Clean Water Act](#).

#### Final 2014/2016 California Integrated Report (Clean Water Act Section 303(d) List / 305(b) Report)

2014 and 2016 Integrated Report | Map | 303(d) List | References | Data Download | Contact Us

#### 2014 AND 2016 INTEGRATED REPORT — 303(D) LISTED WATERS

Zoom to county: All | Zoom to Regional Board: All | Map Help

Show county |  Show Regional Board

Zoom to water body: (Filter: All) | Filter list by: | Reset list

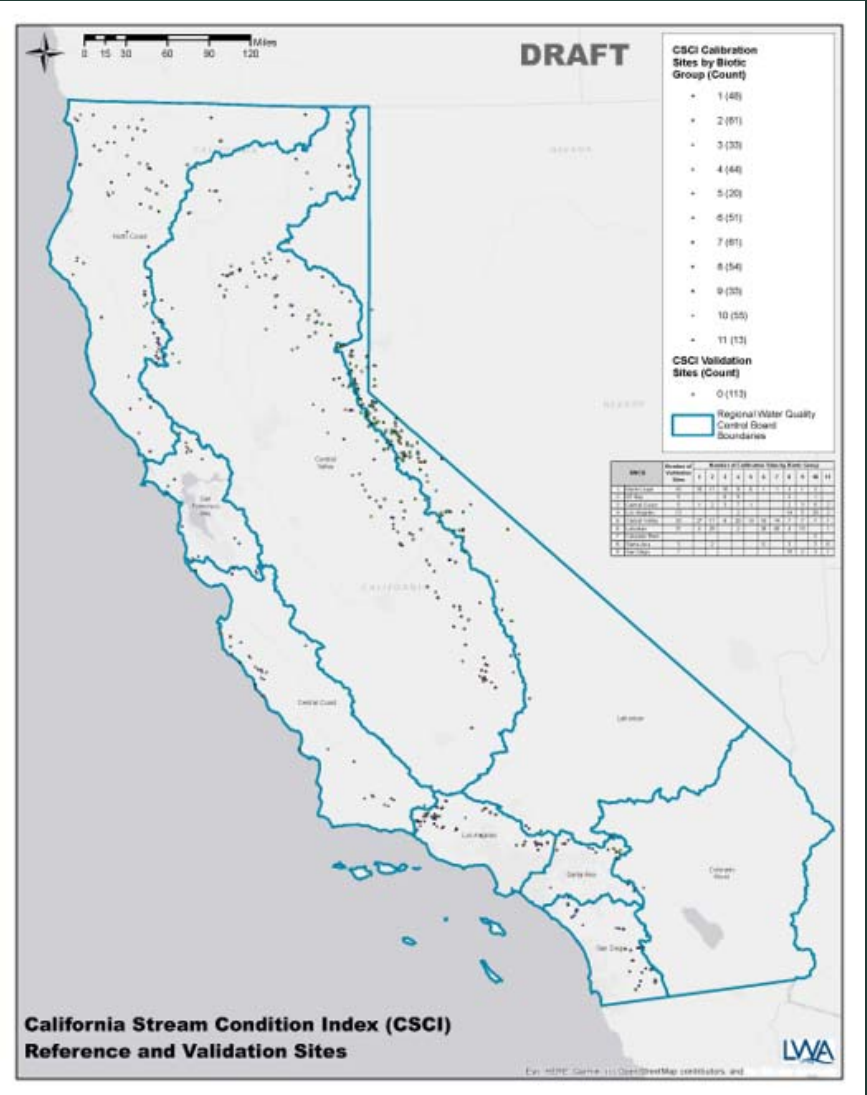
Show all assessed waters  
 Show only impaired ("303(d)-listed") waters

Show water bodies by pollutant:

Pollutant category: All

Pollutant: All

Reset filters

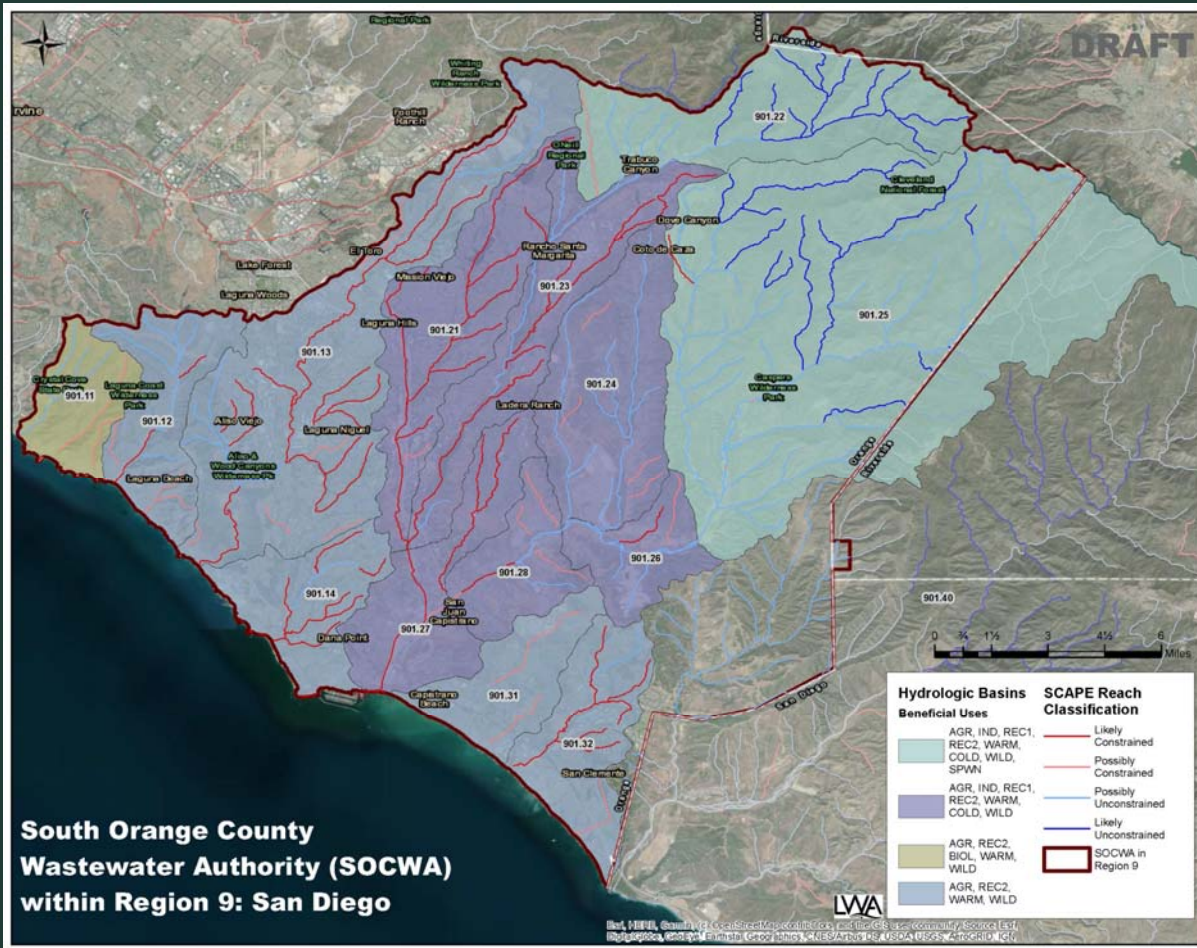


RWQCB	Number of Validation Sites	Number of Calibration Sites by Biotic Group										
		1	2	3	4	5	6	7	8	9	10	11
1 North Coast	16	16	11	16	8	6	1	1	3	1	2	
2 SF Bay	5			6	5				2		1	
3 Central Coast	5	1	2	3	7	1			2	3	9	2
4 Los Angeles	13				2				14	5	29	2
5 Central Valley	33	27	17	8	20	13	16	14	7	7	7	1
6 Lahontan	31	4	29		2		28	46	4	15		1
7 Colorado River											2	
8 Santa Ana	3		2				6		3		2	6
9 San Diego	7								19	2	3	1



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- Resolution No. R9-2020-0234: “CSCI will provide for a robust, direct assessment of whether WARM and COLD beneficial uses are in attainment or impaired”
- SDRWQCB determines that the policy is consistent with 13241 and meets the “necessity” requirement related to the Administrative Procedures Act.
- November 18, 2020 SDRWQCB Meeting public comments and potential presentation.