



State Water Resources Control Board

SUMMARY OF SUBMITTED EVIDENCE FOR AMENDMENT TO THE WATER QUALITY CONTROL PLAN FOR THE SAN DIEGO BASIN TO INCORPORATE A WATER QUALITY OBJECTIVE FOR BIOLOGICAL CONDITION ADOPTED BY THE SAN DIEGO REGIONAL WATER QUALITY CONTROL BOARD

On January 22, 2025, the State Water Resources Control Board (State Water Board) provided [public notice](#) that it would accept new evidence into the administrative record for its consideration of an amendment to the Water Quality Control Plan for the San Diego Basin to incorporate a water quality objective for biological condition ([Biological Objective](#)). The Biological Objective was adopted by the San Diego Regional Water Quality Control Board (San Diego Water Board) in December 2020 and must be approved by the State Water Board before becoming effective.

The State Water Board is accepting written comments on the submitted evidence from April 1, 2025, until 12:00 noon Monday May 19, 2025, and will hold a public workshop on May 6, 2025.

The public notice stated that in order for new evidence to be considered, it must be:

1. Published since November 18, 2020 (the date of the San Diego Water Board's hearing), be relevant to the use of the proposed biological objective in anthropogenically and physically modified soft-bottom streams in the San Diego Region,
2. Accompanied by a statement of the relevance of the evidence to the implementation of the proposed biological objective, and
3. Received by State Water Board by 12:00 noon on Monday, February 24, 2025.

This document summarizes the three letters received by the State Water Board proposing new evidence for the administrative record. Copies of and/or information on how to access the three letters are available from the San Diego Water Board's project website for the Biological Objectives Basin Plan Amendment. The website is: https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/bio_objec tives/

The three comment letters with evidence were submitted by:

- 1) The San Diego Regional Water Quality Control Board (San Diego Water Board)
- 2) The Riverside County Flood Control and Water Conservation District, the County of San Diego, the City of San Diego, the County of Orange, and Orange County Flood Control District (collectively, the Permittees).
- 3) California Coastkeeper Alliance (Coastkeeper Alliance)

Summary of Submitted Evidence

San Diego Water Board

The San Diego Water Board submitted three items for the State Water Board to consider adding to the administrative record.

- California Stream Condition Index (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).
- A table of additional CSCI scores for modified streams that were not included in SCCWRP Report 1367.
- The most recent (2024) Clean Water Act sections 305(b) and 303(d) Integrated Report, including pollutant and CSCI data for streams in the San Diego Region.

The San Diego Water Board noted the CSCI data were submitted because they are “...relevant to the use of the proposed biological objective in anthropogenically and physically modified soft-bottom streams in the San Diego Water Board Region.” The 2024 Integrated Report was submitted because “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.”

Permittees

The Permittees’ letter included three categories of items for the State Water Board to consider adding to the administrative record. The Permittees’ letter includes supplemental information provided as GIS and Microsoft Excel files.

- Channel engineering information and CSCI data for streams in the San Diego Region. The Permittees submitted this evidence “...because it provides a more complete and updated understanding of the number of CSCI scores in the San Diego Region that were collected in soft-bottomed modified channels and flood control channels and demonstrates that a larger dataset is available than has

been previously analyzed.”

- Information about flood control channel maintenance and requirements within the San Diego and Los Angeles Regions, including approximately 510 pages of news articles and local government public comment on flood control maintenance and flooding. The Permittees submitted this because it “. . . provides information regarding the public’s concerns and interests in prioritizing channel maintenance, the damage and impacts from the flooding, and the potential changes in maintenance levels if channel maintenance activities need to be modified or curtailed to attain the SDRBO [San Diego Regional Biological Objective] in modified soft-bottom streams.”
- Two review articles and one perspective article published in scientific journals after 2020¹. The Permittees included these articles because they “. . . [describe] the challenges of restoring modified channels to natural biological conditions and the relationship between biological integrity and flood control management in urban waterbodies.” One review article describes a gap analysis on 11 urban stream restoration projects to identify shortcomings in the projects’ processes that impacted achievement of project goals. The other review article discusses how to prioritize streams for “rehabilitation” in an urban environment. The perspective paper is based on the concept that artificial or heavily-altered freshwaters could be classified as “novel” for stream restoration and management.

California Coastkeeper Alliance

The Coastkeeper Alliance letter, which represents a network of California Coast and Waterkeeper not-for-profit organizations, submitted one item for the State Water Board to consider adding to the administrative record. The Coastkeeper Alliance, like the San Diego Water Board, requested addition of 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).

¹ Zerega, A.; Simões, N.E.; Feio, M.J. How to Improve the Biological Quality of Urban Streams? Reviewing the Effect of Hydromorphological Alterations and Rehabilitation Measures on Benthic Invertebrates. *Water* 2021, 13, 2087. <https://doi.org/10.3390/w13152087>

Eros, T., Hermoso, V., & Langhans, S. D. (2023). Leading the path toward sustainable freshwater management: Reconciling challenges and opportunities in historical, hybrid, and novel ecosystem types. *WIREs Water*, 10(3), e1645. [hPps://doi.org/10.1002/wat2.1645](https://doi.org/10.1002/wat2.1645)

Murphy, B.M., K. Russell, C.C. Stillwell, R. Hawley, M. Scoggins, K.G. Hopkins, M.J. Burns, K.T. Taniguchi-Quan, K.H. Macneal, R. Smith. 2022. Closing the gap on wicked urban stream restoration problems: A framework to integrate science and community values. *Freshwater Science* 41:3.

The Coastkeeper Alliance requested the report be added to the administrative record because it is considered “applicable throughout California” and one purpose of the report is to “address concerns about the ability to achieve reference-based biological integrity goals in channels that have been modified for flood protection or water conveyance.”

Additional Information

More information about the Basin Plan Amendment, including supporting documents, is available at the San Diego Water Board’s website at:

https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/bio_objectives.

Water Board staff is developing an overview of how the San Diego Water Board intends to implement the biological objective in certain programs and expects to post the overview on the Regional Water Board program webpage on or about April 25.

The agenda for the May 6, 2025, State Water Board meeting and instructions for participating in the meeting will be posted on or about April 25, 2025, at

https://www.waterboards.ca.gov/board_info/calendar/.