

California Regional Water Quality Control Board
San Francisco Bay Region

**Candidate Projects for the
2024 Triennial Review of the San Francisco Bay
Basin Water Quality Control Plan**



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**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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https://www.waterboards.ca.gov/sanfranciscobay/basin_planning.html

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1. Introduction

The San Francisco Bay Regional Water Quality Control Board (Water Board) is conducting the 2024 triennial review of the water quality standards in the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan, http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml). The last triennial review was completed in 2021. The Water Board's triennial review will identify those issues that are considered a priority to address through Basin Plan amendment projects. Based on comments from interested parties, coordination with the statewide Basin Plan roundtable, and a review of regulatory program needs, Water Board staff have identified the following issues within the Basin Plan for consideration in the upcoming 2024 triennial review.

We prepared this list to inform the public and inspire interested parties to generate ideas to assist in our efforts to identify and prioritize Basin Plan amendment projects that will best address the water quality planning needs of our region.

In this document, you will find a list of candidate projects, a list of projects that have been removed for consideration since 2021, and descriptions of the ranking criteria that the Water Board will use to determine which projects have priority for the next three years. The projects are presented in alphabetical order. Their priority will be established through the triennial review public process.

2. List of Candidate Projects for the 2024 SF Bay Triennial Review

1. Addition of Commercial and Sport Fishing Beneficial Use to Lakes

This project entails adding Commercial and Sport Fishing (COMM) where the COMM beneficial use is determined to apply. Many lakes and reservoirs in the Region already have this beneficial use designation but we are aware that this designation is missing from some water bodies with active recreational fishing. The need to designate the COMM use for these waterbodies was identified as part of the ongoing work on the Statewide Mercury in Reservoirs TMDL and was highlighted as a concern in the 2024 Integrated Report. The COMM beneficial use is considered impaired when high contaminant concentrations make fish unsafe for human consumption. Other waterbodies may also be reviewed for the COMM beneficial use as part of this project.

CATEGORY: Update Beneficial Uses

COMPLEXITY: Low

ESTIMATED PERSONNEL-YEARS (PY): 0.3

2. Consider Incorporating Clean Water Act Section 304(a) Criteria into the Basin Plan

Federal regulations at 40 CFR 131.20(a) require states to review their water quality standards in comparison to Clean Water Act Section 304(a) criteria as new information becomes available. Water quality objectives in Basin Plan Chapter 3 or in effect under the federal California Toxics Rule (2000) that are not as protective as the U.S. EPA nationally-recommended criteria need to be updated. States should consider adopting new or revised 304(a) criteria as objectives as part of the Triennial Review process.

For example, U.S. EPA promulgated new and revised human health water quality criteria in 2015 (Federal Register 80(124):36986-36989). This ruling established new water quality criteria for seven pollutants that are not in the California Toxics Rule (Arsenic, Chloroform, 3-Methyl-4-Chlorophenol, 1,1,1-Trichloroethane, 1,2,4-Trichlorobenzene, Selenium, and Zinc). The 2015 ruling contains revised water quality criteria that are more stringent than the California Toxics Rule for 64 pollutants. In addition, the 2015 ruling contains revised water quality criteria that are less stringent than the California Toxics Rule for 19 pollutants.

This project would also include ensuring that the Basin Plan's objective and implementation provisions (e.g., for NPDES permits) are consistent with the magnitude and averaging period of U.S. EPA's acute and chronic saltwater criteria for un-ionized ammonia as well as U.S. EPA's 2013 recommended freshwater criteria.

This candidate project would update the Basin Plan to incorporate, as necessary, the revised 304(a) criteria. The Water Board has the authority to incorporate new or updated WQOs into its Basin Plan as needed to adequately protect beneficial uses.

However, for pollutants that are part of the CTR, further action by U.S. EPA to de-promulgate the CTR criterion may be necessary in situations where the updated WQO is less stringent than the CTR criterion. Moreover, it is often the case that adopting any new or revised 304(a) criteria is more appropriately and efficiently accomplished by the State Water Board because the criteria should apply statewide rather than to a single region.

CATEGORY: Update Water Quality Objectives

COMPLEXITY: Low

ESTIMATED PERSONNEL-YEARS (PY): 4.0

3. Clarify Implementation Requirements for Municipal Supply and Agricultural Supply Water Quality Objectives

The Basin Plan should be revised to update the primary and secondary maximum contaminant levels (MCLs) listed in Table 3-5 and clarify appropriate implementation measures for the secondary MCLs. Basin Plan section 3.3.22 prospectively establishes the primary and secondary MCLs specified in Title 22 of the California Code of Regulations as municipal supply water quality objectives. U.S. EPA developed the secondary MCLs as non-mandatory drinking water standards to guide public water systems in managing drinking water for aesthetic considerations, such as taste, color, and odor; concentrations above secondary MCLs do not necessarily present human health risks. When these objectives were originally included in the Basin Plan, the administrative record provided some background information about their implementation. The MUN and AGR objectives were “meant to be applied at the tap because the level of water treatment or the quality/quantity of blending water could vary significantly. If necessary, exemptions from achieving these objectives could be granted if a consistent level of treatment or blending could be demonstrated.” Finally, the project would consider an update to allow analysis of samples passed through a 1.5-micron filter to account for the common filtering process used in drinking water systems.

The Basin Plan should also clarify appropriate implementation measures for the agricultural supply water quality objectives listed in Table 3-6. The Basin Plan does not currently explain how to implement “threshold values” versus “limits.” The update should clarify that the objectives in Table 3-5 are implemented as long-term averages (unlike aquatic life objectives).

CATEGORY: Update Water Quality Objectives

COMPLEXITY: Medium

ESTIMATED PERSONNEL-YEARS (PY): 0.5

4. Clarify Turbidity Water Quality Objective

The Basin Plan’s turbidity water quality objective is difficult to interpret:

Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases from normal background light penetration or turbidity relating to waste discharge shall not be greater than 10 percent in areas where natural turbidity is greater than 50 NTU.

This language is often subject to misinterpretation when determining whether dredging operations are negatively impacting water quality in the Bay. The language can be improved for clarity as well as consistency with turbidity objectives found in the Basin Plans from other regions.

The project would also revise the objective to state also that waste discharges should not increase normal background light penetration and clarify how to regulate discharges affecting turbidity under 50 NTU. Because improving this language would require only minor clarifying changes, this project could also be accomplished as part of another Basin Planning project.

CATEGORY: Update Water Quality Objective

COMPLEXITY: Medium

ESTIMATED PERSONNEL-YEARS (PY): 0.5

5. Climate Change and Shoreline Adaptation Policy

We anticipate that the Water Board will adopt the Basin Plan amendment for the Climate Change and Shoreline Adaptation Policy in June 2024 and complete the State Board and the Office of Administrative Law approvals in fiscal year 2024-2025. The Basin Plan amendment includes two components: (1) a narrative description added to Chapter 1 to explain how climate change could lead to physical and biological impacts in our region and (2) updated language in Chapter 4 to clarify our planning and permitting processes for climate adaptation projects in coastal waters, including projects that result in fill in wetlands.

Future phases or components of this Policy could explore changes to the Basin Plan to address program needs or additional policy development to (1) facilitate the beneficial use of dredged sediment and soil/sediment from other sources, (2) clarify the alternative analysis and compensatory mitigation requirements for green and grey infrastructure, (3) continue to advance use of nature-based shoreline adaptation solutions based on lessons learned from implementation of the first Basin Plan amendment, and/or (4) address projected impacts to beneficial uses from the effects of groundwater rise in response to sea level rise.

Water Board staff have been working to maximize beneficial use of dredged sediment by participating in the Long-Term Management Strategy for Placement of Dredged Material in the San Francisco Bay Region. Water Board staff have also been collaborating with the South Bay Salt Pond Restoration Project to increase the beneficial use of upland soil for tidal marsh restoration by refining the screening process

for upland soil. Based on this preliminary work, Water Board staff anticipate a potential future need for a Basin Plan amendment to advance beneficial use of dredged sediment and soil/sediment from other sources.

Water Board staff anticipate a future need to clarify the alternative analysis and compensatory mitigation requirements for green and grey climate adaptation projects. Green climate adaptation projects use nature-based infrastructure, such as marsh restoration and coarse beaches, to increase the resiliency of shorelines to sea level rise and other climate change impacts. Grey climate adaptation projects are human-engineered infrastructure, such as seawalls and revetments that protect coastal communities from flooding. In places where green infrastructure is not feasible, grey infrastructure may be necessary to protect transportation, energy-generation and wastewater treatment facilities, and communities from sea level rise. Clarifying the Water Boards' approach for permitting green and grey climate adaptation projects would provide regulatory certainty for the regulated entities and landowners along the shoreline.

Water Board staff also anticipate a potential future need for a Basin Plan amendment after gathering lessons learned from implementation of the Climate Change and Shoreline Adaptation Basin Plan amendment described here. For instance, there may be a need to clarify mitigation and monitoring requirements for conversion of one wetland type to another wetland type.

CATEGORY: Update Plans and Policies and Update Implementation Plan

COMPLEXITY: High

ESTIMATED PERSONNEL-YEARS (PY): 1.5

6. Climate Change and Riparian Area Protection Policy

The project is a Basin Plan amendment that focuses on protecting riparian corridors and streams from climate change related impacts on water quality resulting from the following: increases in temperature; frequency, duration, and severity of droughts; and storm magnitude and frequency. Conservation and enhancement of riparian corridors are essential elements of our climate change priorities. Riparian corridors provide numerous functions that support water quality and beneficial uses including temperature regulation, carbon sequestration, groundwater recharge, nutrient cycling, water storage, erosion prevention, pollutant filtration, and food web and structural support for aquatic habitats. Climate change creates significant additional challenges for the protection of streams, as these ecosystems will be more susceptible to increases in temperature, and changes in precipitation patterns and surface/subsurface flow interactions, which will in turn lead to alterations in hydrologic and geomorphic processes that support beneficial uses. Riparian areas and streams also provide important dispersal habitat for species undergoing climate-induced range shifts because they span the climatic gradients that species are likely to follow as they track shifting areas of climatic suitability, and they

contain microclimates that are significantly cooler and more humid than immediately surrounding areas.

During the past three years of implementing this project, Water Board staff charted a course that included multiple project phases and have begun implementing the first phase, which involves assessing current watershed conditions, reviewing the science pertaining to climate change effects on riparian and stream ecosystems in the San Francisco Bay Area, identifying actions to increase watershed resilience to climate change impacts, and evaluating existing policies to explore regulatory options to protect beneficial uses of riparian corridors and streams from climate change impacts. Water Board staff have also been working with San Francisco Estuary Institute to assess current and future riparian conditions in the Petaluma River watershed.

The second phase will involve working with San Francisco Estuary Institute to: 1) map riparian areas in the San Francisco Bay region; and 2) scale up the science and findings from the Petaluma River watershed project to the whole region. Staff will then develop a Basin Plan amendment to update the text in Chapter 4 to include clear policy measures to promote the resilience of riparian corridors and streams to climate change impacts in our region.

In view of the staffing level, project scope, and likely level of effort, Water Board staff does not anticipate completing a Basin Plan amendment during this current three-year period.

CATEGORY: Update Implementation Plans

COMPLEXITY: High

ESTIMATED PERSONNEL-YEARS (PY): 1.5

7. Designate Tribal Tradition and Culture, Tribal Subsistence Fishing, and Subsistence Fishing Beneficial Uses in the San Francisco Bay Region

In 2017, the State Water Board adopted Resolution No. 2017-0027. The provisions for this resolution (Final Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California—Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions) defined three new beneficial uses: Tribal Tradition and Culture (CUL), Tribal Subsistence Fishing (T-SUB), and Subsistence Fishing (SUB). However, the Resolution did not designate these uses for any specific waterbodies in California nor require that the uses be designated. Regional Water Boards are generally responsible for designating beneficial uses for specific waterbodies where the use applies within their respective regions, and this designation occurs through a Basin Planning process.

The first two years of this project were the first phase which prioritized relationship-building and collaboration with tribes and subsistence fishing communities including the following: individual meetings with California Native American Tribes (tribes), community-based organizations, and community members; tribal summits that bring

together multiple tribes if requested; and meetings that bring together multiple community-based organizations. To designate waterbodies with CUL, T-SUB, and SUB beneficial uses, we need more data than are currently available. This data can only come from surveys of community members and traditional ecological knowledge. We need to build relationships with these communities to get the most accurate and meaningful data. To move this project forward more effectively, we prioritized designating the CUL beneficial use in the current phase of this project. Water Board staff have been working with local tribes to document the existence of these uses and their relevant spatial and temporal attributes and gain an understanding of what water quality objectives and implementation policies would be needed to support those uses.

The next phases of this project are to 1) add the CUL, T-SUB and SUB definitions into the Basin Plan as they are already approved and have CEQA completed; 2) designate CUL where geographically appropriate based on our collaboration with tribes; and 3) initiate development of tribal subsistence fishing surveys to inform T-SUB beneficial uses and work toward designating T-SUB where appropriate. This is likely to be completed in the next three years.

Water Board staff will also focus on designating the SUB beneficial use based on the findings of a subsistence fishing survey developed in collaboration with community-based organizations. The final designation of waterbodies is likely to take more than three years which aligns with our other complex Basin Planning projects.

CATEGORY: Update Beneficial Uses

COMPLEXITY: Medium

ESTIMATED PERSONNEL-YEARS (PY): 1.0

8. Evaluate and Refine the Shellfish Harvesting Beneficial Use

Most segments of San Francisco Bay are currently designated appropriate for commercial and recreational shellfish uses (SHELL). There are currently no commercial shellfish beds in San Francisco Bay. However, there are commercial shellfish beds in the region in Tomales Bay and along the coast at Point Reyes National Seashore. The Basin Plan identifies water quality objectives for shellfishing using a bacterial indicator, measured as fecal coliforms or total coliforms. The objectives are stringent because they are based on protection of commercial shellfish beds for human health consumption. When bacterial indicator data are collected and assessed to determine if water bodies are meeting water quality standards, waters may be placed on the impaired waters list if they are not meeting the stringent shellfish standards even if no commercial or recreational shellfishing occurs.

This project would involve refining the spatial and temporal patterns of shellfish harvesting uses, particularly in San Francisco Bay and its marinas. The project may also include refinement of the beneficial use definition to distinguish between commercial and recreational shellfishing as well as the collection of information to support a reference/natural source implementation option for SHELL. The project would

result in a Basin Plan amendment to refine the SHELL beneficial use in specific water bodies targeted in San Francisco Bay.

CATEGORY: Update Beneficial Uses

COMPLEXITY: Medium

ESTIMATED PERSONNEL-YEARS (PY): 1.0

9. Editorial Revisions, Minor Clarifications, or Corrections

Possible Basin Plan editorial changes have been identified by Water Board staff and through suggestions submitted by the public during previous Triennial Reviews. Some of these could be included as additional components for another Basin Planning project. Potential changes include but are not limited to:

- Update Section 4-8 (Stormwater Discharges) to incorporate by reference the limitations on point source stormwater and nonpoint source discharges to provide special protections for marine aquatic life and natural water quality in Areas of Special Biological Significance (ASBS).
- Update Sections 4-8 and 4-14 on urban stormwater to remove outdated and confusing terminology. The two sections should be combined, streamlined, and edited to be consistent with current regulatory practices.
- Discuss requirements of the Sustainable Groundwater Management Act in Chapter 4.
- Discuss direct and indirect potable use programs in Chapter 4.
- Cleanup Chapters 5 and 6 in terms of citations to plans and policies as well as water quality monitoring information. Consider dropping Chapter 6 and moving essential material elsewhere in the Basin Plan.
- Update or delete Figure 4-4 noting dredge material disposal and beneficial reuse sites.
- Add to the Basin Plan several unnamed water bodies that receive permitted discharges. The Basin Plan names some of the water bodies in the San Francisco Bay Region and designates beneficial uses for these water bodies. However, a small number of NPDES wastewater permits cover discharges to water bodies not named in the Basin Plan. This should be a straightforward project that could feasibly be combined with another Basin Plan amendment.
- Update the Basin Plan's toxicity testing requirements. In December 2020, the State Water Board approved an amendment to the Toxicity Control Provisions of the Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California. The new toxicity provisions supersede aspects of the Basin Plan's current toxicity policy, so the Basin Plan

must be edited to conform to the policy. This change would add reference to the Toxicity Provisions, remove the superseded text.

- Align the Ocean Plan and Basin Plan for recreational contact use (REC1). The applicability of the water contact recreation (REC1) beneficial use in the Pacific Ocean is defined in the California Ocean Plan. The Ocean Plan restricts effluent limits intended to protect REC1 to a zone bounded by the shoreline and a distance of 1,000 feet from the shoreline or the 30-foot depth contour and areas designated with REC1 by a regional board. The Basin Plan provides no specific details on where REC1 applies, which leads to complications in writing NPDES permits for the San Francisco Public Utilities Commission's Oceanside outfall that discharges effluent well beyond State waters. The project would clarify that the Basin Plan's application of REC1 to the Pacific Ocean would be equivalent to the Ocean Plan's distance and depth contour specification.
- Add useful cross references to State Water Board policies to sections where they come up. For example, add to Basin Plan section 3.3.12 a sentence like "The 'Water Quality Control Plan for Enclosed Bays and Estuaries of California' contains Sediment Quality Provisions, including additional water quality objectives and related implementation provisions." And add to Basin Plan section 4.5.5.3 a sentence like "The 'Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California' contains additional water quality objectives and related implementation requirements."
- Replace the Basin Plan section 4.7.6 requirements for a compliance schedule with a reference to the requirements the State Water Board set forth in its Compliance Schedule Policy.
- Update the descriptions in Sections 4.11.3-4.11.5 as it is outdated. This revision would consider removing the language of these sections entirely, as the changing nature of the regulated community does not necessarily need to be documented in our Basin Plan.
- Documenting the Regional Water Board approved Salt and Nutrient Management Plans (SNMPs) for the Napa-Sonoma Valley: Sonoma Valley (2-2.02), Livermore Valley (2-10), and Santa Clara Valley (2-9.02) groundwater basins/sub-basins.
- Revising groundwater basin boundary maps to align with California Department of Water Resources Bulletin 118 changes that occurred as per the Sustainable Groundwater Management Act (SGMA) process. This includes adding a description of the changes in Basin Plan section 2.2.2 and revising Basin Plan Figures 2-10, 2-10C, and 2-10D to reflect the current California Department of Water Resources Bulletin 118 basin boundaries for the Westside Basin (2-35), Islais Valley Basin (2-33), and the Santa Clara Valley:Niles Cone sub-basin (2-9.01).

- Adding a description of our environmental screening levels (ESLs) that are used to inform our investigation and cleanup decisions. ESLs are conservative contaminant concentrations in a particular media (soil, soil gas, or groundwater) below which the contaminant can be assumed not to pose a significant, long-term (chronic) threat to human health and the environment.
- Adding a description of the State Water Resource Control Board's Low-Threat Underground Storage Tank Case Closure Policy that is used to assess leaking petroleum underground storage tanks in the Region.
- Incorporate statewide mercury objectives into the Basin Plan. In 2017, the State Water Board adopted Resolution No. 2017-0027, which established five new mercury water quality objectives for the protection of people and wildlife that consume fish and apply to all the inland surface waters, enclosed bays, and estuaries of the State that have the applicable beneficial uses. This effort involves making non-regulatory amendments to the Basin Plan to incorporate these new objectives and make necessary clarifications as to their applicability for various waterbodies throughout the Region.

3. Projects Removed since 2021 Triennial Review

The following projects were removed from consideration during the 2024 Triennial Review. The titles and the reasons for removal are enumerated here:

- **Completed Projects:**
 - **Temperature Limits to Protect Salmonids.** The work outlined in the 2021 Triennial Review was completed. Information was produced by Valley Water in collaboration with the Water Board and is available here: <https://www.valleywater.org/learning-center/healthy-creeks-and-ecosystems/steelhead-regional-temperature-study>
 - **Nutrient Management Strategy and Dissolved Oxygen Assessment Framework.** The framework was completed in the last 3 years. While staff from the Planning Division will continue to work on implementation of the Nutrient Management Strategy, this project is no longer a project that would include a Basin Plan amendment.
 - **Update Cyanide Dilution Credits.** The work outlined in the 2021 Triennial Review was completed.
- **Santa Clara Valley Water Contact Recreation (REC-1) Standards Study.** This project was removed because it is not a priority for the Water Board.
- **Review Un-ionized Ammonia Water Quality Objective.** This project was removed because we will consider it as part of Project 2 to consider 304(a) criteria.
- **Environmental Screening Levels (ESLs) for Groundwater Cleanups.** This project was removed because the Groundwater Divisions believed it to be an editorial revision and is now included as text in Project 9.

- **Modify Groundwater Sub-Basin Boundaries.** This project was removed because the Groundwater Divisions believed it to be an editorial revision and is now included in Project 9.
- **Dredge and Fill Policy Update.** Water Board staff will continue to use the latest information from the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (2019). We have determined that this project does not require a Basin Plan amendment at this time.
- **Develop Flow Criteria for Selected Bay Area Streams and Rivers.** Parts of this project were added to the Climate Change and Riparian Area Protection project so a separate Basin Plan amendment is not needed at this time.

4. Total Maximum Daily Load (TMDL) Priorities

While the focus of the Triennial Review is amending the Basin Plan, we welcome comments on our implementation plans as well. These are the TMDL projects that we are currently working on:

- Suisun Creek Dissolved Oxygen TMDL
- Pescadero Marsh Low Dissolved Oxygen TMDL alternative / Advance Restoration Plan
- Region 2 Reservoir Mercury Management Program TMDL alternative / Mercury Advance Restoration Plan
- San Francisco Bay Beaches Pathogens 2 TMDL
- Lake Merritt Dissolved Oxygen TMDL alternative / Advance Restoration Plan

5. Project Ranking Criteria

This is a description of how the Water Board ranks projects. The public's feedback in response to this document will be incorporated into the "Public Interest" category. We will complete the ranking and share it in the next part of the Triennial Review process.

For every Triennial Review, there are more candidate projects than can be accomplished with available resources: two full-time staff positions funded for Basin Planning efforts. Thus, it is necessary to rank candidate projects to identify the highest priorities.

Each candidate project receives an overall score, which sums the project's individual scores for several ranking criteria. The highest scoring projects will be given priority for Water Board staff action in the following three-year period, subject to available resources. This scoring is not intended as a judgment of the absolute merit of the project.

The ranking criteria and scoring are described below.

1. Water Board Mission (Protect Beneficial Uses)

Projects that promote protection or restoration of beneficial uses are given higher scores, while projects that would result in little or no direct improvement of beneficial uses were given lower scores. No projects that would weaken protection or restoration of beneficial uses are considered.

2. Climate Change Nexus

This criterion recognizes the value of projects that involve some adaptation or policy response to climate change. The Water Board has identified climate adaptation as a priority since 2021. Staff have made significant investments in new partnerships and stakeholder engagement, developed policy and permitting language to include in future regulation, and provided technical assistance to communities around the Bay to support climate change risk assessments and adaptation plans. This work is on-going, and staff expects our climate change adaptation strategy to include Basin Planning projects.

3. Public Interest

Water Board staff solicits input from the public, including the regulated community, citizens, and environmental groups.

4. External Resources Already Invested

This criterion recognizes and gives higher priority to projects for which external resources have already been expended. External resources may include grant funding or funding provided by affected parties to assist Water Board staff in coordinating technical information and stakeholder outreach for Basin Plan amendments.

5. Staff Resources Already Invested

This criterion recognizes and gives higher priority to projects for which the Water Board has already expended substantial staff resources.

6. Implement State Water Board Policy

In all Triennial Reviews conducted by the Regional Water Boards, one of the first items reviewed is whether there have been changes in statewide policies or plans that result in Basin Plan language inconsistent with the new plans or policies.

7. U.S. EPA Priority

Projects that address comments in a U.S. EPA Basin Plan approval letter or other input from U.S. EPA, such as the comment letters on previous Basin Plan amendments or the comment letter on past or current Triennial Reviews.

8. External Resources Likely Available

Where external resources will be (or will continue to be) dedicated to a project, higher priority is given. Such resources would augment Water Board staffing, helping to complete controversial or complex projects that otherwise might not have adequate staffing.

9. Geographic Scope

Projects that address multiple water bodies and regulated entities throughout the Region receive higher scores than projects that are specific to a location or discharger.

10. Input from Internal Water Board Divisions

Staff from the Water Board's Toxics Cleanup, Groundwater Protection, Watershed Protection, NPDES, and Planning divisions were tasked with identifying Basin Planning projects that would facilitate program implementation, clarify the Basin Plan, and provide better customer service.