

EXECUTIVE OFFICER'S SUMMARY REPORT
2:00 p.m., June 13, 2007
Regional Water Quality Control Board
Hearing Room
5550 Skylane Boulevard, Suite A
Santa Rosa, California

ITEM: 1

SUBJECT: *Stream and Wetland Systems Protection Policy*

INTRODUCTION

The purpose of this item is to provide an update on the development of an amendment—the *Stream and Wetland Systems Protection Policy*—to the *Water Quality Control Plan for the North Coast Region* (Basin Plan). The North Coast Regional Water Quality Control Board (Regional Water Board) identified this amendment as a high priority for the North Coast Region during the 2004 triennial review of the Basin Plan.

This item includes information on:

- Amendment Background and Need;
- Scientific Literature Review;
- Proposed Amendment Concept;
- Public Outreach;
- State Water Board Coordination;
- Amendment Schedule; and
- Draft Report on Stream and Wetland Systems Science (Note: This report will be available at or prior to the Board meeting.)

AMENDMENT BACKGROUND AND NEED

Stream and wetland systems, which include streams and wetlands and their associated riparian areas, play a significant role in protecting water quality by providing functions that support beneficial uses. Protection and restoration of these functions is important for protecting and enhancing the Region's water quality today as well as for providing for the long-term sustainability of beneficial uses. For example, protecting and restoring the flood attenuation and groundwater recharge functions of stream and wetland systems will reduce future impacts on beneficial uses as a result climate change, which is predicted to cause water supply shortages and increasingly frequent of and severe storms and floods.¹

¹ For predicted impacts of climate change on water resources, see, e.g., California Department of Water Resources, 2006, *Progress on Incorporating Climate Change into Management of California's Water*

Discharges and land use activities that impact stream and wetland systems may degrade beneficial uses through the loss or impairment of stream and wetland system functions, which include:

- Flood attenuation;
- Groundwater recharge and discharge;
- Water supply;
- Sediment transport and storage;
- Streambank stabilization;
- Pollutant filtration;
- Energy cycling;
- Nutrient cycling;
- Temperature and microclimate control; and
- Maintenance of plant and animal communities.

California's Porter-Cologne Water Quality Control Act and the federal Clean Water Act (CWA) require the Regional Water Board to address discharges and activities that impact water quality, including stream and wetland systems disturbance, through its various regulatory programs, which include the:

- 401 Water Quality Certification Program;
- National Pollutant Discharge Elimination System (NPDES);
- Storm Water Program;
- Timber Harvest Plan (THP) review process;
- Nonpoint Source Pollution Control Program;
- Total Maximum Daily Load (TMDL) Program; and
- Development of Waste Discharge Requirements (WDRs) and Conditional Waivers of WDRs.

Although the Regional Water Board currently regulates many stream and wetland system disturbances under these programs, there is inconsistent regulatory application between different permits, activities, and programs, as well as many unregulated impacts, due to the lack of a region-wide policy framework for stream and wetland systems protection. The absence of an effective framework for protecting stream and wetland systems has resulted in a piecemeal approach to stream and wetland systems protection. This approach is unable to address cumulative impacts and water quality protection and restoration at the watershed level.

As a result, impacts on stream and wetland systems have degraded water quality in many of the Region's watersheds. Statewide, losses of wetlands and riparian areas and their associated functions and beneficial uses are estimated at between 85 and 98 percent of their historic values,² and ongoing degradation of these areas continues to threaten water quality. According

Resources, available online at: http://www.climatechange.ca.gov/documents/2006-07_DWR_CLIMATE_CHANGE_FINAL.PDF (accessed on May 17, 2007).

² See Dahl, T. E., 1990, *Wetlands Losses in the United States 1780s to 1980s*, Washington, DC: U.S. Fish and Wildlife Service, available online at: <http://www.npwrc.usgs.gov/resource/wetlands/wetloss/> (accessed May 17, 2007); and Riparian Habitat Joint Venture, 2004, *The riparian bird conservation plan: a strategy for reversing the decline of riparian associated birds in California*, ver. 2, California Partners in Flight, available online at: http://www.prbo.org/calpif/pdfs/riparian_v-2.pdf (accessed May 17, 2007).

to the 2006 Clean Water Act (CWA) section 303(d) list of water quality limited segments,³ riparian area disturbance (e.g., removal of riparian vegetation) is a contributing factor in 86 percent of temperature and 75 percent of sediment impairments in the North Coast Region. The 303(d) list also identifies hydromodification, streambank modification, and draining and filling of wetlands as significant stressors in many of the Region's watersheds.

The 303(d) list is used by the Regional Water Board to identify those waterbodies for which it must develop TMDLs and accompanying action plans to achieve these TMDLs. TMDL action plans are watershed-specific solutions to alleviate or prevent stressors that contribute to water quality impairments; however, the 303(d) list shows that sediment and temperature impairments across watersheds are frequently linked to similar stressors on stream and wetland systems. Staff has observed that the actions required to address these impairments in different watersheds frequently involve similar stream and wetland system protection and restoration efforts. Based on these observations and the high number of sediment and temperature impaired waterbodies in the Region, the Regional Water Board directed staff during the 2004 triennial review of the Basin Plan to develop a Basin Plan amendment that will provide a region-wide framework for addressing stream and wetland system water quality. This amendment is priority number eight from the 2004 triennial review workplan.⁴

The North Coast Regional Water Board has since identified this amendment as a future implementation instrument to achieve the Scott River Watershed Temperature and Sediment TMDLs and the Shasta River Basin Temperature and Dissolved Oxygen TMDLs. The State Water Resources Control Board (State Water Board) also directed the Regional Water Board to continue development of the *Stream and Wetland Systems Protection Policy* in Resolution No. 2006-0046 approving the Scott River Watershed TMDLs.⁵

During the 2004 triennial review of the *Water Quality Control Plan for the San Francisco Bay Region*, the San Francisco Bay Regional Water Board also identified the development of a policy to protect stream and wetland systems as a high priority for its region. Because neither the North Coast nor the San Francisco Bay Regional Water Boards had available staff to develop these amendments following their triennial reviews, they jointly applied for and received a grant from the U.S. Environmental Protection Agency (USEPA) to develop an amendment for both regions. The USEPA grant is funding two contract staff, (one in each region through the San Francisco Estuary Project (SFEP), to help the Regional Water Boards develop a *Stream and Wetland Systems Protection Policy* amendment. These contractors have been working on the amendment since September 2005. The original USEPA grant will expire in September 2007; however, the Regional Water Boards recently received a second grant from the USEPA, which will allow the contract staff to continue developing the *Stream and Wetland Systems Protection Policy* for an additional year beyond the original contract term.

The specific stream and wetland system issues faced by the North Coast and San Francisco Bay Regional Water Boards vary based on the geology and land use within their Regions'

³ The final 2006 303(d) list for the North Coast Region is available online at: http://www.waterboards.ca.gov/tmdl/docs/303dlists2006/final/r1_final303dlist.pdf (accessed on May 17, 2007).

⁴ The *2004 Triennial Review Priority List and Workplan* is available online at: <http://www.waterboards.ca.gov/northcoast/programs/basinplan/070704trirev/FinalTable1.pdf> (accessed May 17, 2007).

⁵ State Water Board Resolution No. 2006-0046, is available online at: http://www.waterboards.ca.gov/resdec/resltn/2006/rs2006_0046.pdf (accessed May 17, 2007).

watersheds; however, as noted above, many sediment and temperature impairments are caused by similar stressors on stream and wetland systems. Furthermore, staff's research shows that many of the ecological processes that occur in stream and wetland systems are important across different watersheds and between Regions. Therefore, staffs from both Regions have coordinated their background scientific research as well as development of the amendment framework, which is based on this research. Staff's research and proposed amendment framework are described in more detail below (see sections on "Scientific Literature Review" and "Proposed Amendment Concept").

The amendments proposed in each Region likely will share significant similarities, but some implementation actions will vary based on the specific concerns and conditions within each Region, as identified by the Regional Water Boards, staff, and the public during the amendment development and adoption processes. Public comments received to date on the *Stream and Wetland Systems Protection Policy* in the North Coast Region are described below (see section on "Public Outreach").

Additional background information on the amendment in the North Coast Region is available online at: <http://www.waterboards.ca.gov/northcoast/programs/basinplan/swspp.html>.

SCIENTIFIC LITERATURE REVIEW

During the amendment development process, staff has reviewed a significant body of scientific literature to determine:

- The water quality functions that stream and wetland systems perform and the beneficial uses supported by these functions;
- The types of discharges and land use activities that may degrade or disrupt these functions and result in a loss of water quality;
- The conditions or characteristics of stream and wetland systems that must be protected or restored to prevent this loss in water quality and to protect or enhance beneficial uses; and
- Appropriate management measures that can be used to protect and restore stream and wetland system beneficial uses, including methods used by other Regional Water Boards.

This research has revealed that in order to protect and enhance beneficial uses it is necessary to protect and restore the physical, chemical, and biological characteristics of stream and wetland systems. This research also has revealed that the ecological processes that occur both within streams and wetlands (e.g., between upstream and downstream waters) as well as those that occur between streams and wetlands and their surrounding environments (e.g., between streams and wetlands and their associated riparian areas and between different aquatic ecosystems) affect water quality. Finally, this research has revealed the need for watershed management and local plan efforts to recognize and promote better understanding of stream and wetland systems, to: address cumulative impacts; target priority problems; develop integrative solutions; and promote a high level of stakeholder involvement, input, and ownership of the planning and implementation processes.

Key scientific references reviewed by staff to date include the following:

Watershed Processes

1. Ward, J.V. 1989. The four-dimensional nature of lotic ecosystems. *Journal of the North American Benthological Society* 8(1): 2-8.
2. Vannote, R.L., G.W. Minshall, K.W. Cummins, J.R. Sedell, and C.E. Cushing. The river continuum concept. 1980. *Canadian Journal of Fisheries and Aquatic Sciences* 37: 130-137.
3. Junk, W.J., P.B. Bayley, and R.E. Sparks. 1989. The flood pulse concept in river-floodplain systems. In D.P. Dodge, ed., *Proceedings of the International Large River Symposium*. Canadian Special Publication of Fisheries and Aquatic Sciences 106. pp. 110-127.
4. Poff, N.L., J.D. Allan, M.B. Bain, J.R. Karr, K.L. Prestegard, B.D. Richter, R.E. Sparks, and J.C. Stromberg. 1997. The natural flow regime: a paradigm for river conservation and restoration. *BioScience* 47(1): 769-784.
5. Naiman, R.J., T. J. Beechie, L.E. Benda, D.R. Berg, P.A. Bison, L.H. MacDonald, M.D. O'Connor, P.L. Olson, and E.A. Steel. 1992. Fundamental elements of ecologically healthy watersheds in the Pacific Northwest coastal ecoregion. In R.J. Naiman, ed., *Watershed Management: Balancing Sustainability with Environmental Change*. Springer-Verlag, New York. pp. 127-188.

Stream, Wetland, and Riparian Area Characteristics

1. Nadeau, T., and M.C. Rains. 2007. Hydrological connectivity between headwater streams and downstream waters: how science can inform policy. *Journal of the American Water Resources Association* 43(1): 118-133.
2. Lewis, W.M., ed. 1995. *Wetlands: Characteristics and Boundaries*. National Academy of Sciences, Washington, D.C. 328 pp.
3. Whigham, D.F., and T.E. Jordan. 2003. Isolated wetlands and water quality. *Wetlands* 23(3): 541-549.
4. Brinson, M.M., ed. 2002. *Riparian Areas: Functions and Strategies for Management*. National Academy of Sciences, Washington, D.C. 444 pp.

Management Activities and Effects on Water Quality

1. Moore, R.D., D.L. Spittlehouse, and A. Story. 2005. Riparian microclimate and stream temperature response to forest harvesting: a review. *Journal of the American Water Resources Association* 41(4): 813-834.
2. Booth, D.B., D. Hartley, and R. Jackson. 2002. Forest cover, impervious-surface area, and the mitigation of stormwater impacts. *Journal of the American Water Resources Association* 38(3): 835-845.

3. Sommer, T., B. Harrell, M. Nobriga, R. Brown, P. Moyle, W. Kimmerer, and L. Schemel. 2001. California's Yolo Bypass: evidence that flood control can be compatible with fisheries, wetlands, wildlife, and agriculture. *Fisheries* 26(8): 6-16.
4. North Coast Regional Water Board. *Water Quality Control Plan for the North Coast Region* (Basin Plan).
5. State plans and policies and other Regional Water Boards' Basin Plans.

Many of these references and others are discussed in a draft report prepared by staff on stream and wetland systems science.⁶

PROPOSED AMENDMENT CONCEPT

Staff currently is developing draft amendment language for the *Stream and Wetland Systems Protection Policy* based on the identified policy gaps, staff's scientific literature review, and public comments received to date. Release of a public draft of the amendment is scheduled for later this year (see section on "Amendment Schedule" below).

The amendment will protect and restore the physical characteristics of stream and wetland systems, including their connectivity and natural hydrologic regimes, in order to protect beneficial uses. The amendment will protect previously adopted beneficial uses associated with stream and wetland systems, including Flood Peak Attenuation/Flood Water Storage (FLD), Water Quality Enhancement (WQE), and Wetland Habitat (WET), through an implementation plan and new water quality objectives. The Regional Water Board adopted FLD, WQE, and WET in 2003 (Resolution No. R1 2003-0052⁷), but has not yet developed specific water quality objectives or an implementation plan to protect and restore these beneficial uses. The new water quality objectives and implementation plan also will protect other beneficial uses of stream and wetland systems, including those related to water supply, fisheries habitat, and cultural uses.

Water Quality Objectives

Staff is developing new narrative water quality objectives that will recognize key physical, chemical, and biological characteristics and functions of stream and wetland systems, which must be protected and restored to protect and enhance the beneficial uses of these waters. Narrative water quality objectives are being developed for the following:

- Watershed hydrology: protect and restore the infiltration capacity in the watershed to prevent significant adverse impacts on flood peak flows, stream base flows, groundwater recharge, and the hydrologic conditions necessary to support beneficial uses.

⁶ This report will be posted on the Regional Water Board's website for the amendment (<http://www.waterboards.ca.gov/northcoast/programs/basinplan/swspp.html#Documents>) prior to the Board meeting. Hard copies of the report will be made available at the meeting.

⁷ Regional Water Board Resolution No. R1-2003-0052, is available online at: <http://www.waterboards.ca.gov/northcoast/orders/2006/2003-0052-Resolution.pdf> (accessed May 17, 2007).

- Stream channel equilibrium: protect and restore the locations, magnitudes, frequencies, and durations of surface water discharges, and the shapes, slopes, and planforms of stream channels that are necessary to balance sediment loads and water discharges in streams and to prevent excessive erosion or deposition of sediment.
- Floodplain connectivity: protect and restore the connectivity between streams and their floodplains to prevent significant adverse impacts on floodplain functions, which include their ability to: 1) receive and store natural surface drainage; 2) recharge groundwater and surface waterbodies; 3) reduce erosive forces; 4) store and transport sediment; 5) cycle nutrients; 6) provide backwater, channel characteristics, habitat, and movement corridors for fish and wildlife; and 7) provide adequate space for natural adjustments of stream channels.
- Riparian vegetation: protect and restore riparian vegetation to: 1) maintain beneficial water temperatures and microclimates; 2) provide food, cover, and habitat for fish and wildlife; 3) filter pollutants; 4) store sediment; and 5) protect stream channels, floodplains, and floodplain terraces from destabilizing erosion.
- Wetland structure: protect and restore the hydrologic conditions, substrate characteristics, topographic complexity, and vegetation characteristics of wetlands to prevent adverse impacts on wetland functions, which include their ability to: 1) store natural surface drainage; 2) recharge groundwater and surface waterbodies; 3) store and transport sediment; 4) cycle nutrients; 5) filter pollutants; 6) maintain beneficial water temperatures and microclimates; and 7) provide habitat for plant and animal communities.

Implementation Plan

In addition to the new narrative water quality objectives, staff is developing an implementation plan to protect and restore the beneficial uses of stream and wetland systems. The implementation plan will include criteria and actions to evaluate and ensure compliance with the new narrative water quality objectives. The implementation plan will provide flexibility to account for a wide range of watershed conditions (e.g., degree of urbanization, size of watershed, surrounding land uses, etc.) and will establish a general framework for avoiding, minimizing, and mitigating impacts to stream and wetland system beneficial uses.

Staff is developing the following implementation elements:

- Guidance for permit applicants and Regional Water Board staff on how to protect the beneficial uses and water quality functions of stream and wetland systems, including methodology to identify and assess the condition of streams and wetlands and their associated riparian areas;
- Prohibitions on certain types of discharges to stream and wetland systems, such as stormwater discharges that lead to destabilizing erosion or removal of riparian vegetation that leads to detrimental increases in stream temperatures as a result of greater energy input from direct solar radiation;

- Performance criteria (e.g., to maintain appropriate riparian canopy cover for shade, to prevent excessive erosion or deposition in stream channels, etc.) that can be used to assess compliance with the new narrative water quality objectives and can be integrated into existing Regional Water Board permits and programs (e.g., 401 certifications, NPDES stormwater permits, general waste discharge requirements for THPs, waste discharge requirements, CEQA review, etc.);
- Suggested management measures (e.g., for floodplain and vegetation management, stormwater detention and infiltration, soil bioengineering, buffer establishment, etc.) that can be used to meet performance criteria, and monitoring requirements to ensure that management measures are effective;
- A framework for implementing stream and wetlands system protection goals through locally developed watershed plans by providing conditional waivers of waste discharge requirements to activities that comply with plans approved by the Regional Water Board;
- A framework for developing new region-specific general waste discharge requirements for classes of activities, such as restoration projects or flood control maintenance, to protect stream and wetland systems; and
- Other implementation actions, including use of non-regulatory tools (e.g., grants), to protect stream and wetland system beneficial uses and achieve their associated water quality objectives.

PUBLIC OUTREACH

Staff conducted two rounds of public workshops and California Environmental Quality Act (CEQA) scoping meetings to introduce its amendment concept for the *Stream and Wetland Systems Protection Policy* to the public and to solicit feedback on the:

- Proposed scope of the amendment;
- Reasonable alternatives to the amendment; and
- Potential environmental impacts of staff's proposal and the alternatives.

The first round of meetings was held in Eureka, Yreka, and Santa Rosa on May 3, 4, and 8, 2006, respectively. In response to requests from stakeholders for an update on policy development and a more detailed policy proposal, a second round of meetings was held in the same three locations on November 27, 28, and 30, 2006. Both rounds of meetings were well attended by a diverse group of stakeholders, and meeting participants and other interested parties submitted written and verbal scoping comments to Regional Water Board staff.⁸

CEQA scoping comments have been received from individuals with the following affiliations:

- Audubon California
- The Buckeye Conservancy
- CA Department of Fish and Game
- CA Department of Forestry and Fire Protection

⁸ Copies of meeting presentations and documents and summaries of comments are available online at: <http://www.waterboards.ca.gov/northcoast/programs/basinplan/swspp.html#Documents>.

- CA Farm Bureau
- CA Licensed Foresters Association
- The Campbell Group
- City of Fortuna
- Coast Action Group
- County of Siskiyou Board of Supervisors
- County of Sonoma Permit and Resource Management Division
- Defenders of Wildlife
- Environmental Protection Information Center
- Fishnet 4C
- Five Counties Salmonid Conservation Program
- Friends of the Eel River
- Friends of the Navarro
- Graton Community Services District
- Green Diamond Resources Company
- Home Builders Association of Northern California
- Humboldt County Resource Conservation District
- Humboldt Watershed Council
- Inter-Tribal Council of California
- Karuk Tribe of California
- Klamath Riverkeeper
- Laguna de Santa Rosa Foundation
- Lake Shastina Community Services District
- Lake Shastina Property Owners Association
- Mattole Salmon Group
- Morrison & Foerster, LLP
- The Nature Conservancy
- NOAA Fisheries
- North Bay Association of Realtors
- Northcoast Environmental Center
- Occidental Arts and Ecology Center
- People for USA
- Public Lands for the People
- Roberts, Kemp, and Associates, LLC
- Rohnert Park and Cotati Creeks Council
- Roseburg Resources Company
- Russian River Watershed Protection Committee
- Russian Riverkeeper
- Sheppard, Mullin, Richter & Hampton, LLP
- Sierra Club
- Sierra Pacific Industries
- Sonoma County Grape Growers Association
- Sonoma County Water Agency
- Sonoma County Winegrape Commission
- Sotoyome Resource Conservation District
- Southern Sonoma County Resource Conservation District
- Spencer Engineering

- Streamline Planning Consultants
- Timber Products Company
- USDA Natural Resource Conservation Service
- WCCB
- Western United Dairymen
- Individual/Self

Additionally, staff has met and discussed the amendment with representatives of the following agencies and organizations:

- The Buckeye Conservancy
- CA Department of Fish and Game, Northern Region (Region 1)
- CA Department of Fish and Game, Bay Delta Region (Region 3)
- CA Farm Bureau, Humboldt County
- CA Office of Environmental Health Hazard Assessment (OEHHA)
- CA Regional Water Quality Control Board, Central Coast Region (Region 3)
- CA Regional Water Quality Control Board, Lahontan Region (Region 6)
- CA Regional Water Quality Control Board, San Francisco Bay Region (Region 2)
- CA State Water Resources Control Board
- The Cattlemen's Association
- City of Santa Rosa Public Works
- County of Del Norte
- County of Humboldt
- County of Mendocino
- County of Siskiyou
- County of Siskiyou Board of Supervisors
- County of Sonoma
- County of Trinity
- Federated Indians of Graton Rancheria
- Five Counties Salmonid Conservation Program
- Humboldt State University
- Jones and Stokes
- Klamath National Forest
- Laguna de Santa Rosa Foundation
- NOAA Fisheries
- Roberts, Kemp, and Associates, LLC
- Russian Riverkeeper
- San Francisco Estuary Institute
- Sonoma County Water Agency
- Sotoyome Resource Conservation District
- University of California Berkeley
- University of California Cooperative Extension
- University of California Davis
- University of California Santa Cruz
- US Environmental Protection Agency
- USDA Natural Resource Conservation Service
- West Coast Watershed

Staff will hold additional meetings with agencies and organizations at their request and/or to coordinate agency policies and programs throughout the amendment development process. Staff continues to accept CEQA scoping comments on the amendment and requests for meetings from individuals and organizations to discuss their particular issues or concerns. Additional public workshops and meetings for the amendment will be held once the draft amendment and staff report are released later this year (see "Amendment Schedule" section below). Interested parties who would like to receive email updates on the amendment, including meeting notices, may subscribe to the Regional Water Board's email list for the amendment at: http://www.waterboards.ca.gov/lyrisforms/req1_subscribe.html.

Comments and questions may be directed to Bruce Ho at BHo@waterboards.ca.gov or (707) 576-2460 or to Holly Lundborg at HLundborg@waterboards.ca.gov or (707) 576-2609. Written comments also may be mailed to CA RWQCB, North Coast Region, 5550 Skylane Blvd, Ste A, Santa Rosa, CA 95403 or faxed to (707) 523-0135.

STATE WATER BOARD COORDINATION

The State Water Board recently held two CEQA scoping meetings to solicit public input on a proposed statewide *Wetland and Riparian Area Protection Policy*, which may include some similar policy elements to the *Stream and Wetland Systems Protection Policy*. The State Water Board held meetings in northern California (Sacramento) on April 9 and in southern California (Los Angeles) on April 19, 2007. CEQA scoping comments were due to the State Water Board by May 15, 2007. Regional Water Board staff is coordinating with the State Water Board staff to ensure that the proposed *Stream and Wetland Systems Protection Policy* will be consistent with any new statewide standards that may be adopted in the *Wetland and Riparian Area Protection Policy*. Regional Water Board staff is further coordinating with the State Water Board staff to ensure that staff resources are used efficiently and that the State and Regional Water Boards' efforts are complementary and not duplicative.

Although the State Water Board has not yet selected a preferred alternative for the statewide policy, State Water Board Chair Tam Doduc suggested in her opening statements at the State Water Board's CEQA scoping meetings that under any of the alternatives, the Regional Water Boards would likely be responsible for developing region-specific water quality objectives and implementation plans for wetland and riparian area protection. This is consistent with the proposed policy scope for the *Stream and Wetland Systems Protection Policy*, which Regional Water Board staff presented to the public at the May and November 2006 CEQA scoping meetings in the North Coast Region.

AMENDMENT SCHEDULE

The major milestones and public participation opportunities for the *Stream and Wetland Systems Protection Policy* in the North Coast Region are listed below. Dates are subject to change based on feedback from the Regional Water Board, scientific peer reviewers, and members of the public.

1. Present proposed amendment to the public at staff-led public workshops and CEQA scoping meetings (May and November 2006; completed).
2. Update Regional Water Board and the public on amendment status (June 2007).

3. Complete draft amendment and staff report and send to scientific peer reviewers (September 2007).
4. Respond to peer review comments, finalize draft amendment and staff report, and release documents to the public (December 2007).
5. Hold staff- and/or Regional Water Board-led public workshop(s) on draft amendment and staff report, and begin public review and comment period (December 2007 to January 2008).
6. Hold Regional Water Board public adoption hearing (tentatively March 2008).

**PRELIMINARY STAFF
RECOMMENDATION:**

This is a written informational item. No formal Regional Water Board action is necessary at this time.

(SWSPP EOSR_05307)