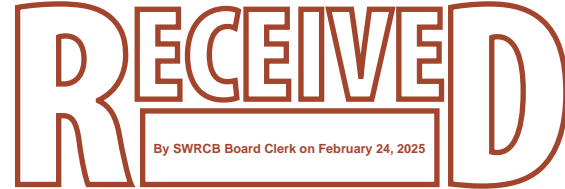




## San Diego Regional Water Quality Control Board

**TO:** Courtney Tyler  
Clerk to the Board  
State Water Resources Control Board  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



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

David W. Gibson  
Digitally signed by David W. Gibson  
Date: 2025.02.24 10:37:25 -08'00'

**DATE:** February 24, 2025

**SUBJECT:** Evidence for Record – R9 Biological Objective

The San Diego Water Board submits evidence described herein for the State Water Board's consideration to include in the administrative record for its decision regarding our December 8, 2020 amendment to the Water Quality Control Plan for the San Diego Basin to incorporate a water quality objective for biological condition (Biological Objective). On January 22, 2025, the State Water Board provided public notice that it was reopening the administrative record for our Biological Objective to accept new evidence relevant to the use of the proposed biological objective in anthropogenically and physically modified soft-bottom streams in the San Diego Region.

The evidence we propose adding is California Stream Condition Index (CSCI) data that is relevant to the use of the proposed biological objective in anthropogenically and physically modified soft-bottom streams in the San Diego Water Board Region (San Diego Region). While some data is presented from outside the San Diego Region and/or within draft reports with not-yet-final conclusions, all the data we wish to include was collected and assessed consistent with the State Water Board's standard operating procedures for the CSCI. Also, some data may be older than 2020 but has undergone more recent analysis. All data requested to be considered is publicly accessible from the CEDEN database.<sup>1</sup>

<sup>1</sup> <https://ceden.org/>. The California Environmental Data Exchange Network (CEDEN) serves as the State Water Board's data system for surface water quality in California.

**1. CSCI data from Southern California Coastal Water Research Project (SCCWRP) Technical Report 1367: A Technical Foundation for Biointegrity and Eutrophication Indicators and Thresholds for Modified Channels, Intermittent Streams, and Streams on the Central Valley Floor (SCCWRP Report 1367, Mazor et al., September 2024)<sup>2</sup>**

SCCWRP Report 1367 contains CSCI scores from southern California streams including streams that have been anthropogenically or physically modified in some form but retain a stream bottom where the channel substrate has not been artificially lined with concrete or other impervious materials from toe of bank to toe of bank. Some sites in the SCCWRP Report 1367 are within southern California but outside of the San Diego Water Board region. These should be considered because the CSCI is a statewide tool that compares a site's conditions against reference streams according to environmental characteristics irrespective of regional Water Board hydrologic boundaries. The report and its CSCI data are available at [https://www.waterboards.ca.gov/rwqcb5/water\\_issues/swamp/streams\\_report/streams\\_indicators\\_thresholds\\_modchannel\\_v6\\_rpt.pdf](https://www.waterboards.ca.gov/rwqcb5/water_issues/swamp/streams_report/streams_indicators_thresholds_modchannel_v6_rpt.pdf)

*Note regarding the use of “modified” when referring to streams in the SCCWRP Report 1367 and the current Administrative Record.*

It is important to consider that the SCCWRP Report 1367 uses the term “modified” when describing streams differently than how the term was broadly considered by the San Diego Water Board. For instance, one criterion in SCCWRP report classifies a stream as “modified” if less than 25% of a given stream bottom reach is hardened. While the Biological Objective would not apply to hardened streambed segments, it would apply to all other perennial and seasonal streams not otherwise excluded (see Staff Report discussion in section 4.5.2).

Further, the SCCWRP report uses a classification system to analyze conditions and CSCI scores in different types of modified streams. Such classification schemes could continue ad infinitum. San Diego Water Board's Basin Plan amendment, however, simply applies the Biological Objective to all streams without hardened streambeds, except as otherwise excluded. In adopting the Biological Objective, the San Diego Water Board examined its appropriateness in a wide range of anthropogenically physically modified streams and in response to comments received during the comment periods for the Biological Objective stated that application of the Stream Biological Objective was inappropriate in streams with **any** level of anthropogenic physical modification (e.g. road crossings, channel movement, bank hardening, etc.).

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<sup>2</sup> SCCWRP report 1367 was submitted to the Central Valley Regional Water Quality Control Board and is available at [https://www.waterboards.ca.gov/rwqcb5/water\\_issues/swamp/streams\\_report/streams\\_indicators\\_thresholds\\_modchannel\\_v6\\_rpt.pdf](https://www.waterboards.ca.gov/rwqcb5/water_issues/swamp/streams_report/streams_indicators_thresholds_modchannel_v6_rpt.pdf)

In effect, that means the analysis in the SCCWRP report does not provide an apples-to-apples comparison with the Biological Objective. Despite the new classification system in the SCCWRP Report, the data in it from anthropogenically modified streams in southern California supports the San Diego Water Board's findings and conclusions that the Biological Objective in anthropogenically physically modified streams in the region can be achieved.

## **2. Other relevant CSCI data from anthropogenically-modified streams available in CEDEN.**

Because the SCCWRP Report 1367 relies on methods that limit the data considered, there are other relevant CSCI data for anthropogenically-modified streams to consider. For example, data collected after the 2020-2021 season, sites sampled as part of Water Board permit programs, sites from completed SWAMP efforts, or some sites sampled by the Central Coast Regional Water Board. A list of such sites from CEDEN that we propose be added to the record is included in Table 1 below.

## **3. The California 2024 Clean Water Act section 305(b) and 303(d) Integrated Report and the CSCI data for Streams in the San Diego Region.**

The 2024 Integrated Report prepared by the State Water Board is available at [https://waterboards.ca.gov/water\\_issues/programs/water\\_quality\\_assessment/2024-integrated-report.html](https://waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html) and includes information that may help the State Water Board's evaluation of the Basin Plan amendment because it is the most updated report approved by the State Water Board on the condition of the waters in the San Diego Region.<sup>3</sup> It identifies, for instance, information about pollutants in many, if not all, of the streams with high or low CSCI scores in the region. The information about pollutants and the stream condition categories in the Integrated Report provide context for the San Diego Water Board's Implementation Plan in the Basin Plan amendment.

In summary, a significant amount of CSCI data has been collected and analyzed by multiple parties since the San Diego Water Board adopted the Biological Objectives Basin Plan amendment in 2020 and the new data supports the Biological Objective. The new data we offer for State Water Board consideration confirms the appropriateness of using the CSCI as articulated by the San Diego Water Board to

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<sup>3</sup> The 2024 Integrated Report was approved by the State Water Board on February 6, 2024. On December 13, 2024, the U.S. EPA gave it Partial Approval and Partial Disapproval. None of the disapproval was related to CSCI scores or related analysis in the San Diego Region.

evaluate the biological integrity of streams in the San Diego Region and guide implementation actions as described in the Basin Plan amendment to protect, enhance, and restore the associated beneficial uses.

We look forward to the State Water Board's May 6, 2025 public workshop on the matter. For questions about the data submitted herein, please contact Chad Loflen, Senior Environmental Scientist, at [Chad.Loflen@waterboards.ca.gov](mailto:Chad.Loflen@waterboards.ca.gov).

Table 1: CSCI data from Bioassessment Sites in CEDEN to Add to the Record

<b>Station Code in CEDEN</b>	<b>Sample Date</b>	<b>CSCI Score</b>
315GAI	5/7/2008	0.895231
315GAI	3/23/2002	0.895232
315RSB	5/7/2008	1.01614
403CE0188	6/10/2015	0.843184
412M08599	7/1/2020	0.862552
412M08599	7/11/2023	0.826094
412M08663	5/26/2021	0.821964
801CYC121	5/31/2024	1.09728
801M127222	5/22/2024	0.916459
801PLC469	5/31/2024	1.0451
801RB8559	7/10/2013	0.839791
801RB8567	6/8/2016	0.804111
801S00375	5/31/2024	0.848324
801S00375	6/6/2023	0.800427
801SCASxx	5/23/2001	0.883071
801SCLCRx	5/23/2001	0.92042
907S11430	6/5/2024	0.864756577
907S11430	6/5/2024	0.956578095
911UACC1	5/9/2023	0.95
ME-VR2	6/23/2022	0.832932
ME-VR2	6/8/2021	0.828065
ME-VR2	6/12/2012	0.817243
ME-VR2	6/11/2015	0.789971
ME-VR2	7/6/2011	0.862861
ME-VR2	6/24/2013	0.847214
SMC00191	7/12/2010	0.921008
SMC01860	7/13/2021	0.811588
SMC01860	6/28/2023	0.820882
403BA0191	7/12/2010	0.921008

<b>Station Code in CEDEN</b>	<b>Sample Date</b>	<b>CSCI Score</b>
SMC00464	7/27/2022	0.957601
405PS0036	7/7/2022	0.954761

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