
San Diego Regional Water Quality Control Board

February 12, 2016

Via Email Only

Mr. Todd Snyder
Watershed Protection Program
Department of Public Works
County of San Diego
5510 Overland Avenue, Suite 410
San Diego, California 92123-1237

In reply refer to / attn:
CW-794836:WChiu

**Subject: San Diego Water Board Notice of Acceptance
San Luis Rey River Watershed Management Area Water Quality Improvement Plan**

Mr. Snyder:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) received the revised final San Luis Rey River Watershed Management Area (WMA) Water Quality Improvement Plan (Plan) on September 29, 2015. The revised final San Luis Rey River WMA Plan was jointly submitted by the City of Oceanside, the City of Vista, and the County of San Diego (collectively San Luis Rey River WMA Copermittees) after considering written comments submitted by the public and San Diego Water Board staff on the draft final San Luis Rey River WMA Plan. Submittal of the San Luis Rey River WMA Plan, as revised in response to comments, is required by Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, NPDES No. CAS0109266, *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region* (Order).

Provisions B and D of the Order describe the required elements that must be included in the Plan. The San Diego Water Board reviewed the revised final San Luis Rey River WMA Plan and the comments received during the Plan revision process. On January 6, 2016, the San Diego Water Board informed the San Luis Rey River WMA Copermittees that there were minor deficiencies remaining. On January 29, 2016, the San Luis Rey River WMA Copermittees provided proposed corrections to the San Luis Rey River WMA Plan (see Attachment 1). After reviewing the proposed corrections, the San Diego Water Board finds that the San Luis Rey River WMA Plan, with the corrections proposed in Attachment 1, is in compliance with Provisions B and D of the Order. To comply with Signatory Requirement Provisions 1.k.(1)(d) and 2.n (requiring certification of the Plan) in Attachment B to the Order, a *certified* final San Luis Rey River WMA Plan incorporating the corrections proposed in Attachment 1 must be submitted promptly to the San Diego Water Board. The San Diego Water Board looks forward to the San Luis Rey River WMA Copermittees achieving full compliance with the Signatory Requirement Provisions of the Order upon submittal of the *certified* final San Luis Rey River WMA Plan.

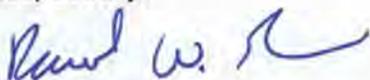
Based on these findings, the San Diego Water Board accepts the revised final San Luis Rey River WMA Plan dated September 29, 2015 with the corrections proposed in Attachment 1. As such, the San Diego WMA Copermittees should continue implementation of the strategies described therein according to the specified schedules. The San Luis Rey River WMA Copermittees are now authorized to allow exemptions to the Hydromodification Management BMP Requirements that have been identified pursuant to Provision E.3.c.(2)(d)(iii) of the Order, and implement the Alternative Compliance Program for Priority Development Projects provided under provision E.3.c.(3) of the Order within the San Luis Rey River WMA.

The San Luis Rey River WMA Plan, dated September 29, 2015, and the proposed corrections in Attachment 1 will be available for public review on the San Diego Water Board website until the certified final San Luis Rey River WMA Plan is submitted and posted. Any person aggrieved by this San Diego Water Board action to accept the San Luis Rey River WMA Plan may petition the State Water Resources Control Board to review the action in accordance with Water Code section 13320 and California Code of Regulations (CCR), title 23, section 2050, et seq. The State Water Resources Control Board must receive the petition by 5:00 p.m. within 30 days after the date of this action except if the thirtieth day falls on a Saturday, Sunday or holiday, the petition must be received no later than 5:00 p.m. on the first business day following. Copies of laws and regulations applicable to petitions are available at http://www.waterboards.ca.gov/public_notices/petitions/water_quality and are available upon request.

Please submit any written correspondence in response to this letter to SanDiego@waterboards.ca.gov. Electronic documents must be submitted as a single file, in Portable Document Format (PDF) format, and converted to text searchable format using Optical Character Recognition (OCR). All electronic documents must also include scanned copies of all signature pages; electronic signatures will not be accepted. Electronic documents submitted to the San Diego Water Board must include the following identification numbers in the header or subject line: **PIN: CW-794836:WChiu**.

Should you have any questions or comments on this matter, please contact Wayne Chiu by phone at (619) 521-3354 or by e-mail at Wayne.Chiu@waterboards.ca.gov.

Respectfully,



David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board

Attachment 1: Proposed Corrections to the San Luis Rey River WMA Plan, County of San Diego Letter to San Diego Water Board dated January 29, 2016

DWG:dtb:law:wc

cc (via email): Mo Lahsaiezadeh, City of Oceanside
Cheryl Filar, City of Vista

Tech Staff Info & Use	
Order No.	R9-2013-0001
NPDES No.	CAS0109266
PIN ID	794836
Regulatory Measure ID	387355

ATTACHMENT 1

**Proposed Corrections to the
San Luis Rey River Watershed Management Area
Water Quality Improvement Plan**

**County of San Diego Letter
to San Diego Water Board
dated January 29, 2016**



County of San Diego

RICHARD E. CROMPTON
DIRECTOR

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January 29, 2016

Laurie Walsh, Senior Water Resource Control Engineer
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

SAN DIEGO RWQCB
2016 JAN 29 PM 12:51

Dear Ms. Walsh:

COUNTY OF SAN DIEGO, PERMIT R9-2013-0001 – ERRATA SHEET FOR REVISED WATER QUALITY IMPROVEMENT PLAN FOR THE SAN LUIS REY WATERSHED MANAGEMENT AREA – PIN NO. 794836:WCHIU

On behalf of the Participating Agencies (PAs) in the San Luis Rey Watershed Management Area, the County of San Diego is pleased to submit the enclosed Water Quality Improvement Plan (WQIP) errata pages in accordance with the requirements set forth in Order R9-2013-0001, as amended by Orders No. R9-2015-0001 and R9-2015-0100, the National Pollution Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds within the San Diego Region, NPDES No. CAS0109226 (Permit).

The errata pages contain revisions that respond to additional email comments from Regional Water Board staff received on January 6, 2016, that were further discussed and clarified during a meeting on January 13, 2016. In addition to the errata pages, the PAs prepared the attached table that describes how each comment was addressed and where in the WQIP the revision will be located.

The San Luis Rey PAs sincerely appreciate your staff's continued willingness to provide feedback and guidance during this process, and look forward to receiving a letter of acceptance based on the additional revisions. If you have any questions or comments, please contact me at (858) 694-3672 or e-mail at Todd.Snyder@sdcounty.ca.gov.

Sincerely,

TODD E. SNYDER, Manager
Watershed Protection Program

Enclosures: Table of comments and revisions
Errata to San Luis Rey River Water Quality Improvement Plan

San Luis Rey Water Quality Improvement Plan Errata to September 2015 Submittal

January 29, 2016

The following are corrections to the San Luis Rey Water Quality Improvement Plan – revised version submitted to the San Diego Water Board on September 29, 2015. If accepted by Water Board staff, the San Luis Rey Participating Agencies will incorporate these changes into a revised, complete Water Quality Improvement Plan that will be submitted within 45 days after receiving the letter of acceptance/approval.

~~Strikeouts~~ indicate deletions; underlines indicate insertions; *[brackets/italics]* indicate other change instructions.

Section 3.1.3 (last two sentences)

The ~~W~~watershed level goals will address compliance at the San Luis Rey River mouth and along the lower San Luis Rey River. Goals applicable at mouth of San Luis Rey River are based on the TMDL compliance pathways as illustrated in **Table 3-2** and **Table 3-3**. Goals along the lower San Luis Rey River are based on improvements in water quality at storm drain outfalls or in the San Luis Rey River (receiving water).

Section 3.1.3.2

For the lower River, the Participating Agencies will focus on flow elimination at persistently flowing outfalls during dry weather as shown in **Table 3-6**, and load reductions in storm drain discharges or concentration of bacteria in the lower River during wet weather as shown in **Table 3-7**. The lower River wet weather load reduction percentages were arrived at by comparing the differences in load reduction requirements from the Bacteria TMDL (refer to **Table 3-8**) for other watershed management areas that have both freshwater and marine requirements. The mean of these differences was added to the final load reduction percentage required for the San Luis Rey TMDL compliance point. The TMDL load reduction requirements were developed to ensure that the covered receiving waters meet water quality objectives in the Water Quality Control Plan for the San Diego Basin (Basin Plan) and the Water Quality Control Plan for Ocean Waters of California (Ocean Plan). The Basin and Ocean Plans were developed to preserve and enhance water quality and to ensure protection of designated beneficial uses of waters. This means that the lower River goals, which borrow from the TMDL's required load reductions, are consistent with Provision B.3.a.(1)(a) that requires final numeric goals to be based on measurable criteria or indicators capable of demonstrating that discharges from storm drains will not cause or contribute to exceedances of water quality standards, and/or the conditions of receiving waters are protected from storm drain discharges, and/or beneficial uses of receiving waters are protected from storm drain discharges and will be supported.

As with the WQIP implementation option of the TMDL compliance goal, these goals would be achieved through implementation of programmatic source control BMPs that are further discussed in **Section 3.2** and detailed in Appendix 3B.

Table 3-6 (heading rows)

Title ^b	Number	Metric	Baseline	4 th Permit Term Interim Numeric Goals Permit Term 2013 – 2018	2 nd Permit Term Final Numeric Goals Permit Term 2018 – 2023
				Meet TMDL Final Compliance Date of (April 4, 2021)	

Table 3-7

Title ^b	Metric	Baseline ^c	4 th Permit Term Interim Numeric Goals Permit Term 2013 – 2018	2 nd Permit Term Interim Numeric Goals Permit Term 2018 – 2023	3 rd Permit Term Interim Numeric Goals Permit Term 2023 - 2028	4 th Permit Term Final Numeric Goals Permit Term 2028-2033
Reduce bacteria contributions from outfalls during wet weather	Bacteria load reductions at storm drain outfalls per acre at key outfalls or bacteria concentration in the lower River	To be developed through transitional wet weather outfall monitoring program or historical storm drain monitoring. Fecal coliform: 2.44×10^{10} MPN/storm/acre Enterococcus: 1.18×10^{11} MPN/storm/acre	Identify five key drainage areas ^d within the Lower SLR River HA; develop baseline loading estimates at these five outfalls. Reduce bacteria loads cumulatively or at key outfalls ^d by 0.3% or meet Bacteria WQOs in the lower River ^e .	Reduce bacteria loads cumulatively or at key outfalls ^d by 4.17% 1.3% or meet Bacteria WQOs in the lower River ^e .	Reduce bacteria loads cumulatively or at key outfalls ^d by 5.85% 6.0% or meet Bacteria WQOs in the lower River ^e .	Reduce bacteria loads cumulatively or at key outfalls ^d by 41.69% 11.9% ^e or meet Bacteria WQOs in the lower River ^f .

a. West of Interstate 15

b. The goals may be adapted as monitoring data is collected and analyzed.

c. *Transitional Monitoring and Assessment Program Report for the San Luis Rey River Watershed Management Area (2012 – 2014)*; *Appendix K – Five-Year Assessment of Random and Targeted MS4 Outfall Discharge Data Collected under NPDES Permit Order No. R9-2007-0001 in San Diego County Watersheds*; 2015. Prepared for the County of San Diego City of Oceanside and City of Vista by Weston Solutions Inc. – http://www.projectcleanwater.org/index.php?option=com_content&view=article&id=44&Itemid=34

d. Refer to Appendix 3K for baseline determination methodology.

e. Key drainage areas may be identified based on factors such as loading estimates, microbial source tracking data, source identification, size of pipe, proximity to receiving water, or other appropriate methods.

f. The five selected key drainage areas are the wet weather storm drain outfall monitoring locations identified in Table 3-1 and Figure 3-1 of Attachment 4A-5 to the Monitoring and Assessment Plan as MS4-SLR1 through MS4-SLR5. The selected key drainage areas are all typical drainages that are representative of the San Luis Rey Watershed Management Area.

g. This final load reduction goal of 11.9% is consistent with the MS4 Discharge Load Reduction TMDL compliance pathway to protect recreational uses at the San Luis Rey River Mouth (#4 in Table 3-5) was arrived at by adding the mean difference between the Enterococcus load reduction requirements to meet the stream freshwater standards and those to meet the ocean standards in Attachment E of the Permit (0.16%), to the required final load reductions for San Luis Rey River at the Pacific Ocean Shoreline (11.69%), see Table 3-8. The modeling was designed to meet the receiving water limits in the river; no dilution was assumed.

h. Meet the water quality objectives for freshwater Single Sample Maximums of 400 MPN/100mL for Fecal Coliform and 61 MPN/100mL for Enterococcus at the two stream monitoring locations identified in Table 4-5. Bacteria loads will be measured in the freshwater section of the stream.

Table 3-8 [insert new table]

Table 3-8. Comparison of Wet Weather Load Reductions ^a for Watersheds with Freshwater and Marine Bacteria TMDL Requirements

<u>Location</u>	<u>Freshwater Load Reduction ^b</u>	<u>Marine Load Reduction ^c</u>	<u>Difference</u>
<u>South Orange County Watershed Management Area (Aliso)</u>	<u>27.52%</u>	<u>27.37%</u>	<u>0.15%</u>
<u>South Orange County Watershed Management Area (Lower San Juan)</u>	<u>27.12%</u>	<u>26.90%</u>	<u>0.22%</u>
<u>Mission Bay Watershed Management Area (Tecolote)</u>	<u>18.15%</u>	<u>18.05%</u>	<u>0.07%</u>
<u>San Diego River Watershed Management Area</u>	<u>47.74%</u>	<u>47.47%</u>	<u>0.27%</u>
<u>San Diego Bay Watershed Management Area (Chollas)</u>	<u>21.46%</u>	<u>21.36%</u>	<u>0.10%</u>
	<u>Mean Difference</u>	<u>Mean Difference</u>	<u>0.16%</u>

a. Enterococcus load reduction requirements from the Bacteria TMDL in Table 6.3 of Attachment E to the Permit.
 b. Single Sample Maximum for freshwater is 61 MPN/100mL (Water Quality Control Plan for the San Diego Basin, effective date April 4, 2011).
 c. SSM for marine is 104 MPN/100mL (Water Quality Control Plan for the San Diego Basin, effective date April 4, 2011).

[Renummer subsequent tables in Chapter 3]

Section 3.1.5 (last sentence)

The proposed schedule for achievement of final Bacteria TMDL (~~and the final jurisdictional goals~~) is consistent with final compliance schedules contained in the Permit. The proposed schedule for the interim and final goals is provided in **Table 3-8 3-9**.

Table 3-15 [insert new row at end of table, under Provision B.3.b.(1)(b)(iii) reference line]

Agency	Optional Strategy	Implementation Timeframe	Triggers	Resources	Pollutant Sources	Pollutant					
						Bacteria	Nutrients	Total Dissolved Solids	Index of Biotic Integrity	Chloride	Toxicity
Provision B.3.b.(1)(b)(iii) - Incentives or programs that may be implemented to encourage or implement projects that will rehabilitate the conditions of channels or habitats											
City of Vista	Rehabilitation projects for stream channel conditions or habitats.	Implementation of each project would begin 2-5 years from the determination that it will be conducted	Implementation of this strategy may be triggered if (1) an interim goal has not been met; (2) determined that project is necessary to meet final goals; (3) necessary resources, including funding, staff, site, and permits are secured; and (4) approval of project by RWQCB	Restoration program would require the following resources: (1) evaluation of project water quality equivalency and contribution toward achieving numeric goals; (2) project feasibility and design; (3) funding source secured; (4) environmental review; (5) City Council support and approval; (6) RWQCB approval.	All	•	•	•	•	•	•

Appendix 3K [insert new appendix]

APPENDIX 3K: CALCULATIONS OF BASELINE LOADS FOR WET WEATHER MS4 OUTFALLS IN SAN LUIS REY WATERSHED

The calculated baseline loads are:

- Fecal coliform = 2.44×10^{10} MPN/ Storm/ Acre
- Enterococcus = 1.18×10^{11} MPN/ Storm/ Acre

These baseline flux (load/acre) values are standardized to discharge volumes expected from a 0.5 inch average storm event.

The baseline load/acre values were calculated in the following manner:

Values were calculated by use of data collected as part of the *Five-Year Assessment of Random and Targeted MS4 Outfall Discharge Data Collected under NPDES Permit Order No. R9-2007-0001 in San Diego County Watersheds* (2015) report. The data were collected during storm events of 0.1-inch total daily precipitation or greater from 27 randomly selected major (≥ 36 inches in diameter) MS4 outfalls over a 5 year period (2008-2013). MS4 outfall discharges were selected at random for collection of grab samples. In total, 29 samples were collected over the course of the study.

For each outfall and sampled storm event, pollutant loads were calculated by multiplying the analyte concentration by the estimated runoff volume from a 0.5 inch storm (the runoff estimates for 0.5 inch storm runoff volumes were made using the hydrology manual calculations; the Rational Method). Storm event pollutant loads were then converted to loads per acre (i.e., flux) by dividing each load by the acreage of the monitored drainage area. Arithmetic means were calculated for each fecal indicator species. These arithmetic means, expressed as MPN/storm/acre (standardized for a 0.5 in storm event), represent the baseline values for Fecal coliform (2.44×10^{10} MPN/ Storm/ Acre) and *Enterococcus* (1.18×10^{11} MPN/ Storm/ Acre).

Literature Cited

Weston Solutions, Inc. 2015. *Five-Year Assessment of Random and Targeted MS4 Outfall Discharge Data Collected under NPDES Permit Order No. R9-2007-0001 in San Diego County Watersheds*. www.projectcleanwater.org.

Section 4.1.1.2 (first paragraph, penultimate sentence)

Wet weather goals for the Lower San Luis Rey River are aimed at reducing bacteria loading at key outfalls consistent with TMDL load reduction options at storm drain outfalls or reducing bacteria concentrations in the receiving water.

Table 4-3

Jurisdiction	Condition	First Permit Term Interim Numeric Goals Permit Term 2013-2018 (Chapter 3)	Assessment Metric	Monitoring Elements
City of Oceanside, City of Vista, County of San Diego	Dry Weather	Effectively eliminate flow from 20% of persistently flowing outfalls.	Presence/absence of dry weather flow at persistent flowing outfalls ^b	Flow data collected during Dry Weather Storm Drain Outfall Monitoring per Provision D.2.
		Reduce by 20% the aggregate flow from persistently flowing outfalls.	Dry weather flow at persistent flowing outfalls ^b	
	Wet Weather	Identify five key drainage areas ^c with the Lower SLR River HA; develop baseline loading estimates at these five outfalls. <u>Reduce bacteria loads cumulatively or at key outfalls ^c by 0.3% or meet Bacteria WQOs in the lower River ^d.</u>	Develop baseline used to estimate bacteria load reductions at storm drain outfalls. <u>Bacteria load reductions per acre at key outfalls ^c or bacteria concentrations in the lower River.</u>	Combination of bacteria and flow data from the transitional wet weather outfall monitoring program ^d, historical storm drain monitoring, and/or Storm Drain Outfall Monitoring per Provision D.2 or receiving water monitoring ^d.

^a. West of Interstate 15

^b. Flow is defined as all dry weather flows except groundwater and other exempt or permitted non-stormwater flows.

^e. ~~Key drainage areas may be identified based on factors such as loading estimates, microbial source tracking data, source identification, size of pipe, proximity to receiving water, or other appropriate methods.~~

^c. ~~The five selected key drainage areas are the wet weather storm drain outfall monitoring locations identified in Table 3-1 and Figure 3-1 of Attachment 4A-5 to the Monitoring and Assessment Plan, as MS4-SLR1 through MS4-SLR-5. The selected key drainage areas are all typical drainages that are representative of the San Luis Rey Watershed Management Area.~~

^d. ~~Transitional Monitoring and Assessment Program Report for the San Luis Rey River Watershed Management Area (2012 – 2014). Appendix K - Five-Year Assessment of Random and Targeted MS4 Outfall Discharge Data Collected under NPDES Permit Order No. R9-2007-0001 in San Diego County Watersheds. 2015. Prepared for the County of San Diego City of Oceanside and City of Vista by Weston Solutions Inc. http://www.projectcleanwater.org/index.php?option=com_content&view=article&id=44&Itemid=34~~

^d. Meet the water quality objectives for freshwater Single Sample Maximums of 400 MPN/100mL for Fecal Coliform and 61 MPN/100mL for Enterococcus at the two stream monitoring locations identified in Table 4-5. Bacteria loads will be measured in the freshwater section of the stream.

Section 4.1.2 (last three items of first bulleted list)

- Sediment quality monitoring, if appropriate, and
- TMDL monitoring, and
- Receiving water monitoring to show progress toward lower River goals.

Section 4.1.2.6 [add new section]

4.1.2.6 RECEIVING WATER MONITORING TO SHOW PROGRESS TOWARD MEETING LOWER RIVER GOALS

To show progress toward achieving the lower river wet weather goal, receiving water monitoring will be conducted at two in-stream sites to measure bacteria concentrations. The sites are identified in Table 4-5 below. Both sites are located along the San Luis Rey River, west of Interstate-15, with SLR25 (Olive Hill) being located upstream of Benet Bridge (MLS). Both sites will be sampled monthly during dry weather, and at least once during the monitoring year within 24 hours after a storm event. A description of the receiving water monitoring to show progress toward achieving the lower River wet weather goals and a map of the sites are included in the Monitoring and Assessment Plan in Attachment 4A-7.

Table 4-5 [add new table]

Table 4-1. Lower River Receiving Water Monitoring Locations

<u>Station ID</u>	<u>Latitude</u>	<u>Longitude</u>	<u>Cross Street Description</u>	<u>Channel Type</u>	<u>Jurisdiction</u>
<u>SLR-MLS</u>	<u>33.22065</u>	<u>-117.35825</u>	<u>Benet Road Bridge over San Luis Rey River</u>	<u>Natural Channel</u>	<u>City of Oceanside</u>
<u>SLR25 (Olive Hill)</u>	<u>33.28802</u>	<u>-117.22313</u>	<u>Camino Del Rey Bridge over San Luis Rey River</u>	<u>Natural Channel</u>	<u>County of San Diego</u>

[Renumber subsequent tables in Chapter 4]

Table 4-6 (previously Table 4-5)

<u>Jurisdiction</u>	<u>Number of Storm Drain Outfalls Monitored Per Year</u>		
	<u>Field Screening ^a</u>	<u>Dry Weather Monitoring ^b</u>	<u>Wet Weather Monitoring ^c</u>
City of Oceanside	19	5	2
County of San Diego	15	5	2
City of Vista	4	2	1

a. For Participating Agencies with fewer than 125 major storm drain outfalls in the watershed, 80% of major storm drain outfalls must be screened twice per year.

b. For dry weather storm drain outfall monitoring locations, see Table 2-4 and Figure 2.1 of Appendix 4A, Attachment 4A-5.

c. For wet weather storm drain outfall monitoring locations, see Table 3-1 and Figure 2.1 of Appendix 4A, Attachment 4A-5.

Appendix 4, Attachment 4A-5, Section 3.1.2

The monitoring locations for wet weather storm drain outfall monitoring and land use compositions for each drainage area are provided in Table 3-1, Table 3-2 supports that the chosen outfalls are representative of the San Luis Rey Watershed Management Area with an emphasis on urban land uses as indicated in Permit Provision D.2.a.(3)(a)(i), and ~~Figure 2-1~~ Figure 3-1 shows the drainage areas for the wet weather storm drain outfall monitoring locations.

Appendix 4, Attachment 4A-5, Table 3-1 [add new column]

Storm Drain Site Name	Jurisdictional Identifier	Jurisdiction	Latitude	Longitude	Drainage Area Land Use Composition
MS4-SLR-1	North River Rd & Melba Bishop Park	City of Oceanside	33.25583	-117.29243	<ul style="list-style-type: none"> • <u>Agriculture 44%</u> • <u>Commercial 21%</u> • <u>Educational 3%</u> • <u>Single-Fam. Resident. 15%</u> • <u>Rural Resident. 7%</u> • <u>Transportation 7%</u> • <u>Open Space 3%</u>
MS4-SLR-2	Toopal Drive at Wanis View Estates	City of Oceanside	33.22186	-117.34984	<ul style="list-style-type: none"> • <u>Single-Fam. Resident. 64%</u> • <u>Transportation 27%</u> • <u>Open Space 10%</u>
MS4-SLR-3	G-5	City of Vista	33.23521	-117.24966	<ul style="list-style-type: none"> • <u>Commercial 3%</u> • <u>Multi-Fam. Resident. 8%</u> • <u>Single-Fam. Resident. 58%</u> • <u>Transportation 19%</u> • <u>Open Space 13%</u>
MS4-SLR-4	COSD MS4 SLR02	County of San Diego	33.283702	-117.217033	<ul style="list-style-type: none"> • <u>Single-Fam. Resident. 3%</u> • <u>Rural Resident. 68%</u> • <u>Transportation 6%</u> • <u>Open Space 23%</u>
MS4-SLR-5	COSD MS4 SLR03	County of San Diego	33.31787	-117.16383	<ul style="list-style-type: none"> • <u>Multi-Fam. Resident. 19%</u> • <u>Rural Resident. 5%</u> • <u>Transportation 1%</u> • <u>Open Space 75%</u>

Appendix 4, Attachment 4A-5, Table 3-2 [add new table]

Table 5-25. Land Use Comparison, San Luis Rey River WMA and Monitored Drainage Areas

Land Use	WMA Area (acres)*	WMA Area (%)*	Outfalls Area (acres)	Outfalls Area (%)	(% Diff.)
<u>Agricultural (Combined)</u>	<u>49,415</u>	<u>21.4%</u>	<u>210</u>	<u>26.1%</u>	<u>4.7%</u>
<u>Commercial</u>	<u>1,978</u>	<u>0.9%</u>	<u>103</u>	<u>12.9%</u>	<u>12.0%</u>
<u>Educational</u>	<u>657</u>	<u>0.3%</u>	<u>12</u>	<u>1.5%</u>	<u>1.3%</u>
<u>Industrial</u>	<u>1,617</u>	<u>0.7%</u>	<u>0</u>	<u>0.0%</u>	<u>-0.7%</u>
<u>Mixed Use</u>	<u>1</u>	<u>0.0%</u>	<u>0</u>	<u>0.0%</u>	<u>0.0%</u>
<u>Multi-Family Residential</u>	<u>1,547</u>	<u>0.7%</u>	<u>29</u>	<u>3.6%</u>	<u>2.9%</u>
<u>Open Space (Combined)</u>	<u>117,063</u>	<u>50.7%</u>	<u>144</u>	<u>17.9%</u>	<u>-32.8%</u>
<u>Rural-Residential</u>	<u>45,760</u>	<u>19.8%</u>	<u>103</u>	<u>12.9%</u>	<u>-7.0%</u>
<u>Single-Family Residential</u>	<u>7,168</u>	<u>3.1%</u>	<u>138</u>	<u>17.2%</u>	<u>14.1%</u>
<u>Transportation</u>	<u>5,719</u>	<u>2.5%</u>	<u>63</u>	<u>7.9%</u>	<u>5.4%</u>
Total	230,925		803		

*acreage excludes state, federal and tribal lands.

Appendix 4, Attachment 4A-5, Figure 3-1 [add new figure]

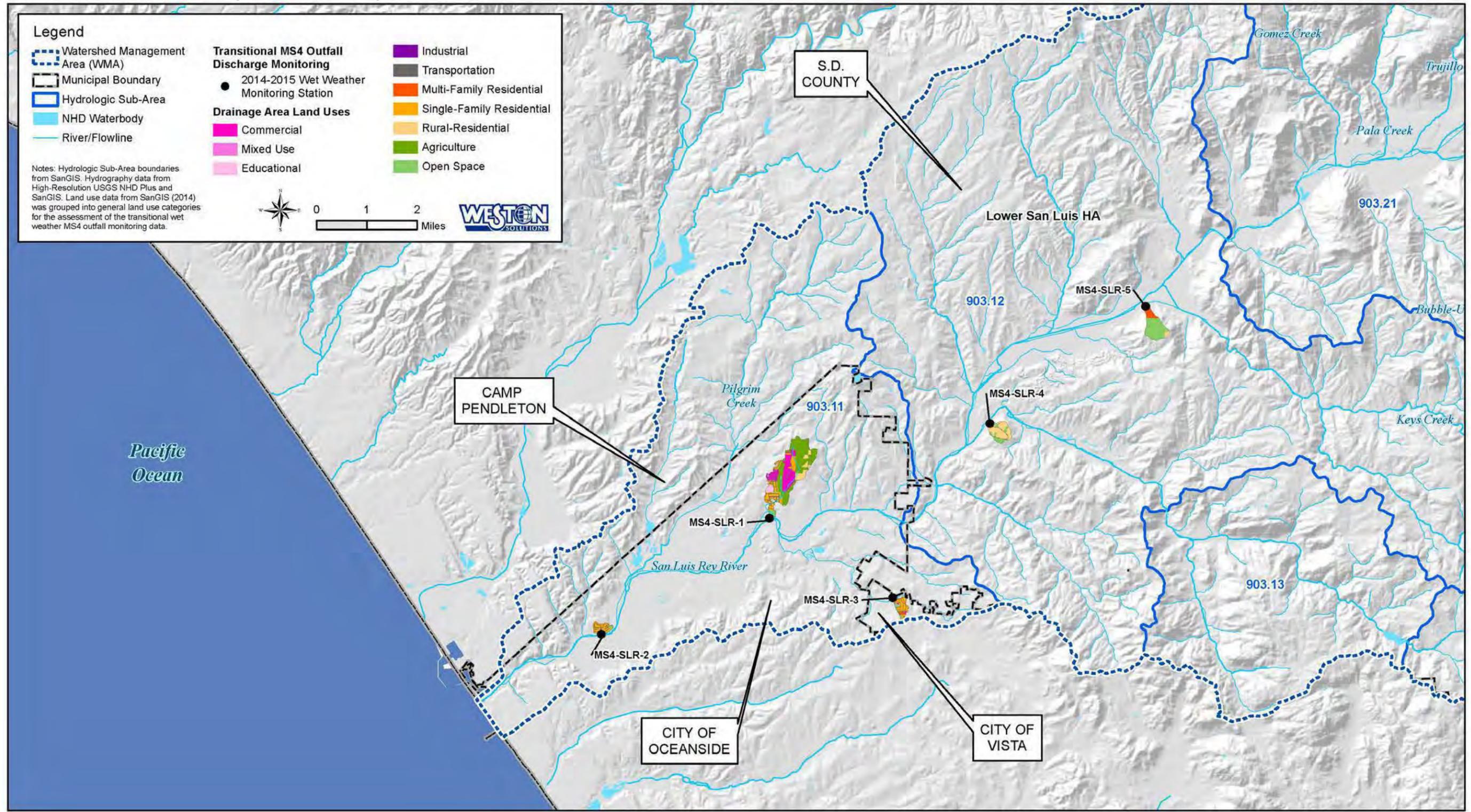


Figure 3-1. Drainage Areas of Wet Weather Outfall Monitoring Sites

Appendix 4, Attachment 4A-7 [add new attachment]

ATTACHMENT 4A-7: LOWER SAN LUIS REY RIVER BACTERIA MONITORING PLAN

1. PROJECT DESCRIPTION

1.1 INTRODUCTION

In response to the National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds Within the San Diego Region Order No. R9-2013-0001 (as amended by Order Nos. R9-2015-0001 and R9-2015-0100; Permit), bacteria receiving water monitoring will be conducted at two locations in the lower San Luis Rey River. Data collected through this monitoring effort will be used to demonstrate progress toward achieving the lower River wet weather goal for bacteria load reductions in stormwater discharges, as identified in the San Luis Rey Water Quality Improvement Plan (WQIP).

This monitoring is to assess the water quality of the River in response to the strategies implemented to meet the goal to reduce bacteria contributions from outfalls during wet weather in the lower River (Table 1-1; as presented in the WQIP). As directed by San Diego Regional Water Quality Control Board staff, the types of indicator bacteria to be analyzed and the frequency of monitoring events are consistent with the Permit, as outlined in Permit Attachment E: *Specific Provisions for Total Maximum Daily Loads 6. Revised Total Maximum Daily Loads for Indicator Bacteria, Project I –Twenty Beaches and Creeks in the San Diego Region (Including Tecolote Creek)*. Provision 6 of Permit Attachment E includes a description of minimum monitoring requirements proposed in this plan. The San Luis Rey Participating Agencies have developed this Monitoring Plan for the lower San Luis River Watershed to meet the requirements of the MS4 Permit.

Table 1-1. Wet Weather Watershed Goals for Lower San Luis Rey River^a

Title ^b	Metric	Baseline	Interim Numeric Goals Permit Term 2013 – 2018	Interim Numeric Goals Permit Term 2018 – 2023	Interim Numeric Goals Permit Term 2023 - 2028	Final Numeric Goals Permit Term 2028-2033 (April 4, 2031)
Reduce bacteria contributions from outfalls during wet weather	Bacteria load reductions per acre at key outfalls or bacteria concentrations in the lower River	Fecal coliform: 2.44* 10 ¹⁰ MPN/ Storm/ Acre Enterococcus: 1.18* 10 ¹¹ MPN/ Storm/ Acre ^c	Reduce bacteria loads cumulatively or at key outfalls ^d by 0.3% or meet Bacteria WQOs in the lower River ^f .	Reduce bacteria loads cumulatively or at key outfalls ^d by 1.3% or meet Bacteria WQOs in the lower River ^f .	Reduce bacteria loads cumulatively or at key outfalls ^d by 6.0% or meet Bacteria WQOs in the lower River ^f .	Reduce bacteria loads cumulatively or at key outfalls ^d by 11.9% ^e or meet WQOs in the lower River ^f .

a. West of Interstate 15

b. The goals may be adapted as monitoring data is collected and analyzed.

c. Refer to Appendix 3K of the WQIP for baseline determination methodology.

d. The five selected key drainage areas are the wet weather storm drain outfall monitoring locations identified in Table 3-1 and Figure 3-1 of Attachment 4A-5 to the Monitoring and Assessment Plan, as MS4-SLR-1 through MS4-SLR-5. The selected key drainage areas are all typical drainages that are representative of the San Luis Rey Watershed Management Area.

e. This final load reduction goal of 11.9% was arrived at by adding the mean difference between the Enterococcus load reduction requirements to meet the stream freshwater standards and those to meet the ocean standards in Attachment E of the Permit (0.16%), to the required final load reductions for San Luis Rey River at the Pacific Ocean Shoreline (11.69%). The modeling was designed to meet the receiving water limits in the river; no dilution was assumed.

f. Meet the water quality objectives for freshwater Single Sample Maximums of 400 MPN/100mL for Fecal Coliform and 61 MPN/100mL for Enterococcus at the two stream monitoring locations identified in Table 2-2 and Figure 2-1. Bacteria loads will be measured in the freshwater section of the stream

The intent of having a wet-weather watershed goal for the lower River is for Participating Agencies to cooperatively achieve pollutant load reductions necessary to restore and protect the designated beneficial use of water contact recreation (REC-1) (SDRWQCB, 2011c).

1.2 BACTERIA RECEIVING WATER LIMITATIONS

Table 1-3 provides the water quality objectives for the lower San Luis Rey River. Data collected through implementation of this Bacteria Monitoring Program will be used to evaluate progress toward, and attainment of, the lower San Luis Rey wet-weather bacteria goal.

Table 1-3. Water Quality Objectives for Bacteria

<u>Parameter</u>	<u>Dry Weather^(a)</u>		<u>Wet Weather^(b)</u>	
	<u>Numeric Target (MPN/100mL)^(c)</u>	<u>Allowable Exceedance^(c)</u>	<u>Numeric Target (MPN/100mL)^(d)</u>	<u>Allowable Exceedance</u>
<u>Enterococcus</u>	<u>33</u>	<u>0%</u>	<u>61</u>	<u>0%</u>
<u>Fecal Coliform</u>	<u>200</u>	<u>0%</u>	<u>400</u>	<u>0%</u>

mL – milliliter, MPN – Most Probable Number

Source: SDRWQCB, 2011a

(a) Dry weather days are defined as days with less than 0.1 inch of rainfall observed during the previous 72 hours.

(b) Wet weather days are defined as days with rainfall events of 0.1 inches or greater, and the following 72 hours.

(c) Dry weather numeric objectives are based on the 30-day geometric mean water quality objectives in the Basin Plan (SDRWQCB, 2011c).

(d) Wet weather numeric objectives are based on the single sample maximum water quality objectives in the Basin Plan (SDRWQCB, 2011c)

2. MONITORING APPROACH

This section describes the purpose, scope, and types of monitoring to be conducted. Additional details of the sampling, analytical methodology, and data quality objectives are described in the Quality Assurance Project Plan (QAPP) (County of San Diego, 2015).

2.1. MONITORING

Monitoring is designed to meet the receiving water monitoring requirements of the Permit. The monitoring will include both dry and wet weather sampling at two (2) sites, with varied sample event frequency (Table 201). The sites will be sampled monthly, and at least once within 24 hours after a storm event. Collected data will be used to address the following questions:

- Are bacteria levels improving at the monitoring sites?
- Are WQOs for bacteria indicators being met at the monitoring sites?

Table 2-1. Scope of the Monitoring Program

<u>Monitoring Period</u>	<u>Number of Monitoring Locations</u>	<u>Event Type</u>	<u>Grab Samples Per Site Per Event</u>	<u>Event Frequency</u>
<u>Oct. 1 to Sept. 30</u>	<u>2</u>	<u>Dry</u>	<u>1</u>	<u>At least Monthly</u>
<u>Oct. 1 to Apr. 30</u>	<u>2</u>	<u>Wet</u>	<u>1</u>	<u>At least once within the first 24 hours of the end of the storm event during the rainy season (Oct. 1 through Apr. 30).</u>

Notes: Not including QA Samples

2.1.1 MONITORING LOCATIONS

According to Provision 6.d.(2)(a) of Attachment E of the Permit, for creeks addressed by the TMDL, monitoring sites should consist of, at a minimum, one site at or near the mouth of the creek and one or more sites upstream of the mouth. Therefore, two sites have been selected for monitoring in this manner along the lower section the San Luis Rey River. The sites are identified in Table 4-5 below. Both sites are located along the San Luis Rey River, west of Interstate-15, with SLR25 (Olive Hill) being located upstream of Benet Bridge (MLS).

Table 2-2 provides the sites' location names and coordinates. Figure 2-1 presents a map of the sites within the San Luis Rey River Watershed.

Table 2-2. Monitoring Locations

Site Name	Location Description	Jurisdiction	Lat.	Long.
<u>Benet Bridge (MLS)</u>	<u>Benet Road Bridge over San Luis Rey River</u>	<u>City of Oceanside</u>	<u>33.22065</u>	<u>-117.35825</u>
<u>SLR25 (Olive Hill)</u>	<u>Camino Del Rey Bridge over San Luis Rey River</u>	<u>County of San Diego</u>	<u>33.28802</u>	<u>-117.22313</u>

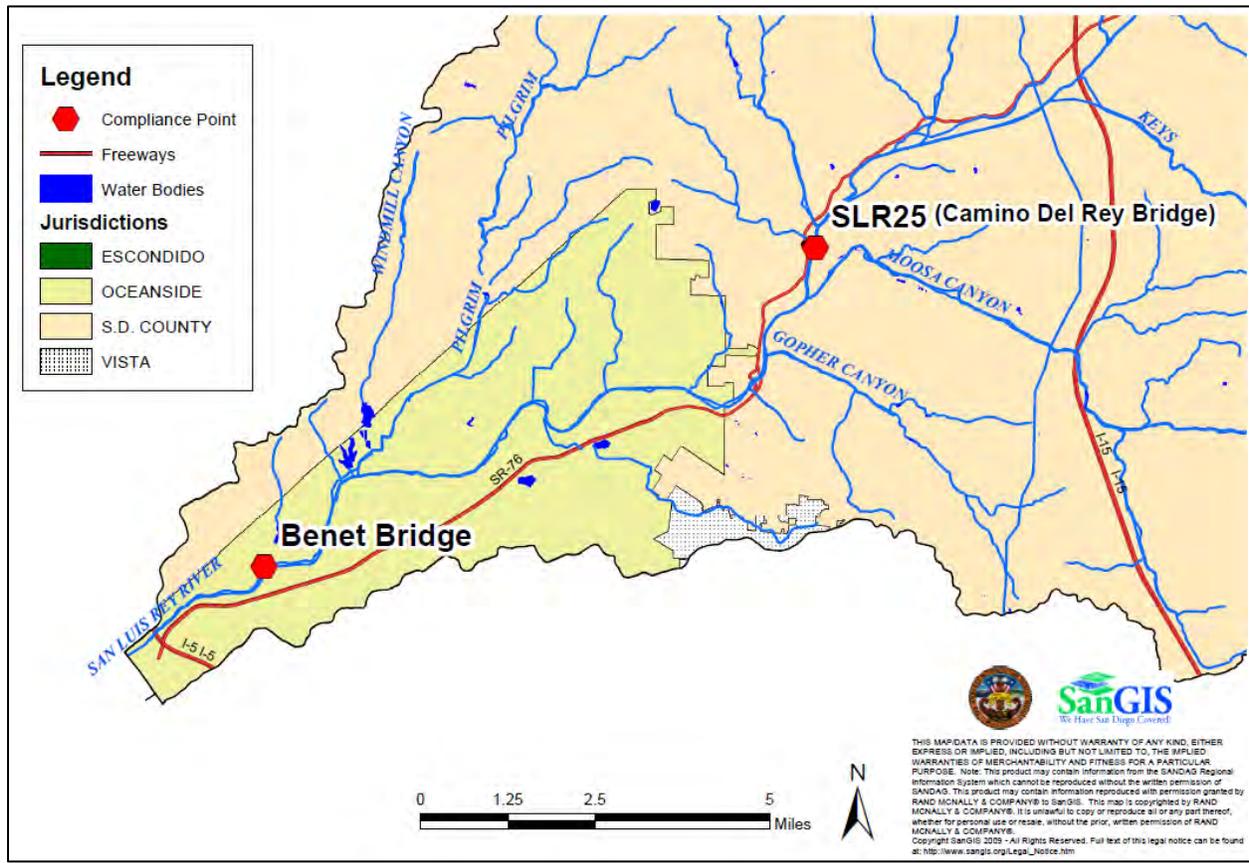


Figure 2-1. Monitoring Locations

2.1.2 CONSTITUENTS

As indicated by the water quality objectives for bacteria in the stream, fecal indicator bacteria (FIB) are the target constituents. Samples collected at monitoring sites will be analyzed for fecal coliform and *Enterococcus*. All samples will be analyzed for FIB in accordance with Surface Water Ambient Monitoring Program (SWAMP) requirements provided in the QAPP (County of San Diego, 2015). Table 2-3 presents the constituents and reporting limits.

Table 2-3. Water Sample Analyses for Bacteria Monitoring

<u>Parameter</u>	<u>Project Reporting Limit^(a)</u>
<u><i>Enterococcus</i></u>	<u>1 CFU/100mL</u>
<u>Fecal Coliform</u>	<u>2 CFU/100mL</u>

Notes:

CFU – Colony Forming Units

(a) The target reporting limits are consistent with methodology of the Assembly Bill 411 program to facilitate overlap with that program. However, reporting limits may increase depending on dilution in countable range.

2.1.3. DRY WEATHER MONITORING

As identified in Table 2-1, dry weather monitoring will be conducted throughout the year (monitoring year begins October 1 and ends September 30) at both monitoring sites. Samples will be collected at the monitoring locations listed in Table 2-2 on dry weather days, after an antecedent dry period of 72 hours with less than 0.1 inches of rainfall. During each dry weather monitoring event, field observations will be recorded and a grab sample will be collected at each location. The methodology for field observations and sample collection/transport is described in the QAPP (County of San Diego, 2015).

2.1.4. WET WEATHER MONITORING

As identified in Table 2-1, wet weather monitoring will be conducted within 72 hours after at least one storm event during the wet season, (October 1 to April 30) at both monitoring sites. Storm events resulting in greater than 0.1 inches of precipitation will be targeted for sampling. During each wet weather monitoring event, a grab sample will be collected within 24 hours of the end of precipitation using the same sample collection technique as during a dry weather monitoring event, taking additional safety precautions as needed. Field observations are not required but will be recorded, if feasible. The methodology for field observations and sample collection/transport is described in the QAPP (County of San Diego, 2015).

2.1.5. STORM EVENT SELECTION CRITERIA

The following criteria will be used to determine if mobilization will occur for an impending storm event:

- Storms must be forecast to produce at least 0.10 inch (2.54 millimeters [mm]) of rain over a 24 hour duration.
- Storm events must be preceded by at least 72 hours of dry conditions (<0.10 inch of precipitation).

3. DATA MANAGEMENT AND REPORTING PROCEDURES

This section describes the management of field and analytical data and reporting procedures for the lower San Luis Rey River Bacteria Monitoring Program.

3.1. DATA MANAGEMENT

Field Data Records and Analytical Data Reports will be sent to and kept by the Project Manager. Data will be submitted in a standardized California Environmental Data Exchange Network (CEDEN)-compatible format to the County of San Diego.

Specific data review, storage and maintenance procedures for field and laboratory data are described in the QAPP (County of San Diego, 2015).

3.2. ASSESSMENT AND REPORTING PROCEDURES

Monitoring Reports will be prepared annually to be included in the Participating Agencies' Assessment Program Reports or WQIP Annual Reports as appropriate. The annual reports will summarize the collected data and provide the results of analysis and assessments of dry and wet weather data collected herein. The data will be used to inform progress toward meeting the lower San Luis Rey bacteria goal.

The resulting data will also be submitted to the California Environmental Data Exchange Network (CEDEN).

4. REFERENCES

California Regional Water Quality Control Board, San Diego Region (SDRWQCB). January 2007. Order No. R9-2007-0001. NPDES No. CAS0108758. Waste Discharge Requirements For Discharges Of Urban Runoff From The Municipal Separate Storm Sewer Systems (MS4s) Draining The Watersheds Of The County Of San Diego, The Incorporated Cities Of San Diego County, The San Diego Unified Port District, And The San Diego County Regional Airport Authority. San Diego, California.

California Regional Water Quality Control Board, San Diego Region (SDRWQCB). Effective April 2011(a). Resolution No. R9-2010-0001. A Resolution Amending the Water Quality Control Plan for the San Diego Basin (9) To Incorporate Revised Total Maximum Daily Loads for Indicator Bacteria, Project I – Twenty Beaches and Creeks in the San Diego Region (including Tecolote Creek). San Diego, California.

California Regional Water Quality Control Board, San Diego Region (SDRWQCB). April 2011(c). Water Quality Control Plan for the San Diego Basin (9). San Diego, California.

California Regional Water Quality Control Board, San Diego Region (SDRWQCB). Adopted May 2013. Order No. R9-2013-0001. NPDES No. CAS0109266. National Pollutant Discharge Elimination System (NPDES) Permit And Waste Discharge Requirements For Discharges From The Municipal Separate Storm Sewer Systems (MS4s) Draining The Watersheds Within The San Diego Region. San Diego, California.

County of San Diego. 2015. Quality Assurance Project Plan for the San Diego River Watershed Bacteria TMDL Monitoring Program. Available from the County of San Diego Department of Public Works Watershed Protection Program upon request.

SanGIS, 2009. SanGIS/San Diego Association of Governments (SANDAG) GIS Data Warehouse. http://www.sangis.org/Download_GIS_Data.htm. Accessed on May 7, 2012.

Chapter 5 (first paragraph, second sentence)

The adaptive management process is the framework to evaluate progress toward compliance with the Bacteria TMDL and meeting the watershed goals.

Table 5-3

Jurisdiction	Condition	First Permit Term <u>Interim</u> Numeric Goals <u>Permit Term 2013-2018</u> (Chapter 3)	Assessment Metric
City of Oceanside, City of Vista, County of San Diego	Dry Weather	Effectively eliminate flow from 20% of persistently flowing outfalls.	Presence/absence of dry weather flow at persistent flowing outfalls ^b
		Reduce by 20% the aggregate flow from persistently flowing outfalls.	Dry weather flow at persistent flowing outfalls ^b
	Wet Weather	Identify five key drainage areas^e with the Lower SLR River HA; develop baseline loading estimates at these five outfalls. Reduce bacteria loads cumulatively or at key outfalls ^c by 0.3% or meet Bacteria WQOs ^d in the lower River.	Develop baseline used to estimate bacteria load reductions at storm drain outfalls. Storm Drain Outfall Monitoring per Provision D.2 or receiving water monitoring.

a. West of Interstate 15

b. Flow is defined as all dry weather flows except groundwater and other exempt or permitted non-stormwater flows.

c. Key drainage areas may be identified based on factors such as loading estimates, microbial source tracking data, source identification, size of pipe, proximity to receiving water, or other appropriate methods.

C. The five selected key drainage areas are the wet weather storm drain outfall monitoring locations identified in Table 3-1 and Figure 3-1 of Attachment 4A-5 to the Monitoring and Assessment Plan as MS4-SLR-1 through MSR-SLR-5. The selected key drainages are all typical drainages that are representative of the San Luis Rey Watershed Management Area.

~~d. Transitional Monitoring and Assessment Program Report for the San Luis Rey River Watershed Management Area (2012–2014). Appendix K—Five Year Assessment of Random and Targeted MS4 Outfall Discharge Data Collected under NPDES Permit Order No. R9-2007-0001 in San Diego County Watersheds. 2015. Prepared for the County of San Diego City of Oceanside and City of Vista by Weston Solutions Inc. http://www.projectcleanwater.org/index.php?option=com_content&view=article&id=44&Itemid=34~~

d. Meet the water quality objectives for freshwater Single Sample Maximums of 400 MPN/100mL for Fecal Coliform and 61 MPN/100mL for Enterococcus at the two stream monitoring locations identified in Table 4-5.

**SAN LUIS REY WATER QUALITY IMPROVEMENT PLAN
 REVISIONS TO ADDRESS JANUARY 6, 2016 RWQCB COMMENTS**

#	Comment	Revision
1	<p>The City of Vista failed to include any incentives or programs that may be implemented to encourage or implement projects that will rehabilitate the conditions of channels or habitats within the jurisdiction of the City of Vista in the San Luis Rey River WMA. The City of Vista has not met the requirements of Provisions B.3.b.(1)(b)(iii)-(v).</p>	<p>Table 3-15 (errata page 4): Added row at end of table, under Provision B.3.b.(1)(b)(iii) reference line with optional jurisdictional strategy for stream channel conditions or habitat rehabilitation projects.</p>
2	<p>The San Luis Rey River WMA Water Quality Improvement Plan includes final wet weather indicator bacteria numeric goals for the lower San Luis Rey River (a freshwater water body) at "key outfalls" based on saltwater numeric targets of the Beaches and Creeks Bacteria TMDLs. The San Luis Rey River WMA Copermittees failed to develop and incorporate appropriate final numeric goals based on measurable criteria or indicators capable of demonstrating: (i) discharges from the Copermittees' MS4s will not cause or contribute to exceedances of water quality standards, AND/OR (ii) the conditions of receiving waters are protected from MS4 discharges, AND/OR (iii) beneficial uses of receiving waters are protected from MS4 discharges and will be supported. The San Luis Rey River WMA Copermittees have not met the requirements of Provision B.3.a.(1)(a) of the Order.</p>	<p>Section 3.1.3: Clarified that revised lower river goal is based on water quality improvements in storm drain outfalls <i>or in the lower river</i>.</p> <p>Section 3.1.3.2: Added description of how the lower river goals were developed and why they are consistent with Provision B.3.a.(1)(a).</p> <p>Table 3-6: Changed column headers to match analogous column header changes in Table 3-7.</p> <p>Table 3-7: Added "<i>or meet Bacteria WQOs in the lower River</i>" to each interim goal and the final goal; increased the load reduction goal for each permit term for consistency with freshwater bacteria requirements (see comment 3 revision below).</p> <p>Table 3-8: New table that shows a "back of the envelope" calculation to compare wet weather load reductions among the Region 9 Bacteria TMDL watersheds that have both freshwater and marine requirements. (This calculation was used to increase the load reduction goals for the lower River relative to the September 2015 submittal, which relied on the Bacteria TMDL load reduction requirements for the San Luis Rey TMDL (ocean) compliance point.)</p> <p>Section 3.1.5: Minor clarification to omit reference to "jurisdictional goals" (all goals presented are watershed goals).</p> <p>Appendix 3K: New appendix that describes how the wet weather storm drain outfall baseline load was determined (for inclusion in Table 3-7).</p>
3	<p>The San Luis Rey River WMA Water Quality Improvement Plan includes interim wet weather indicator bacteria numeric goals for the lower San Luis Rey River based on load reductions in storm water. The first interim numeric goal is to "<i>identify five key drainage areas within the lower SLR River HA; develop baseline loading estimates at these five outfalls.</i>" The first interim numeric goal does not demonstrate progress toward achieving final numeric goals in the receiving waters and/or MS4 discharges. The San Luis Rey River WMA</p>	<p>Table 3-7: Added the baseline value, the calculation for which is described in new Appendix 3K; added interim goal for a 0.3% load reduction at key outfalls or meet Bacteria WQOs in lower river to the current permit term (2013-2018) column.</p>

<p>Copermittees have not met the requirements of Provisions B.3.a.(1)(b) and B.3.a.(2)(b)(iv) of the Order.</p>	<p>The San Luis Rey River WMA Water Quality Improvement Plan indicates the San Luis Rey River WMA Copermittees will monitor "five key drainage areas" within the lower San Luis Rey River Hydrologic Area. The San Luis Rey River WMA Water Quality Improvement Plan does not identify the "key drainage areas" that will be monitored. The San Luis Rey River WMA Water Quality Improvement Plan also lacks an adequate discussion of the linkage between the bacteria load reduction wet weather final numeric goal, the monitoring data that will be collected, and how the final numeric goal and monitoring data will demonstrate: (i) discharges from the Copermittees' MS4s will not cause or contribute to exceedances of water quality standards, AND/OR (ii) the conditions of receiving waters are protected from MS4 discharges, AND/OR (iii) beneficial uses of receiving waters are protected from MS4 discharges and will be supported. In addition, the monitoring and assessment program in the San Luis Rey River WMA Water Quality Improvement Plan only includes one receiving water monitoring location at the San Luis Rey River Mass Loading Station (MLS). Because the final numeric goals are based on the Beaches and Creeks Indicator Bacteria TMDLs, the San Diego Water Board expects the receiving water monitoring to be consistent with bacteria monitoring requirements for creeks pursuant to the Beaches and Creeks Bacteria TMDLs. The San Luis Rey River WMA Copermittees have not met the requirements of Provisions B.4.a, D.1.b, D.2.a.(3), and D.2.c of the Order, and needs to include monitoring that is consistent with Specific Provision 6.d.(2)(a) of Attachment E to the Order.</p>
<p>4</p>	<p>Table 3-7: Added footnotes with references to where in the WQIP the locations of the five selected key drainage outfalls are located (footnote d), and the locations of the two new stream monitoring sites (footnote f). Section 4.1.1.2: Minor clarification regarding purpose of lower river goal. Table 4-3: Made changes to match Table 3-7. Section 4.1.2: Added bullet for monitoring to show progress toward lower river goals. Section 4.1.2.6: New section to describe receiving water monitoring. Table 4-5: New table to identify lower river receiving water monitoring locations. Table 4-6: Renumbered from 4-5. Added footnotes to provide references to where in the WQIP the locations of the monitored dry and wet weather storm drain outfalls are located in the watershed. Chapter 4 Appendix, Attachment 4A-7: New Monitoring and Assessment Plan attachment to describe the receiving water monitoring that will show progress toward the lower river wet weather goal; attachment includes a table and figure that identify and locate the two stream monitoring sites. Section 5: Minor change to clarify purpose of adaptive management with respect to all watershed goals. Table 5-3: Made changes to match Table 3-7.</p>