California Regional Water Quality Control Board
San Diego Region
David Gibson, Executive Officer

Executive Officer's Report
November 18, 2020

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The November report for the Tentative Schedule of Significant NPDES Permits, WDRs, and Actions; Agenda Items Requested by Board Members; and the attachments noted above are included at the end of this report.

Part A – San Diego Region Staff Activities

1. Personnel Report

Staff Contact: Dulce Romero

An updated staff list of the San Diego Water Board can be viewed at: https://www.waterboards.ca.gov/sandiego/board_info/agendas/2020/nov/StaffList_Nov2020.pdf.

Recruitment

The recruitment process continues to fill one Scientific Aid in the Wetland and Riparian Protection Unit and one Student Assistant (Engineering and Architectural Sciences) in the Groundwater Protection Unit.

Recent Hire

Congratulations to Cynthia Cortez who began work on October 1, 2020, as a Student Assistant (Engineering and Architectural Sciences) in the Storm Water Management Unit. Cynthia is a Chemical Engineering Student at the University of California, San Diego. She will be working primarily on assisting the public with obtaining industrial storm water permit coverage pursuant to Senate Bill (SB) 205. SB 205 (2019) requires a person applying to a city or county for a new or renewed business license to demonstrate enrollment in a National Pollutant Discharge Elimination System (NPDES) storm water permit, if such a permit is required.

Information on our vacancies can be found on the CalCareers and San Diego Water Board websites:

https://calcareers.ca.gov/CalHRPublic/Search/AdvancedJobSearch.aspx

https://www.waterboards.ca.gov/sandiego/about_us/employment/

Part B – Significant Regional Water Quality Issues

1. Commercial Agriculture Regulatory Program Update

Staff Contacts: Christina Arias and Jason DuMond

Since the San Diego Water Board adopted Commercial Agriculture Order Numbers R9-2016-0004 and R9-2016-0005 (General Agricultural Orders[1]) in November 2016, the Commercial Agriculture Regulatory Program (Program) has spent substantial effort on increasing enrollment. Additionally, Program staff continue to identify collaboration opportunities for education and outreach with agencies such as the local municipalities and Third-Party Group grower coalitions.

[1] The Orders are available at this website: https://www.waterboards.ca.gov/sandiego/water_issues/programs/commercial_agriculture/

Enforcement

As the local farm community is primarily comprised of thousands of small (<10 acre) operations, educating and enrolling owners and operators is a challenging, time-consuming process. The Program's enforcement process begins with issuing Directives to non-filers, instructing them to enroll within 30 days. The next step, if necessary, is to issue Notices of Violation to growers who had not responded to the Directives. This involves identifying the proper responsible party, explaining the requirements of the General Agricultural Orders, and putting the responsible parties in contact with Third-Party Group grower coalitions. Staff have been able to successfully enroll an additional 150 operations with this enforcement effort and now have approximately 1,400 growers and more than 35,000 acres enrolled in the General Agricultural Orders.

In a few instances, the informal enforcement process described above has not resulted in compliance. On January 23, 2020, the San Diego Water Board issued an offer to settle administrative civil liability to Peltzer Family Cellars, L.L.C. (Peltzer), to address penalties associated with alleged violations of the General Agricultural Orders. On April 30, 2020, Peltzer accepted the San Diego Water Board's offer and waived its right to a hearing. Peltzer is now enrolled in the Program under membership of the Upper Santa Margarita Irrigated Lands Group. On October 6, 2020, Peltzer submitted payment of $3,333 to settle the financial penalty associated with the administrative civil liability for failing to enroll.

With the help of the San Diego Water Boards' Compliance Assurance Unit, the Program has issued four additional offers to settle administrative civil liabilities since August 2020. One grower has agreed to settle the allegations and the enforcement case is in the final stages, which includes a 30-day public review and comment period. The remaining three cases are still in development.

Outreach and Education

Program staff have been building partnerships with the local municipalities, specifically the Municipal Separate Storm Sewer System (MS4) Copermittees, to respond to complaints and to educate and assist growers with meeting requirements of the Program. Upon receiving a complaint, staff reach out to the MS4 Copermittees to coordinate and assist with information gathering and complaint response. In addition, when the MS4 Copermittees find non-filers during their routine inspection efforts, they contact the Program staff to alert them of the non-compliant growers.

San Diego Water Board staff Christina Arias will present Program information in a webinar hosted by the Region's largest grower coalition, the San Diego Region Irrigated Land Group (SDRILG), on November 18, 2020. The purpose of the presentation is to provide background to SDRILG members regarding the San Diego Water Board's mission, goals of the Program, and requirements for all owners and operator. SDRILG members will receive educational credit, as required under the Agricultural General Orders, for participating. Program staff hope to use this outreach opportunity to connect with many growers, share information, and answer questions about the Program.

2. Wildfires and Climate Change *(Attachment B-2)*

Staff Contacts: Jimmy Smith and Jill Harris

This year, California and the West Coast are yet again experiencing devastating wildfires. Since mid-August, hundreds of wildfires have burned over a million acres throughout California, causing numerous deaths, hundreds of thousands of evacuations, dangerous air quality, and smoke reaching the East Coast of the United States. Unfortunately, the severe fires in 2020 may no longer be a unique event: wildfires in California have become increasingly large, frequent, and damaging in the past few decades, and this pattern is expected to continue.

The Department of Forestry and Fire Protection (Cal Fire) reports that 15 of the 20 largest fires in California since recordkeeping began in 1932 occurred since 2000, and 5 of the top 6 occurred this year (See Attachment B-2). When the Cedar Fire burned over 270,000 acres in San Diego County in 2003, it was the largest fire to have occurred in State history. Now, it is the 8th largest and only about one-third the size of the August Complex Fire in and around Mendocino County. Further south, the LNU Lightning Complex fires[2] in the Napa area have destroyed almost 1500 structures.

The LNU Lightning Fire (capradio.org)

[2] The name of the complex fires refers to the name of the local unit of Cal Fire, the Sonoma–Lake–Napa Unit (LNU).

It is likely that the increased intensity and frequency of wildfires are a result of a changing climate as drought, higher temperatures, stronger winds, and large lightning storms all contributed to the current fires. But what can be found in the scientific literature? Several recent peer-reviewed scientific articles and investigative journalism pieces have explored the connection between climate change and wildfires in the west. Together, these analyses all point to climate change, along with questionable forestry management practices, as the likely causes for the numerous and large fires the west continues to face.

For example, a recent scientific study asserts that the increased extent of wildfires in California since the 1970s is likely caused by human-induced warming.[3] Higher temperatures directly dry potential fuels and increase winds that also contribute to an atmospheric vapor pressure deficit (VPD), which is a measure of air moisture. The later arrival of winter rains is also found to contribute to fall forest fires. The study concludes that forest fire area increases exponentially with VPD, and the forests of the Sierra Nevada and North Coast should expect the trend of enhanced wildfires to continue.

Another recent study[4] looked at wildfires as a contributor to poor air quality and modeled emission projections from wildfires under multiple climate change scenarios and a range of population growth estimates for California. They predict a median increase of carbon dioxide wildfire emission of 56 percent above the baseline period of 1961 - 1990. This increase is driven almost entirely by climate change, with little influence of population growth or development. As climate change increases wildfire emissions, those larger populations in newly developed areas are likely to suffer from harmful air quality. They go on to conclude that *"Efforts to adapt to changing climate and projected increases in large fire frequency are likely going to require the restoration of fire as a natural process in these systems."*

The U.S. Global Change Research Program delivers the National Climate Assessment to Congress and the President no less than every four years. Among other research topics, they analyze trends in global change, both human-induced and natural, and project major trends for the subsequent 25 to 100 years. The fourth assessment[5] finds that "*The integrity of Southwest forests and other ecosystems and their ability to provide natural habitat, clean water, and economic livelihoods have declined as a result of recent droughts and wildfire due in part to human-caused climate change. Greenhouse gas emissions reductions, fire management, and other actions can help reduce future vulnerabilities of ecosystems and human well-being."* They also find that the area burned in the Southwest from 1984 to 2015 was twice the amount that would have burned had climate change not occurred (Figure 1). The causative factors include increased temperatures that have intensified drought and pest infestations that have

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[3] Williams, AP et al (2019) Observed Impacts of Anthropogenic Climate Change on Wildfire in California, *Earth's Future* 7(8): 892-910. (Link to paper)

[4] Hurteau, MD et al (2014) Projected Effects of Climate and Development on California Wildfire Emissions through 2100, *Environmental Science and Technology* 48: 2298-2304. (Link to Hurteau paper).

[5] Reidmiller, DR et al (2018) Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II, US Global Research Program, 1515 pp. (Link to 4th Climate Assessment)

dried and killed trees making them more susceptible to burning. Continued greenhouse gas emissions are projected to lead to more wildfires across the Southwest, with fire frequency increasing 25 percent and the occurrence of very large fires increasing three times.

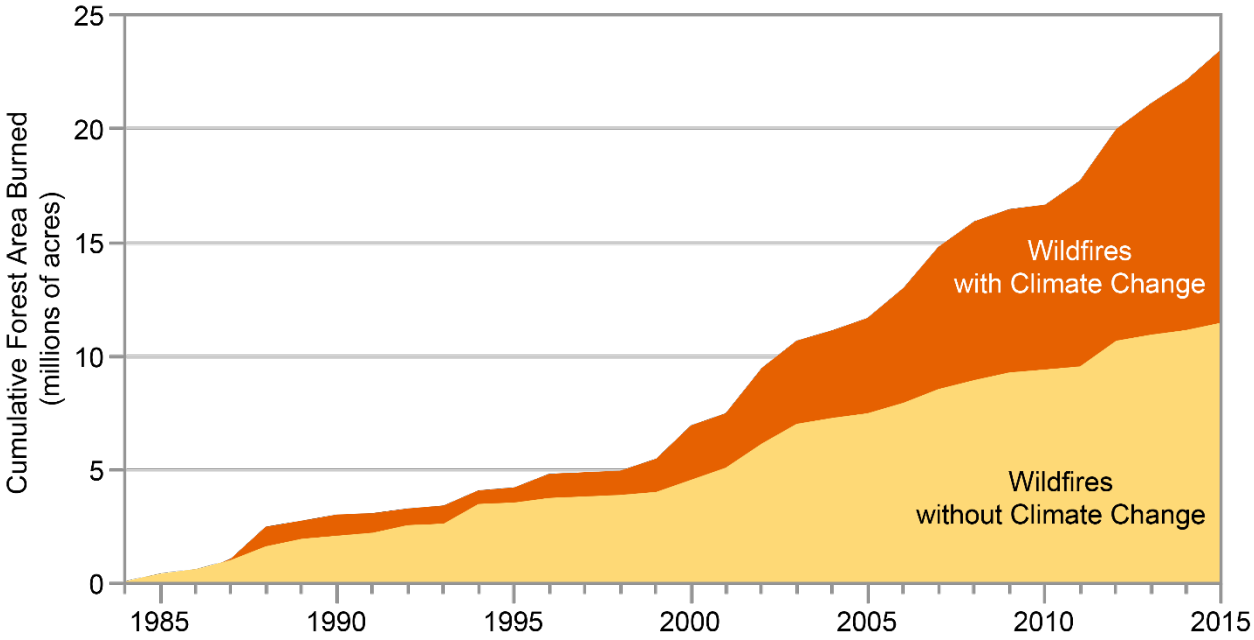


Figure 1 Climate Change Has Increased Wildfire (USGRP, 4th Climate Assessment)

Beyond peer-reviewed journal articles, the press is also actively pursuing the link between wildfires, climate change and fire management. Recent analyses have shown that increasing wildfires are tipping the balance of forests as net carbon sinks. In fact, between 2001-2010, California's forests emitted more carbon from burning than they soaked up, according to a recent article[6] that relates findings of the National Park Service and the University of California. The 2014 King Fire alone, burning just under 100,000 acres and so not among the 20 largest fires in state history, is estimated to have released 5.2 million metric tons of carbon, an amount equivalent to the emissions of 1.1 million passenger cars in a year. With twice the amount of carbon in forests than in the atmosphere, this has large implications for climate change. These conditions have created a positive feedback loop, where megafires contribute to climate change that encourages longer fire seasons and bigger fires.

The New York Times recently published a set of in-depth articles[7] covering the connection between wildfires and climate change, including the impacts of altered Santa Ana winds, consequences for some of the most vulnerable populations, and the need to set small fires today to prevent large fires tomorrow. One of the pieces from 2017, *In a Warming California, a Future of More Fire,* the New York Times reports that *"Climate Change will increase year-to-year variability in temperature and precipitation that will*

[6] Shogren, E (2017) What fire researchers learned from California's blazes, High Country News, 11 December (Link to article)

[7] The New York Times (2020) The Climate Connections to California's Wildfires, The New York Times, 8 September (Link to NY Times).

create greater contrast between drought years and wet years. And that can lead to much greater fire risk."

An article published at the end of September 2020[8] directly claims that *"the consequences climate scientists have long been warning about are coming to fruition in the increased intensity of natural disasters around the globe, recently in the form of devastating wildfires that ravaged the western states and enshrouded areas not plagued with flames under hazes of smoke."* The article quotes many scientists who paint a grim picture for California's future:

> *"What we're seeing with the fire activity really is climate change, and it really is climate change smacking us in the face. This year, certainly in the western U.S., is the worst fire year in recent history."*
>
> Dr. Phillip Duffy, climate scientist and president and executive director of the Woodwell Climate Research Center
>
> *"These are not unprecedented events. Scientists know these types of fires burned in the late 1800s and early 1900s, but it's the frequency at which they are now burning that has become a concern."*
>
> Dr. Crystal Raymond, climate adaptation specialist with the Climate Impacts Group at the University of Washington
>
> *Climate change is expected to continue to cause our wildfire season to be longer and more intense, and so we do need to start preparing for a future in which we experience these longer, more intense wildfires more frequently."*
>
> Dr. Kristina Dahl, senior climate scientist at the Union of Concerned Scientists
>
> *The ignition source of wildfires, whether lightning or human-caused, has "been around for millennia." When you add a wind event on top of that, it then kicks the fires into high gear, allowing the fire to spread rapidly into communities. As the climate warms, the potential for those ingredients for fire to align with one another are increasing"*
>
> Dr. Brian Harvey, professor of fire and forest ecology at the University of Washington

The article attempts to end on a hopeful note by outlining the steps necessary to mitigate the fire danger. Improved forest management will help, but widespread policy changes are needed to drastically cut greenhouse gas emissions to the atmosphere that are contributing to extreme weather events. Other interim steps include better vegetative clearing around structures, stricter building codes to include fire resistant materials, and a re-evaluation of development at the wildland urban interface.

Climate change is widely expected to enhance wildfires already made more intense by forest management practices. This does not bode well for the fall that has typically been a season of intense wildfires in the San Diego Region. Prevention and awareness are critical to safely navigating longer and more intense fire seasons. The San Diego County Fire Authority offers numerous tips for community risk reduction (Link to SD

[8] Jacobo, J. (2020), How climate change affects wildfires, like those in the West, and makes them worse, *ABC News,* 30 September (Link to ABC News article)

County Fire Authority). Cal Fire is good source of information on active fires (Link to Cal Fire). As Smokey Bear continues his long campaign that *"Only you can prevent wildfires"* his website offers numerous educational materials (Link to Smokey), reminding us all to do what we can to prevent, prepare for and mitigate the impacts of wildfires in our region.

3. Sanitary Sewer Overflows and Transboundary Flows from Mexico in the San Diego Region – August 2020 *(Attachment B-3)*

Staff Contact: Keith Yaeger

Sanitary sewer overflow (SSO) discharges from public sewage collection systems and private laterals, and transboundary flows from Mexico into the San Diego Region can contain high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oil, and grease. SSO discharges and transboundary flows can pollute surface and ground waters, thereby threatening public health, adversely affecting aquatic life, and impairing the recreational use and aesthetic enjoyment of surface waters. Typical impacts of SSO discharges and transboundary flows include the closure of beaches and other recreational areas, the inundation of property, and the pollution of rivers, estuaries, and beaches.

Sanitary Sewer Overflows (SSOs)

State agencies, municipalities, counties, districts, and other entities (collectively referred to as public entities) that own or operate sewage collection systems report SSO spills through an on-line database system, the *California Integrated Water Quality System* (CIWQS). These SSO spills are required to be reported under the Statewide General SSO Order,[9] the San Diego Regional General SSO Order,[10] and/or individual National Pollutant Discharge Elimination System (NPDES) permit requirements. Some federal entities[11] report this information voluntarily. Most SSO reports are available to the public on a real-time basis at the following State Water Board webpage: https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main.

[9] State Water Board Order No. 2006-0003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems* as amended by Order No. WQ 2013-0058-EXEC, *Amending Monitoring and Reporting Program for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems*.

[10] San Diego Water Board Order No. R9-2007-0005, *Waste Discharge Requirements for Sewage Collection Agencies in the San Diego Region*.

[11] Marine Corps Base Camp Pendleton reports sewage spills to CIWQS as required by its individual NPDES permit, Order No. R9-2013-0112, NPDES Permit No. CA0109347, *Waste Discharge Requirements for the Marine Corps Base, Camp Pendleton, Southern Regional Tertiary Treatment Plant and Advanced Water Treatment Plant, Discharge to the Pacific Ocean via the Oceanside Ocean Outfall*. The U.S. Marine Corps Recruit Depot and the U.S. Navy voluntarily report sewage spills through CIWQS.

Details on the reported SSOs are provided in the following attached tables:

- Table 1: August 2020 - Summary of Public and Federal Sanitary Sewer Overflow Events
- Table 2: August 2020 - Summary of Private Lateral Sewage Discharge Events
- Table 3: August 2020 - Summary of Sewage Discharges by Source

A summary view of information on SSO trends is provided in the following attached figures:

- Figure 1: Number of SSOs per Month
- Figure 2: Volume of SSOs per Month

These figures show the number and total volume of sewage spills per month from August 2019 to August 2020. During this period, 37 of the 63 collection systems in the San Diego Region regulated under the Statewide SSO Program reported one or more sewage spills. Twenty-six collection systems did not report any sewage spills. A total of 320 sewage spills were reported and over 14.6 million gallons of sewage reached surface waters.

Additional information about the San Diego Water Board sewage overflow regulatory program is available at https://www.waterboards.ca.gov/sandiego/water_issues/programs/sso/index.shtml.

Transboundary Flows

Water and wastewater in the Tijuana River and from canyons located along the international border ultimately drain from the City of Tijuana, Mexico into the United States (U.S.). The water and wastewater flows are collectively referred to as transboundary flows. The U.S. Section of the International Boundary and Water Commission (USIBWC) operates canyon collectors that capture dry weather transboundary flows for treatment at the South Bay International Wastewater Treatment Plant (SBIWTP) at the U.S./Mexico border. Dry weather transboundary flows that are not captured by the canyon collectors for treatment at the SBIWTP, such as flows within the main channel of the Tijuana River,[12] are reported by the USIBWC pursuant to Order No. R9-2014-0009, the NPDES permit for the SBIWTP discharge. These uncaptured flows can enter waters of the U.S. and/or State, potentially polluting the Tijuana River Valley and Estuary, and south San Diego beach coastal waters.

During the month of August 2020, there were five reported dry weather transboundary flows that resulted in over 19 million gallons of contaminated water[13] flowing from Mexico into the United States. On August 20, 2020, Pump Stations PB-1 and CILA were shut down to perform repairs on the conveyance system in Mexico. With Pump

[12] Tijuana River transboundary flows typically consist of a mixture of groundwater, urban run-off, storm water, treated sewage wastewater, and untreated sewage wastewater from infrastructure deficiencies and other sources in Mexico.

[13] As used in this report, the term "contaminated water" is intended to refer to water that either meets the definition of "contamination" under Water Code section 13050(k) or that creates, or threatens to create, a condition of "pollution" under Water Code section 13050(l).

Station CILA shut down, flow in the Tijuana River bypassed the River Diversion Structure and crossed the U.S./Mexico border. Pump Station PB-1 and CILA were reactivated on August 21, 2020. Details on the transboundary flows reported in August 2020 are provided in the attached tables:

- Table 4: August 2020 - Summary of Transboundary Flows from Mexico by Event
- Table 5: August 2020 - Summary of Transboundary Flows from Mexico by Weather Condition

According to the 1944 *Water Treaty for the Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande* and stipulations established in IBWC Minute No. 283, the USIBWC and the Comisión Internacional de Limites y Aguas (CILA)[14] share responsibility for addressing border sanitation problems, including transboundary flows. Efforts on both sides of the border have led to the construction and ongoing operation of several pump stations and treatment plants to reduce the frequency, volume, and pollutant levels of transboundary flows. This infrastructure includes but is not limited to the following:

- The SBIWTP, located just north of the U.S./Mexico border, provides secondary treatment for a portion of the sewage from Tijuana, Mexico and transboundary flows conveyed from canyon collectors located in Smuggler's Gulch, Goat Canyon, Canyon del Sol, Stewart's Drain, and Silva Drain. The secondary-treated wastewater is discharged to the Pacific Ocean through the South Bay Ocean Outfall, in accordance with USIBWC's NPDES permit, Order No. R9-2014-0009.
- Several pump stations and wastewater treatment plants in Tijuana, Mexico.
- The River Diversion Structure and Pump Station CILA in the City of Tijuana diverts dry weather transboundary flows from the Tijuana River. The flows are diverted to a discharge point at the Pacific Ocean shoreline, approximately 5.6 miles south of the U.S./Mexico border; or the flows can be diverted to SBIWTP or another wastewater treatment plant in Tijuana, depending on how Tijuana's public utility department (CESPT) directs the flow into the collection system. The River Diversion Structure is not designed to collect wet weather river flows and any river flows over 1,000 liters per second (35.3 cubic feet per second, 22.8 MGD).

Additional information about sewage pollution within the Tijuana River Watershed is available at https://www.waterboards.ca.gov/sandiego/water_issues/programs/tijuana_river_valley_strategy/sewage_issue.html.

[14] The Mexican section of the IBWC.

Part C – Statewide Issues of Importance to the San Diego

1. Fiscal Year 2019-20 Invoice Collection Report and Fiscal Year 2020-21 Annual Fee Schedule

Staff Contact: Kimberly A. McMurray-Cathcart

Introduction

Each person who discharges waste or proposes to discharge waste that could affect the quality of the waters of the state of California (State) is required by California Water Code (Water Code) section 13260 to pay an annual fee and file a report of waste discharge with the appropriate Regional Water Quality Control Board. The State Water Resources Control Board (State Water Board) adopts regulations which establish an annual schedule of fees in accordance with Water Code section 13260. The State Water Board is also required to adjust fees annually to conform to the revenue levels set forth in the Budget Act. The State Water Board adopted the Fiscal Year (FY) 2020-21 annual schedule of fees in September 2020.[15]

Annual fees are collected through scheduled invoicing of dischargers by the State Water Board. Revenue collected through the invoicing of annual fees is deposited in the Waste Discharge Permit Fund (WDPF), as required by the Water Code. Inquiries from dischargers about the nature, basis, and content of the invoices sent by the State Water Board are fielded by the Fee Coordinators at the Regional Water Boards. Typically, about five percent of invoiced parties in the San Diego region contact the Fee Coordinator with questions. Some inquires, such as requests to terminate or transfer permit coverage, involve follow-up actions facilitated by program staff.

Distinct from other program fees, Site Cleanup Program (SCP) dischargers are not subject to invoicing for payment of annual fees under Water Code section 13260. Instead, Water Code section 13304 authorizes the Regional Water Boards to recover costs associated with the oversight of clean up at sites where a discharge of waste has occurred and that discharge creates, or threatens to create, a condition of pollution or nuisance. The SCP is funded from the Cleanup and Abatement Account (Cleanup Account), oversight costs are billed to responsible parties, and the costs recovered are deposited back into the Cleanup Account. The State Water Board invoices dischargers on behalf of the Regional Water Boards for oversight work performed by staff assigned to cleanup sites.

Invoicing Fiscal Year 2019-20

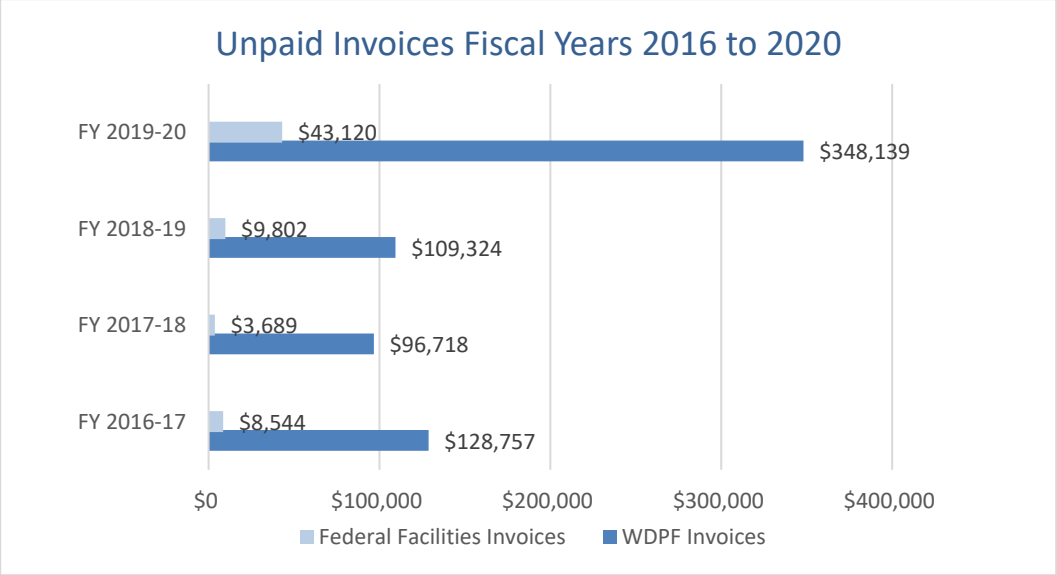
The State Water Board generated 2,625 WDPF invoices for San Diego Region dischargers in FY 2019-20. The invoices represented $9,561,531 in revenue for the WDPF; approximately 4 percent more revenue than was invoiced in FY 2018-19. Increased revenue for the WDPF in FY 2019-20 from the San Diego Region is largely attributable to increases in annual fees adopted in the FY 2019-20 Fee Schedule.

[15] The Fee Schedule is in the California Code of Regulations at title 23, Cal. Code Regs., §2200 (Fee Schedule). The FY 2020-21 Fee Schedule has been filed with the Office of Administrative Law and will be filed with the Secretary of State prior to becoming regulation. A copy of the Fee Schedule can be found at https://www.waterboards.ca.gov/resources/fees/.

The State Water Board sent San Diego Region dischargers in the SCP 179 invoices for work performed in FY 2019-20. The invoices represented $802,339 in Cleanup Account recovery costs, which is a 2 percent increase in recovery costs billed over the same period in FY 2018-19.

Unpaid Invoices in the San Diego Region Fiscal Years 2015 to 2019

As of July 1, 2020, the total amount of unpaid WDPF invoices from FY 2016-17 through FY 2019-20 is $682,938. Of that total, $65,155 is owed by federal facilities. The total amount of unpaid invoices for each fiscal year between July 2017 and June 2020 is displayed below alongside the amounts attributable to federal facilities. Overall, receivables generally decrease over time due to persistent collection efforts. For example, as of July 1, 2019 the total amount of unpaid invoices for FY 2018-19 was $294,040 with $14,965 attributable to federal facilities. As of 1 July 2020, as shown below, the amount was reduced by $189,879.



Process for Collection of Unpaid Invoices

Thirty days after a WDPF annual fee or SCP invoice is sent, payment to the State Water Board is due (Due Date). Following the Due Date, the State Water Board Division of Administrative Services (DAS) pursues payment compliance through a notice process to dischargers with unpaid invoices. DAS mails delinquent parties a Demand for Payment within 30 days following the Due Date, a Notice of Violation within 60 days, and then a Final Collection Letter within 90 days. The Final Collection Letter notifies a discharger that the overdue payment will be sent to a collection agency.

The normal process for collection of unpaid invoices was interrupted following the Governor's statewide order to close all but essential businesses in March 2020. In April 2020, DAS deferred the payment compliance measures described above for a 60-day period as an initiative to implement available COVID-19 relief efforts for annual fee stakeholders experiencing disrupted business operations. Demands for Payment, Notices of Violation, and Final Collection letters were not sent out by mail on the normal 30-60-90-day cycle to those dischargers with an unpaid invoice. In addition, businesses experiencing difficulties with timely payment were encouraged to contact DAS to determine if other mechanisms, such as payment plans, could be arranged to accommodate payment delays. The total amount of unpaid invoices increased by 18

percent at the end of FY 2019-20, compared with the total amount of unpaid invoices at the end of FY 2018-19. Whether this increase is related to the postponed payment compliance measures is unclear.

Across the State, there is about a 98 percent success rate collecting amounts due on invoices from dischargers. The remaining two percent of past due invoices are sent to a collection agency. The San Diego Region relies on the DAS process and has generally pursued civil liability for past due annual fees through an Administrative Civil Liability (ACL) Complaint only when the discharger is facing an ACL for other violations.

Pursuant to Water Code section 13261, the Water Boards can assess civil liability in an amount up to $1,000 per day for unpaid annual fee invoices. Unpaid annual fee invoices may also justify rescission of waste discharge requirements, including storm water and other National Pollutant Discharge Elimination System (NPDES) permits. Under Water Code section 13304, a judgment lien may be recorded on a property where SCP oversight costs have not been recovered from a discharger and that lien may be foreclosed by the State to recover money on the judgment lien.

Federal facilities do not receive Demands for Payment, Notices of Violation, and Final Collection Letters for failure to pay invoices, as overdue payments attributable to federal facilities are referred to the State Water Board, Office of the Chief Counsel, for collection.

Fiscal Year 2020-21 Annual Fee Schedule Highlights

Due to the transition to the Fi$Cal accounting system in FY 2018-19, the State Water Board has been unable to generate robust reports on FY 2019-20 revenue and expenditures, or gauge the total fund reserve at the beginning of FY 2020-21. Further uncertainty has been created by COVID-19 related economic impacts that may affect dischargers' ability to generate revenue, which in turn may affect the ability to pay annual fee invoices.

These uncertainties, and other considerations such as staff vacancies associated with various Fee Schedule options presented by DAS staff, were the subject of a 4-hour public deliberation by the State Water Board in September 2020. State Water Board members ultimately resolved to take a moderate approach that increases fees in FY 2020-21 to cover most aspects of the proposed Budget Change Proposals (BCPs) and minimize staff vacancies, but deferred the full annual fee increases needed to fill all staff positions until FY 2021-22.

As of March 2020, DAS planned to present the State Water Board with a Fee Schedule recommendation that would avoid raising annual fees in FY 2020-21 based on reduced projected expenditures resulting from statewide salary cuts in FY 2020-21. However, by June 2020 the budget adopted by the legislature and Governor added six new BCPs which added $6,023 million to the water boards' expenditure budget. This increase produced a parallel expectation that additional annual fee revenue would be raised by the State Water Board in FY 2020-21 to fund BCP work in various impacted programs. The BCPs are:

Title	Amount	Program
Business Licenses: Stormwater Discharge Compliance (SB 205)	$175,000	Storm Water
Freshwater and Estuarine Harmful Algal Bloom Program (AB 834)	$1,500,000	All WDPF
Accurate and Timely Assessment of California Surface Water Quality	$1,289,000	All WDPF
Water Resilience Portfolio	$1,338,000	WDR & NPDES
Sewer Service Provision for Disadvantaged Communities (SB1215)	$1,087,000	WDR & NPDES
Continuation of the Cannabis Program	$10,500,000	Cannabis
Cannabis Cultivation (funding expired 6/30/2019)	($9,866,000)	Cannabis

In addition to the BCPs above, additional expenditures anticipated in FY 2020-21 are associated with staff cost adjustments. Specifically, an additional $3.9 million for retirement and health care costs, even after the $7.4 million in staff cost savings associated with furlough salary reductions are factored into the projected WDPF expenditures.

At the September 2020 hearing, DAS presented four options to the State Water Board. Fee payers encouraged adoption of the "Status Quo" option that would have deferred all necessary annual fee increases until FY 2021-22, created a revenue shortfall of $9.6 million, and left 42 staff positions vacant in FY 2020-21.[16] Although fee payers commented that cost of compliance with permits is a more significant concern, they suggested deferring fee increases would signal solidarity with the economic uncertainty that businesses are facing. DAS recommended an option to raise additional revenue of $9.6 million that would fully staff all statewide positions.

The State Water Board adopted an alternative option that increases annual fees in all programs except Land Disposal and generates $7.2 million in additional revenue, but with a shortfall of $2.4 million this increase is insufficient to cover all BCP positions and results in 10 statewide vacancies that will not be filled. The Board specifically requested language in the resolution that the vacancy impacts on the Regional Water Boards' priorities and staffing needs be considered.

Increases in annual fees will be implemented ranging from 1.4 percent in the Confined Animal Facilities program to 9.3 percent in the NPDES program. However, some program specific fees will remain unchanged in FY 2020-21: Cannabis, Land Disposal, Water Quality Certification (WQC) wildfire mitigation, Storm Water No Exposure Certification , and program related surcharges.

Other Fee Schedule changes in the WQC program related to In-Stream Gravel Mining and Beach Nourishment projects. Both extraction activities were added to a "Special Flat Fee" category and taken out of the "Dredging Discharge" category. This will effectively lower the application and annual fees on these types of projects. The Dredging Discharge category of projects calculates fees on a per cubic yard basis,

[16] "Status Quo" deferment of fees would require a steep increase in annual fees of up to 11.8 percent in the WDR program to fill all staff positions in FY 2021-22.

versus a flat fee for the entire project. Previously, the prohibitive cost of fees on beach replenishment projects on a per cubic yard basis, considering the volumes of material involved, resulted in discouragement of beneficial beach nourishment projects in Southern California.

Cannabis program enrollment revenue was about two-thirds of the revenue projected for FY 2019-20. The legislature and the administration signaled the cannabis program should be fostered; however, fees should remain stable. Given shortfalls in revenue, and a disinclination at this time to increase fees to make up shortfalls, repercussions in the cannabis program will translate into 55 total statewide vacancies that will not be filled. Thirty-five staff have already been redirected to other program work and twenty staff positions will be held open.

The Fee Schedule regulation proposal was filed with the Office of Administrative Law (OAL) on October 30, 2020 for review as emergency rulemaking under Government Code section 11342.545. The Fee Schedule is expected to be approved by OAL and filed with the California Secretary of State in November 2020. The Fee Schedule will be effective as a regulation as of the date it is filed with the Secretary of State and DAS can begin to generate invoices.

The State Water Board anticipates invoices for FY 2020-21 annual fees will generated and mailed by mid-November 2020.[17] Throughout the fiscal year, approximately 26,000 invoices will be generated and mailed to the regulated community.

[17] DAS generates invoices based on information entered by San Diego Water Board staff into the California Integrated Water Quality System database which can be found at (http://www.waterboards.ca.gov/water_issues/programs/ciwqs/) and by State and Regional Water Boards staff in the Storm Water Management and Tracking System database which can be found at (https://www.waterboards.ca.gov/water_issues/programs/stormwater/smarts/).

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN DIEGO REGION

Significant NPDES Permits, WDRs, and Actions of the San Diego Water Board

November 18, 2020

APPENDED TO EXECUTIVE OFFICER'S REPORT

TENTATIVE SCHEDULE
SIGNIFICANT NPDES PERMITS, WDRs, AND ACTIONS
OF THE SAN DIEGO WATER BOARD

Action Agenda Items – San Diego Water Board

December 8, 2020
Remote Meeting

Action Agenda Item	Action Type	Draft Complete	Written Comments Due	Consent Item
Rescission of Order No. 88-05, Waste Discharge Requirements for Mountain Empire Unified School District, Mountain Empire Junior and Senior High School, San Diego County (Tentative Order No. R9-2020-0221). *(Bushnell)*	Waste Discharge Requirement Rescission	75%	14-Nov-20	Yes
Rescission of Order No. 88-64, Waste Discharge Requirements for Oakvale Park, San Diego County (Tentative Order No. R9-2020-0220). *(Komeylyan)*	Waste Discharge Requirement Rescission	75%	11-Nov-20	Yes
Rescission of Order No. 88-69, Waste Discharge Requirements for Pine Valley Trailer Park, San Diego County (Tentative Order No. Rj9-2020-0222). *(Bushnell)*	Waste Discharge Requirement Rescission	75%	14-Nov-20	Yes
Rescission of Order No. R9-2004-0409, Waste Discharge Requirements for Ramona Unified School District, Hanson Elementary School, San Diego County (Tentative Order No. R9-2020-0179). *(Komeylyan)*	Waste Discharge Requirement Rescission	75%	11-Nov-20	Yes
Non-Regulatory Updates to the Water Quality Control Plan for the San Diego Basin (Tentative Resolution No. R9-2020-0254). *(Santillan)*	Resolution	100%	30-Nov-20	Yes

Action Agenda Item	Action Type	Draft Complete	Written Comments Due	Consent Item
State of the Ocean Report by the City of San Diego, Status and Trends of Water Quality Conditions in the Vicinity of Point Loma Ocean Outfall and South Bay Ocean Outfall. *(Yaeger)*	Informational Item	NA	NA	NA
Update on New Wetland Policy. *(Becker)*	Informational Item	NA	NA	NA

January 2021
No Meeting Scheduled

February 10, 2021
Remote Meeting

Action Agenda Item	Action Type	Draft Complete	Written Comments Due	Consent Item
Amendment No. 2 to Order No. R9-2005-0258, Waste Discharge Requirements for Skyline Ranch Country Club Wastewater Treatment Plant, San Diego County. *(Bushnell)*	Waste Discharge Requirement Amendment	20%	TBD	Yes
Discussion of Draft Findings for the 2022 Clean Water Act Sections 303(d) and 305(b) Integrated Report. *(Nagoda)*	Informational Item	30%	TBD	NA
Settlement Agreement for a November 2019 Sanitary Sewer Overflow. *(Clemente)*	Settlement Agreement	90%	TBD	TBD
Amendment to Order No. R9-2010-0004, as amended by Order No. R9-2011-0039: Waste Discharge Requirements for the United State Marine Corps, Marine Corps Base Camp Pendleton, Las Pulgas Landfill, San Diego County. *(Grove)*	Waste Discharge Requirement Amendment	50%	TBD	Yes
San Diego Water Board Practical Vision Update. *(Gibson)*	Resolution	33%	NA	TBD

Agenda Items Requested by Board Members

March 5, 2020

Requested Agenda Item	Board Member	Status
Informational item regarding progress at Lake San Marcos and an Executive Officer's Report prior to the meeting.	Abarbanel	November 2020
Reschedule statutorily required stakeholder meeting with USEPA regarding border water quality issues, which was cancelled in March 2020	Abarbanel	Complete
Informational item regarding the University of California San Diego (UCSD) Climate Action Plan.	Strawn	Complete August 2020

June 10, 2020

Requested Agenda Item	Board Member	Status
Request to attend the next joint agency meeting regarding the decommissioning of the San Onofre Nuclear Generating Station (SONGS), and a briefing on whether having the United States Nuclear Regulatory Commission and the California Department of Toxic Substance Control serve as the lead agencies for the SONGS project is appropriate.	Warren	Fall 2020
San Diego State University (SDSU) to present the findings of its preliminary homeless encampment bacteria report.	Strawn	Ongoing
Orange County Water District to present its PFAS Pilot Program to the Board, and a representative from OEHHA to discuss the PFAS subjects at a future Board Meeting.	Abarbanel, Olson	September-December 2020

August 12, 2020

Requested Agenda Item	Board Member	Status
Update on the status of the Lake San Marcos project.	Abarbanel	November 2020

Requested Agenda Item	Board Member	Status
Update on how municipalities in the Region are dealing with increased trash in public spaces (specifically beaches) given intensified use during the COVID pandemic.	Warren	Fall 2020
Any agreement or resolution to use Supplemental Environmental Project funds to supplement SCCWRP Ambient Monitoring Programs include an effort to avoid spending SEP funds on administrative costs.	Abarbanel	Summer 2021

September 9, 2020

Requested Agenda Item	Board Member	Status
Staff to send a letter to the County of Orange regarding public breaching of the Aliso Creek beach sand berm for recreational purposes	Abarbanel	November 2020
Information regarding the scientific data to support the Governor's assertion that the 2020 wildfires are due to climate change	Abarbanel	November 2020
Update on new scientific information regarding climate change and how we are including climate change considerations in our work.	Abarbanel	February 2021

October 14, 2020

Requested Agenda Item	Board Member	Status
Notify Board Members when staff plan to attend community of public environmental meetings for outreach purposes so they can participate should they desire.	Warren	Ongoing

Top 20 Largest California Wildfires

	FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
1	**AUGUST COMPLEX** *(Under Investigation)**	August 2020	Tehama	**1,006,140**	199	1
2	**MENDOCINO COMPLEX** *(Under Investigation)*	July 2018	Colusa, Lake, Mendocino & Glenn	**459,123**	280	1
3	**SCU LIGHTNING COMPLEX** *(Under Investigation)**	August 2020	Stanislaus, Santa Clara, Alameda, Contra Costa, & San Joaquin	**396,624**	222	0
4	**LNU LIGHTNING COMPLEX** *(Under Investigation)**	August 2020	Sonoma, Lake, Napa, Yolo & Solano	**363,220**	1,491	5
6	**CREEK FIRE** *(Under Investigation) **	September 2020	Fresno & Madera	**326,706**	856	0
5	**NORTH COMPLEX** *(Under Investigation)**	August 2020	Butte, Plumas & Yuba	**318,724**	2,352	15
7	**THOMAS** *(Powerlines)*	December 2017	Ventura & Santa Barbara	**281,893**	1,063	2
8	**CEDAR** *(Human Related)*	October 2003	San Diego	**273,246**	2,820	15
9	**RUSH** (*Lightning*)	August 2012	Lassen	**271,911 CA / 43,666 NV**	0	0
10	**RIM** *(Human Related)*	August 2013	Tuolumne	**257,314**	112	0

	FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
11	**ZACA** *(Human Related)*	July 2007	Santa Barbara	**240,207**	1	0
12	**CARR** *(Human Related)*	July 2018	Shasta County & Trinity	**229,651**	1,614	8
13	**MATILIJA** *(Undetermined)*	September 1932	Ventura	**220,000**	0	0
14	**WITCH** *(Powerlines)*	October 2007	San Diego	**197,990**	1,650	2
15	**KLAMATH THEATER COMPLEX** *(Lightning)*	June 2008	Siskiyou	**192,038**	0	2
16	**MARBLE CONE** *(Lightning)*	July 1977	Monterey	**177,866**	0	0
17	**LAGUNA** *(Powerlines)*	September 1970	San Diego	**175,425**	382	5
18	**BASIN COMPLEX** *(Lightning)*	June 2008	Monterey	**162,818**	58	0
19	**DAY FIRE** *(Human Related)*	September 2006	Ventura	**162,702**	11	0
20	**STATION** *(Human Related)*	August 2009	Los Angeles	**160,557**	209	2

There is no doubt that there were fires with significant acreage burned in years prior to 1932, but those records are less reliable, and this list is meant to give an overview of the large fires in more recent times.
This list does not include fire jurisdiction. These are the Top 20 regardless of whether they were state, federal, or local responsibility.
*Numbers not final.

10/6/2020

Table 1: August 2020 – Summary of Public and Federal Sanitary Sewer Overflow Events

Responsible Collection System Agency	Total Volume (Gallons)[1]	Total Recovered (Gallons)[2]	Total Reaching Surface Waters (Gallons)[3]	Total Reaching Separate Storm Drain and Recovered (Gallons)[4]	Total Discharged to Land (Gallons)[5]	Surface Water Body Affected[6]	Miles of Pressure Sewer	Miles of Gravity Sewer	Population in Service Area[7]
City of San Diego	3,850	2,050	1,800	2,050	0	Torrey Pines State Beach	112.5	2,925.1	2,500,000
City of San Diego	2,275	2,250	0	0	2,275	Not Applicable	112.5	2,925.1	2,500,000
Eastern Municipal Water District	4,000	4,000	0	0	4,000	Not Applicable	33.0	636.0	254,286
Murrieta Western Municipal Water District	9,700	5,000	9,700	0	0	Unnamed Tributary	0.0	200.0	7,200

[1] Total Volume = total amount that discharged from sanitary sewer system to a separate storm drain, drainage channel, surface water body, and/or land.

[2] Total Recovered = total amount recovered from a separate storm drain, drainage channel, surface water body, and/or land.

[3] Total Reaching Surface Waters = total amount reaching separate storm drain (not recovered), drainage channel, and/or surface water body, but does not include amount reaching separate storm drain that was recovered.

[4] Total Reaching Separate Storm Drain and Recovered = total amount reaching separate storm drain that was recovered.

[5] Total Discharged to Land = total amount reaching land.

[6] Agencies are only required to note the surface water body affected if the discharge reaches or has the potential to reach a surface water. If the discharge did not reach a surface water and does not have a potential to reach a surface water (i.e., a discharge to land or a discharge to a separate storm drain that is fully recovered) the surface water body affected is listed as "Not Applicable." If the discharge was to a surface water body or to a separate storm drain and was not fully recovered, and the surface water body was not reported, the surface water body affected is listed as "Not Reported."

[7] As reported in the Collection System Questionnaire required under Order No. 2006-0003-DWQ.

Responsible Collection System Agency	Total Volume (Gallons)[1]	Total Recovered (Gallons)[2]	Total Reaching Surface Waters (Gallons)[3]	Total Reaching Separate Storm Drain and Recovered (Gallons)[4]	Total Discharged to Land (Gallons)[5]	Surface Water Body Affected[6]	Miles of Pressure Sewer	Miles of Gravity Sewer	Population in Service Area[7]
Otay Municipal Water District	17,100	1,500	0	0	17,100	Not Applicable	2.2	81.2	19,700
United States Marine Corps Base Camp Pendleton	70	30	0	0	70	Not Applicable	39.2	125.0	83,340
United States Navy Southwest Division	450	450	0	450	0	Not Applicable	Not Available	Not Available	Not Available

Table 2: August 2020 – Summary of Private Lateral Sewage Discharge Events

Responsible Collection System Agency	Total Volume (Gallons)[1]	Total Recovered (Gallons)[2]	Total Reaching Surface Waters (Gallons)[3]	Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land (Gallons)[4]	Surface Water Body Affected[5]	Population in Service Area[6]	Number of Lateral Connections
Carlsbad Municipal Water District	2	2	0	2	Not Applicable	69,825	22,700
City of Oceanside	106	5	101	5	Oceanside Harbor	175,464	42,040
City of San Diego	37	37	0	37	Not Applicable	2,500,000	265,012
City of San Diego	165	165	0	165	Not Applicable	2,500,000	265,012
City of San Diego	119	119	0	119	Not Applicable	2,500,000	265,012
City of San Diego	730	730	730	0	Drainage Channel	2,500,000	265,012
City of San Diego	41	41	0	41	Not Applicable	2,500,000	265,012
City of San Diego	160	0	160	0	Not Reported	2,500,000	265,012

[1] Total Volume = total amount that discharged from private lateral to a separate storm drain, drainage channel, surface water body, and/or land.

[2] Total Recovered = total amount recovered from a separate storm drain, drainage channel, surface water body, and/or land.

[3] Total Reaching Surface Waters = total amount reaching separate storm drain (not recovered), drainage channel, and/or surface water body, but does not include amount reaching separate storm drain that was recovered.

[4] Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land = total amount reaching separate storm drain that was recovered and/or total amount reaching land.

[5] Agencies are only required to note the surface water body affected if the discharge reaches or has the potential to reach a surface water. If the discharge did not reach a surface water and does not have a potential to reach surface water (i.e., a discharge to land or a discharge to a separate storm drain that is fully recovered) the surface water body affected is listed as "Not Applicable." If the discharge was to a surface water body or to a separate storm drain and was not fully recovered, and the surface water body was not reported, the surface water body affected is listed as "Not Reported."

[6] As reported in the Collection System Questionnaire required under Order No. 2006-0003-DWQ.

Responsible Collection System Agency	Total Volume (Gallons)[1]	Total Recovered (Gallons)[2]	Total Reaching Surface Waters (Gallons)[3]	Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land (Gallons)[4]	Surface Water Body Affected[5]	Population in Service Area[6]	Number of Lateral Connections
City of San Diego	18	18	0	18	Not Applicable	2,500,000	265,012
City of San Diego	185	185	0	185	Not Applicable	2,500,000	265,012
City of San Diego	425	125	300	125	Not Reported	2,500,000	265,012
Fallbrook Public Utility District	20	15	0	20	Not Applicable	2,500,000	265,012
Moulton Niguel Water District	900	200	680	220	Not Reported	172,068	50,638
Padre Dam Municipal Water District	22	22	0	22	Not Applicable	70,492	15,641

Table 3: August 2020 – Summary of Sewage Discharges by Source

Spill Type	Month/Year	Number of Spills	Total Volume (Gallons)[1]	Total Recovered (Gallons)[2]	Total Reaching Surface Waters (Gallons)[3]	Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land (Gallons)[4]
Public Spills	August 2020	5	36,925	14,800	11,500	25,425
Federal Spills	August 2020	2	520	480	0	520
Private Spills	August 2020	14	2,930	1,664	1,971	959
All Spills	**August 2020**	**21**	**40,375**	**16,944**	**13,471**	**26,904**

[1] Total Volume = total amount that discharged from sanitary sewer system to a separate storm drain, drainage channel, surface water body, and/or land.

[2] Total Recovered = total amount recovered from a separate storm drain, drainage channel, surface water body, and/or land.

[3] Total Reaching Surface Waters = total amount reaching separate storm drain (not recovered), drainage channel, and/or surface water body, but does not include amount reaching separate storm drain that was recovered.

[4] Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land = total amount reaching separate storm drain that was recovered and/or total amount reaching land.

Figure 1: Number of SSOs per Month

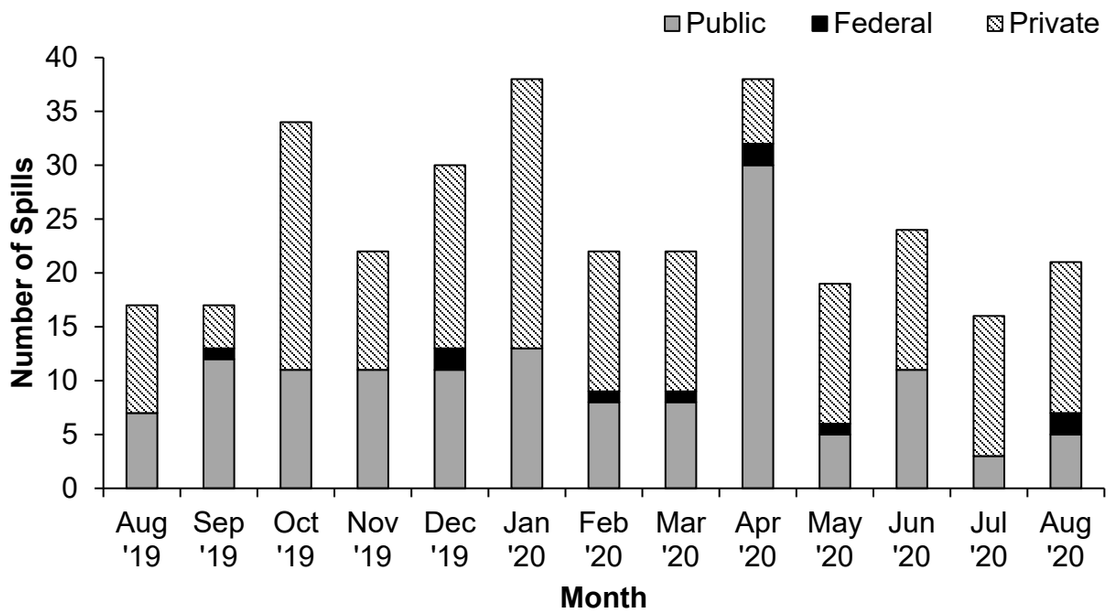


Figure 1: The number of public, federal, and private sanitary sewer overflows (SSOs) per month from August 2019 to August 2020.

Figure 2: Volume of SSOs per Month

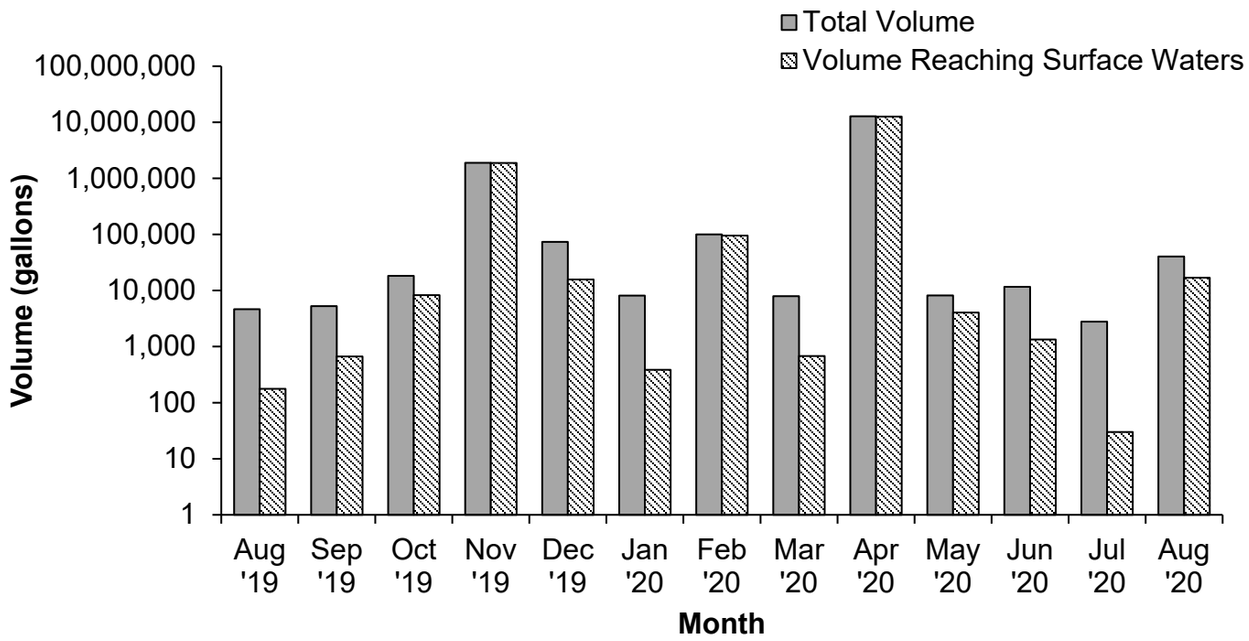


Figure 2: The volume of public, federal, and private sanitary sewer overflows (SSOs) per month from August 2019 to August 2020. Note the logarithmic scale on the vertical axis showing the wide variation in SSO volumes.

Table 4: August 2020 – Summary of Transboundary Flows from Mexico by Event[1]

Location	Date(s) of Transboundary Flow	Weather Condition[2]	Total Volume (Gallons)	Total Recovered (Gallons)	Total Reaching Surface Waters (Gallons)	Additional Details
Tijuana River	8/20/2020 through 8/21/2020	Dry	8,560,000	0	8,560,000	Pump Station CILA was shut down to perform repairs on the conveyance system in Mexico. With Pump Station CILA shut down, flow in the Tijuana River bypassed the River Diversion Structure and crossed the U.S./Mexico border.
Tijuana River	8/26/2020 through 8/27/2020	Dry	1,400,000	0	1,400,000	Trash and construction debris blocked the intake screens of Pump Station CILA allowing flow in the Tijuana River to bypass the River Diversion Structure and cross the U.S./Mexico border.
Tijuana River	8/28/2020 through 8/29/2020	Dry	3,660,000	0	3,660,000	Trash and debris blocked the intake screens of Pump Station CILA allowing flow in the Tijuana River to bypass the River Diversion Structure and cross the U.S./Mexico border.
Tijuana River	8/30/2020 through 8/31/2020	Dry	1,777,000	0	1,777,000	Trash and debris blocked the intake screens of Pump Station CILA allowing flow in the Tijuana River to bypass the River Diversion Structure and cross the U.S./Mexico border.

[1] Transboundary flow volumes are obtained from self-monitoring reports submitted by USIBWC under Order No. R9-2014-0009.

[2] Order No. R9-2014-0009 requires monthly reporting of all dry weather transboundary flows defined as the preceding 72 hours have been without precipitation greater than 0.1 inch, based on the Goat Canyon Pump Station rain gauge. Wet weather transboundary flows are not required to be reported and information is provided voluntarily.

Location	Date(s) of Transboundary Flow	Weather Condition[2]	Total Volume (Gallons)	Total Recovered (Gallons)	Total Reaching Surface Waters (Gallons)	Additional Details
Tijuana River	8/31/2020 through 9/1/2020	Dry	3,607,000	0	3,607,000	Trash and debris blocked the intake screens of Pump Station CILA allowing flow in the Tijuana River to bypass the River Diversion Structure and cross the U.S./Mexico border.

Table 5: August 2020 - Summary of Transboundary Flows from Mexico by Weather Condition

Weather Condition[1]	Month/Year	Total Volume (Gallons)	Total Recovered (Gallons)	Total Reaching Surface Waters (Gallons)
Dry Weather	August 2020	19,004,000	0	19,004,000
Wet Weather	August 2020	Not Applicable	Not Applicable	Not Applicable

[1] Order No. R9-2014-0009 requires monthly reporting of all dry weather transboundary flows. Wet weather transboundary flows are not required to be reported. All wet weather transboundary flow information is provided voluntarily.