STATE OF CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION

STAFF REPORT FOR OFF SITE MEETING OF JULY 14, 2011

Prepared June 27, 2011

ITEM NUMBER: 18

SUBJECT: Performance Measurement and Results

Establishing water quality outcome-based performance measures, in combination with programmatic work prioritization, provides us meaningful feedback on our progress towards tangible change, **and** towards achieving our measurable goals:

- 80% of groundwater will be clean by 2025, with the remaining exhibiting positive trends
- 80% of aquatic habitat will be healthy by 2025, with the remaining exhibiting positive trends
- By 2025, 80% of lands will be managed to maintain proper watershed functions, and the remaining 20% will exhibit positive trends

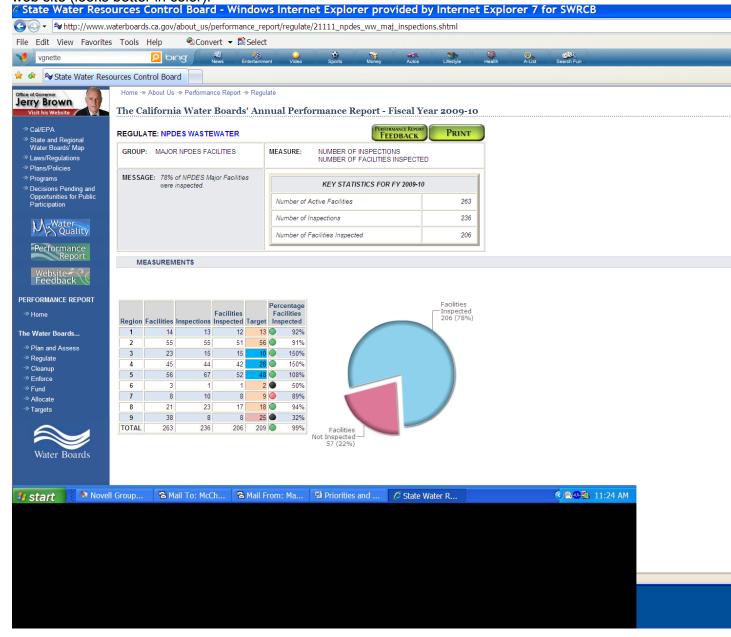
This report discusses staff's efforts in:

- Prioritizing programmatic work to ensure we are spending the bulk of our time on the most important projects, with respect to health and environmental threats;
- Measuring our performance toward achieving tangible positive change in reducing those health and environmental threats; and
- Developing appropriate measures of water quality outcome and risk/threat reduction for programs that either don't currently have them or require additional specified measures.

The Water Boards' efforts to protect and allocate the State's waters include developing performance measures over the last couple of years, as part of the Water Boards' development as performance-based organizations¹. In the spirit of moving toward a Water Board "report card", we are establishing performance targets for some measures of Water Board work. The report relies principally on data that are available through the primary databases used by the Water Boards. As with any new effort, data availability limits the type of information that is reported. Over time, the information presented will better illustrate the work and effectiveness of the Water Boards and the quality of our State's waters. The State Board web pages for the Annual Performance Report solicit public comments for continual improvement of the information presented. In addition, improvements in the Water Boards' data systems will enhance routine reporting of performance. As those systems are enhanced, the Performance Report will evolve to describe the water environment outcomes of our efforts. These real world measures are the reasons the Water Boards exist and the reasons for the staff and the Board Members to do their jobs – to effect real change, real environmental outcomes. Measuring them is not so easy. The companion agenda item for this off site meeting contains some short stories from individual staff that describe changes that they have effected or at least participated in producing those improvements. These random vignettes collectively demonstrate more meaningful changes we have accomplished, and that we are striving to measure in a more orderly fashion through improved performance measures.

¹ Performance-based organizations have clear and measurable goals, objectives, and targets for improved performance, which are established and reported.

Here is a screen shot of the State Board's Performance Measures part of our Water Board's web site (looks better in color):



We have the same "Performance Report" green button on the lower left of our home web page. In the following parts of this report, our office's three technical sections provide updates on their performance measures.

GROUNDWATER PROGRAMS

Prioritization Efforts

The four groundwater programs (Site Cleanup [SCP], Department of Defense [DoD], Underground Storage Tanks [UST], and Land Disposal) continue to implement their prioritization strategies to ensure we are working on the highest priority groundwater projects in the Central Coast region. Each of these programmatic prioritization efforts includes criteria to identify the sites posing the

greatest exposure risk to human health and the environment (e.g., inhalation, ingestion, etc.). SCP and DoD also evaluate the project complexity (e.g., hydrologic conditions, waste characteristics, etc.) and extent of public participation needed to reduce both human and environmental exposure risk and move projects toward closure. Staff first implemented the prioritization strategies in 2009 and re-evaluated their sites based on the various programmatic prioritization criteria in the 2010/2011 fiscal year. However, DoD staff noted that due to federal contracting means there were some sites that had a time-driven immediacy based on expiring contracted funds. Consequently, DoD staff re-prioritized their cases in the 2010/2011 fiscal year with this additional criterion in mind.

In most of the groundwater programs, we have more sites than we have staff capacity to work on, so this prioritization allows us to stay focused on the most important sites, those that pose the greatest risks to human health and water quality. Our primary goal through these prioritization efforts is to identify our highest priority sites, such that we can focus our limited resources to successfully decrease the risk at these sites, ultimately making them lower priority cases. We understand that these prioritized lists are dynamic, and that new priorities can arise (in the form of emerging new pollutants, or as we successfully reduce pollutant risk through our cleanup efforts at existing priority sites, etc.).

Performance Measurement

The groundwater cleanup programs (SCP, UST, DoD) measure performance through tangible water quality outcomes, such as site closure. Closure reflects when groundwater beneath a cleanup site is at or near water quality objectives for a targeted pollutant, and the soil does not pose a threat to existing land uses or underlying groundwater. We typically close cleanup cases when they fit this definition. Staff closes SCP and UST cases through an Executive Officer action when the site's groundwater meets all water quality objectives. Other low risk sites are reviewed by the Board before the Executive Officer closes the case.

Groundwater cleanup sites can take many years to clean up, dependent on the volume of waste discharged and the complexity of the geology, among other variables. As such, other project components (e.g., cleanup project milestones) must be considered to measure progress, in addition to closure. We use the startup of active remediation as one of these interim measures; this project milestone reflects the point where site characterization (site assessment) is sufficient to initiate cleanup actions. We currently use these two measures (closure and start up of active remediation) to gauge our progress in three of the groundwater cleanup programs (UST, SCP, and DoD). Table 1 below shows the fiscal year targets (2010-2011) and outcomes (through June 17, 2011) in these three programs, for both of these measures.

TABLE 1 PROGRAM PERFORMANCE REPORT CARD GROUNDWATER CLEANUP PROGRAMS

(Fiscal Year: July 1, 2010-June 30, 2011)

Program	Closure Target ¹	Closures ^{2,3}	Additional Closures Pending Well Abandonment ⁴	Sites Moving Into Active Remediation Target ¹	Sites Moving Into Active Remediation ³
UST	17	7	8	12	6
SCP	12	8	1	7	10
DoD	3	8	0	6	10

Notes:

Projected target for the fiscal year July 1, 2010 through June 30, 2011.

- ² Central Coast Water Board staff considers closure achieved when all wells have been appropriately abandoned.
- Data Source: GeoTracker as of May 26, 2011 (https://www.geotracker.waterboards.ca.gov/).
- Site has met all cleanup requirements, but awaiting completion of well abandonment.

Closure Performance: Table 1 shows that the Underground Storage Tanks (UST) program fell short of its program goals for closure in the 2010-2011 fiscal year. We believe this was in part due to the downturn in the regional economy in conjunction with shortfalls in the UST Cleanup Fund. Slowdowns in the rate of reimbursement slowed overall progress on projects, decreasing the number of closures. Eight UST sites have completed all soil and groundwater cleanup work, but have yet to document well abandonment completion and therefore are not considered closed by the program definition. We are contacting the responsible parties associated with these sites to push them the final step to closure.

Table 1 shows that the SCP program also fell short of their projected program targets for closure. SCP did not meet their projected targets due to 1) lack of funding for some responsible parties to complete their closure reporting and field work requirements, 2) reluctance of property owners to have a deed restrictions placed on their properties for the low-risk pollution that remains above water quality objectives (potential recommended closures), 3) lack of general fund money for staff to work on closing sites that are not in cost recovery due to insolvent responsible party, and 4) some responsible parties did not obtain access to complete remediation activities from adjacent property owners.

The DoD program exceeded its closure target for the most recent fiscal year. The significant number of DoD closures above the projected target reflects an influx of federal DoD money to close out Santa Rosa Island USTs and transformers at this formerly used defense site.

Moving to Active Remediation Performance: Table 1 also shows groundwater program staff exceeded the target for moving sites from characterization to remediation in DoD and SCP. Similar to the closures explanation above, extra federal DoD money helped push priority cleanup projects at DoD facilities into cleanup. The UST program did not achieve the target for regional economic reasons stated above. In addition, the UST program is a cost-reimbursement program. Many small facility owners stage their cleanup actions around the reimbursement from a previous phase of work – that is they finance their next work using reimbursement money from the Cleanup Fund. As reimbursement slows down, the rate of new work decreases. Water Board staff hopes to see the pace of remediation pick up as the economy improves.

Cumulative Program Closure Performance: Keeping the big picture in mind, Table 2 shows the total number of groundwater cleanup cases (open and closed) for which the Water Board is the lead agency, in addition to the total number of cases closed by Water Board staff and remaining open cases for the UST, SCP, and DoD programs. This table reflects how each program is performing with respect to the overall task of completing cleanup and closing all sites.

TABLE 2 CUMULATIVE PROGRAM PERFORMANCE REPORT CARD GROUNDWATER CLEANUP PROGRAMS

(Cumulative to present, June 17, 2011)

Program Total To	otal Cases New Ca	ases Remaining	Inactive
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	Cases	Closed	This Year ¹	Open Cases ²	Cases
UST	622	361	1	261	0
SCP	234	83 ³	7	144	7
DoD	375	272 ³	0	91	12

Notes:

- New cases since year July 1, 2010.
- This number includes new cases.
- Not all pre-Geotracker (mid-2005) information is included in this total.

Data source is Geotracker

Future Performance Measures: Central Coast UST program manager, Chris Adair, has been participating on a state-wide Water Board technical group developing recommendations for new groundwater performance measures. These new measures will be used in evaluating SCP, UST, and DoD program performance. Some of the new environmental outcome measures under development include:

- Number of groundwater sites with human health exposures controlled. Human health exposures include water ingestion and contact (surface and groundwater) and vapor inhalation;
- Number of sites with groundwater pollutant migration adequately controlled. A
 controlled plume would be defined as not migrating or expanding, not discharging to
 surface water, and not creating health risk due to ingestion or vapors/inhalation; and
- Number of acres remediated for re-use or redevelopment.

The software consultant (EcoInteractive) made the necessary modifications to GeoTracker and Water Board staff is entering baseline data for human health exposures controlled and contaminant migration controlled (the first two bullets above) this fiscal year. The State Office of Research Planning and Performance (ORPP) plans to report on these measures at the end of the 2011-2012 fiscal year. Groundwater program managers are also developing a metric for the volume and mass of contaminants removed from the environment. Some of these amounts are more difficult to estimate than others depending on the remedial method employed, and as a result, this may diminish the value of the measure. For instance, monitoring of in-situ remedial technologies (i.e. peroxide injection) can show a decrease of mass or volume but will not yield the amount of contaminant destroyed. This new metric is scheduled to be rolled out in fiscal year 2012-2013.

In 2009, the Air Force implemented a "Remedy in Place by 2012" program at all their federal facilities, including Vandenberg Air Force Base (Vandenberg). The Air Force used performance-based contracts to implement and expedite cleanup actions at selected Vandenberg Installation Restoration Program sites. As the Air Force is soon to meet this goal at Vandenberg and other facilities across the country, coupled with the fact that these consulting/remedial contracts will soon expire, the Air Force is now structuring a new strategy to achieve "fence to fence closure" at their federal facilities. As "site closure" is also a Water Board priority because the site no longer poses a risk to human health or the environment, DoD staff will continue to work cooperatively with Air Force and Vandenberg staff to finalize and implement their closure strategy.

Landfill Program Performance: Because landfills can be both waste disposal sites, and groundwater cleanup sites, the landfill program uses different measures to gage program effectiveness. Currently the program uses the number of revised waste discharge requirements (WDRs) and the number facilities inspected as the two primary measures. These two measures

reflect the early state of development for performance measurement in the landfill program, in that they are relatively easy to measure, but don't readily measure tangible water quality improvement or protection. Quality landfill inspections with appropriate follow up are integral to running an effective landfill program, particularly at sites undergoing construction, and active landfill sites prior to, and during, the rainy season. Quality inspections can effectively identify potential future threats to water quality, and initiate remedies that prevent discharges to surface water or groundwater. Similarly, writing and implementing effective WDRs is a very important component in a successful landfill program. However, simply measuring whether WDRs were revised or inspections were conducted tells us little about whether these actions were effective at protecting and restoring surface and groundwater.

Internal Prioritization Efforts: The land disposal team has developed and implemented a prioritization strategy that focuses staff on the most important landfill work. Staff evaluates and scores each site based on the landfill's threat to water quality, natural siting criteria, size of landfill, if engineered corrective action are in place, and if there is public and/or Water Board interest in the site. Based on the outcome of the prioritization efforts (second year now), staff has identified our highest priority work and is making progress on all the sites that have either a high or medium priority designation. The program manager evaluates those sites that are low priority on a case-by-case basis as issues arise to determine if they need to be addressed at the expense of not working on the high and medium priority sites.

Future Performance Measures: As mentioned above, measuring the number of WDRs revised does not provide a clear indication of program performance with respect to water quality outcomes. Central Coast Region Landfill program manager Thea Tryon and Groundwater Section manager John Robertson are working with the State Board landfill program staff to develop more meaningful performance measures, reflecting water quality outcomes (i.e., total number of sites with effective corrective action in place, ratio of downward pollutant trend corrective action wells to total corrective action wells at a landfill, number of closure elements [i.e., final cover, landfill gas recovery] in place at a landfill, etc.). Developing these more complex and more meaningful measures will require modifications to Geotracker in the form of added fields, reports, and additional data input by staff. However, due to lack of funding, State Board staff has not modified the land disposal Geotracker fields such that these more meaningful proposed performance measures can be used. Additionally, there currently is a lack of consensus among the regional landfill program managers on what the new performance measures should be. For example, some regions would prefer to use CIWQS as the database to measure how many monitoring reports and technical reports staff review in each region as a measure of how we are doing. Region 3 will continue to move toward developing meaningful measures because these future measures will provide a much clearer picture of landfill program performance as it relates to water quality. In the meantime, Table 3 shows the existing performance targets and measures.

TABLE 3 PERFORMANCE REPORT CARD LANDFILL PROGRAM GROUNDWATER SECTION

(Current Fiscal Year: July 1, 2010 – June 30, 2011)

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Landfill Program Measure		Target ¹	Completed
Revised WDRs		2	2
Land E Facilities Inspec	Disposal ted	22	22

Projected target for the 2010-2011 fiscal year.

Historically, the Central Coast Water Board's landfill program has targeted site-specific water quality outcomes and milestones. While these do not serve as consistent annual reporting measures because they are singular events, they mark important goals that will ultimately improve groundwater quality beneath these individual sites. Some examples of these past landfill program water quality outcomes include:

- Requiring the unlined Santa Maria landfill, located adjacent to the Santa Maria River in river sands and gravels, to stop receiving municipal waste (in November 2002). Stopping municipal waste disposal in combination with other Water Board-required actions (e.g., placement of final cover, increasing landfill gas recovery, etc.) mitigated offsite groundwater discharges from the landfill and significantly decreased future pollutant loading to groundwater.
- Requiring the Crazy Horse landfill, located on highly permeable soils near Prundedale, to stop receiving waste in April 2009. At the time the Central Coast Water Board put this requirement in place, the Crazy Horse landfill had three distinct groundwater plumes associated with the unlined portion of the waste disposal site. The combination of final cover installation and increased landfill gas recovery will result in a decrease in pollutants reaching groundwater beneath this site.

PERMITTING, TMDL, AND ENFORCEMENT SECTION

Permitting Program Performance and Facility Prioritization: The permitting programs include National Pollutant Discharge Elimination System (NPDES) permits and waste discharge requirements for domestic, municipal, and industrial waste discharges. Primary measures include the number of revised waste discharge requirements (WDRs) and the number of facilities inspected.

NPDES and WDR program staff are formalizing criteria to "score" their permitted facilities based on the discharge's threat to water quality, complexity, flow rate, type of permit issued, and number of permit violations during a five-year period. Based on one facility's score compared to another, Water Board staff can prioritize inspections and permit renewals. Quality inspections can effectively identify potential future threats to water quality and initiate remedies that prevent discharges to surface water or groundwater. Quality inspections with appropriate follow up are integral to running effective permitting programs.

Similarly, writing effective WDRs is a very important component in a successful program. However, measuring the number of WDRs revised alone does not provide a clear indication of program performance. Development of water-quality improvement and protection measures is an ongoing process. Performance targets and measures are summarized below in Table 4.

TABLE 4 PERFORMANCE REPORT CARD NPDES AND WDR PROGRAMS

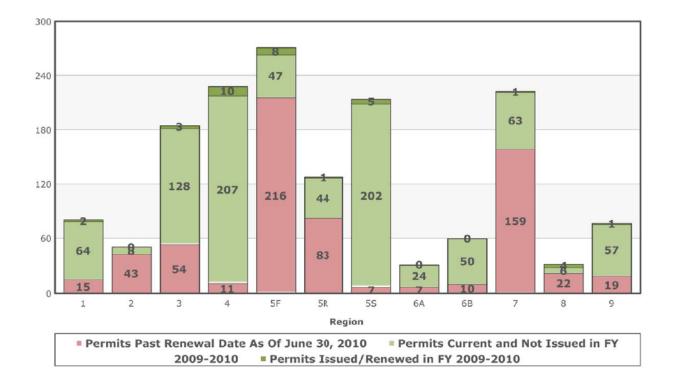
(Current Fiscal Year: July 1, 2010 – June 30, 2011)

Permitting Program Measure	Target	Completed
Revised WDRs	4	4
Site Inspections	40	66
NPDES Facilities Inspected	10	18
NPDES Permits Reissued or Issued	7	6

Here is the State Board's performance table for just the WDR program (Fiscal Year 09-10):

Region	Active Number of Facilities	Permits Issued / Renewed During FY 09-10	Permits Past Renewal Date as of June 30, 2010	Percentage Facilities With Current Permits
1	81	2	15	81%
2	51	0	43	16%
3	185	3	54	71%
4	228	10	11	95%
5	613	14	306	50%
6	91	0	17	81%
7	223	1	159	29%
8	32	4	22	31%
9	77	1	19	75%
TOTAL	1,581	35	646	59%

Here is a chart showing the information in the table above:



Enforcement Program Performance: Enforcement does not easily lend itself to target setting, as it is inherently reactive in nature (usually). However, staff has established one performance measure, the percentage of violations subject to mandatory minimum penalties that have been addressed within 18 months of discovery. This measure is detailed below in Table 5.

TABLE 5
PERFORMANCE REPORT CARD
ENFORCEMENT PROGRAM

(Current Fiscal Year: July 1, 2010 – June 30, 2011)

Enforcement Program Measure	Target	Completed
% of MMP Violations Addressed within 18 Months	100	70

From January 1, 2006, to January 1, 2010 (18 months ago), CIWQS shows 334 total MMP violationss; 234 (70%) with enforcement, 100 (30%) without enforcement. Of the 100 violations without enforcement, 74 are by a single discharger, and those may be due to a reporting error. Enforcement staff will resolve those violations this fiscal year. Enforcement staff will continue to initiate MMP enforcement actions using the Expedited Payment Letter process, which has proven to reduce staff time needed to respond to MMP violations.

TMDL Program Performance: The TMDL Program priorities include addressing impaired waterbodies through development of Total Maximum Daily Loads (TMDLs) and ensuring implementing actions occur to address water quality impairments. These priorities are not a shift in stated priorities of previous years; however, we've adjusted the strategies of how we address these priorities.

The Clean Water Act requires states to develop TMDLs for waterbodies that are not meeting water quality standards. The TMDL Program in the Central Coast Region is the program tasked with addressing this federal requirement. The state has adopted a TMDL Policy establishing protocols for TMDL approval. TMDL approval options include approval through basin plan amendments, single-vote actions by the Regional Board, and certifications by the Regional Board or executive officer. Specifics regarding under which circumstances these approaches should be used are provided in the Policy. The basin plan amendment approach is typically more time-consuming, relative to the other approaches. In addition to TMDL approval to address water quality impairments, category 4b of the Integrated List is a list of impaired waters being addressed by existing regulatory mechanisms. Impaired waters placed in category 4b of the Integrated List do not require TMDL development, as long as the implementation measures of the existing regulatory mechanism truly address the impairment. USEPA developed guidance regarding how states can justify when an impairment can be placed in category 4b.

Federal and state TMDL program managers and their executive management candidly expect increasing efficiency in TMDL development and approval; although the priorities of the Central Coast Region TMDL program are constant, we've adjusted our TMDL approval strategies to meet these expectations.

We diversified our TMDL adoption and implementation approaches in the Central Coast Region in fiscal year 2010-2011 and will do the same in 2011-2012. We adopted the Salinas River Fecal Coliform TMDL as a basin plan amendment, addressing 12 impairments in a single project. The Board adopted the Salinas River Chlorpyrifos and Diazinon TMDL as a Regional Board resolution, certifying that existing and anticipated regulatory actions will implement the TMDL. This TMDL addresses 35 impairments in a single project. The Executive Officer certified the Tularcitos Creek, San Antonio Creek, San Lorenzo Creek, Cholame Creek, and Arroyo de la Cruz bacteria TMDLs. These are five separate TMDLs in separate watersheds; they provide that an existing non-regulatory program will address the impairments. We anticipate adoption of the Santa Maria Bacteria TMDL through USEPA approval of a TMDL technical report, addressing 28 bacteria-related impairments in a single report. Therefore, in fiscal year 2010-2011, we anticipate approval of eight TMDL projects addressing 81 impairments using adoption via basin plan amendment, Region Board certification, Executive Officer certification, and USEPA approval of a TMDL technical report. We will use similar adoption strategies in 2011-2012.

In 2011-2012 we will complete development and pursue adoption of eight separate TMDL reports addressing 101 impairments, using basin plan amendments, Regional Board and Executive Officer certifications, and USEPA approval of TMDL technical reports. These tasks are included in our 2011-2012 draft TMDL work plan.

Valuable staff resources are dedicated to TMDL development and approval. However, we well realize that TMDL development without implementation does nothing toward helping us reach our vision and measurable goals. To this end, the TMDL program is using a diversified approach to foster TMDL implementation. Several of our approved TMDLs rely on regulatory mechanisms administered in the Agricultural and Stormwater programs. Additionally, we oversee many non-point source pollution control efforts occurring in impaired watersheds through our Grants Program. Accordingly, we invest TMDL resources in these programs. These resources are well-leveraged insofar as these programs not only implement approved TMDLs, but also address water quality problems in impaired waters where TMDLs are not yet developed. This sets the stage for the TMDL program to address 303d-listed waters through

the non-basin plan amendment approval process because existing regulatory programs are addressing these listings. As such, robust regulatory programs, such as the Agricultural and Stormwater programs, are vital to continuing TMDL approval efficiency.

In some cases, required TMDL implementation actions fall outside of WDRs, waivers, and NPDES permits and the programs that administer them. In these cases, the TMDL Program is tasked with identifying responsible parties and tracking implementation actions. For example, the Regional Board has approved prohibitions for sediment and bacteria loading that apply to a spectrum of dischargers, many of whom are not monitored through permits, and many of whom are still unknown to us. The TMDL program has developed means of reaching out to these implementing parties and is developing implementation and reporting requirements. We have invested staff resources to this effort in fiscal years 2010-2011 and 2011-2012.

The TMDL Program priorities include TMDL development and implementation that advance our attainment of the Central Coast vision and measurable goals. We have implemented strategies to expedite TMDL development, approval, and implementation to increase efficiency as we experience decreasing staffing. We believe the result will be increasing improved water quality utilizing more streamlined approaches.

The following are the resulting TMDL Program performance measures and stated goals for each measure. It is important to bear in mind that each project and fiscal year is unique, and will therefore yield results differing from other projects and fiscal years.

Our TMDL performance measures are:

- 1. Incident Tracking: an annual increase in reported and resolved incidents.
- 2. Early TMDL Implementation: one early implementation action for each project.
- 3. Work Plan Task Completion: ≥ 80% completion rate.
- 4. Novel Approaches: an annual increase in the number of approaches.

Measure	Target	FY 2009-2010 Result
Incident Tracking	Annual increase	O ^a
Early TMDL Implementation	3	3
Work Plan Task Completion	80% task completion	96% tasks completed
	3 TMDL approvals	7 TMDLs approved
Novel Approaches	Annual increase	2

a: No incidents reported this fiscal year, therefore none resolved.

WATERSHED PLANNING AND PROTECTION SECTION

The Watershed Planning and Protection Section measures long-term performance through water quality results of sampling and watershed assessment through the Central Coast Ambient Monitoring Program (CCAMP). For example, reductions in impaired waterbodies or pollutants impairing waterbodies, as evaluated every two years pursuant to Section 303(d) of the Clean Water Act, indicate improvements in overall water quality in our region. Increases in impaired waterbodies (as shown in the Table below) are an indicator of declining water quality. However, this table also reflects a greater number of measurements than with past listings, so this may just be a more accurate list of impairments rather than declining water quality.

Our website (http://www.ccamp.org/) now displays data and information measured against water quality standards and indicators so that we can see changes in water quality over time at regional, watershed, waterbody and sampling site scales. We expect to detect and understand these changes over several years. We are working on adding information that shows changes in land uses (increase or decrease in impervious surfaces) or practices (increase or decrease in fertilizer or pesticide use) so we can relate on-the-ground implementation actions to changes in water quality in streams and estuaries. We expect to detect these types of changes over a few months to years. Finally, we are measuring program/project performance on an annual basis to detect progress toward more on-the-ground implementation and, ultimately, water quality improvement.

The specific program performance measures for the key programs in the Watershed Planning and Protection Section are listed below, along with targets or goals that indicate successful performance. These measures were selected to inform our progress improving specific tangible outcomes that are expressed more generally by our measurable goals. For example, achieving 80% healthy aquatic habitat depends on our success evaluating the conditions of waterbodies (via the CCAMP program) and implementing permitting and enforcement activities that reduce pollution and habitat degradation (via the Stormwater and Agricultural Regulatory Programs). These measures were also chosen to inform what activities water board staff make highest priority based on the principle, "what gets measured gets done." For example, by measuring whether CCAMP data is used in an increasing number or in greater capacity of Water Board projects and by the public, and by measuring whether our Basin Plan Amendments are creating new requirements to use in permits, Total Maximum Daily Loads or enforcement cases, we are more likely to focus on the activities we have determined are the most important to protect and improve water quality and achieve our goals.

CCAMP Program Performance Measures and Targets

Performance measures as determined for Fiscal Year 2010-2011 and intended to be used again for Fiscal Year 2011-2012 are shown in Table 7 below. The table includes the targets/goals set and indicates whether those targets/goals were met this Fiscal Year 2010-2011. Not all of the measures have been evaluated to determine if they met targets yet and some have been evaluated qualitatively.

TABLE 7 PERFORMANCE REPORT CARD CCAMP PROGRAM

Measure	Initial Target	FY 09-10 Result	FY 10-11 Target / Result
Number of Sampling Sites Visited	541	541	Will be met – Target: 627 Result: currently 583 (May and June measures not yet recorded)
Number of Analyses Conducted	1491	1491	Met – Target: 1192 Result; currently 1400 (May and June measures not recorded yet)
Number of combinations added/removed from 303(d) list	509 added/36 removed	509 added/36 removed	Not applicable this year
CCAMP data is delivered to SWAMP	annually in November	Not met	Met
Turn-around time between CCAMP data delivery and CCAMP website update (including quality checking and entry into staging database)	decreases until it reaches a goal of 30 days	Not met	Met – turnaround time is 30 days for the first time ever starting in May, 2011!
Vision metrics, using data from multiple sources including CCAMP, are updated	annually	Met (see website)	Not met – Vision metric work has been delayed because of other priority work (Preparing Monitoring and Reporting Programs for Agriculture and Salinas Stormwater)
CCAMP web site hits	Increase annually	Established baseline: 132 daily "hits" 21.0 MB average daily data transfer	Met – Target: increase 09-10 Results: 197 daily "hits"; 30.7 MB average daily data transfer

303(d)/305(b) data from external sources is delivered in SWAMP comparable format via the SWAMP Data Upload and Checking System	80% of data	80% of data	Met – Target: 80% of data Results: Greater than 90% of data delivered was done via CalDUCs data checker
CCAMP data is referenced in TMDL Project Plans, Ag Watershed Plans, and other internal water quality planning documents	80% of plans/documents	80% TMDL and Ag plans/documents	Met – Target 80% of TMDL and Ag plans/documents Results: 52% of responders (17 people) used CCAMP data in 43 documents in 10-11, including 9 TMDL Project Plans
Staff use CCAMP data to inform decision-making	At least 20	At least 20	Met – Target: at least 20 Results: 24 staff (73% of responders have used CCAMP data and staff to inform decisions, and 70% have used CCAMP website this yea).
R3 staff are aware of Regional water quality issues, including most impaired reaches and trends of concern	Increasing trend	Increasing trend	Met – Target: Increase 09-10 Results: 83% of responders feel they are aware of Regional surface water issues

In Fiscal Year 2011-2012, CCAMP will be monitoring in the Salinas watershed. We will be conducting followup tissue monitoring at three lakes (Pinto, Uvas, Loch Lomond) to determine if fish consumption advisories are required. These lakes had elevated tissue levels in samples collected through statewide tissue bioaccumulation monitoring. This is aligned with our priority to protect public health.

The CCAMP endowment has recovered to the extent that we can plan for expansion of some program elements. We have vetted a number of ideas related to program expansion with other staff and Monterey Bay National Marine Sanctuary staff and hope to finalize and begin implementing these ideas this year. We have already added metals (zinc and copper) to our monthly monitoring suite. We also intend to deploy semi-permeable membrane devices at our coastal confluences to determine how widespread the microcystin toxin is in our watersheds. This is the toxin associated with blue-green algae blooms, confirmed in the Pajaro watershed, and proving lethal to sea otters. Other considerations include reinstalling a flow-weighted solid phase extraction column in the Salinas River to analyze trends in loading of pyrethroids and other pollutants to Monterey Bay (previously implemented by the Central Coast Long-term Environmental Assessment Network). We would also like to add additional analyses to the existing column maintained by the City of Watsonville on the Pajaro River. As a second priority,

we would also consider instrumenting the Santa Maria River mouth. We also would like to begin conducting quarterly grab sampling for a more comprehensive suite of analytes, including pesticides, metals, and some pollutants of emerging concern. This is to better align with our measurable goal of healthy aquatic habitat and better indicate where and what is impacting our creeks, estuaries and marine areas.

CCAMP will be working with Moss Landing Marine Labs Regional Data Center, through a \$500,000 Proposition 50 grant, to move our data uploading and checking tools to the data center for use by grants managers and other data gatherers. This grant will provide us with a solid foundation of institutional support, including staffing, for our tool, and is part of our long-term succession plan. We want to expand our website functionality to include a "status" page using all data submitted for the Clean Water Act Section 303(d) process for Listing Impaired Waters, that allows for selection and display of data from specific projects. A number of features currently included on the website need additional development as well. We also hope to return to our Vision assessment work, that includes developing report cards of health related to aquatic habitat, groundwater, and land use.

We are hoping to partner with the Central Coast Wetlands Group through an EPA Wetlands Grant to develop a riparian habitat rapid assessment approach that can be used on a relatively broad scale to characterize overall health of riparian systems. That proposal is currently being developed. Finally, we would like to develop and formalize an approach for using existing CCAMP bioassessment and physical habitat data to determine impairment associated with sediment. This approach will be used in the future for Clean Water Act Section 303(d) process for Listing Impaired Waters.

Basin Planning Program

In this program, targets and methods to track are still being developed. The number of Basin Plan Amendments in progress at any time will change from year to year and the Triennial Review is only conducted every three years so those measures will not apply every year. Performance measures for Fiscal Year 2010-2011 are the same as those established for Fiscal Year 2009-2010 and are shown in Table 9 below. The table includes the targets/goals set and indicates whether those targets/goals were met this Fiscal Year. Not all of the measures have been evaluated to determine if we met targets yet. Performance measures and targets for this program are not yet included in the state-wide performance tracking and reporting. State Board staff in conjunction with Water Board staff from all the regions are currently developing performance measures for Basin Planning activities. Our staff is reevaluating the measures and targets below related to our own priorities, shifts in Basin Planning project assignments, and the state-wide effort.

We have identified three priority areas for Basin Plan Amendments that are crucial to watershed health:

- 1. Watershed Protection
- 2. Aquatic Habitat Protection
- 3. Recharge Protection

We discussed these concepts at some length at last year's off-site meeting. Since then, we have discussed approaches for Aquatic Habitat Protection with other Regional Board staff and State Board staff. The North Coast Region and Bay Area Region have been attempting to develop a Riparian Protection policy for a few years. State Board staff members have been participating in that process with an eye toward using that product for statewide policy, and some of the other regions' staff members have been monitoring that process to see how it would apply in other regions. The San Diego region sees a need for augmentation of the scope

to suit their unique needs, and we see a similar need for different riparian and aquatic habitat protection issues in our region (i.e., removal of riparian corridor vegetation is not covered in the on-going North Coast/Bay Area regions' effort – that draft policy is more focused on dredge and fill issues). We are developing amendment language that will fill this void.

We have made slow progress on Watershed and Recharge Protection amendments. A bill recently passed by the State Assembly, AB 359, would require local agencies providing water service that are preparing a groundwater management plan to map out recharge areas. Such mapping is key to recharge area protections.

TABLE 9
PERFORMANCE REPORT CARD
BASIN PLANNING PROGRAM

Measure	Target	FY 2010-2011 Result
Number of potential Basin Plan Amendments aligned with our vision and measurable goals included in our Basin Plan Triennial Review Priority List adopted by the Board	7	7
Number of tasks completed or deliverables submitted for potential Basin Plan Amendment projects aligned with our vision and measurable goals	At least 6	4 (project descriptions for Basin Plan Amendments)
Number of approved Basin Plan amendments aligned with our vision and measurable goals	Increasing trend	Not met (no amendments developed or approved)
Number of new or revised permits, Total Maximum Daily Loads, enforcement actions that incorporate or are consistent with new requirements of potential new amendments	Increasing trend	Not measured
Number of new or revised permits, Total Maximum Daily Loads, enforcement actions that incorporate or are consistent with new requirements of new amendments	Increasing trend	Not met (no new amendments developed or approved)

Frequency of use of the Basin Plan by stakeholders/the public (webhits)	Increasing trend	Met
CCAMP web site hits	Increase annually	Not yet measured
Number of stakeholders attending public workshops	Increasing trend	Not met (No workshops held)
Number of comments submitted during basin plan amendment comment periods:	Increasing trend	Not met (No amendments available for comment)

Stormwater Program and Clean Water Act Section 401 Water Quality Certification (Stormwater/401) Priorities and Effectiveness Assessment

During Fiscal Year 2010-2011, the Stormwater/401 Unit completed its planning effort to better align its work with the office's Vision of Healthy Watersheds. This vision alignment process served to guide the Stormwater/401 Unit's work throughout the fiscal year. Through the vision alignment process, the unit developed broad long-term goals and targets, and formulated shorter-term objectives to achieve the long-term goals. The unit's long term goals and targets are identified in the table below:

Priority Problems	Priority Goals	Target
Loss /lack of natural watershed processes	Increase natural watershed processes	By 2025, 80% of targeted subwatersheds in urban areas have watershed processes within natural ranges, and the remaining 20% exhibits positive trends in key parameters.
Loss /lack of aquatic/riparian habitat	Increase aquatic / riparian habitat	By 2025, 80% of aquatic and riparian habitat in targeted subwatersheds in urban areas is healthy, and the remaining 20% exhibits positive trends in key parameters. The geographic area covered by aquatic and riparian habitat exhibits a positive trend in size.
Urban pollutants in stormwater runoff	Decrease pollutants in stormwater	By 2025, 80% of urban runoff discharges meet water quality standards for key parameters, and the remaining 20% exhibits positive trends.

To ensure implementation of positive steps towards these long term goals, the unit identified shorter term objectives. For each objective, staff identified how it will measure progress towards achieving the objective, as well as the target for objective attainment. In Fiscal Year 2010-2011, staff is not using all of the measures and targets it has identified for each objective, due to scheduling of program implementation and lack of information tracking systems in some instances. The unit's Fiscal Year 2010-2011 objectives, measures, and targets, and progress towards those targets, are summarized in the table below. Following the summary table is a discussion of staff implementation efforts to meet the objectives, as well as other work staff focused on in Fiscal Year 2010-2011.

Objective	Measure	Target	FY 2010- 2011 Result
Preservation, restoration, and enhancement of watershed processes at the site level for new	a. Percentage of municipalities participating in the Joint Effort for Hydromodification Control ² that have approved updated Stormwater Management Programs	a. 100%	a. 97%
development and redevelopment	b. Percentage of municipalities reviewed that are in compliance with Joint Effort for Hydromodification Control requirements	b. 80%, with increasing trend	b. Currently under analysis
	c. Number of municipalities audited/inspected, with necessary enforcement follow-up	c. 10 per year	c. 8
Implementation of source control best management practices (BMPs)	a. Percentage of municipalities reviewed that are in compliance with source control BMP requirements	a. 80% with increasing trend b. 5	a. Currently under analysis
	b. Number of construction sites inspected, with necessary enforcement follow-up		
	c. Number of industrial sites inspected, with necessary enforcement follow-up	c. 0	c. 7
Treatment of urban runoff	a. Percentage of municipalities reviewed that are in compliance with treatment BMP requirements	a. 80% with increasing trend	a. Currently under analysis
Elimination of non- stormwater discharges from municipalities	a. Percentage of municipalities reviewed that are in compliance with illicit discharge/non-stormwater discharge requirements	a. 80% with increasing trend	a. Currently under analysis

A principal focus for the Stormwater/401 Unit is municipal stormwater regulation, since municipalities implement Stormwater Management Programs that address a wide range of threats to watershed health over large geographic areas. During Fiscal Year 2010-2011, staff concentrated on four tasks related to regulation of municipal stormwater: (1) Redrafting the City of Salinas' individual stormwater permit; (2) Assisting the State Board in drafting the Statewide General Phase II Municipal Stormwater Permit; (3) Implementing the Joint Effort for

² The Joint Effort for Hydromodification Control is a group endeavor by Central Coast Water Board staff, municipalities, the Central Coast Low Impact Development Initiative, and consultants to develop hydromodification control criteria for the Central Coast region that will maintain watershed processes at new development and redevelopment projects.

Hydromodification Control; and (4) Implementing targeted audits of high priority aspects of municipalities' stormwater programs.

Staff is currently drafting the stormwater permit for the City of Salinas. Staff anticipates the draft will be available for public review in August 2011, with Central Coast Water Board consideration of adoption planned for December 2011. During drafting of this permit, staff has concentrated on developing requirements for watershed-based stormwater management and improved measurement of program performance. Staff's efforts on the City of Salinas' permit have also contributed to its work on the Statewide General Phase II Municipal Storm Water Permit. This permit covers the majority of the municipalities on the Central Coast, and therefore is vital for addressing municipal stormwater within the region. Staff has worked closely with State Board staff in drafting this permit, which was distributed for public review in June 2011. Staff will continue to coordinate with State Board staff as the permit works its way through the adoption process.

In addition to these municipal stormwater permitting activities, staff has conducted focused oversight of municipalities' implementation of their stormwater programs. In particular, staff has tracked and reviewed municipalities' participation in the Joint Effort for Hydromodification Control and conducted targeted audits of high priority aspects of municipalities' stormwater programs. These oversight efforts are ongoing, so the results of staff review are not expected until July-August 2011. Currently, staff has audited five municipalities, with an additional three audits scheduled for June 2011. Staff is also reviewing several documents related to the Joint Effort for Hydromodification Control from each municipality at this time. Assessment of the results of the audits and Joint Effort document reviews will be used by staff to determine the unit's progress toward attaining its objectives.

Staff in the Stormwater/401 unit has also implemented important work in the Clean Water Act Section 401 Water Quality Certification Program. Specifically, staff has focused in Fiscal Year 2010-2011 on protection of beneficial uses from impacts resulting from maintenance activities conducted in creeks. The widespread nature of these impacts has the potential to result in significant cumulative impacts throughout the region. Staff efforts have substantially increased mitigation conducted to offset these impacts. In addition to these efforts, staff has conditioned numerous certifications to help reduce impacts from an array of projects conducted within waters of the State. In Fiscal Year 2010-2011, staff issued approximately 64 certifications in the Central Coast region.

Fiscal Year 2010-2011 is the first year the Stormwater/401 Unit is using its vision alignment planning process to assess the effectiveness of its activities. As such, the number of measurements staff is using for assessment is limited, and staff is still evaluating its performance for several measures. Stormwater/401 Unit staff plan to build on this year's process with expanded measurements in Fiscal Year 2011-2012. Measures staff will use in Fiscal Year 2011-2012 in addition to those used in Fiscal Year 2010-2011 include:

Objective	Measure	Target
Preservation of aquatic/riparian habitat	Average per project decrease to proposed permanent fill acreage upon certification (not counting restoration and similar projects)	Increasing trend

Restoration/enhancement of degraded aquatic/riparian habitat	a. Develop and begin implementation of a 401 mitigation compliance assessment plan	a. Completion of task
	b. Average per project increase to proposed permanent fill mitigation ratios upon certification (not counting restoration and similar projects)	b. Increasing trend
Implementation of source control BMPs	Adoption of Salinas permit with specific source control BMP requirements	Board adoption
Treatment of urban runoff	Adoption of Salinas permit with specific treatment BMP requirements	Board adoption
Elimination of non- stormwater discharges from municipalities	Adoption of Salinas permit with specific illicit discharge/non-stormwater discharge requirements	Board adoption

Agricultural Regulatory Program

During Fiscal Year 2009-2010, the Agricultural Regulatory Program completed its planning effort to align its work with the Water Board's Vision of Healthy Watersheds. This vision alignment process served to guide a coordinated watershed approach to implement the Agricultural Regulatory Program. This approach was discussed in detail at the June 2009 Board Meeting and focuses on the highest priority water quality issues, such as nitrate loading to groundwater and surface water toxicity, in the most impaired agricultural areas of the Central Coast Region. Addressing priority agricultural water quality issues, on a watershed basis, using a focused and systematic approach, maximizes our effectiveness toward tangible improvements in water quality. Staff is assessing and tracking progress of programmatic efforts at the watershed scale, using specific, tangible operational measures, and will adapt to the feedback the tracking provides. The program's operational measures, long term goals and targets are summarized in the table below:

	Agricultural Regulatory Program			
	Priority Problems	Priority Goals	Target	
	Nitrate in groundwater from fertilizer	Minimize nitrate loading to groundwater	By 2025, 80% of groundwater in agricultural areas meets nitrate water quality objectives, and the remaining 20% exhibits positive trends.	
2.	Pollutants in agricultural tailwater	Minimize polluted tailwater	By 2025, 80% of agricultural tailwater is eliminated or treated, and the remaining 20% exhibits positive trends in nitrate, toxicity, and sediment.	
3.	Surface water toxicity from pesticides	Minimize toxicity in surface water	By 2025, 80% of surface water in agricultural areas meets toxicity and pesticide water quality objectives, and the remaining 20% exhibits positive trends.	
4.	Lack of aquatic/riparian habitat	Increase aquatic/riparian habitat	By 2025, 80% of aquatic and riparian habitat in agricultural areas is healthy, and the remaining 20% exhibits positive trends in key parameters.	

5.	Surface water	Minimize	By 2025, 80% of surface water in agricultural
	nutrients from	nutrients in	areas meets nutrient water quality objectives,
	fertilizer	surface water	and the remaining 20% exhibits positive trends.
6.	Sediment discharge	Minimize sediment discharge	By 2025, 80% of surface water in agricultural areas meets sediment and turbidity water quality objectives, and the remaining 20% exhibits positive trends.

Agricultural Order Renewal

Currently, the Agricultural Regulatory Program's highest priority is to renew the Agricultural Order to include conditions that address the priority water quality problems identified above. The Water Board adopted a Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands in 2004 (2004 Agricultural Order). Since adoption, the Water Board has extended the 2004 Agricultural Order three times. In adopting the 2004 Agricultural Order, the Water Board found that the discharge of waste from irrigated lands had impaired and polluted the waters of the State and of the United States within the Central Coast Region. impaired the beneficial uses, and caused nuisance. However, the 2004 Agricultural Order did not try and address nitrate groundwater pollution in a focused manner at that time and did not include conditions consistent with typical orders to control waste discharges from industries or activities affecting water quality so severely. On March 17, 2011, staff recommended an updated Agricultural Order to the Water Board. Staff's recommendation included conditions that focus on the most important water quality problems and priorities (e.g. addressing nitrate impacts to drinking water sources) in the most impaired areas. The inclusion of the conditions that address these priority issues in an updated Agricultural Order is essential to evaluating progress and maximizing the program's effectiveness toward tangible improvements in water quality.

Staff began the process to renew the Agricultural Order in 2008 and will propose a well-developed recommendation to the Water Board in September 2011.

Agricultural Regulatory Program Implementation and Effectiveness Assessment

To ensure implementation of positive steps towards these long term goals, the program identified shorter term operational measures. For each measure, staff identified how it will measure progress towards achieving the objective, as well as the short-term target. In Fiscal Year 2010-2011, staff is using a subset of the measures and targets it has identified, due to some delays in program implementation and development of information tracking systems (due to resources being shifted to work on the updated Agricultural Order). The program's Fiscal Year 2010-2011 measures, and targets, and progress towards those targets, are summarized in the table below. Following the summary table is a discussion of staff implementation efforts to meet the objectives, as well as other work staff focused on in Fiscal Year 2010-2011.

Measure	Target	FY 2010-2011 Result
Agricultural Sustainability - Number of acres certified sustainable (e.g. Central Coast Vineyard Team Sustainable in Practice)	Increasing Trend	Target met 2009: 11,000 Acres 2010: 15,000 Acres Increase: 4,000 Acres

Reduce Nitrate Loading / Nutrient		
Management Implementation –	D . T .	
a. Number of drinking water wells	a. Decreasing Trend	
impacted by nitrate	b. Decreasing Trend	
contamination in agricultural	c. Increasing Trend	
areas.		
b. Number of nutrient impaired		
waterbodies in agricultural areas.		Currently under analysis
c. Number of Water Board		
regulatory actions to evaluate		
compliance and conduct follow-		
up related to nitrate loading and		
implementation of nutrient		
management practices (e.g.		
13267 letters, inspections,		
enforcement).		
Reduce Pollutant Loading / Tailwater Elimination –		Target not met vet hut baseline
	Decreasing Trend	Target not met yet but baseline established: 84,021 Acres
Number acres with reported tailwater		established. 64,021 Acres
Reduce Toxicity and Pesticide		
Loading / Pesticide Management		
Practice Implementation –		
Number of toxicity and pesticide	Decreasing Trend	Currently under analysis
impaired waterbodies in agricultural		
areas.		
Aquatic Habitat / Riparian Habitat		
Protection –		
Number of Water Board regulatory		
actions to evaluate compliance and		
conduct follow-up related to aquatic	Increasing Trend	Currently under analysis
/riparian habitat protection (e.g.		
13267 letters, inspections,		
enforcement).		
Enrollment –		
a. Number of acres of irrigated land	a. 100% in priority	a. Currently under analysis
enrolled in the Agricultural Order	areas; 80% of all	b. Currently under analysis; In
b. Number of Water Board	irrigated lands	FY 2010-2011, 1740 letters
regulatory actions to evaluate	b. Increasing Trend	(13267) required growers to
compliance and conduct follow-	aorodomig mond	update electronic Notice of
up enrollment (e.g. 13267 letters,		Intent.
inspections, enforcement).		
inspections, enforcement).		

In Fiscal Year 2010-2011, staff initiated data management improvements to advance the Water Board's ability to prioritize agricultural operations and individual farms, and track progress towards water quality improvement using the identified operational measures and targets. This is among the program's highest priorities for program implementation. As part of this effort, staff developed an electronic Notice of Intent (eNOI). Growers were required to submit updated information about farming operations using the eNOI by January 31, 2011. In response to this

requirement, approximately 1171 operations submitted an eNOI – representing approximately 328,927 acres of irrigated land in the Central Coast region. Staff is continuing to improve the eNOI and plans to use similar tools for the submittal of information related to groundwater quality and management practice implementation.

Staff in the Agricultural Regulatory Program has also coordinated with staff in the Grants Program to implement important grant projects that address priority agricultural water quality issues. Specific efforts include Proposition 50 and Proposition 84 grant projects to implement a coordinated Irrigation and Nutrient Management Program in the Central Coast Region, 319(h) Non-Point Source Grant Program projects to address nutrient impairments in the Pinto Lake and Morro Bay areas, and PG&E Fund grant projects to implement irrigation and nutrient management projects focused on crop types with a high potential to load nitrate to groundwater (e.g., lettuce and strawberries). In addition, Agricultural Regulatory Program staff is also coordinating with Groundwater Section staff to support grant projects focused on groundwater sampling for nitrate and protection of drinking water sources.

Fiscal Year 2010-2011 is the first year the Agricultural Regulatory Program is using its vision alignment process to assess the effectiveness of its activities. Staff plans to build upon the current year's effort with expanded measurements in Fiscal Year 2011-2012. Measures staff will use in Fiscal Year 2011-2012, in addition to those used in Fiscal Year 2010-2011 include:

Measure (Added for FY 2011-2012)	Target
Reduce Nitrate Loading / Nutrient Management Practice	
Implementation –	
Number of farms with at least one groundwater well sampled for nitrate.	a. 100% of priority farms b. Increasing Trend
b. Number of Water Board regulatory actions to evaluate	b. Increasing Trend
compliance and conduct follow-up related to nitrate loading	
discharge characterization, implementation of nutrient	
management practices, and discharge control (e.g. 13267	
letters, inspections, enforcement).	
Reduce Pollutant Loading / Tailwater Elimination –	
Number of Water Board regulatory actions to evaluate	
compliance and conduct follow-up related to tailwater discharge	Increasing Trend
characterization, implementation of management practices, and	
discharge control (e.g. 13267 letters, inspections, enforcement).	
Reduce Toxicity and Pesticide Loading / Pesticide	
Management Practice Implementation –	
a. Number of farms with discharge monitoring data for toxicity	a. 100% of priority farms
and/or pesticides.	b. Increasing Trend
b. Number of Water Board regulatory actions to evaluate	
compliance and conduct follow-up related to discharge	
characterization, implementation of management practices,	
and discharge control (e.g. 13267 letters, inspections,	
enforcement).	

For more details on the Agricultural Regulatory Program's operational measures, please visit the Water Board's website at:

http://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/index.shtml.

Conclusion

As with many government and regulatory agencies, it is easy to get caught up in producing paper products that may not actually provide a significant benefit to society or our resources (the classic "report that sits on a shelf" syndrome). We, on the other hand, are focusing on water quality outcome-based performance measures. We are constantly challenging ourselves to take actions within our programs and across our organization that are targeted toward solving our highest priority water quality problems and protecting those waters and uses that are threatened by land uses and activities in our watersheds. This framework helps to keep us focused on the right work at the right time. We look forward to discussion with the Board.

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