STATE WATER RESOURCES CONTROL BOARD
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

DRAFT STAFF REPORT AND WORK PLAN

FOR THE REVIEW OF
STATE WATER QUALITY CONTROL PLANS AND
STATE POLICIES FOR WATER QUALITY CONTROL

July 3, 2026

CALIFORNIA
Water Boards
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

Table of Contents

List of Acronyms, Initialisms, and Abbreviations

304(a) recommended criteria	Clean Water Act section 304(a) recommended criteria
Antidegradation Policy	Statement of Policy with Respect to Maintaining High Quality of Waters in California
Basin Plan	Regional Water Quality Control Plan
Bay-Delta Plan	Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary
CFR or C.F.R.	Code of Federal Regulations
Cannabis Policy	Cannabis Cultivation Policy: Principles and Guidelines for Cannabis Cultivation
CEC	Constituents of Emerging Concern
CIWQS	California Integrated Water Quality System
Compliance Schedule Policy	Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits
CTR	California Toxics Rule
Dredge or Fill Procedures	State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State
Enclosed Bays and Estuaries Plan	Water Quality Control Plan for Enclosed Bays and Estuaries: Sediment Quality Provisions
Enclosed Bays and Estuaries Policy	Water Quality Control Policy for the Enclosed Bays and Estuaries of California
Guidance for Toxic Hot Spot Policy	Water Quality Control Policy for Guidance on Development of Regional Toxic Hot Spot Plans
GWR	Groundwater Level Rise

Impaired Waters Policy	Water Quality Control Policy for Addressing Impaired Waters: Regulatory Structure and Options
ISWEBE Plan	Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California
Listing Policy	Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List
MCL	Maximum Contaminant Levels
NPS	Nonpoint Source
NPS Pollution Enforcement Policy	Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program
North Coast Instream Flows Policy	Policy for Maintaining Instream Flows in Northern California Coastal Streams
NPDES	National Pollutant Discharge Elimination System
Ocean Plan	Water Quality Control Plan for Ocean Waters of California
OTC	Once-Through Cooling
OTC Policy	Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling
OTC Policy for Inland Waters	Water Quality Control Policy on the Use and Disposal of Inland Waters Used for Powerplant Cooling
Plans and Policies	Water Quality Control Plans and State Policies for Water Quality Control
Porter-Cologne Act	California Porter-Cologne Water Quality Control Act
Recycled Water Policy	Water Quality Control Policy for Recycled Water
Regional Water Board	Regional Water Quality Control Board

Review of State Plans and Policies	Review of State Water Quality Control Plans and State Policies for Water Quality Control
SED	Substitute Environmental Documentation
SEP Policy	Supplemental Environmental Projects Policy
SLR	Sea Level Rise
State Implementation Policy	Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California
State Water Board	State Water Resources Control Board
Thermal Plan	Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California
Tribe(s)	California Native American Tribe(s)
USC or U.S.C.	United States Code
USEPA	United States Environmental Protection Agency
UST Low-Threat Closure Policy	Low-Threat Underground Storage Tank Closure Policy
Water Boards	State Water Board and Regional Water Boards, collectively
Water Code	California Water Code
WQO	Water Quality Objective

1. Introduction

The State Water Resources Control Board ("State Water Board") and the nine California Regional Water Quality Control Boards ("Regional Water Boards") (collectively the "Water Boards" or individually a "Water Board") work together to protect the quality of California's water resources for human health, the environment, and all beneficial uses of water. A complex state and federal regulatory scheme under the California Porter-Cologne Water Quality Control Act ("Porter-Cologne Act") and the federal Water Pollution Control Act, known as the Clean Water Act ("CWA"), governs the protection of California's water quality. The goal of the Porter-Cologne Act, which was enacted in 1969 prior to the Clean Water Act, is "to attain the highest water quality which is reasonable, considering all demands being made and to be made on those waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible." (Wat. Code, § 13000.)

One of the fundamental ways that the Water Boards work to achieve this goal is through the development, revision, and implementation of water quality control plans and state policies for water quality control ("plans and policies"). (Wat. Code, §§ 13140, 13240, 13170.) The Water Boards review and assess the plans and policies within each board's jurisdiction, as well as other applicable water quality standards and water quality criteria, to determine if future revisions are necessary to protect water quality.

This Staff Report and Work Plan support the State Water Board's Review of State Water Quality Control Plans and State Policies for Water Quality Control ("Review of State Plans and Policies"). Through the Review of State Plans and Policies, the State Water Board identifies and prioritizes issues that could result in the modification or adoption of plans or policies to keep pace with regulatory and policy changes, new scientific information and technologies, and environmental shifts. This includes review of 5 state plans and 26 state policies that are currently in effect. The State Water Board is also reviewing applicable state promulgated water quality standards, federally promulgated water quality standards, and Clean Water Act section 304(a) recommended criteria ("304(a) recommended criteria").[1] While each Regional Water Board also adopts and regularly reviews the regional water quality control plan ("basin plan") for its region, this review solely focuses on plans and policies adopted by the State Water Board.

The State Water Board is conducting the review in accordance with both state and federal law. Under the Porter-Cologne Act, the State Water Board conducts periodic reviews of state plans and policies, as well as a triennial review of the Water Quality Control Plan for Ocean Waters of California ("Ocean Plan"). (Wat. Code, §§ 13143, 13170, 13170.2, 13240.) Consistent with the Clean Water Act and its implementing regulations, the State Water Board reviews water quality standards and related measures on a triennial basis. (33 U.S.C. 303(c); 40 C.F.R. § 130.20.) For the Review of

[1] As used herein, "water quality standards" includes water quality standards adopted by the State Water Board and approved by the United States Environmental Protection Agency and federally promulgated water quality standards that apply throughout California unless the context indicates otherwise.

State Plans and Policies, the State Water Board is conducting the periodic and triennial reviews in a single combined proceeding.

During this review, the State Water Board engaged the public, interested parties, governmental agencies, and California Native American Tribes ("Tribes") to gather feedback and information to identify, inform, and prioritize future changes or additions to state plans and policies. This public engagement, in addition to State Water Board staff's review and evaluation, has resulted in this Staff Report and Work Plan.

This Staff Report and Work Plan include a list of current projects and projects for future consideration that will help guide the State Water Board's priorities for future amendments to state plans and policies through public rulemaking actions. This Staff Report and Work Plan also provide an overview of water quality control in California as carried out through the establishment and revision of state plans and policies and their triennial and periodic review. The report explains the roles of the State Water Board and Regional Water Boards in protecting the state's water quality and describes the process for reviewing water quality standards and 304(a) recommended criteria.

The projects identified in the Staff Report and Work Plan reflect the State Water Board's priorities for water quality control planning, but do not predetermine any outcome for the listed projects. The State Water Board will conduct public proceedings in accordance with applicable law, including relevant rulemaking and public participation requirements, when it undertakes a project identified in this Staff Report and Work Plan. For example, the State Water Board is currently considering potential amendments to three water quality control plans: the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("Bay-Delta Plan"), the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California ("ISWEBE Plan"), and the Water Quality Control Plan for Ocean Waters of California ("Ocean Plan"). In addition, the State Water Board is currently engaged in related implementation proceedings and in various stages of scientific and technical evaluation that may inform potential rulemaking proceedings. Any public comments in the public proceedings for the projects identified in this Staff Report and Work Plan, including potential rulemaking or other proceedings that have been initiated, must be submitted in accordance with the notices and procedures for those individual proceedings.

The State Water Board may reevaluate and reprioritize projects, including those identified in previous reviews and new projects not identified in this Staff Report and Work Plan, as scientific information or regulatory approaches evolve or as priorities and resources allow.

Appendix A is a summary of the Work Plan.

Appendix B describes the projects that were identified in recent reviews and the status of projects identified for future consideration in those reviews.

2. Overview of Water Quality Matters Considered in the Review

This section describes and summarizes the state plans and policies, other applicable water quality standards, and 304(a) recommended criteria that are included in the Review of State Plans and Policies. It also provides information about the role of the State Water Board and Regional Water Boards in periodic and triennial reviews and describes matters generally addressed by the Regional Water Boards in their basin plan reviews.

2.1 State Water Quality Control Plans

State water quality control plans are established by the State Water Board to preserve and enhance California's waters to protect human health, aquatic life and ecosystems, and other beneficial uses of water. State water quality control plans identify and designate beneficial uses or incorporate the beneficial use designations in the Regional Water Boards' basin plans, establish water quality objectives to protect the beneficial uses, and include implementation programs to achieve the objectives.[2]

2.2 State Policies for Water Quality Control

State policies for water quality control contain general water quality principles and guidelines for long-range water resource planning, water quality objectives at key locations for planning and for water quality control activities, and other principles and guidelines the State Water Board deems essential for water quality control.

2.3 Federally Promulgated Water Quality Standards for California

The United States Environmental Protection Agency ("USEPA") has promulgated water quality standards applicable to waters in California. Standards include both designated uses of water and water quality criteria, but USEPA has focused on promulgating water quality criteria while relying on the Water Boards' designation of uses. Promulgated standards include criteria for priority toxic pollutants under the USEPA's 1992 National Toxics Rule and 2000 California Toxics Rule ("CTR"). (40 C.F.R. §§ 131.36(b)(10) (National Toxics Rule), 131.38 (CTR).) The CTR includes various types of freshwater or saltwater, acute or chronic aquatic life criteria for 23 priority toxic pollutants and human health criteria for 92 priority toxic pollutants. Additionally, the USEPA established a national chronic numeric criterion for selenium that applies to most fresh waterbodies in California to protect aquatic life and aquatic-dependent wildlife. (81 Fed. Reg. 45285 (July 13, 2016); 89 Fed. Reg. 101914 (Dec. 17, 2024).)

In 1994, USEPA promulgated criteria to protect fish and wildlife resources of the San Francisco Bay-Sacramento-San Joaquin Delta ("Bay-Delta") that address salinity, estuarine habitat, and other parameters. (40 C.F.R. § 131.37; 40 Fed. Reg. 4664 (Jan. 24, 1995).) The State Water Board subsequently adopted the 1995 Bay-Delta Plan, and

[2] Together, the beneficial uses and the water quality objectives established to reasonably protect the beneficial uses are called water quality standards under the terminology of the federal Clean Water Act.

USEPA approved the plan and committed to withdraw the standards set forth in Code of Federal Regulations, title 40, section 131.37. The Third District Court of Appeal confirmed that, once approved by USEPA, the applicable water quality standards are those in the 1995 Bay-Delta Plan as a matter of law. (*State Water Resources Control Board Cases* (2006) 136 Cal.App.4th 674, 774-775 [citing 33 U.S.C. § 1313(c)(2)(A), (c)(3)].) Accordingly, because the 1995 Bay-Delta Plan supplanted USEPA's standards, the State Water Board will not review USEPA's Bay-Delta standards further. More recent Bay-Delta Plan planning proceedings are discussed below.

2.4 Clean Water Act Section 304(a) Recommended Criteria

The USEPA publishes national recommended water quality criteria under Clean Water Act section 304(a) (hereinafter "304(a) recommended criteria") for determining whether surface water quality is healthy for humans, aquatic life, and aquatic-dependent wildlife. These criteria are national recommendations and are not promulgated by USEPA as water quality standards. States may adopt these criteria as water quality standards or use them as guidance in developing their own water quality standards. As with other water quality standards, the Water Boards will develop and adopt any water quality standards that are derived from 304(a) recommended criteria as amendments to plans or policies after following the rulemaking requirements and other procedures described in Section 3.2. The 304(a) recommended criteria are established at a national scale, so they may not account for the impacts to local aquatic life and may not consider feasibility or economics.

2.5 State Water Board and Regional Water Board Roles

The State Water Board shares responsibility for developing, revising, and implementing plans and policies with nine Regional Water Quality Control Boards (Regional Water Boards). (Wat. Code, §§ 13170, 13240-13248.) The State Water Board's plans and policies contain water quality objectives that are designed to ensure that the corresponding beneficial uses of California's waters are protected statewide. The State Water Board may also adopt plans and policies to ensure a coordinated approach across Regional Water Board boundaries or where implementation requires integration with the State Water Board's water right authorities. Similarly, the Regional Water Boards protect the water quality of the waters within their regions through the development, revision, and implementation of basin plans that designate the beneficial uses of California's waters within their region and contain water quality objectives that apply in their region. Basin plan amendments adopted by the Regional Water Boards are not effective until approved by the State Water Board. (Wat. Code, § 13245.) Together, the State Water Board and Regional Water Boards provide comprehensive water quality protection for California's waters.

This review is focused on state plans and policies adopted by the State Water Board, other water quality standards, and 304(a) recommended criteria. Because the Regional Water Boards review basin plans through their own public proceedings, this review does not address those basin plans. Moreover, certain elements of federal triennial review are more appropriately addressed by the Regional Water Boards in their review of basin plans to the extent that they address specific waterbodies. For example, the Regional

Water Boards re-examine any waterbody segments with water quality standards lacking the aquatic life and recreational uses specified in Clean Water Act section 101(a)(2) to determine whether there is new information available that might lead to establishing those beneficial uses. With respect to such federal triennial review provisions, however, the Water Boards' respective roles are less clearly defined. This Staff Report and Work Plan focus on plans and policies adopted by the State Water Board and other federally promulgated water quality standards that apply statewide, because water quality standards adopted by the Regional Water Boards and federally promulgated water quality standards that do not apply statewide are more appropriately subject to review by the various Regional Water Boards during their triennial reviews. As appropriate, the State Water Board and Regional Water Boards may coordinate to ensure that the appropriate agency addresses a specific matter.

3. Framework for Periodic and Triennial Reviews

The State Water Board conducts periodic reviews of state plans and policies as required by the Porter-Cologne Act and triennial reviews consistent with the Clean Water Act and its implementing regulations.[3] The purpose of these reviews is to assess state plans and policies, as well as other applicable water quality standards, to determine if future revisions are necessary. During these reviews, the State Water Board engages the public, interested parties, governmental agencies, and Tribes to gather feedback and information to identify, inform, and prioritize future changes or additions to state plans and policies. This section generally describes the review process and provides information about future rulemaking processes for current projects.

3.1 Legal Framework

The Porter-Cologne Act requires that plans and policies be periodically reviewed and may be revised. (Wat. Code, §§ 13143, 13170, 13240.) The Ocean Plan must be "reviewed at least every three years to guarantee that the current standards are adequate and are not allowing degradation to indigenous marine species or posing a threat to human health." (*Id*., § 13170.2, subd. (b).)

The Clean Water Act and its implementing regulations provide that states "shall from time to time (but at least once each three-year period [beginning in 1972]) hold public hearings for the purpose of reviewing applicable water quality standards and, as appropriate, modifying and adopting standards." (33 U.S.C. § 1313(c)(1); 40 C.F.R. § 131.20(a).) The results of the review are made available to USEPA. (33 U.S.C. § 1313(c)(1); 40 C.F.R. § 131.20(c).) Key elements of the federal review include "evaluating whether there is any new information about Tribal reserved rights applicable

[3] The Clean Water Act and its implementing regulations also direct states to prepare a continuing planning process that describes specific processes and elements. (33 U.S.C. § 1313(e); 40 C.F.R. § 130.5(b).) State Water Board staff developed a May 2001 "Report in Support of U.S. Environmental Protection Agency's Review of California's Continuing Planning Process." In addition to describing elements of the state's continuing planning process, the report also generally describes California's water quality planning processes. The May 2001 report is a non-binding planning document that does not impose independent, enforceable requirements and may be updated to reflect the Water Boards' current practices in the future.

to State waters that needs to be considered to establish water quality standards" consistent with federal regulations. (40 C.F.R. §§ 131.20(a), 131.9 [protection of Tribal reserved rights].)[4] The federal review also requires a re-examination of any waterbody segment with water quality standards that do not include aquatic life and recreational uses specified in CWA section 101(a)(2) to determine if new information is available.[5] (40 C.F.R. § 131.20(a).)[6] In addition, if a state does not adopt new or revised criteria for parameters for which USEPA has published new or updated Clean Water Act section 304(a) recommended criteria, then the state must provide an explanation when it submits the results of the review to the USEPA. (40 C.F.R. § 131.20(a).)

The Regional Water Boards conduct their own reviews of their basin plans for waterbody-specific issues, including Tribal reserved rights applicable to state waters within their basins, beneficial use designations including designations for aquatic life and recreational uses specified in CWA section 101(a)(2), and water quality objectives. This review does not address such elements that are more appropriately considered at the regional level.

3.2 Future Rulemaking

The Review of State Plans and Policies will not include the adoption of any proposed changes or additions to the state plans and policies under review. Plans and policies are the equivalent of regulations and, thus, the adoption or revision of plans and policies are subject to specific rulemaking provisions of the Administrative Procedure Act (Gov. Code, § 11353). Each rulemaking project will have its own public process and must comply with specific applicable legal requirements in addition to applicable rulemaking requirements of the Administrative Procedure Act. As appropriate, these additional requirements include the following: conducting external scientific peer review (Health and Saf. Code, § 57004); complying with the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.); considering the human right to water (Wat. Code, § 106.3); considering economics (*Id*., § 13241); conducting meaningful consultation with Tribes and engaging in equitable and culturally relevant community outreach (*Id*., § 189.7); making concise, programmatic findings on potential environmental justice, Tribal impacts, and racial equity considerations related to the adoption or revision of plans for policies (*Id*., § 13149.2); and public participation requirements. Public comments on current and future rulemaking and other proceedings must be submitted in accordance

[4] In March 2026, USEPA stated that it intends to rescind the 2024 Tribal Reserved Rights Rule, which would affect elements of the federal review. Until rescinded or set aside, however, the rule remains in effect. ("Revising the Federal Water Quality Standards Regulation to Protect Tribal Reserved Rights | US EPA," last viewed on April 10, 2026.)

[5] CWA section 101(a)(2) states that "it is the national goal that wherever attainable, an interim goal of water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water be achieved by July 1, 1983." (33 U.S. C. 1251(a)(2).)

[6] 40 C.F.R. 131.20(a) provides that "[t]he State shall also re-examine any waterbody segment with water quality standards that do not include the uses specified in section 101(a)(2) of the Act every 3 years to determine if any new information has become available. If such new information indicates that the uses specified in section 101(a)(2) of the Act are attainable, the State shall revise its standards accordingly."

with the notices and procedures applicable to those proceedings, and not as part of this review.

Water quality rulemakings are often complex and controversial. The Water Boards' decision to initiate rulemaking may be based on various sources of information, including periodic and triennial reviews of plans and policies and basin plans, other prioritization efforts by the Water Boards, changes in environmental conditions, watershed initiatives, public input, and changes in state or federal laws or regulations. These preliminary sources of information, including this review, do not necessarily provide the detailed information necessary to draft and support a potential revision to a state plan or policy or to comply with other state laws that also may apply in the rulemaking process.

Accordingly, once a Water Board determines that a state plan or policy should be adopted or revised, it engages in preliminary planning, information gathering, scientific study, data gathering and analyses, and outreach to consider in the initial drafting of potential alternatives. These steps can be informal or formal, and may include written correspondence with the public, interested parties, or governmental agencies, consultation with Tribes, staff workshops, coordination of scientific studies or data analyses, and engagement with watershed, technical, expert, or public advisory groups. Depending on the complexity of the subject, available scientific information, and level of engagement, this stage can take anywhere from months to several years. Moreover, the work does not end with the adoption or revision of a state plan or policy. Regulatory provisions of state plans and policies must be approved by the Office of Administrative Law. Once the State Water Board receives approval from the Office of Administrative Law, it must then submit any water quality objectives and beneficial uses that are intended to also serve as water quality standards to USEPA for USEPA's approval. The State Water Board may need to develop training and other resources to assist Water Board staff in carrying out the state plan or policy. Education, guidance, and training may be offered. It is not uncommon for the Water Boards' rulemaking proceedings to result in litigation against the Water Boards, which also consumes staff time to defend the rulemaking. Additional staff may need to be hired or redirected. For additional information regarding California's development and adoption of new and revised water quality objectives and beneficial uses, see the Summary of California's Process for Adopting New and Revised Water Quality Objectives and Beneficial Uses.[7]

With respect to consideration of the public trust, the Porter-Cologne Act is a codification of the Water Boards' public trust duty regarding water quality. The Water Boards consider relevant public trust resources and measures to protect those resources, where feasible, through the Water Boards' Porter-Cologne Act responsibilities to reasonably protect beneficial uses, including fisheries. (State Water Board Order WQ 2023-0081, p. 35.) A specific finding on the public trust is not required in the Review of State Plans and Policies because the review process does not directly result in actions

[7] Summary of California's Process for Adopting New and Revised Water Quality Objectives and Beneficial Uses (last updated January 14, 2025) at https://waterboards.ca.gov/plans_policies/docs/factsheet_wqobu.pdf

potentially affecting public trust resources and the protection of public trust resources is more meaningfully evaluated in the context of individual regulatory or policy actions.

4. Current Review Process and Public Participation

The State Water Board engaged the public, interested parties, governmental agencies, and Tribes in the Review of State Plans and Policies. To seek feedback, the State Water Board released an online public survey in the fall of 2024, which closed in the winter of 2024. The State Water Board received a total of 59 responses from various public agencies (including the State and Regional Water Boards), nonprofit organizations, businesses, volunteer groups, private individuals, and one Tribe.

The State Water Board also conducted its own internal appraisal of state plans and policies, water quality standards, 304(a) recommended criteria, and other relevant information. This review included an assessment of the adequacy of current standards in the Ocean Plan and potential for degradation to indigenous marine species or threat to human health. (Wat. Code, § 13170.2, subd. (b).) Additionally, after the survey closed, State Water Board staff overseeing each of the state plans and policies reviewed the public survey results. Using the information gathered and input received, staff prepared this Staff Report and Work Plan to guide the State Water Board's future planning efforts.

Staff identified current projects and projects for future consideration to establish or revise state plans and policies, which include new or revised water quality standards. In most instances, a project is a State Water Board proceeding, occurring separately from this Review of State Plans and Policies, that is focused on specific plans, policies, or standards and is generally expected to result in a rulemaking. In some instances, a project is an effort that may inform a potential future rulemaking project or implement an existing plan or policy.

Current projects are projects that are substantially underway and that the State Water Board has directed staff to continue to work on as of the date of this Staff Report and Workplan. These are priority projects and will be the focus of State Water Board staff's efforts for the next three years.

Projects for future consideration are projects that are not substantially underway as of the date of this Staff Report and Workplan. Although some preliminary efforts for projects for future consideration are occurring or may occur in the next three years, most of these projects are unlikely to be formally initiated at the staff level via development of a project charter document ("chartered") in the next three years. Therefore, projects for future consideration were not further prioritized within this Review of State Plans and Policies due to the broad scope of projects spanning multiple programs. The list of projects for future consideration will be considered during future priority setting exercises by the State Water Board, by program managers, and during future triennial and periodic reviews. The State Water Board will engage the public during these priority setting exercises to ensure adequate public review at the appropriate time. As State Water Board priorities and resources allow, these future

projects may be initiated, and more information will be provided about the scope of the projects in project-specific updates and future reviews.

The State Water Board may reevaluate and reprioritize projects, including those identified in previous reviews and new projects not identified in this Staff Report and Work Plan, as scientific information or regulatory approaches evolve or as priorities and resources allow.

A variety of factors informed the identification of current projects versus projects for future consideration. These factors generally include the following: the protection and restoration of beneficial uses, including uses affecting public health and ecosystems; public input, including survey feedback; feedback from Tribes; local, state, and federal agency information; agency priorities; the potential to align plans and policies and provide consistency or coordination in more than one region; updated or available scientific or technical information; compliance with legal requirements; the complexity and urgency of the projects and anticipated completion time; staff resource capacity; and budgetary constraints. Considering the broad scope of this review, the State Water Board has not weighed factors in a particular manner but instead has evaluated them holistically and as appropriate in identifying and prioritizing current and potential future projects. In the case of state plans or policies that have limited regional scope (e.g., the Pollutant Policy Document for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary), State Water Board staff coordinated with the appropriate Regional Water Board to collaboratively consider projects relevant to those state plans and policies.

Not every plan, policy, or other water quality standard requires revision. Similarly, not every project or topic requires adoption of a new plan, policy, or other water quality standard. As explained above, the State Water Board invited public, Tribal, and agency participation in the review process, and even if no comments were received, Water Board staff conducted their own review of state plans and policies, water quality standards, and 304(a) recommended criteria. If no one, including State Water Board staff, provided any information supporting potential revision or potential adoption of a plan, policy, or water quality standard, no further review of that plan, policy, or water quality standard was conducted. Results of the review and prioritization process are outlined in Sections 6 and 7 of this report.

Following the release of the Draft Staff Report and Work Plan, there will be a public comment period and public hearing. (As noted previously, any comments on the contents, policy options, or implications of projects should be made in accordance with the notice and procedures for those individual proceedings.) The State Water Board will then review and respond to the public comments and revise the Staff Report and Work Plan, as appropriate. The State Water Board will consider adoption of the Final Staff Report and Work Plan at a future public meeting. After adoption, the State Water Board will transmit the results of the Review of State Plans and Policies to USEPA.

5. Summary of Existing State Plans and Policies

This section describes the 5 state plans and 26 policies that are currently in effect and included in this Review of State Plans and Policies.

Two state policies for water quality control are not included in this review: the Water Quality Enforcement Policy and the Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems ("Onsite Wastewater Treatment System Policy"). The Water Quality Enforcement Policy was most recently amended on December 5, 2023, and the amendments took effect on November 7, 2024. The Onsite Wastewater Treatment System Policy was most recently amended on April 18, 2023, and the amendments took effect on September 26, 2023. Neither policy contains water quality objectives or water quality standards, and both policies are subject to their own special review cycles of at least every five years.

5.1 State Water Quality Control Plans

5.1.1 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("Bay-Delta Plan")

The Bay-Delta Plan is primarily a flow dependent plan that provides reasonable protection of beneficial uses in the San Francisco Bay/Sacramento-San Joaquin Delta ("Bay-Delta") watershed that require control of water diversions and related activities, focusing on municipal and industrial uses, agricultural uses, and fish and wildlife uses. The State Water Board is also in the process of considering the inclusion of Tribal beneficial uses. Because diversions of water from the Bay-Delta watershed are a driver of water quality in the watershed, much of the implementation for the Bay-Delta Plan relies upon the combined water right and water quality authorities of the State Water Board. The Bay-Delta Plan is complementary to other state plans and policies adopted by the State Water Board and to the basin plans adopted by the Regional Water Boards for the same waters that address parameters such as toxic chemicals, bacterial contamination, and other parameters that have the potential to impair beneficial uses or cause nuisance.

The Bay-Delta Plan can be accessed at this link: https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf

5.1.2 Water Quality Control Plan for Enclosed Bays and Estuaries: Sediment Quality Provisions ("Enclosed Bays and Estuaries Plan")

The Enclosed Bays and Estuaries Plan includes sediment quality objectives and a program of implementation that integrate chemical and biological measures to determine whether sediment-dependent biota are protected from exposure to toxic pollutants in California's enclosed bays and estuaries.

The Enclosed Bays and Estuaries Plan can be accessed at this link: https://www.waterboards.ca.gov/water_issues/programs/bptcp/docs/sediment/sed_qual_provs.pdf

5.1.3 Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California ("ISWEBE Plan")

The State Water Board has directed staff to propose the establishment of the ISWEBE Plan to protect water quality in inland surface waters, bays, and estuaries. The following effective provisions will be incorporated into the ISWEBE Plan:

- **Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California ("Trash Provisions")**

  The Trash Provisions include a water quality objective and a program of implementation to reduce trash and ensure it does not adversely affect beneficial use or cause nuisance. The Trash Provisions include a prohibition of the discharge of trash, a time schedule, and monitoring and reporting elements.

  The Trash Provisions can be accessed at this link: https://www.waterboards.ca.gov/water_issues/programs/trash_control/docs/trash_appendix_e_121615.pdf

- **Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California—Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions ("Mercury Provisions")**

  The provisions include three beneficial use definitions: Tribal Traditional Culture ("CUL"), Tribal Subsistence Fishing ("T-SUB"), and Subsistence Fishing ("SUB"). The provisions also include five water quality objectives for methylmercury and a program of implementation to protect beneficial uses associated with the consumption of fish by both people and wildlife.

  The Tribal and Subsistence Beneficial Use and Mercury Provisions can be accessed through this link: https://www.waterboards.ca.gov/plans_policies/docs/2023/mercury-tribe.pdf

- **Part 3 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California—Bacteria Provisions and a Water Quality Standards Variance Policy ("Bacteria Provisions" and "Variance Policy")**

  The Bacteria Provisions include numeric bacteria water quality objectives for the water contact recreation ("REC-1") beneficial use and a program of implementation. The Variance Policy identifies the procedures by which the Regional Water Boards may adopt water quality standards variances, insofar as they apply to the development of National Pollutant Discharge Elimination System ("NPDES") permit limits and requirements.

  The Bacteria Provisions and Variance Policy can be accessed through this link: https://www.waterboards.ca.gov/plans_policies/docs/bacteria.pdf

- **State Wetland Definition and Procedures for Discharges of Dredged or Fill Materials to Waters of the State ("Dredge or Fill Procedures")**

  The Dredge or Fill Procedures includes a consistent statewide definition of wetland waters of the state and a regulatory framework for dredge and fill activities. It includes detailed procedures for determining if a feature qualifies as a wetland, requirements for alternatives analysis, and mitigation measures to ensure no net loss of wetland functions. The policy extends protection to wetlands that may not be covered under federal law. The Dredge and Fill Procedures were adopted as both a state policy under Water Code section 13140 for all inland surface waters, enclosed bays, estuaries, and coastal lagoons of the state, and as a water quality control plan amendment under Water Code section 13170 for waters of the United States. Therefore, they are identified both here as a plan and below, in Section 5.2, as a policy.

  The Dredge and Fill Procedures can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf

- **State Policy for Water Quality Control: Toxicity Provisions ("Toxicity Provisions"**

  The Toxicity Provisions include statewide numeric water quality objectives for acute and chronic toxicity to aquatic life, a program of implementation to control toxicity, a consistent yet flexible framework for monitoring toxicity, and a statewide statistical approach to analyze test results. The Toxicity Provisions were adopted as both a state policy under Water Code section 13140 for all inland surface waters, enclosed bays, estuaries, and coastal lagoons of the state, and as a water quality control plan amendment under Water Code section 13170 for waters of the United States. Therefore, they are identified both here as a plan and below, in Section 5.2, as a policy.

  The Toxicity Provisions can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/2021/2021-state-policy-toxicity-provisions.pdf

5.1.4 Water Quality Control Plan for Ocean Waters of California ("Ocean Plan")

The Ocean Plan establishes water quality standards to preserve and enhance California's territorial ocean waters for the use and enjoyment of the public through the control of waste discharges and seawater intakes. The Ocean Plan sets forth beneficial uses for ocean waters of California, establishes water quality objectives to protect those uses (e.g., chemical, physical, and biological characteristics), identifies areas where discharges are prohibited, and sets forth a program of implementation describing the actions necessary to achieve the water quality objectives.

California's territorial boundaries for ocean waters extends three nautical miles seaward from the state's mainland, outermost islands, reefs, and rocks, and include all waters

between those islands and the mainland. The Ocean Plan is also applicable to open bays, such as Monterey Bay and Santa Monica Bay, but is not applicable to enclosed bays, coastal lagoons, or estuaries.

The Ocean Plan can be accessed through this link:
https://www.waterboards.ca.gov/water_issues/programs/ocean/docs/oceanplan2019.pdf

5.1.5 Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California ("Thermal Plan")

The Thermal Plan prohibits the discharge of elevated temperature wastewater into cold interstate waters and prohibits discharges having a maximum temperature greater than five degrees above natural receiving water temperatures to warm interstate waters. It also controls the temperature of discharge to coastal waters, enclosed bays, and estuaries.

The Thermal Plan can be accessed through this link:
https://www.waterboards.ca.gov/plans_policies/docs/2023/thermpln.pdf

5.2 State Policies for Water Quality Control

5.2.1 Statement of Policy with Respect to Maintaining High Quality of Waters in California ("Antidegradation Policy")

The Antidegradation Policy applies to the discharge of waste to high-quality surface water and groundwater. This policy requires that the quality of existing high-quality water be maintained unless the state finds that any change will be consistent with maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial use of such water, and will not result in water quality less than that prescribed in policies as of the date on which such policies became effective. The policy also requires best practicable treatment or control of discharges to high-quality waters to assure that pollution or nuisance will not occur, and that the highest water quality consistent with maximum benefit to the people of the state will be maintained.

The Antidegradation Policy can be accessed through this link:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1968/rs68_016.pdf

5.2.2 Cannabis Cultivation Policy: Principles and Guidelines for Cannabis Cultivation ("Cannabis Cultivation Policy")

The Cannabis Cultivation Policy includes principles and guidelines for cannabis cultivation activities to protect water quality and instream flows and to ensure that the diversion of water and discharge of waste associated with cannabis cultivation does not have a negative impact on water quality, aquatic habitat, riparian habitat, wetlands, and springs. The Cannabis Cultivation Policy applies to cannabis cultivation for commercial recreational, commercial medial, and personal medical uses.

The Cannabis Cultivation Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2017/final_cannabis_policy_with_att_a.pdf

5.2.3 Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits ("Compliance Schedule Policy")

The Compliance Schedule Policy includes uniform provisions authorizing compliance schedules for NPDES permits where appropriate to comply with permit limitations implementing new, revised, or newly interpreted water quality standards. As authorized by the Clean Water Act, the NPDES Program controls water pollution by regulating point sources, which are discrete conveyances such as pipes or man-made ditches, that discharge pollutants into waters of the United States.

The Compliance Schedule Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2008/rs2008_0025.pdf

5.2.4 Water Quality Control Policy for Consolidated Toxic Hot Spots Cleanup Plan ("Consolidated Cleanup Plan")

The Consolidated Cleanup Plan, which is a policy for water quality control, specifies where and how each identified toxic hot spot in enclosed bays, estuaries, and coastal waters will be remediated. The document defines a toxic hot spot and includes ranking criteria to assist in establishing priorities for addressing toxic hot spots and other measures to facilitate the implementation of the policy. The Consolidated Cleanup Plan also includes a priority list and description of toxic hot spots, pollutant sources, cost estimates for implementation and recovery, preliminary remediation actions, and a two-year funding schedule.

The Consolidated Cleanup Plan can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/bptcp/docs/dfed_complete.pdf

5.2.5 State Wetland Definition and Procedures for Discharges of Dredged or Fill Materials to Waters of the State ("Dredge or Fill Procedures")

The Dredge or Fill Procedures includes a consistent statewide definition of wetland waters of the state and a regulatory framework for dredge and fill activities. It includes detailed procedures for determining if a feature qualifies as a wetland, requirements for alternatives analysis, and mitigation measures to ensure no net loss of wetland functions. The policy extends protection to wetlands that may not be covered under federal law. These procedures are also described as a water quality control plan in section 5.1 above.

The Dredge or Fill Procedures can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/2021/procedures.pdf

5.2.6 Water Quality Control Policy for the Enclosed Bays and Estuaries of California ("Enclosed Bays and Estuaries Policy")

The Enclosed Bays and Estuaries Policy includes principles to prevent water quality degradation and to protect the beneficial uses of waters of enclosed bays and estuaries. The policy primarily applies to municipal wastewater and industrial process wastewater and includes quality requirements for waste discharges, discharge prohibitions, and a monitoring program. Per a 1995 amendment, the Policy includes discharges of treated groundwater from groundwater clean up projects. The Enclosed Bays and Estuaries Policy does not apply to waste from vessels, cooling water, or land runoff except as indicated in the policy for siltation and combined sewer flows.

The Enclosed Bays and Estuaries Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1995/rs1995_0084.pdf

5.2.7 Water Quality Control Policy for Guidance on Development of Regional Toxic Hot Spot Plans ("Guidance for Toxic Hot Spot Policy")

The Guidance for Toxic Hot Spot Policy includes guidance on the development of regional toxic hot spot cleanup plans. The Guidance for Toxic Hot Spot Policy contains a definition of a toxic hot spot, general ranking criteria, the mandatory contents of the cleanup plans, and issues to be considered by the State Water Board in the development of the Regional Consolidated Cleanup Plans. The policy applies to all enclosed bays, estuaries and coastal waters.

The Guidance for Toxic Hot Spot Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1998/rs98-090.shtml

5.2.8 Water Quality Control Policy for Addressing Impaired Waters: Regulatory Structure and Options ("Impaired Waters Policy")

The Impaired Waters Policy is intended to ensure that impaired surface waters of the state, which are waters that are not attaining water quality standards, are addressed in a timely and meaningful fashion. The policy includes principles for resolving impairments, including through the development and implementation of total maximum daily loads ("TMDLs"). The policy also describes the process for adopting TMDLs and a regulatory decision tree.

The Impaired Waters Policy can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/iw_policy.pdf

5.2.9 Policies and Procedures for Investigation and Cleanup and Abatement of Dischargers Under Water Code Section 13304 (Resolution 92-49)

Also known as State Water Board Resolution 92-49, this policy includes procedures that a Regional Water Board shall follow in requiring persons to investigate a discharge of

waste and to clean up the waste and abate the effects of a discharge or threat of a discharge subject to Water Code section 13304. This policy also identifies conditions under which a Regional Water Board may establish containment zones for specific groundwater units.

State Water Board Resolution 92-49 can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1996/rs96_079.pdf

5.2.10 Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List ("Listing Policy")

The Listing Policy describes the process by which the State Water Board and Regional Water Boards will comply with requirements of Clean Water Act section 303(d) to list as impaired those surface waters that do not achieve water quality standards. The policy includes listing factors, delisting factors, the process for assembling and evaluating readily available data and information, and the methodology for TMDL scheduling. The Listing Policy also includes guidance for interpreting and analyzing data and information as they are compared to water quality standards.

The Listing Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/020315_8_amendment_clean_version.pdf

5.2.11 Policy for Regulation of Discharges of Municipal Solid Waste ("Municipal Solid Waste Policy")

The Municipal Solid Waste Policy ensures compliance with the federal municipal solid waste regulations. The Municipal Solid Waste Policy includes requirements for the siting, construction, and monitoring of municipal solid waste landfills, with specific focus on preventing leachate and runoff from entering groundwater and surface waters.

The Municipal Solid Waste Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2005/rs2005-0058_rs93-62.pdf

5.2.12 Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program ("NPS Implementation and Enforcement Policy")

The NPS Implementation and Enforcement Policy explains how the Water Boards will use Water Code authorities to address pollution from diffuse sources like agricultural runoff and urban stormwater, providing a framework for identifying violations and implementing corrective actions to protect water quality. The policy describes the five key elements that a NPS control implementation program shall include and provides a bridge between the NPS program and the Water Board's Water Quality Enforcement Policy.

The NPS Implementation and Enforcement Policy can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/nps/docs/plans_policies/nps_iepolicy.pdf

5.2.13 Policy for Maintaining Instream Flows in Northern California Coastal Streams ("North Coast Instream Flow Policy")

The North Coast Instream Flow Policy includes principles and guidelines for maintaining instream flows for the protection of fishery resources, while minimizing water supply impacts on other beneficial uses of water, such as irrigation, municipal use, and domestic use. The North Coast Instream Flow Policy applies to the processing of water right applications, water right registrations and changes to existing water rights as well as related enforcement requirements in coastal streams in Marin County, Sonoma County, and portions of Napa, Mendocino, and Humboldt counties.

The North Coast Instream Flow Policy can be accessed through this link: https://www.waterboards.ca.gov/waterrights/water_issues/programs/instream_flows/docs/adopted_policy.pdf

5.2.14 Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling ("Once-Through Cooling Policy for Coastal and Estuarine Waters" or "OTC Policy")

The OTC Policy for Coastal and Estuarine Waters includes requirements for power plants that withdraw coastal and estuarine waters for cooling purposes to reduce harmful effects on marine life caused by operation of cooling water intake systems. The policy requires facilities to either implement closed-cycle cooling technologies or demonstrate equivalent environmental protection through alternative methods, with specific compliance schedules. The policy also includes immediate and interim requirements for facilities to minimize or offset marine life impingement and entrainment impacts until final compliance is achieved. These requirements serve to protect California's coastal ecosystems while maintaining electric grid reliability as facilities achieve compliance with the OTC Policy.

The OTC Policy can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/otc-policy-2023/otc-policy-2023.pdf

5.2.15 Water Quality Control Policy on the Use and Disposal of Inland Waters Used for Powerplant Cooling ("Once-Through Cooling Water Policy for Inland Waters")

The Once-Through Cooling Water Policy for Inland Waters applies to power plant cooling systems that draw from inland waters, such as rivers and lakes, to protect beneficial uses and keep the consumptive use of freshwater for powerplant cooling to that minimally essential for the welfare of the citizens of the state. The policy includes principles, discharge prohibitions, and implementation components.

The Once-Through Cooling Water Policy for Inland Waters can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1975/rs75_058.pdf

5.2.16 Pollutant Policy Document for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

The Pollutant Policy Document for the San Francisco Bay/Sacramento San Joaquin Delta Estuary contains a basis for regulatory efforts and policy guidance directed to the Regional Water Boards for the San Francisco Bay and Central Valley regions in updating portions of their basin plans. The policy identifies and characterizes pollutants that had the greatest potential biological significance to beneficial uses in the Bay-Delta in the late 1980s and includes pollutant sources and loadings, recommended pollutant policy actions, and a monitoring and assessment program.

The Pollutant Policy Document for the Bay-Delta Estuary can be accessed through this link: https://www.waterboards.ca.gov/plans_policies/docs/pollutant_policy/ppd.pdf

5.2.17 Water Quality Control Policy for Recycled Water ("Recycled Water Policy")

The Recycled Water Policy includes a comprehensive framework to support the use of recycled water from wastewater sources in California while protecting public health and the environment. The policy includes goals for expanding water recycling, streamlines permitting processes for recycled water projects, and provides guidance on addressing constituents of emerging concern in potable recycled water projects.

The Recycled Water Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2018/121118_7_final_amendment_oal.pdf

5.2.18 Policy on Supplemental Environmental Projects ("SEP Policy")

The SEP Policy includes a framework for the Water Boards to use in exercising their discretion to include supplemental environmental projects as appropriate in the settlement of administrative enforcement actions, thus directing resources toward activities that benefit water quality and environmental health in affected communities. A supplemental environmental project is an environmentally beneficial project that a person subject to an enforcement action voluntarily agrees to undertake in settlement of the action and to offset a portion of a civil penalty. The policy includes definitions, legal guidelines, categories of projects, types of projects that are not acceptable as supplemental environmental projects, project solicitation and selection guidance, and requirements for settlements and stipulated orders that include a supplemental environmental project.

The SEP Policy can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/enforcement/docs/seps/20180503_sep_policy_amd.pdf

5.2.19 Policy on the Disposal of Shredder Waste ("Shredder Waste Policy")

The Shredder Waste Policy includes minimum requirements for disposal of hazardous and non-hazardous waste resulting from shredding of automobile, appliance, and sheet metal at specific types of waste disposal facilities based on potential impacts to waterbodies.

The Shredder Waste Policy can be accessed through this link: https://waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1987/rs1987_0022.pdf

5.2.20 Sources of Drinking Water Policy

The Sources of Drinking Water Policy includes direction to the Regional Water Boards to designate surface waters and groundwaters of the state that are suitable or potentially suitable for municipal or domestic supply, with several exceptions, with the municipal and domestic supply ("MUN") beneficial use.

The Sources of Drinking Water Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2006/rs2006_0008_rev_rs88_63.pdf

5.2.21 Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California ("State Implementation Policy" or "SIP")

The State Implementation Policy includes procedures for permitting discharges of priority toxic pollutants to inland surface waters, enclosed bays, and estuaries. The policy serves as the implementation provisions for priority toxic pollutant criteria promulgated by the USEPA through the National Toxics Rule and the CTR, and for priority toxic pollutant objectives in basin plans. It describes the process for determining if effluent limitations are required, considerations for setting appropriate dilution credits, the process for calculating effluent limitations, the process for determining compliance schedules, and monitoring requirements to ensure consistent statewide application of Clean Water Act requirements.

The State Implementation Policy can be accessed through this link: https://www.waterboards.ca.gov/plans_policies/docs/2023/sip.pdf

5.2.22 State Policy for Water Quality Control

The State Policy for Water Quality Control states that protection of water quality of waters of the state requires implementation of water resources management programs that conform with 12 general principles. The policy also includes a program of

implementation that states that water quality control plans and waste discharge requirements shall conform to the policy.

The State Policy for Water Quality Control can be accessed through this link: https://www.waterboards.ca.gov/rwqcb3/publications_forms/publications/basin_plan/appendices/appendixa_1.pdf

5.2.23 State Policy for Water Quality Control: Toxicity Provisions ("Toxicity Provisions")

The Toxicity Provisions include statewide numeric water quality objectives for acute and chronic toxicity to aquatic life, a program of implementation to control toxicity, a consistent yet flexible framework for monitoring toxicity, and a statewide statistical approach to analyze test results. The Provisions are also described as a water quality control plan amendment in section 5.1 above.

The Toxicity Provisions can be accessed through this link: https://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/2021/2021-state-policy-toxicity-provisions.pdf

5.2.24 Low-Threat Underground Storage Tank Closure Policy ("UST Low-Threat Closure Policy")

The UST Low-Threat Closure Policy includes consistent statewide criteria for closing petroleum underground storage tank sites that pose a low threat to human health, safety, and the environment, streamlining the closure and cleanup process to increase process efficiency and preserve limited resources for mitigation of releases. Sites that meet the criteria do not require further corrective action.

The UST Low-Threat Closure Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

5.2.25 Underground Storage Tank Pilot Program Policy ("UST Pilot Program Policy")

The UST Pilot Program Policy includes a policy for funding oversight of remedial action at underground storage tank sites. It includes guidelines for selecting local agencies for pilot projects, model contract language, petitions for review, cost recovery procedures, and evaluation procedures for agreements between the State Water Board and local agencies. This Policy has largely been superseded by subsequent legislative and regulatory reforms, including Health & Safety Code, division 20, section 25297.01 (establishing the Local Oversight Program).

The UST Pilot Program Policy can be accessed through this link: https://waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1988/rs1988_0023.pdf

5.2.26 Policy with Respect to Water Reclamation in California ("Water Reclamation Policy")

The Water Reclamation Policy includes principles for the reuse of treated wastewater through reclamation projects. The policy also served to adopt planning and guidance documents, to support legislative changes, and to direct the establishment of an advisory committee.

The Water Reclamation Policy can be accessed through this link: https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/1977/rs77_001.pdf

6. Work Plan for State Plans and Policies

This section serves as a work plan for State Water Board efforts to undertake projects for state plans and policies and other water quality standards, and consideration of 304(a) recommended criteria. The work plan for state plans and policies and other water quality standards is summarized in Appendix A.

As stated above, a project is often a State Water Board proceeding, occurring separately from this Review of State Plans and Policies, that is focused on specific plans, policies, or standards and is generally expected to result in a rulemaking. In some instances, a project is an effort that may inform a potential future rulemaking project or implement an existing plan or policy.

Current projects are projects that are already substantially underway and that the State Water Board has directed staff to continue to work on as of the date of this Staff Report and Workplan. This Work Plan provides focuses on current projects because they have been more thoroughly scoped or more information is available.

Projects for future consideration are projects that are not substantially underway as of the date of this Staff Report and Workplan. Although some preliminary efforts for projects for future consideration are occurring or may occur in the next three years, most of these projects are unlikely to be chartered in the next three years. As State Water Board priorities and resources allow, these future projects will be initiated, and more information will be provided about the scope of the projects in project-specific updates and future reviews. The State Water Board may reevaluate and reprioritize projects, including those identified in previous reviews and new projects not identified in this Staff Report and Work Plan, as scientific information or regulatory approaches evolve or as priorities and resources allow.

Table 1 provides a summary of whether a current project, a project for future consideration, or no project is identified in the Work Plan for each state plan and policy. This Work Plan does not identify current projects or projects for future consideration for all state plans and policies. A state plan or policy may not have a current project or project for future consideration identified for various reasons, such as when the purpose

of the state plan or policy is being met without the need for revision or where there is no information supporting a potential new or revised state plan or policy.

Table 1: State Plans and Policies Work Plan Summary

Plan or Policy	Current Project	Future Project	No Projects Identified
Antidegradation Policy		✓	
Bay-Delta Plan	✓		
Cannabis Cultivation Policy		✓	
Compliance Schedule Policy		✓	
Consolidated Cleanup Plan		✓	
Dredge or Fill Procedures		✓	
Enclosed Bays and Estuaries Plan		✓	
Enclosed Bays and Estuaries Policy			✓
Guidance for Toxic Hot Spot Policy		✓	
Impaired Waters Policy		✓	
Investigation and Cleanup and Abatement of Dischargers under Water Code 13304		✓	
ISWEBE Plan	✓	✓	
Listing Policy		✓	
Municipal Solid Waste Policy			✓
NPS Implementation and Enforcement Policy		✓	
North Coast Instream Flow Policy			✓
Ocean Plan	✓	✓	
OTC Policy for Coastal and Estuarine Waters		✓	
OTC Policy for Inland Waters		✓	
Policy to Support Development of Objectives for Copper and Zinc	✓		
Pollutant Policy Document for the Bay-Delta		✓	
Recycled Water Policy	✓		
Shredder Waste Policy		✓	
Sources of Drinking Water Policy			✓
State Implementation Policy		✓	
State Policy for Water Quality Control		✓	
State Policy for Water Quality Control: Toxicity Provisions		✓	
Supplemental Environmental Projects Policy		✓	
Thermal Plan			✓
Tribal Beneficial Use Designations and Supporting Efforts	✓		
Urban and Industrial Stormwater Infiltration Policy	✓		
UST Low-Threat Closure Policy		✓	
UST Pilot Program Policy		✓	
Water Reclamation Policy		✓	

Plan or Policy	Current Project	Future Project	No Projects Identified
Water Rights Enforcement Policy	✓		

6.1 Current Projects

Current projects are projects that are already substantially underway and that the State Water Board has directed staff to continue to work on as of the date of this Staff Report and Workplan.

6.1.1 Bay-Delta Plan: Update the Bay-Delta Plan for the Reasonable Protection of Fish and Wildlife

Managed by the Division of Water Rights.

This project involves developing amendments to the Bay-Delta Plan to establish flow-dependent water quality objectives for the reasonable protection of fish and wildlife in the Bay-Delta and upstream tributaries and related implementation measures. The State Water Board is also in the process of considering the addition of Tribal beneficial uses to the Bay-Delta Plan. The Bay-Delta watershed is a critical resource to the state – it is one of the most important ecosystems, and the hub of the state's water supply network, integral to the culture and way of life of Tribes, an important recreational and commercial waterway, and the home to numerous small and large communities. As one of the largest tidal estuaries on the west coast of the Americas, it provides habitat to a vast array of aquatic, terrestrial, and avian wildlife in the Delta, San Francisco Bay, and nearshore ocean, as well as diverse species assemblages upstream of the watershed.

This project includes potential updates to inflows to the Sacramento River and its tributaries and the Delta eastside tributaries (including the Calaveras, Cosumnes, and Mokelumne rivers), cold water habitat protections in these watersheds, Delta outflows, interior Delta flows, and other possible changes. This project is ongoing. Revised draft Sacramento/Delta updates to the Bay-Delta Plan were released for public comment in December 2025.

This project is a priority due to the severity of impacts to the Bay-Delta ecosystem and long-standing declines of several native fish species, including those that are listed as threatened or endangered under the State and Federal Endangered Species Acts and non-listed culturally, recreationally, and commercially important species like fall-run Chinook salmon.

More information about this project can be found at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/comp_review.html.

6.1.2 Bay-Delta Plan: Implement the Bay-Delta Plan's Lower San Joaquin River Flow and Southern Delta Salinity Objectives through Regulations

Managed by the Division of Water Rights.

In 2018, the State Water Board adopted amendments to the Bay-Delta Plan focusing on lower San Joaquin River watershed flow objectives for the protection of fish and wildlife beneficial uses, southern Delta salinity objectives for the protection of agricultural beneficial uses, and an associated program of implementation. The State Water Board is in the process of developing regulations to require actions by water right holders and claimants to implement the 2018 amendments to the Bay-Delta Plan in coordination with additional updates to the Bay-Delta Plan.

This project is a priority because it implements the lower San Joaquin River flow and southern Delta salinity water quality objectives that were adopted in December 2018.

More information about this project can be found at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/implementation-activities-lower-san-joaquin-river.html and https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/implementation-activities-southern-delta-salinity.html

6.1.3 Bay-Delta Plan: Evaluate Whether to Incorporate the Tuolumne River Voluntary Agreement

Managed by the Division of Water Rights.

The Bay-Delta Plan, as amended in 2018, provides pathways for voluntary agreements to implement the lower San Joaquin River flow portions of the Bay-Delta Plan. In November 2022, the State Water Board received a memorandum of understanding for a proposed Tuolumne River Voluntary Agreement consisting of flow and habitat measures to be considered as implementation of the Lower San Joaquin River flow objectives for the Tuolumne River. The proposed Tuolumne River Voluntary Agreement does not fully conform to the current provisions of the Bay-Delta Plan. To incorporate the proposed Tuolumne River Voluntary Agreement, the State Water Board will need to consider updates to the Bay-Delta Plan. On April 11, 2023, the State Water Board issued a Notice of Preparation for this project and on November 5, 2025, it held a public workshop on the draft scientific basis report for the voluntary agreement. The draft scientific basis report for the proposed Tuolumne River Voluntary Agreement was submitted to an independent scientific peer review pursuant to the requirements of California Public Health and Safety Code section 57004. Scientific peer review responses are expected in Summer 2026.

The Tuolumne River is in the lower San Joaquin River watershed. The Bay-Delta Plan requires improved instream flows in the watershed in February through June, which are critical months for protecting migrating fish on the Stanislaus, Tuolumne, and Merced rivers. The Bay-Delta Plan also recognizes that other “non-flow” factors, such as habitat loss, affect survival rates of fish and other species.

This project is a priority because it would provide an opportunity for the State Water Board to consider implementing a voluntary agreement on the Tuolumne River that includes flow and physical habitat features that could occur more quickly than implementation of the flow objectives through a regulation. Additionally, implementing a

voluntary agreement could contribute to Delta outflow changes proposed in the Sacramento/Delta update to the Bay-Delta Plan.

More information about this project can be found at: https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/

6.1.4 ISWEBE Plan: Establish Harmful Algal Blooms and Cyanotoxins Water Quality Objectives and a Program of Implementation

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

The primary objectives of this project are to establish numeric water quality objectives for several cyanotoxins for the protection of municipal and domestic water supply and water contact recreation beneficial uses; establish a narrative water quality objective for harmful algal blooms (HABs); and establish a program of implementation to achieve these objectives and reduce the occurrence of HABs. This project applies to inland waters, estuaries, lagoons, and enclosed bays. This project includes consideration of the 304(a) recommended criteria for microcystin and cylindrospermopsin.

California faces significant water quality challenges from HABs and the cyanotoxins they produce. Since 2021, reports of HABs have increased by approximately 200 percent. HABs can result from the proliferation of algae or cyanobacteria in water and produce cyanotoxins, form dense mats, deplete oxygen concentrations, and generate unpleasant tastes and odors. HABs can harm people, pets, livestock, fish, shellfish, wildlife, birds, and the environment.

The project is a priority because of the significant impacts that HABs have on drinking water, recreation, and other human activities in water and the threat they pose to aquatic ecosystems, wildlife, pets, and domestic animals.

More information about this project can be found at: https://www.waterboards.ca.gov/water_issues/programs/habs-objectives/index.html.

6.1.5 Ocean Plan: Improve Seawater Desalination Provisions

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section I.

This project involves developing potential amendments to the Ocean Plan to improve seawater desalination project planning, permitting, and compliance. Potential amendments may address the following subject areas or requirements, in addition to other appropriate subjects that may be identified during the rulemaking process:

- Identified need and sizing of facilities,
- sensitive habitat protection,
- compensatory mitigation,
- racial equity and environmental justice,
- subsurface intake feasibility assessments,

- pilot projects,
- seawater intrusion, and
- volumetric annual reporting.

Significant technical information and interested party feedback have been provided to the Water Boards on the current challenges with permitting, opportunities for clarity, and ensuring environmental justice statutory requirements and considerations are met. The amendments are proposed in response to:

- The State Water Board's prioritization of the project during the 2019 Ocean Plan Triennial Review.
- Directives in California's Water Supply Strategy (August 2022) "to streamline permits that meet the recommended siting and design standards for projects located in the identified priority areas"[8] and the recommendations in the corresponding interagency Seawater Desalination Siting and Streamlining Report to Expedite Permitting[9] submitted to the Governor's Office in December 2023.
- Identified clarity and streamlining revisions proposed by Water Board staff based on first-hand implementation experience.
- Significant feedback from the public, interested parties, governmental agencies, and Tribes based on Ocean Plan implementation experience, agency expertise, and industry knowledge.

This project is a priority because it addresses recommendations made in the 2019 Ocean Plan Triennial Review to streamline and clarify permitting consistent with statewide directives, and input from interested parties.

More information about this project can be found at: https://www.waterboards.ca.gov/water_issues/programs/ocean/desalination/.

6.1.6 Ocean Plan: Address Impacts of Anthropogenic Nutrients on Coastal Ocean Acidification, Hypoxia, and Harmful Algal Blooms

Managed by the Division of Water Quality Sustainable Water Plans and Policies Section I.

This project involves developing a potential amendment to the Ocean Plan to establish water quality objectives and a program of implementation to address the effects of anthropogenic sources of nutrients on California's ocean waters and ecosystems, including coastal ocean acidification, hypoxia, and harmful algal blooms.

Excessive anthropogenic nutrients can cause eutrophication, which exacerbates global issues of ocean acidification, hypoxia, and harmful algal blooms at a regional scale. Research and modeling conducted by the Southern California Coastal Water Research Project, the University of California, Los Angeles, and other institutions indicate that anthropogenic point source discharges (i.e., wastewater) contribute to the occurrence,

[8] Water Supply Strategy
[9] Seawater Desalination Siting and Streamlining Report to Expedite Permitting

intensity, and duration of eutrophication within the Southern California Bight. Addressing impacts of nutrient pollution may benefit California's marine life and habitat (e.g., by reducing marine mammal strandings, bird mortality, and seasonal habitat compression).

This project is a priority because of the severity of impacts to marine life and habitat from anthropogenic nutrients, the need for a consistent objective to quantify or qualify ocean acidification, oxygen and/or toxic algae, and the high likelihood of substantial improvements to marine life through the program of implementation.

Information about this project will be published in the future.

6.1.7 Policy to Support the Development of Site-Specific and Permit-Specific Water Quality Objectives for Copper and Zinc

This project is managed by the Division of Water Quality, Sustainable Plans and Policies Section II.

This project is to establish a new water quality control policy to support the development of site-specific and permit-specific water quality objectives for copper and zinc in low salinity waters of California using the Biotic Ligand Model. The policy scope includes protocols, procedures, and a plan of implementation. This project will help ensure that new site-specific and permit-specific objectives are based on recent scientific understanding of bioavailability and that protocols and procedures are consistently applied. This project is a priority because of the possibility that multiple waterbodies have been incorrectly determined to be impaired based on water quality standards for copper and zinc that were not based on the latest science.

More information about this project can be found at:
https://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/projects/site-specific-water-quality-objectives-for-copper-zinc.html

6.1.8 Recycled Water Policy: Revise the Recycled Water Goals and Constituents of Emerging Concern Monitoring Requirements

Managed by the Division of Water Quality, Sustainable Plans and Policies Section II.

This project is to begin development of an amendment to the Recycled Water Policy to update the statewide goals for recycled water production and constituents of emerging concern ("CECs") monitoring requirements for potable recycled water projects.

The current goals in the Recycled Water Policy are based on historical legislative recycled water goals that are outdated. In 2018, the State Water Board amended the Recycled Water Policy to include new reporting requirements for all California wastewater and recycled water facilities to annually submit monthly volumes of influent, effluent, and recycled water in the Volumetric Annual Report. Staff implemented the Volumetric Annual Report in applicable permits and have collected more than five years of volumetric data, which provide valuable insight into wastewater potentially available for recycling. Revisions to the recycled water goals would be based on this recent

volumetric data and incorporate input from the public, interested parties, governmental agencies, and Tribes.

In addition, the Recycled Water Policy requires potable recycled water projects to monitor for CECs potentially present in recycled water. Since the Recycled Water Policy was amended in 2018, the State Water Board developed a CEC Program as part of the Water Supply Strategy that builds on previous projects and is focused on addressing CECs proactively through a coordinated approach with partner agencies, analytical services, academic institutions, and other Water Board programs. There is a need to harmonize the CEC monitoring requirements in the Recycled Water Policy with the new CEC Program and the requirements in California Code of Regulations, title 22, chapter 3: Water Recycling Criteria.

This project is a priority because of the importance of recycled water as a growing water supply in an era of increasing climate uncertainty. There is a need to update the Recycled Water Policy to continue incentivizing recycled water projects, reducing barriers to their implementation, and protecting water quality and public health.

More information about this project can be found at:
https://www.waterboards.ca.gov/water_issues/programs/recycled_water/policy.html

6.1.9 Tribal Beneficial Use Designations and Supporting Efforts

Managed by the Office of Public Engagement, Equity, and Tribal Affairs.

In 2017, the State Water Board adopted definitions for Tribal Tradition and Culture ("CUL") and Tribal Subsistence Fishing ("T-SUB") beneficial uses into the ISWEBE Plan. This project involves State Water Board staff efforts to implement the beneficial use definitions by providing guidance for designating waters with uses in water quality control plans (most designations will be done by Regional Water Boards as basin plan amendments) and facilitating coordination with Tribes.

This project is a priority because furthering the restoration and protection of Tribal beneficial uses is our shared responsibility and will further support efforts to honor Tribal sovereignty, culture, and communities.

More information about Tribal beneficial uses can be found at:
https://waterboards.ca.gov/Tribal_affairs/beneficial_uses.html.

More information about consultation and engagement with Tribes on the Bay-Delta Plan can be found at:
https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/Tribal_coordination.html

6.1.10 Urban and Industrial Stormwater Infiltration Policy

Managed by the Division of Water Quality, Surface Water Permitting Section.

This project involves the development of a water quality control policy to regulate urban and industrial stormwater infiltration systems, with the goal of protecting groundwater quality and beneficial uses while supporting California's goals for stormwater capture and use. The goal of the project is to provide a clear, consistent statewide framework to guide how infiltration systems are sited, designed, and managed, helping to reduce uncertainty for permittees and improve groundwater protection.

In developing the draft policy, the State Water Board performed extensive outreach with municipalities, state and local agencies, groundwater and stormwater experts, industry representatives, environmental organizations, and other interested parties. Input from this outreach helped shape the risk-based structure of the policy and its minimum statewide standards. The State Water Board anticipates releasing the draft policy for public comment in fall 2026.

This project is a priority because stormwater management projects that prioritize infiltration are increasingly important strategies for climate resilience and local water supply, and a statewide policy is needed to ensure these projects are protective of drinking water aquifers and other beneficial uses.

More information about this project can be found at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/projects/urban_stormwater_infiltration_policy.html.

6.1.11 Water Rights Enforcement Policy

Managed by the Office of Enforcement and the Division of Water Rights.

This project involves the development of a water quality control policy with a framework for strong, fair, transparent, and efficient enforcement of the state's water rights priority system. The State Water Board anticipates releasing the draft policy for public comment in 2027.

This project is a priority because it will improve the Water Board's ability to prioritize limited resources to achieve meaningful compliance. It will also provide a consistent approach to liability assessment.

More information about this project will be published in the future.

6.2 Projects for Future Consideration

Projects for future consideration are projects that are not substantially underway as of the date of this Staff Report and Workplan. Although some preliminary efforts for projects for future consideration are occurring or may occur in the next three years, most of these projects are unlikely to be chartered in the next three years.

6.2.1 Antidegradation Policy

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

A. Add guidance on determining whether a discharge or potential discharge to a high-quality water is subject to the best practicable treatment or control to assure pollution or nuisance will not occur and the highest water quality consistent with the maximum benefit to the people of the state will be maintained.

6.2.2 Cannabis Cultivation Policy

Managed by the Division of Water Rights, Cannabis Enforcement Section.

A. Amend Attachment A of the Cannabis Cultivation Policy to account for changes in cannabis cultivation practices, including potential revision of water diversion, water use, waste discharge requirements, and assessment of tier and risk designations.

6.2.3 Compliance Schedule Policy

Managed by the Division of Water Quality, Surface Water Permitting Section.

A. Amend the Compliance Schedule Policy to allow for more time to comply with new limitations or new interpretations of limits in appropriate circumstances.

6.2.4 Consolidated Cleanup Plan

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II.

A. Evaluate the applicability of this policy and consider rescinding, given that the Legislature has not authorized any funding to support the program since 1999, and as a result, this policy has not been actively implemented since the early 2000s.

6.2.5 Dredge or Fill Procedures: Evaluating the Need for Future Development of Delineation Procedures for Non-wetland Waters

Managed by the Division of Water Quality, Watersheds and Wetlands Section.

A. This project supports the development of a consistent science-based statewide approach to delineating non-wetland waters. This project involves evaluating existing technical guidance and recommending changes needed to enhance the Water Board's capacity to delineate non-wetland waters (e.g., rivers, streams). The project will compile existing tools and methods, document gaps and limitations, and produce recommendations in the form of a summary document.

6.2.6 Enclosed Bays and Estuaries Plan

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II.

A. Amend the sediment quality objectives to recognize changes in taxonomic nomenclature.
B. Add monitoring approaches.
C. Add requirements for sediment toxicity testing using *Neanthes arenaceodentata*, a marine worm.
D. Add the multivariate AZTI Marine Biotic Index to the suite of assessment tools. (AZTI is a European private foundation which developed the index.)
E. Develop and add a prescriptive assessment framework for the protection of aquatic-dependent wildlife and resident finfish.
F. Develop guidance that describes how to address contaminated sediment sites that exceed sediment quality objectives. Incorporate useful requirements, guidance, or direction from the Consolidated Clean-up Plan and the Guidance for Toxic Hot Spot Policy.

6.2.7 Guidance for Toxic Hot Spot Policy

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II.

A. Evaluate the applicability of this policy and consider rescinding, given that the Legislature has not authorized any funding to support the program since 1999, and as a result, this policy has not been actively implemented since the early 2000s.

6.2.8 Impaired Waters Policy

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

A. Add a description of how a TMDL and a TMDL's regulatory requirements apply after a waterbody is delisted from the Clean Water Act section 303(d) list.
B. Add a description of the process for amending or rescinding a TMDL.

6.2.9 Investigation and Cleanup and Abatement of Dischargers under Water Code 13304 (Resolution 92-49)

Managed by the Division of Water Quality, Underground Storage Tanks and Site Cleanup Programs Section.

A. Amend Resolution 92-49 to update references, improve readability, and provide clarifications.
B. Add language requiring sea level rise and groundwater vulnerability assessments if a site is located within projected sea level rise or groundwater vulnerability areas.
C. Update public notification requirements and review turnaround times for workplans and proposed closures.

6.2.10 ISWEBE Plan

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

A. Add or revise water quality objectives for human health and aquatic life to be consistent with new or revised 304(a) recommended criteria. See Section 7 for an initial prioritization of parameters impacting human health and aquatic life.
B. Add a human waste parameter, such as the human DNA marker HF 183, to the bacteria water quality objectives for the protection of water contact recreation.
C. Amend the 1 part per thousand salinity threshold for application of *Escherichia coli* or enterococci bacteria objectives to inland saline waters.
D. Amend the Mercury Provisions' program of implementation for storm water discharges (Section IV.D.3) to limit implementation of best management practices to waters where storm water discharges are shown to be causing or contributing to an exceedance of a mercury water quality objective.
E. Develop laboratory test methods and alpha values for aquatic toxicity test species to expand the number of species for which the test of significant toxicity could be applied, then amend the Aquatic Toxicity Provisions' Table 1: Toxicity Test Methods, Regulatory Management Decision, β Error, and α Error. This project applies to the Toxicity Provisions that are both a state water quality control plan and a state policy for water quality control.
F. Add water quality objectives for cadmium to protect aquatic life uses, including threatened and endangered salmonid species. The objective would supersede existing cadmium criteria in the California Toxics Rule.
G. Add water quality objectives for total residual chlorine and chlorine-produced oxidants and implementation procedures for NPDES permitting.
H. Evaluate potential amendments to the Trash Provisions that remove requirements to use the rational method for calculating runoff and exempt certain land uses or situations.

6.2.11 Listing Policy

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

A. Update listing and delisting factors and facilitate a more efficient methodology for developing an accurate and useful Clean Water Act section 303(d) list of impaired waters.

6.2.12 NPS Implementation and Enforcement Policy

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II.

A. Evaluate whether an amendment is needed to ensure consistency with administrative tools used to address nonpoint source pollution.

6.2.13 Ocean Plan

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section I.

A. Add Tribal Tradition and Culture (“CUL”) and Tribal Subsistence Fishing (“T-SUB”) beneficial uses to the list of beneficial uses of ocean waters that shall be protected. Include definitions that are consistent with the definitions in the ISWEBE Plan. This project does not include designation of beneficial uses to individual segments of the Pacific Ocean.
B. Revise the shellfish harvesting beneficial use definition to distinguish between recreational, commercial, or Tribal types of harvesting.
C. Amend the bacterial shellfish harvesting water quality objectives to more reasonably protect shellfish harvesting beneficial uses, including uses specifically for recreational, commercial, or Tribal types of harvesting.
D. Amend the fecal coliform water quality objective for the protection of water contact recreation to reflect California-specific epidemiological data and to use the same time period for calculating the geometric mean as is used for enterococci.
E. Gather information regarding the Areas of Special Biological Significance General Exception for stormwater and non-point source discharges of waste to consider if revisions or additional requirements are necessary to ensure natural water quality is maintained and beneficial uses are protected within areas of special biological significance.
F. Amend the water quality objectives for metals to be consistent with federal standards by investigating the relationship between total recoverable and total dissolved metals.
G. Amend the water quality objectives for tetrachlorodibenzo-p-dioxin (TCDD) and TCDD-equivalents in Appendix I of the Ocean Plan to be consistent with the toxicity equivalence factors in the California Toxics Rule.
H. Add or revise water quality objectives for human health and aquatic life to be consistent with new or revised 304(a) recommended criteria. See Section 7 for an initial prioritization of parameters impacting human health and aquatic life.
I. Add sediment quality objectives and a program of implementation to protect benthic communities, human health, and marine wildlife that may be affected via food web transfer.
J. Develop a water quality objective and program of implementation to address microplastic and microfiber pollution.
K. Amend the aquatic toxicity provisions to replace the use of “toxicity units” with the Test of Significant Toxicity statistical approach and revise implementation requirements to be more consistent with the Toxicity Provisions established for inland waters.

L. Amend the suspended solids effluent limitations in Table 4 to be consistent with USEPA secondary wastewater treatment requirements.

M. Add direction for monitoring CECs in ocean waters.

N. Amend provisions for the control of vessel incidental discharges and invasive species.

O. Amend the definition of waste to add the potential for waste discharges.

P. Add language that addresses natural sources of constituents that enter ocean waters of California.

Q. Revise or rescind the Exception to the Ocean Plan for the San Francisco Storm Water and Wastewater Discharges.

R. Add water quality objectives for total residual chlorine and chlorine-produced oxidants and implementation procedures for NPDES permitting.

S. Evaluate potential amendments to the Trash Provisions that remove requirements to use the rational method for calculating runoff and exempt certain land uses or situations.

T. Amend portions of the Ocean Plan to update formatting, style, and consistency.

6.2.14 Once-Through Cooling Water Policy for Coastal & Estuarine Waters

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section I.

A. Evaluate whether an amendment to the policy is needed to ensure consistency with the final Clean Water Act section 316(b) rule as issued in 2014.

B. Evaluate whether updates are needed to the Final 2010 Substitute Environmental Document.

6.2.15 Once-Through Cooling Water Policy for Inland Waters

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

A. Evaluate the applicability of this policy and consider rescinding or revising. To the State Water Board's knowledge, no power plants currently use inland waters for once-through cooling.

6.2.16 Pollutant Policy Document for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Managed by the San Francisco Bay and Central Valley Regional Water Quality Control Boards.

A. Evaluate the applicability of this policy, including whether it currently informs the Regional Water Boards' work, and consider rescinding in coordination with the San Francisco Bay Regional Water Quality Control Board and the Central Valley Regional Water Quality Control Board.

6.2.17 Shredder Waste Policy

A. Evaluate the applicability of this policy and consider rescinding.

6.2.18 State Implementation Policy

Managed by the Division of Water Quality, Surface Water Permitting Section.

A. Amend this policy to clarify data needs when conducting a reasonable potential analysis.
B. Revise the laboratory analytical method minimum levels, including Appendix 4 of the State Implementation Policy, and require the use of most sensitive analytical method.
C. Add a requirement to evaluate whether the receiving water exceeds water quality standards based on available receiving water data, even if not listed as impaired under CWA section 303(d).
D. Clarify the hardness dependent metal criteria, such as the selection of appropriate hardness levels and circumstances for their use.
E. Evaluate measures for compliance with other state policies and requirements governing the human right to water, Tribal consultation, racial equity, and community outreach.
F. Remove Section 4, Toxicity Control Provisions, as the section was superseded by the State Policy for Water Quality Control: Aquatic Toxicity Provisions. This would be an editorial, non-regulatory amendment.

6.2.19 State Policy for Water Quality Control

Managed by the Division of Water Quality, Water Quality Standards and Assessment Section.

A. Evaluate the applicability of this policy and consider rescinding.

6.2.20 Supplemental Environmental Projects Policy

Managed by the Division of Water Quality, Underground Storage Tanks and Site Cleanup Programs Section.

A. Improve project tracking and reporting in accordance with the existing policy.
B. Consider whether to amend this policy to extend the period for completion of projects from 36 months to some longer period.
C. Evaluate measures for compliance with other state policies and requirements governing the human right to water, Tribal consultation, racial equity, and community outreach.

6.2.21 UST Low-Threat Closure Policy

Managed by the Division of Water Quality, Underground Storage Tanks and Site Cleanup Programs Section.

A. Amend the UST Low-Threat Closure Policy to update references, improve readability, and provide clarifications.
B. Add language requiring sea level rise and groundwater vulnerability assessments if a site is located within a projected sea level rise or groundwater vulnerability areas.

6.2.22 UST Pilot Program Policy

Managed by the Division of Water Quality, Underground Storage Tanks and Site Cleanup Programs Section.

A. Evaluate the applicability of this policy and consider rescinding.

6.2.23 Water Reclamation Policy

Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II.

A. Evaluate the applicability of this policy and consider rescinding.

7. Review of 304(a) Recommended Criteria

This section describes the State Water Board's review of USEPA's 304(a) recommended criteria. The 304(a) recommended criteria provide guidance to the states regarding acceptable levels of water quality parameters[10] in water to protect human health and aquatic life that can be used to establish state water quality standards and help manage pollutant discharges into waterways. USEPA has not promulgated the 304(a) recommended criteria as water quality standards. As explained previously, states may adopt the 304(a) recommended criteria into their water quality standards, use them as guidance in developing their own water quality standards, or adopt other water quality standards based on sound scientific rationale. As part of a Clean Water Act triennial review, a state considers 304(a) recommended criteria, "the discharge or presence of which in the affected waters could reasonably be expected to interfere with those designated uses adopted by the State, as necessary to support such designated uses." (33 U.S.C. § 1313(c)(2)(B).) If a state does not adopt new or revised water quality standards for parameters for which USEPA has published new or updated 304(a) recommended criteria, then the state must provide an explanation when it submits the results of its review to USEPA. (40 C.F.R. § 131.20(a).)

[10] A water quality parameter is a chemical, physical, or biological metric used to assess water quality. A parameter may be for a toxic pollutant, a non-toxic pollutant, or a non-pollutant measurement of water quality.

The State Water Board's review focuses on protection of water quality statewide. As used in this Staff Report and Work Plan, "water quality standards" includes water quality standards adopted by the State Water Board and approved by USEPA and other federally promulgated water quality standards that are applicable throughout California unless the context indicates otherwise.

The 304(a) recommended criteria and water quality standards were compiled and added to two tables which display and compare the criteria and standards, hereinafter known as the "Comparison Tables," which are available as two separate tabs in the Microsoft Excel file at the following link: https://www.waterboards.ca.gov/plans_policies/docs/2026/rspp-comp-tables.xlsx

The Comparison Tables allow an assessment of the variations for each of the 304(a) recommended criteria so that the State Water Board and the public can ascertain whether a currently effective statewide water quality standard exists for each parameter and, if so, which is more stringent. To understand the differences between the 304(a) recommended criteria and the currently effective water quality standards for the same parameters, staff analyzed the available information for waterbody conditions to determine whether additional waterbodies would be considered impaired if the State Water Board adopted new or revised statewide water quality standards equal to the 304(a) recommended criteria. This determination is based on the presence and concentration of a parameter in a waterbody. Where waterbody presence and concentration data for a parameter were unavailable in the waterbody but discharge data from NPDES permitted facilities were available, State Water Board staff analyzed the discharge data to determine whether the measured value of a parameter in the discharge might reasonably be expected to interfere with beneficial uses. This potential interference is based on whether the discharge of that parameter would exceed the more stringent 304(a) recommended criteria compared to the effective statewide water quality standard for that parameter. While the more stringent 304(a) recommended criteria could be assumed to be more protective, without adequate data to show presence and concentration of the parameters in the receiving waterbodies, we cannot conclude that it is reasonably expected that beneficial uses are being interfered with such that standards updates are appropriate.

Additionally, staff identified one current project and two projects for future consideration to adopt new or revised water quality objectives based on the comparison of the 304(a) recommended criteria and corresponding water quality standards for the same parameters. Finally, staff explains why certain new or revised criteria are not identified as a current project or a project for future consideration.

The compilation, comparison, and analysis of 304(a) recommended criteria and water quality standards focuses on fresh waters and ocean waters. Criteria and standards for estuaries, coastal lagoons, enclosed bays, and inland saline waters are excluded because their variable water quality conditions or unique nature makes them better suited for a waterbody-specific level of consideration and analysis that is more appropriately undertaken by the applicable Regional Water Board.

The Water Boards provide comprehensive water quality protection for California's waters. The Regional Water Boards collectively address certain parameters for which USEPA has published 304(a) recommended criteria in their individual basin plans, thus effectively providing statewide water quality protection where the State Water Board has not adopted the 304(a) recommended criterion for a specific pollutant on a statewide basis. For example, eight of the nine Regional Water Boards have adopted basin plans that incorporate certain drinking water maximum contaminant levels as water quality objectives for certain parameters for which USEPA has published 304(a) recommended criteria, so these water quality objectives are being treated as currently effective statewide water quality standards for the purposes of the comparison. Thus, water quality standards and water quality protections are developed and implemented statewide through the coordinated and collective efforts of the Water Boards and not just through the State Water Board's individual actions.

7.1 Compilation of Criteria and Standards into the Comparison Tables

This section describes the sources of information used and steps taken to create the two Comparison Tables, which display and compare the 304(a) recommended criteria and the currently effective statewide water quality standards for the same parameters. One table applies to fresh waters and includes 162 parameters. One table applies to ocean waters and includes 140 parameters.

The 304(a) recommended criteria were obtained from USEPA's website.[11] To more easily compare related parameters for beneficial uses, the 304(a) recommended criteria were grouped by related beneficial uses.

For fresh waters, the 304(a) recommended criteria were placed into groups as follows:

- 304(a) Recommended Recreational Criteria were grouped to consider the REC-1 beneficial use.
- 304(a) Recommended Human Health Criteria for Consumption Water + Organism were grouped to consider the MUN beneficial use for human health impacts.
- 304(a) Recommended Organoleptic Criteria were grouped to consider the MUN beneficial use for taste and odor impacts.
- 304(a) Recommended Human Health Criteria for Consumption of Organism Only were grouped to consider the Commercial and Sport Fishing ("COMM") beneficial use.
- 304(a) Recommended Aquatic Life Criteria for Freshwater Maximum (Acute) were grouped to consider the Cold Freshwater Habitat ("COLD") and Warm Freshwater Habitat ("WARM") beneficial uses for acute impacts.

[11] USEPA "National Recommended Water Quality Criteria Tables:" National Recommended Water Quality Criteria Tables | US EPA (last visited on May 29, 2026).

- 304(a) Recommended Aquatic Life Criteria for Freshwater Continuous (Chronic) were grouped to consider the COLD and WARM beneficial uses for chronic impacts.

For ocean waters, 304(a) recommended criteria were placed into groups as follows:

- 304(a) Recommended Recreational Criteria were grouped to consider REC-1 beneficial use.
- 304(a) Recommended Human Health Criteria for Consumption of Organism Only were grouped to consider the COMM beneficial use.
- 304(a) Recommended Aquatic Life Criteria for Saltwater Maximum (Acute) were grouped to consider the Marine Habitat (MAR) beneficial use for acute impacts.
- 304(a) Recommended Aquatic Life Criteria for Saltwater Continuous (Chronic) were grouped to consider the MAR beneficial use for chronic impacts.

The currently effective water quality standards were obtained for each parameter with a 304(a) recommended criterion. For fresh waters, standards were obtained from the ISWEBE Plan, the CTR, the NTR, the Federal Register, and the California Code of Regulations.[12] For ocean waters, standards were obtained from the Ocean Plan and the CTR.

The standards from the National Toxics Rule that are deemed applicable to statewide waters are those referred to in the Water and Use Classification for Waters of the Sacramento-San Joaquin Delta and for Waters of the State that are defined as inland (i.e., all surface waters that are not bays, estuaries, or ocean waters) and designated with the MUN beneficial use. For the purposes of this compilation, comparison, and analysis, all fresh waters of the state are assumed to be designated with the MUN beneficial use.

When selecting aquatic life standards for ocean waters (i.e., those for the MAR beneficial use), the instantaneous maximum limiting concentration water quality objectives from the Ocean Plan were used for acute standards, and the 6-month median limiting concentration water quality objectives from the Ocean Plan were used for chronic standards.

[12] The California Code of Regulations is the repository of state maximum contaminant levels and associated levels, which are maximum residual disinfectant levels, action levels, and secondary maximum contaminant levels. Maximum contaminant levels are included because they apply to the significant majority of statewide fresh waters as eight of the nine Regional Water Boards' basin plans include chemical constituent water quality objectives that include maximum contaminant levels by reference. Each basin plan, except for the Santa Ana Regional Water Board's basin plan, provides that, at a minimum, waters designated for use as domestic or municipal supply (i.e., MUN) shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels specified in section 64444 of the California Code of Regulations, title 22, for organic chemicals, and section 64431 of the California Code of Regulations, title 22, for inorganic chemicals, which are incorporated by reference into such basin plans.

In some instances, multiple standards apply to the same parameter (e.g., the CTR and the Ocean Plan include different values for tetrachloroethylene) and are reflected in the Comparison Tables with multiple rows for the same parameter.

7.2 Comparison of Variation Between Criteria and Standards

The Comparison Tables compare the variation between 304(a) recommended criteria and water quality standards by identifying if there is a 304(a) recommended criterion but no currently effective statewide water quality standard for a particular parameter and beneficial use. The tables also identify if the 304(a) recommended criterion is more stringent than a currently effective statewide water quality standard for a particular parameter and beneficial use. Tables 2 and 3 provide summary counts.

Table 2. Summary Counts of Criteria and Standards Comparison for Fresh Waters by Beneficial Use Group

	REC-1	MUN for Human Health	MUN for Taste & Odor	COMM	COLD & WARM for Acute	COLD & WARM for Chronic
Number of Parameters with 304(a) Recommended Criteria	7	118	28	111	49	48
Number of Parameters with a 304(a) Recommended Criterion and No Statewide Standard	5	18	23	20	27	28
Number of Parameters Where the 304(a) Recommended Criterion is More Stringent Than the Statewide Standard	5	91	23	93	27	28

Table 3. Summary Counts of Criteria and Standards Comparison for Ocean Waters by Beneficial Use Group

	REC-1	COMM	MAR for Acute	MAR for Chronic
Number of Parameters with 304(a) Recommended Criteria	2	110	43	42
Number of Parameters with a 304(a) Recommended Criterion and No Statewide Standard	0	19	14	14
Number of Parameters Where the 304(a) Recommended Criterion is More Stringent Than the Statewide Standard	0	90	22	17

7.3 Analysis of Interference with Beneficial Uses

To determine whether the currently effective statewide water quality standards for parameters for which EPA has published 304(a) recommended criteria could reasonably be expected to interfere with beneficial uses of waters, available presence and discharge data for those parameters were evaluated. Presence data were primarily relied upon for this analysis. Presence data reflects conditions in the water body, which includes the influence of discharges to the water body, and more clearly demonstrates whether the currently effective statewide water quality standard of that parameter potentially interferes with beneficial uses when compared with the 304(a) recommended criteria. Discharge data were only used when presence data were unavailable for a particular parameter, but discharge data were available. The analysis of discharge data may not fully reflect whether the discharge of a parameter at a concentration that exceeds the more stringent 304(a) recommended criterion could reasonably be expected to interfere with beneficial uses for several reasons. For example, instances where a discharge sample exceeds a more stringent 304(a) recommended criterion may be associated with a limited number of facilities or waterbodies and not reflect statewide discharges. The exceedances could be remediated through changes to a regional standard, or through changes in permit conditions without first adopting a 304(a) recommended criterion as a statewide water quality standard. Additionally, a water quality-based effluent limitation for any given discharge can be less stringent than the applicable water quality standard because, while it is derived from the applicable water quality standard, it is actually calculated based on several facility-specific and parameter-specific factors, such as dilution credits for mixing zones and averaging periods. Evaluating each of the discharge samples to determine the derivation of each water quality-based effluent limitation in the applicable permit was beyond the scope of this analysis.

The analyses of presence data and discharge data were conducted with the following assumptions and exclusions:

- The most stringent currently effective statewide water quality standard for each parameter–beneficial use combination was considered.

- The analyses were limited to parameters where the 304(a) recommended criterion was more stringent than the currently effective statewide water quality standard.
- If the 304(a) recommended criterion was less stringent than or equal to the currently effective standard, the parameter was not further analyzed.
- Parameters that had a statewide standard and no corresponding 304(a) recommended criteria were not analyzed.
- The analyses were not conducted for pH as its expression as a range with a minimum and maximum value complicates the analysis beyond the scope of this statewide analysis.
- Parameters with variable 304(a) recommended criteria were not analyzed as site-specific information (e.g., hardness data, species present in the waterbody, quantification of natural conditions) would have been required to conduct the analysis.
- Parameters with narrative 304(a) criteria were not analyzed as interpreting the narrative and identifying an appropriate numeric value is beyond the scope of this statewide analysis.[13]

Parameters with variable and narrative 304(a) recommended criteria would be better analyzed at the Regional Water Board level.

7.3.1 Presence Data Analysis

Readily available surface water quality data were analyzed using a mock integrated report[14] assessment to evaluate whether additional waterbodies would be identified as impaired in accordance with the Listing Policy and placed on the Clean Water Act Section 303(d) List if the more stringent 304(a) recommended criteria were adopted as water quality standards. Readily available data were taken from the data sets used to generate the 2018, 2020-2022, 2024, 2026, and 2028 California Integrated Reports. These data were used because they have consistent formatting and meta data information that allow for query and analysis. Additionally, the data sets include information on the quality of the data, such as quality assurance and quality control documentation.

The data sets were filtered and some data were excluded. Data used for the analysis met the following conditions:

- Data were for a known parameter. In a small number of instances, the parameter name was too vague and data were not used. Additionally, the analysis was not

[13] It is likely that currently effective narrative water quality objectives in Basin Plans provide an equivalent level of protection for beneficial uses as the narrative 304(a) recommended criteria.
[14] The Integrated Report consists of the Clean Water Act section 303(d) list of impaired waters and the section 305(b) surface water quality condition report. To develop the Integrated Report, data from California surface waters are evaluated and, if appropriate, assessed to determine if they contain pollutants at levels that exceed water quality standards.

conducted for Perfluorooctanesulfonic Acid (PFOS) and Perfluorooctanoic Acid (PFOA) due to mismatched naming conventions.

- Data passed the quality assurance checks used for the Integrated Report.
- Data were collected on a waterbody that was assessed in an Integrated Report for the relevant parameter and relevant beneficial use. For example, malathion has a 304(a) recommended criterion for aquatic life, but not for human health or organoleptic effects. Data for malathion would only be included in the analysis if malathion data were assessed in an Integrated Report to determine if an aquatic life beneficial use was supported. If malathion data were only assessed in an Integrated Report to determine if a human health beneficial use was supported, the malathion data were not included in the analysis because there is no 304(a) recommended criteria for human health.

The following assumptions and data manipulations were made:

- When the waterbody sample concentration was below the laboratory reporting limit, the concentration was assumed to be zero and meeting the objective or criterion. This assumption allowed for the relative comparison of more sample data.
- For some parameters, data for individual compounds, isomers, metabolites, or alky groups were summed before comparison with an objective or criterion. Data were summed using the Integrated Report methodology. See Appendix K: list of Summing Pollutants from the 2026 California Integrated Report for more information at: https://www.waterboards.ca.gov/water_issues/programs/tmdl/2025_2026state_ir_reports/appendix-k-list-of-summing-pollutants.xlsx.
- Waterbody sample data were applied to chronic criteria for aquatic life uses (i.e., COLD, WARM, MAR). Acute criteria were not used in the analysis. Use of chronic values is consistent with their use in integrated report assessments, which ensure assessments reflect longer-term ambient water quality conditions.

Waterbody sample data were grouped into parameter-use combinations, where each combination is for a unique parameter and a unique beneficial use (WARM, COLD, MAR, COMM, MUN, REC-1). This allowed analysis of parameters that have multiple criteria and standards.

For each of the parameter-use combinations, each row of sample data was compared to the currently effective water quality standard. Each exceedance of a 304(a) recommended criterion and water quality standard was counted. The number of samples and the number of exceedances were tallied. The difference between the number of exceedances using the current standard and the 304(a) recommended criterion was also calculated. The exceedance counts were compared to the minimum number of measured exceedances needed to place a waterbody segment on the Section 303(d) list as provided in Tables 3.1 and 3.2 of the Listing Policy, which are based on the binomial distribution statistical probability approach.

Applying the 304(a) recommended criterion instead of the currently effective standard as part of a mock Integrated Report assessment would result in one or more new waterbodies being listed as impaired for 33 parameters. See Table 4 (for fresh waters) and Table 5 (for ocean waters) for the list of parameters, associated beneficial use, and estimated number of new waterbody listings out of the 1,316 waterbodies with readily available data.

Table 4. Parameters For Which Additional *Fresh Waters* Would Be Listed as Impaired if the 304(a) Recommended Criterion Was Used Instead of the Currently Effective Standard

Parameter	Beneficial Use	Number Of New Waterbody Listings
1,2,4-Trichlorobenzene	COMM	1
1,2,4-Trichlorobenzene	MUN	1
2,4-Dichlorophenol	MUN	1
Alkalinity	COLD/WARM	24
Alpha-Hexachlorocyclohexane (HCH)	COMM	1
Arsenic	MUN	287
Benzo[a]anthracene	COMM	3
Benzo[a]pyrene	COMM	4
Benzo[a]pyrene	MUN	1
Benzo[b]fluoranthene	COMM	3
beta-Hexachlorocyclohexane (HCH)	COMM	1
Bis(2-Chloroethyl) Ether	COMM	2
Chloride	COLD/WARM	24
Chlorine	WARM	2
Chloroform	MUN	3
DDE (p,p′-Dichlorodiphenyldichloroethylene)	COMM	1
DDE (p,p′-Dichlorodiphenyldichloroethylene)	MUN	1
DDT (4,4'DDT/p,p′-Dichlorodiphenyltrichloroethane)	MUN	1
Demeton	WARM	1
Dibenz[a,h]anthracene	COMM	3
Dibenz[a,h]anthracene	MUN	1
Dichlorobromomethane	COMM	1
Dieldrin	COMM	1
Dieldrin	MUN	1
Endrin	COMM	1
Endrin	MUN	1
Guthion	COLD/WARM	5
Heptachlor	COMM	2
Heptachlor	MUN	2
Hexachlorobutadiene	COMM	2

Parameter	Beneficial Use	Number Of New Waterbody Listings
Hexachlorobutadiene	MUN	1
Hexachloroethane	COMM	1
Hexachloroethane	MUN	1
Indeno(1,2,3-cd)pyrene	COMM	3
Indeno(1,2,3-cd)pyrene	MUN	1
Iron	COLD/WARM	53
Malathion	COLD/WARM	26
Methoxychlor	COLD/WARM	3
Methoxychlor	MUN	2
Pentachlorophenol	COMM	3
Solids, Dissolved and Salinity	MUN	104
Vinyl Chloride	MUN	1

Table 5. Parameters For Which Additional *Ocean Segments* Would Be Listed as Impaired if the 304(a) Recommended Criterion Was Used Instead of the Currently Effective Standard

Parameter	Beneficial Use	Number Of New Waterbody Listings
Aldrin	COMM	2
Dieldrin	COMM	1

For fresh waters, staff focused on the six parameters with 20 or more additional listings to further consider the geographic distribution of the additional fresh waters that would be listed as impaired if the 304(a) recommended criterion was used instead of the currently effective standard. Table 6 shows the number of additional waterbodies by Regional Water Board. Additional listings for alkalinity, chloride, malathion, and dissolved solids and salinity would be limited to two or three regions, whereas additional listings for arsenic and iron would occur across the state.

Table 6. Number of Additional *Fresh Water* Segments that Would Be Listed as Impaired by Regional Water Board for Parameters with 20 or More Additional Listings

Region	Alkalinity for COLD & WARM	Arsenic for MUN	Chloride for COLD & WARM	Iron for COLD & WARM	Malathion for COLD & WARM	Solids, Dissolved and Salinity for MUN
North Coast	3	34		8		4
San Francisco Bay	2	4	8	2		1
Central Coast		72			20	
Los Angeles		9	12	5	5	3
Central Valley	19	95		15		30
Lahontan		13		2		7
Colorado River Basin		15	4	2		9
Santa Ana		15		3		
San Diego		30		20		4
Total	**24**	**287**	**24**	**57**	**25**	**58**

7.3.2 Discharge Data Analysis

Water body presence and concentration data were unavailable, but discharge data from NPDES permitted facilities were available, for the following 11 parameters:

- 1,3-Dichloropropene
- 2,3,4,6-Tetrachlorophenol
- 2,3,7,8-TCDD (Dioxin)
- 2,6-Dichlorophenol
- Butylbenzyl Phthalate
- Hexachlorobenzene
- Hydrogen Sulfide
- Parathion
- Perfluorooctanoic acid
- Perfluorooctanoic sulfonate
- Tributyltin (TBT)

Discharge data for these 11 parameters were analyzed to evaluate whether more stringent water quality-based effluent limitations derived from the more stringent 304(a) recommended criteria would be necessary to protect beneficial uses of the waters that receive those discharges. Discharge data for arsenic and iron were also included as the above analysis indicated that more than twenty waterbodies statewide would be listed as impaired for those parameters if the more stringent 304(a) recommended criterion was adopted as the water quality standard. Discharge data for solids, dissolved and salinity data were not readily available in the discharge data set.

Discharge data were taken from the California Integrated Water Quality System (CIWQS) through the state's Open Data Portal (https://data.ca.gov/dataset/water-quality-effluent-electronic-self-monitoring-report-esmr-data, May 31, 2026). The data were submitted by dischargers into CIWQS electronically in self-monitoring reports from NPDES effluent monitoring. Note that CIWQS discharge data are not available for each parameter with a 304(a) recommended criterion. Data from years 2021 through 2025 were used. This five year period captures recent discharge conditions and parameters that are only monitored once during a five-year permit term.
The following assumptions and data manipulations were made:

- A synonym for the parameter was used in several instances, based on the Parameter Reference List found at https://www.waterboards.ca.gov/ciwqs/docs/chc_npdes/parameter_reference_list.xlsx.
- Data were filtered such that only data with the location type of "effluent monitoring" were considered.
- Values expressed in milligrams per liter (mg/L) were converted to micrograms per liter (ug/L).
- Calculated compliance values, such as pounds per day, were not analyzed.
- The estimated result was used for data with the qualifiers of less than (<), less than or equal to (<=), and detected not qualified (DNQ).
- Data missing both a result and a method detection limit were excluded.
- Data reported as non-detect values where the laboratory analysis method detection limit was greater than (i.e., exceeded) the 304(a) recommended criterion were counted as exceedances of the 304(a) recommended criterion. These are instances where the discharge may exceed the 304(a) recommended criterion.

Discharge data from facilities that discharge to the ocean and bays were separated from data from facilities that discharge to fresh waters. Each row of discharge data was compared to the 304(a) recommended criterion when the criterion is more stringent than the currently effective water quality standards for the same parameter.

Applying the 304(a) recommended criterion instead of the currently effective water quality standard may result in more stringent water quality-based effluent limitations for all the parameters in Table 7 for discharges to fresh waters and 1 parameter for discharges to ocean waters and bays. The results are provided in Table 7. Parameters are further prioritized in Section 7.4 below.

Table 7. Parameters for Which More Stringent Effluent Limitations Derived from More Stringent 304(a) Recommended Criteria May Be Necessary to Protect Beneficial Uses

Parameter	Beneficial Use	Number of Discharge Samples that Exceed the 304(a) Criterion When the 304(a) Criterion Is More Stringent than the Statewide Standard*	Total Number of Discharge Samples Analyzed
1,3-Dichloropropene	MUN Human Health	822	962
2,3,4,6-Tetrachlorophenol	MUN Taste & Odor	1	1
2,3,7,8-TCDD (Dioxin)	COMM	1,150	1,156
2,3,7,8-TCDD (Dioxin)	MUN Human Health	1,973	1,981
Arsenic, Total	COMM	981	989
Arsenic, Total	MUN Human Health	1,568	1,568
Butylbenzyl Phthalate	COMM	1,220	1,288
Butylbenzyl Phthalate	MUN Human Health	2,065	2,133
Hexachlorobenzene	MUN Human Health	2,245	2,245
Hexachlorobenzene**	COMM	915	915
Hydrogen Sulfide	COLD/WARM Chronic	4	4
Iron, Total	COLD/WARM Acute	755	1,057
Iron, Total	COLD/WARM Chronic	436	649
Parathion	COLD/WARM Acute	77	96
Parathion	COLD/WARM Chronic	53	60
Perfluorooctanoic Acid	COMM	15	15
Perfluorooctanoic sulfonate	COMM	15	15
Tributyltin (TBT)	COLD/WARM Acute	117	174
Tributyltin (TBT)	COLD/WARM Chronic	65	121

*Includes instances where there is a 304(a) recommended criterion and no existing statewide water quality standard.

**Hexacholorobenzene for the protection of COMM is the only parameter applicable to ocean waters. The rest of the parameters are applicable to fresh waters.

7.4 Work Plan for Projects Related to 304(a) Recommended Criteria

This section serves as a work plan for State Water Board efforts to undertake water quality control projects relating to 304(a) recommended criteria. Current projects are projects that are already substantially underway and that the State Water Board has directed staff to continue to work on as of the date of this Staff Report and Work Plan. Projects for future consideration are projects that are not substantially underway as of the date of this Staff Report and Work Plan. Although some preliminary efforts for projects for future consideration are occurring or may occur in the next three years, most of these projects are unlikely to be chartered in the next three years. As State Water Board priorities and resources allow, these future projects will be initiated, and more information will be provided about the scope of the projects.

7.4.1 Prioritization Factors

Several factors were evaluated in prioritizing projects to add or revise water quality standards for parameters with 304(a) recommended criteria. These include:

- Whether there is a currently effective water quality standard for the parameter that applies to statewide waters.
- Whether the 304(a) recommended criterion is more stringent than the currently effective water quality standard.
- Whether adopting the 304(a) recommended criterion is likely to support a beneficial use by reducing a parameter's interference with the use in one or more waterbodies across the state. While there are multiple ways to consider this factor, the above mock integrated report analysis informs whether a new impairment listing is likely if the 304(a) recommended criterion were adopted as a water quality standard.
- Whether adopting the 304(a) recommended criterion is likely to be needed to protect beneficial uses by leading to more stringent water quality-based effluent limitations.
- Whether the project would protect human health or aquatic life, with a higher priority given to human health protection due to the potential to affect drinking water, fish consumption, or public safety.
- Whether the State Water Board is already engaged in related water quality control planning efforts.
- The State Water Board's annual strategic priorities.
- Staff capacity.

7.4.2 Current Project

There is one current project that involves adopting water quality standards for parameters with 304(a) recommended criteria: the ISWEBE Plan project to establish HABs and cyanotoxins water quality objectives and a program of implementation. This project includes consideration of the 304(a) recommended criteria for cylindrospermopsin and microcystin for the protection of REC-1, and the underlying science. See Section 6.1.5 above for more information about the project.

This is a priority because there are 304(a) recommended criteria but no numeric water quality standards, HABs and cyanotoxins are impacting human health and public safety, the State Water Board is currently engaged in related water quality control planning efforts, it is a priority in the State Water Board's 2026 Annual Strategic Work Plan, and scientific and technical information is available to support the potential development of water quality standards.

7.4.3 Projects for Future Consideration

There are two projects for future consideration that involve adding water quality standards for parameters with 304(a) recommended criteria; one for fresh waters and one for ocean waters.

Fresh Waters

One project for future consideration is to add to or revise water quality standards in the ISWEBE Plan for parameters to be consistent with new or revised 304(a) recommended criteria for fresh waters for the protection of human health. Protecting waters for human health impacts associated with drinking water (i.e., MUN, but not MUN for taste and odor protection) and the consumption of fish (i.e., COMM) is a priority and appropriate for a statewide project. Adding or revising standards to protect aquatic life (i.e., WARM, COLD) is more appropriate at a regional scale due to the variety of aquatic species across the state.

The most likely ten parameters to include in this project are shown in Table 8. These parameters are priorities because they meet one of the following conditions:

- Parameters for which more than 20 additional waterbodies would be listed as impaired if the 304(a) recommended criterion for MUN was used instead of the currently effective water quality standard, and the additional listings are distributed across the state.

- Parameters for which discharge samples would exceed or may exceed the more stringent 304(a) recommended criterion for MUN for human health protection or for COMM if the 304(a) recommended criterion was used instead of the currently effective water quality standard.

Table 8. Fresh Waters Parameters for Project for Future Consideration

Parameter	Beneficial Use	> 20 Waterbodies Distributed Across the State Would Be Listed as Impaired	Discharge Samples Exceed the More Stringent 304(a) Criterion
1,3-Dichloropropene	MUN		x
2,3,7,8-TCDD (Dioxin)	MUN & COMM		x
Arsenic	MUN & COMM	x	x
Butylbenzyl Phthalate	MUN & COMM		x
Hexachlorobenzene	MUN		x
Perfluorooctanoic Acid	COMM		x
Perfluorooctanoic sulfonate	COMM		x
Phenol, Single Compound	MUN & COMM		x
Polychlorinated Biphenyls (PCBs), Sum	MUN & COMM		x
Solids, dissolved & salinity	MUN	x	

A likely early step in any project for fresh waters would be to compile and consider currently effective water quality objectives in Regional Water Boards' basin plans to determine whether there is significant protection for beneficial uses from these parameters. Another likely early step would be to investigate if exceedances are due to natural sources.

Ocean Waters

The other project for future consideration is to add to or revise water quality standards for parameters to be consistent with new or revised 304(a) recommended criteria in the Ocean Plan.

The most likely three parameters to include in this project are shown in Table 9. These parameters are priorities because they meet one of the following conditions:

- Parameters for which additional segments of the Pacific Ocean would be listed as impaired if the 304(a) recommended criterion for COMM was used instead of the currently effective water quality standard.

Parameters for which discharge samples would exceed or may exceed the more stringent 304(a) recommended criterion for COMM if the 304(a) recommended criterion was used instead of the currently effective water quality standard.

Table 9. Ocean Waters Parameters for Project for Future Consideration

Parameter	Beneficial Use	Additional Ocean Segments Would Be Listed as Impaired	Discharge Samples Exceed the More Stringent 304(a) Criterion
Aldrin	COMM	x	x
Dieldrin	COMM	x	x
Hexachlorobenzene	COMM		x

It is important to note the lack of sample data from the Pacific Ocean for many of the parameters with 304(a) recommended criteria, which is likely the reason the mock integrated report presence analysis did not identify any parameters associated with the MAR use. As more ocean sampling is completed and as more data are compiled and analyzed, the number of parameters may be further prioritized and refined in future reviews.

When undertaking a project to add or revise a water quality standard to be consistent with a 304(a) recommended criterion, for both fresh waters and ocean waters, one of the first steps will be to consider if a statewide or regional approach is appropriate. A Regional Water Board is often better able to focus on setting a standard at a small scale that is reasonably protective, especially for the protection of aquatic life (e.g., what might protect one species of fish may not be sufficient to protect a different species) and

different waterbody types. A statewide project may be more appropriate if a pollutant impacts similar types of aquatic life and waterbody types across multiple regions.

The parameters identified in both projects for future consideration are a higher priority than other parameters because adopting water quality standards based on the 304(a) recommended criteria is more likely to protect a beneficial use by reducing a parameter's interference with the use.

7.4.4 Projects Not Identified as a Current Project or Project for Future Consideration

If a state does not adopt new or revised standards for parameters for which USEPA has published new or updated 304(a) recommended criteria, then it must provide an explanation when it submits the results of the review to USEPA. The State Water Board must comply with all applicable federal and state laws in conducting all water quality standards rulemakings as described in Section 3.2, and it lacks the resources and personnel to adopt new water quality standards or revise currently effective water quality standards for each parameter with new or updated more stringent 304(a) recommended criteria. Accordingly, the State Water Board prioritized its work, as described above, on projects that can produce the most benefits consistent with the goals of the Clean Water Act while also taking into account other relevant factors. Adopting new or revised water quality standards that are equal to the remaining more stringent 304(a) recommended criteria are not identified as current projects or projects for future consideration currently because of the unavailability of State Water Board resources to expend on lower priorities.

APPENDIX A: Work Plan Summary

This appendix provides a list of current projects and projects for future consideration as a summary of the work plan. A “project” is often a State Water Board proceeding, occurring separately from the Review of State Plans and Policies, that is focused on specific plans, policies, or standards and is generally expected to result in a rulemaking. In some instances, a project is an effort that may inform a potential future rulemaking project or implement an existing plan or policy.

Current Projects

Current projects are projects that are already substantially underway and that the State Water Board has directed staff to continue to work on as of the date of this Staff Report and Work Plan.

Bay-Delta Plan
(Managed by the Division of Water Rights)

A. Update the Bay-Delta Plan for the reasonable protection of fish and wildlife.
B. Implement the Bay-Delta Plan’s lower San Joaquin River flow and southern Delta salinity objectives through regulations.
C. Evaluate whether to incorporate the Tuolumne River Voluntary Agreement as an element of the Bay-Delta Plan.

Inland Surface Waters, Enclosed Bays, and Estuaries Plan
(Managed by the Division of Water Quality, Inland Standards Unit)

A. Establish harmful algal blooms and cyanotoxins water quality objectives and a program of implementation.

Ocean Plan
(Managed by the Division of Water Quality, Ocean Standards Unit)

A. Improve seawater desalination provisions.
B. Address impacts of anthropogenic nutrients on coastal ocean acidification, hypoxia, and harmful algal blooms.

Policy to Support the Development of Site-Specific and Permit-Specific Water Quality Objectives for Copper and Zinc
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II)

A. Establish a policy with protocols, procedures, and a plan of implementation for the development of site-specific and project-specific objectives for copper and zinc.

Recycled Water Policy
(Managed by the Division of Water Quality, Sustainable Plans and Policies Section II)

A. Revise the recycled water goals and constituents of emerging concern monitoring requirements.

Tribal Beneficial Use Designations and Supporting Efforts
(Managed by the Office of Public Engagement, Equity, and Tribal Affairs)

A. Assist Regional Water Boards in adding Tribal Tradition and Culture (CUL) and Tribal Subsistence Fishing (T-SUB) definitions to their basin plans and in designating waters with the uses.

Urban and Industrial Stormwater Infiltration Policy
(Managed by the Division of Water Quality, Surface Water Permitting Section)

A. Develop a water quality control policy to regulate urban and industrial stormwater infiltration systems.

Water Rights Enforcement Policy
(Managed by the Office of Enforcement and the Division of Water Rights)

A. Develop a water quality control policy with a framework for strong, fair, transparent, and efficient enforcement of the state's water rights priority system.

Projects for Future Consideration

Projects for future consideration are projects that are not substantially underway or in development. Although some preliminary efforts for potential future projects are occurring and may occur in the next three years, most of these projects are unlikely to be chartered in the next three years.

Antidegradation Policy
(Managed by the Division of Water Quality, Water Quality Standards and Assessment Section)

A. Add guidance on determining if a discharge or potential discharge to a high-quality water will result in the best practicable treatment or control to assure pollution or nuisance will not occur and the highest water quality consistent with the maximum benefit to the people of the state will be maintained.

Cannabis Cultivation Policy
(Managed by the Division of Water Rights, Cannabis Enforcement Section)

A. Amend Attachment A of the Cannabis Policy to account for changes in cannabis cultivation practices, including potential revision of water diversion, water use, waste discharge requirements, and assessment of tier and risk designations.

Compliance Schedule Policy
(Managed by the Division of Water Quality, Surface Water Permitting Section)

A. Amend the Compliance Schedule Policy to allow for more time to comply with new limitations or new interpretations of limits in appropriate circumstances.

Consolidated Cleanup Plan
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II)

A. Evaluate the applicability of this policy and consider rescinding, given that the Legislature has not authorized any funding to support the program since 1999, and as a result, this policy has not been actively implemented since the early 2000s.

Dredge or Fill Procedures
(Managed by the Division of Water Quality, Watersheds and Wetlands Section)

A. Evaluate the need for future development of delineation procedures for non-wetland waters.

Enclosed Bays and Estuaries Plan
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II)

A. Amend the sediment quality objectives to recognize changes in taxonomic nomenclature.
B. Add monitoring approaches.
C. Add requirements for sediment toxicity testing using *Neanthes arenaceodentata*, a marine worm.
D. Add the multivariate AZTI Marine Biotic Index to the suite of assessment tools (AZTI is a European private foundation which developed the index.).
E. Develop and add a prescriptive assessment framework for the protection of aquatic-dependent wildlife and resident finfish.
F. Develop guidance that describes how to address contaminated sediment sites that exceed sediment quality objectives. Incorporate useful requirements, guidance, or direction from the Consolidated Clean-up Plan and the Guidance for Toxic Hot Spot Policy.

Guidance for Toxic Hot Spot Policy
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II)

A. Evaluate the applicability of this policy and consider rescinding, given that the Legislature has not authorized any funding to support the program since 1999,

and as a result, this policy has not been actively implemented since the early 2000s.

Impaired Waters Policy
(Managed by the Division of Water Quality, Water Quality Standards and Assessment Section)

A. Add a description of how a TMDL and a TMDL's regulatory requirements apply after a waterbody is delisted from the Clean Water Act section 303(d) list.
B. Add a description of the process for amending or rescinding a TMDL.

Investigation and Cleanup and Abatement of Dischargers under Water Code 13304 (Resolution 92-49)
(Managed by the Division of Water Quality, UST and Site Cleanup Programs Section)

A. Amend Resolution 92-49 to update references, improve readability, and provide clarifications.
B. Add language requiring sea level rise and groundwater vulnerability assessments if a site is located within projected sea level rise or groundwater vulnerability areas.
C. Update public notification requirements and review turnaround times for work plans and proposed closures.

ISWEBE Plan
(Managed by the Division of Water Quality, Water Quality Standards and Assessment Section)

A. Add or revise water quality objectives for human health and aquatic life to be consistent with new or revised 304(a) recommended criteria.
B. Add a human waste parameter, such as the human DNA marker HF 183, to the bacteria water quality objectives for the protection of water contact recreation.
C. Amend the 1 part per thousand salinity threshold for application of *Escherichia coli* or enterococci bacteria objectives to inland saline waters.
D. Amend the Mercury Provisions' program of implementation for storm water discharges (Section IV.D.3) to limit implementation of best management practices to waters where storm water discharges are shown to be causing or contributing to an exceedance of a mercury water quality objective.
E. Develop laboratory test methods and alpha values for aquatic toxicity test species to expand the number of species for which the test of significant toxicity could be applied, then amend the Aquatic Toxicity Provisions' Table 1: Toxicity Test Methods, Regulatory Management Decision, β Error, and α Error. This project applies to the Toxicity Provisions that are both a state water quality control plan and a state policy for water quality control.

F. Add water quality objectives for cadmium to protect aquatic life uses, including threatened and endangered salmonid species. The objective would supersede existing cadmium criteria in the California Toxics Rule.

G. Add water quality objectives for total residual chlorine and chlorine-produced oxidants and implementation procedures for NPDES permitting.

H. Evaluate potential amendments to the Trash Provisions that remove requirements to use the rational method for calculating runoff and exempt certain land uses or situations

Listing Policy
(Managed by the Division of Water Quality, Water Quality Standards and Assessment Section)

A. Update listing and delisting factors and facilitate a more efficient methodology for developing an accurate and useful Clean Water Act section 303(d) list of impaired waters.

NPS Implementation and Enforcement Policy
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II)

A. Evaluate whether an amendment is needed to ensure consistency with administrative tools used to address nonpoint source pollution.

Ocean Plan
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section I)

A. Add Tribal Tradition and Culture (“CUL”) and Tribal Subsistence Fishing (“T-SUB”) beneficial uses to the list of beneficial uses of ocean waters that shall be protected. Include definitions if needed, consistent with the definitions in the ISWEBE Plan. This project does not include designation of beneficial uses to individual segments of the Pacific Ocean.

B. Revise the shellfish harvesting beneficial use definition to distinguish between recreational, commercial, or Tribal types of harvesting.

C. Amend the bacterial shellfish harvesting water quality objectives to more reasonably protect shellfish harvesting beneficial uses, including uses specifically for recreational, commercial, or Tribal types of harvesting.

D. Amend the fecal coliform water quality objective for the protection of water contact recreation to reflect California-specific epidemiological data and to use the same time period for calculating the geometric mean as is used for enterococci.

E. Gather information regarding the Areas of Special Biological Significance General Exception for stormwater and non-point source discharges of waste to consider if revisions or additional requirements are necessary to ensure natural

water quality is maintained and beneficial uses are protected within areas of special biological significance.

F. Amend the water quality objectives for metals to be consistent with federal standards by investigating the relationship between total recoverable and total dissolved metals.

G. Amend the water quality objectives for tetrachlorodibenzo-p-dioxin (TCDD) and TCDD-equivalents in Appendix I of the Ocean Plan to be consistent with the toxicity equivalence factors in the California Toxics Rule.

H. Add or revise water quality objectives for human health and aquatic life to be consistent with new or revised 304(a) recommended criteria. See Section 7 for an initial prioritization of parameters impacting human health and aquatic life.

I. Add sediment quality objectives and a program of implementation to protect benthic communities, human health, and marine wildlife that may be affected via food web transfer.

J. Develop a water quality objective and program of implementation to address microplastic and microfiber pollution.

K. Amend the aquatic toxicity provisions to replace the use of “toxicity units” with the Test of Significant Toxicity statistical approach and revise implementation requirements to be more consistent with the Toxicity Provisions established for inland waters.

L. Amend the suspended solids effluent limitations in Table 4 to be consistent with USEPA secondary wastewater treatment requirements.

M. Add direction for monitoring Constituents of Emerging Concern (CECs) in ocean waters.

N. Amend provisions for the control of vessel incidental discharges and invasive species.

O. Amend the definition of waste to add the potential for waste discharges.

P. Amend the Ocean Plan to add language that addresses natural sources of constituents that enter ocean waters of California.

Q. Revise or rescind the Exception to the Ocean Plan for the San Francisco Storm Water and Wastewater Discharges.

R. Add water quality objectives for total residual chlorine and chlorine-produced oxidants and implementation procedures for NPDES permitting.

S. Evaluate potential amendments to the Trash Provisions that remove requirements to use the rational method for calculating runoff and exempt certain land uses or situations.

T. Amend portions of the Ocean Plan to update formatting, style, and consistency.

Once-Through Cooling Water Policy for Coastal & Estuarine Waters
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section I)

A. Evaluate whether an amendment to the policy is needed to ensure consistency with the final Clean Water Act section 316(b) rule as issued in 2014.
B. Evaluate whether updates are needed to the Final 2010 Substitute Environmental Document.

Once-Through Cooling Water Policy for Inland Waters
(Managed by the Division of Water Quality Water Quality Standards and Assessment Section)

A. Evaluate the applicability of this policy and consider rescinding or revising. To the State Water Board's knowledge, no power plants currently use inland waters for once-through cooling.

Pollutant Policy Document for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary
(Managed by the San Francisco Bay and Central Valley Regional Water Quality Control Boards)

A. Evaluate the applicability of this policy, including whether it currently informs the Regional Water Boards' work, and consider rescinding in coordination with the San Francisco Bay Regional Water Quality Control Board and the Central Valley Regional Water Quality Control Board.

Shredder Waste Policy

A. Evaluate the applicability of this policy and consider rescinding.

State Implementation Policy
(Managed by the Division of Water Quality Surface Water Permitting Section)

A. Amend this policy to clarify data needs when conducting a reasonable potential analysis.
B. Revise the laboratory analytical method minimum levels, including Appendix 4 of the State Implementation Policy, and require the use of most sensitive analytical method.
C. Add a requirement to evaluate whether the receiving water exceeds water quality standards based on available receiving water data, even if not listed as impaired under CWA section 303(d).
D. Clarify the hardness dependent metal criteria, such as the selection of appropriate hardness levels and circumstances for their use.
E. Evaluate measures for compliance with other state policies and requirements governing the human right to water, Tribal consultation, racial equity, and community outreach.
F. Remove Section 4, Toxicity Control Provisions, as the section was superseded by the State Policy for Water Quality Control: Aquatic Toxicity Provisions. This would be an editorial, non-regulatory amendment.

State Policy for Water Quality Control
(Managed by the Division of Water Quality Water Quality Standards and Assessment Section)

A. Evaluate the applicability of this policy and consider rescinding.

Supplemental Environmental Projects Policy
(Managed by the Division of Water Quality Underground Storage Tanks and Site Cleanup Programs Section)

A. Improve project tracking and reporting in accordance with the existing policy.
B. Consider whether to amend this policy to extend the period for completion of projects from 36 months to some longer period.
C. Evaluate measures for compliance with other state policies and requirements governing the human right to water, Tribal consultation, racial equity, and community outreach.

Underground Storage Tank Low-Threat Closure Policy
(Managed by the Division of Water Quality Underground Storage Tanks and Site Cleanup Programs Section)

A. Amend the UST Low-Threat Closure Policy to update references, improve readability, and provide clarifications.
B. Add language requiring sea level rise and groundwater vulnerability assessments if a site is located within a projected sea level rise or groundwater vulnerability areas.

Underground Storage Tank Pilot Program Policy
(Managed by the Division of Water Quality Underground Storage Tanks and Site Cleanup Programs Section)

A. Evaluate the applicability of this policy and consider rescinding.

Water Reclamation Policy
(Managed by the Division of Water Quality, Sustainable Water Plans and Policies Section II)

A. Evaluate the applicability of this policy and consider rescinding.

APPENDIX B: Previous Reviews of State Plans

This appendix describes the projects that were identified in recent reviews of state water quality control plans and the status of projects identified for future consideration in those reviews.

B.1 Ocean Plan's Most Recent Review

The State Water Board most recently reviewed the Ocean Plan in 2019. (State Water Board Res. No. 2019-0066.) The Staff Report and Work Plan for the review listed 4 very high priority projects, 8 high priority projects, 8 medium priority projects, and 2 low priority projects. Table B-1 describes the projects identified in the 2019 review. It lists the projects identified in the 2019 review, the 2019 priority ranking, the corresponding project in the current review, and the status.

Table B-1 – Status of Projects Recommended for Further Review in the 2019 Review of the Ocean Plan

2019 Priority	2019 Project Title or Description	Current Project Description	Status
Very High	General exception to the Ocean Plan for stormwater and nonpoint source discharges into Areas of Special Biological Significance	Gather information regarding the Areas of Special Biological Significance General Exception for stormwater and non-point source discharges of waste to consider if revisions or additional requirements are necessary.	State Water Board staff is compiling information for evaluation and to support future consideration of potential revisions.
Very High	Bacteria objectives for water contact recreation	Amend the fecal coliform water quality objective for water contact recreation to reflect California-specific epidemiological data and to use the same time period for calculating the geometric mean as is used for enterococci.	State Water Board staff co-hosted the California Bacteria Summit in 2022 to better understand what it means to have waters that are safe to swim and shellfish that are safe to eat and identify actions needed to achieve those outcomes. Staff host semi-annual Beach Water Quality Workgroup meetings, in part to share scientific advancements. Staff attend ongoing discussions about use of human DNA metrics and stormwater management practices.
Very High	Desalination implementation provisions	Amend the Ocean Plan to improve seawater desalination provisions.	An amendment is underway as described in Section 6.1.6 of this Workplan.
Very High	Tribal beneficial uses	Add definitions of the CUL and T-SUB beneficial uses to the Ocean Plan.	State Water Board staff is currently working on guidance as described in Section 6.1.10 of this Workplan. While the guidance is focused on actions to designate waters with CUL or T-SUB, it will also be helpful in adding definitions to the Ocean Plan.

2019 Priority	2019 Project Title or Description	Current Project Description	Status
High	Ocean acidification, hypoxia, and climate change impacts	Amend the Ocean Plan to address impacts of anthropogenic nutrients on coastal ocean acidification, hypoxia, and harmful algal blooms	An amendment is underway as described in Section 6.1.7 of this Workplan.
High	Toxicity water quality objectives	Amend the Ocean Plan to replace "toxicity units" with Test of Significant Toxicity statistical approach and revise implementation requirements.	Significant work has not commenced on this project.
High	Shellfish harvesting beneficial uses and water quality objectives	Revise the shellfish harvesting beneficial use definition to distinguish between recreational, commercial, or Tribal types of harvesting. Amend the bacterial shellfish harvesting water quality objectives to more reasonably protect shellfish harvesting beneficial uses.	State Water Board staff co-hosted the California Bacteria Summit in 2022 to better understand what it means to have waters that are safe to swim and shellfish that are safe to eat and identify actions needed to achieve those outcomes. Staff host semi-annual Beach Water Quality Workgroup meetings, in part to share scientific advancements.
High	Nutrients and objectionable aquatic growth water quality objectives	Amend the Ocean Plan to address impacts of anthropogenic nutrients on coastal ocean acidification, hypoxia, and harmful algal blooms	An amendment is underway as described in Section 6.1.7 of this Workplan.
High	Non-substantive administrative changes	Update formatting, style, and consistency.	Significant work has not commenced on this project.
High	Natural source exclusion	Amend language that addresses natural sources of constituents.	Significant work has not commenced on this project.

2019 Priority	2019 Project Title or Description	Current Project Description	Status
High	Microplastics and microfibers	Develop a water quality objective and a program of implementation to address microplastics & microfiber pollution.	State Water Board staff is coordinating with the Ocean Protection Council on understanding and addressing impacts associated with microplastics and microfibers. Staff is also funding and coordinating efforts to establish methods for sample collection, sample processing, and laboratory analysis.
High	Exception to the Ocean Plan for San Francisco storm water and wastewater discharges	Revise or rescind the Exception to the Ocean Plan for the San Francisco Storm Water and Wastewater Discharges	State Water Board staff is coordinating with San Francisco Bay Regional Water Quality Control Board staff to consider the use of a water quality standards variance in an upcoming permit, followed by potential recission of the exception.
Medium	CECs monitoring procedures	Considering potential options and approaches for monitoring CECs in ocean waters.	State Water Board staff is working to develop a statewide CEC strategy to prioritize and manage CECs and proactively ensure the protection of drinking water supplies, public health, and the environment. This effort is expected to support projects for future consideration to develop CEC monitoring procedures, including considerations for ocean waters.
Medium	Suspended solids effluent limitations	Amend the suspended solids effluent limitations in Table 4 of the Ocean Plan to be consistent with USEPA secondary wastewater treatment requirements.	Significant work has not commenced on this project.

2019 Priority	2019 Project Title or Description	Current Project Description	Status
Medium	Water quality objectives for dioxin and related compounds	Amend water quality objectives for TCDD and TCDD-equivalents to be consistent with toxicity equivalent factors in the CTR.	Significant work has not commenced on this project.
Medium	Sediment quality objectives	Add sediment water quality objectives and a program of implementation to the Ocean Plan.	Significant work has not commenced on this project.
Medium	Expression of water quality objectives for metals	Amend water quality objectives for metals to federal standards by investigating the relationship between total recoverable and total dissolved metals.	Significant work has not commenced on this project.
Medium	Mixing zone and dilution implementation provisions	No longer identified as a future project.	This project is no longer being pursued. The Ocean Plan's conservative assumptions for mixing zones will continue to be used to protect beneficial uses. Because receiving water characteristics are fluid, the Ocean Plan relies on conservative assumptions to ensure that beneficial uses are protected. These assumptions are: (1) that the lowest average monthly trapping level, the point where effluent density matches surrounding ambient water, is used to calculate minimum initial dilution; and (2) that ocean currents do not influence plume mixing as effluent exits an outfall. This project would have reevaluated the

2019 Priority	2019 Project Title or Description	Current Project Description	Status
			second assumption, regarding the influence of currents on mixing.
Medium	Review of water quality objectives and references in Table 3 of the Ocean Plan	Add/Revise water quality objectives to be consistent with 304(a) recommendations	Significant work has not commenced on this project.
Medium	Expand waste definition to include potential discharges	Amend definition of waste to the Ocean Plan to add the potential for waste discharge.	Significant work has not commenced on this project.
Low	Vessel discharges and invasive species	Amend provisions for the control of vessel incidental discharge and invasive species	Significant work has not commenced on this project.
Low	Background seawater concentrations for effluent limitation calculations	No longer identified as a future project	State Water Board staff is no longer pursuing this project. Effluent limitations for metals not included in Table 5 of the Ocean Plan are defined with a background concentration of zero. State Water Board staff will continue to monitor updates in metal and metalloid background concentration data.

B.2 Bay-Delta Plan's Most Recent Review

In 2009, the State Water Board conducted a review of the 2006 Bay-Delta Plan. (State Water Board Res. No. 2009-0065.)

The Staff Report for the 2006 review discussed two issues that had already identified for further review: the southern Delta salinity objective and San Joaquin River flow objectives. The State Water Board addressed these issues in the 2018 Bay-Delta Plan amendments by adopting new and revised water quality objectives for southern Delta salinity and Lower San Joaquin River flows and associated implementation measures. (State Water Board Res. No. 2018-0059.) The State Water Board is currently considering amendments to the Bay-Delta Plan focused on the Sacramento River, certain tributaries, and the Delta.

The Staff Report for the 2006 review identified additional projects for potential amendments to the Bay-Delta Plan. These are shown in Table B-2, along with a brief description of the status of each project.

Table B-2– Status of Projects Recommended for Further Review in the 2006 Review of the Bay-Delta Plan

Project Name	Status
Delta Outflow Objectives	An amendment is underway as described in Section 6.1.1 of this Workplan with this scope incorporated within the update to the Bay-Delta Plan for the reasonable protection of fish and wildlife.
San Joaquin River Inflow/Export (I/E) Objectives	A narrative interior Delta flow objective is being proposed as part of the update to the Bay-Delta Plan as described in Section 6.1.1 of this Workplan, which encompasses the I/E objective and other interior Delta flow issues and calls for evaluation as part of the periodic review if additional implementation actions are needed to achieve the narrative objective. However, no substantive changes are being made to the I/E objective, and none are planned at this time.
Delta Cross Channel (DCC) Gate Closure Objectives	A narrative interior Delta flow objective is being proposed as part of the update to the Bay-Delta Plan as described in Section 6.1.1 of this Workplan, which encompasses the DCC Gate Closure objective and other interior Delta flow issues and calls for evaluation as part of the periodic review if additional implementation actions are needed to achieve the narrative objective. However, no substantive changes are being made to the DCC Gate Closure objective, and none are planned at this time.
Suisun March Objectives	No changes are needed at this time because other changes being made to the Bay-Delta Plan sufficiently address those issues, including changes to tributary inflows and Delta outflow objectives and implementation measures.
Old & Middle River Flow (OMR) Reverse Flow Objectives	A narrative interior Delta flow objective is being proposed as part of the update to the Bay-Delta Plan as described in Section 6.1.1 of this Workplan, which encompasses OMR reverse flow and related interior Delta flow issues and calls for evaluation as part of the periodic review if additional implementation actions are needed to achieve the narrative

	objective. However, no substantive changes are being made to the Bay-Delta Plan related to OMR reverse flows, and none are planned at this time
Floodplain Habitat Flow Objectives	No changes are needed at this time because other changes being made to the Bay-Delta Plan sufficiently address those issues, including changes to tributary inflows and Delta outflows and other actions included in the program of implementation.
Changes to the Monitoring and Special Studies Program	An amendment is underway as described in Section 6.1.1 of this Workplan with this scope incorporated within the update to the Bay-Delta Plan.
Changes in the program of implementation to implement new or revised water quality objectives	An amendment is underway as described in Section 6.1.1 of this Workplan with this scope incorporated within the update to the Bay-Delta Plan.

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