County of San Diego

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To: San Diego River WQIP Consultation Panel

From: San Diego River WQIP Participating Agencies

Subject: Request Consultation Panel Comments on the Goals for the Water Quality Improvement Plan Provision B.3 Chapter

Date: October 16, 2014

Introduction

On behalf of the Participating Agencies (Cities of El Cajon, La Mesa, San Diego, Santee, County of San Diego, and California Department of Transportation – Caltrans) that are developing the San Diego River Water Quality Improvement Plan (SDR WQIP), the County of San Diego is providing the jurisdictional goals for your review and comment. Provision B.3 of California Regional Water Quality Control Board – San Diego Region Order No. R9-2013-0001[1] (Permit) requires development of goals that address the highest priority water quality conditions identified for the San Diego River Watershed (SDR). The draft report, Provision B.3 Water Quality Improvement, Goals, Strategies and Schedules[2], was sent to you previously and it is also available on the Project Clean Water web site. Thank you for your feedback on strategies and schedules at the Consultation Panel meeting on August 21. The jurisdictions' goals are now ready for your review. This memo provides the background on the development of the goals to provide context to the Consultation Panel's review of the attached goals. Please send your comments to Ruth de la Rosa by the close of business on October 30, 2014. We appreciate your time and effort. Please do contact us if you have questions or need additional information to assist you in providing your comments. In addition to providing comments by email, Participating Agencies anticipate a face-to-face meeting to further discuss your comments on the goals on Wednesday, October 29, 2014. Meeting details will be sent separately.

General Background

During preparation of Provision B.2, Priority Water Quality Conditions[3] the Participating Agencies identified the water quality priorities within the watershed that will be addressed by the

[1] Permit: use the imbedded web link or type the following into your internet browser's address line: http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/updates052313/2013-0523_Order_No._R9-2013-0001_COMPLETE.pdf

[2] Provision B.3 chapter: use the imbedded web link or type the following into your internet browser's address line: http://www.projectcleanwater.org/images/SDR_cp_draft_wqip_b3.pdf

[3] Provision B.2 chapter: use the imbedded web link or type the following into your internet browser's address line:

Water Quality Improvement Plan. A detailed evaluation of receiving water quality conditions and impacts from jurisdictions' storm water conveyance system discharges was performed to identify the priority and highest priority water quality condition(s). Based on the water quality assessments, priority water quality conditions were identified for the San Diego River Watershed. The list of priority water quality conditions was narrowed to identify the highest priority water quality condition(s) through a four-step screening process. The resulting highest priority water quality condition in the San Diego River Watershed Management Area is bacteria.

Bacteria have been a focus since the adoption of the Bacteria Total Maximum Daily Load (TMDL) (Water Board Resolution No. R9-2010-0001). The purpose of the Bacteria TMDL is to protect the health of those who recreate at beaches. The TMDL requires Participating Agencies to attain required load reductions during both dry and wet weather conditions within a 10- and 20-year compliance timeline, respectively.

The goals of the WQIP are focused to achieve compliance with the Bacteria TMDL. However, by addressing multiple pollutants with a single BMP strategy, jurisdictions can decrease the likelihood of future water quality impairments and also address the other priority water quality conditions in the SDR watershed.

Numeric Goals Requirements

The Participating Agencies must develop and incorporate numeric goals into the Water Quality Improvement Plan. Numeric goals will be used to support Water Quality Improvement Plan implementation and measure reasonable progress towards addressing the highest priority water quality condition identified. For each final numeric goal, at least one interim numeric goal must be expressed as a reasonable increment toward achieving the final numeric goal. Reasonable interim numeric goals must be established to be accomplished during each 5 year period after the acceptance of the Water Quality Improvement Plan[4] and establishment of at least one interim numeric goal that will work toward achieving the final numeric goal[5] Numeric goals must be based on measureable criteria or indicators capable of demonstrating one or more of the following:

- Discharges from the Participating Agencies' stormwater conveyance system will not cause or contribute to exceedances of water quality standards in receiving waters
- The conditions of receiving waters and associated habitat are protected from storm water conveyance system discharges
- Beneficial uses of receiving waters are protected from stormwater conveyance system discharges and will be supported.

The Participating Agencies are using the TMDL requirements as dry and wet weather interim and final numeric goals, and have developed draft interim numeric goals to be accomplished during the first 5 year period after acceptance of the WQIP.

Numeric Goals Based on the Bacteria TMDL

The Permit provides multiple options for demonstrating compliance with the Bacteria TMDL interim and final numeric goals – referred to as compliance pathways. Each compliance pathway is an independent option to demonstrate progress and ultimately compliance with the TMDL; any one of the compliance pathways may be used. As stated above, the Participating Agencies will use the TMDL requirements for the interim and final goals which are presented in

[4] Refer to Provision II.B.3.a.(2)(b)(iii) on page 24 of the Permit
[5] Refer to Provision II.B.3.a.(2)(b)(iv) on page 25 of the Permit

Tables 2 and 3 of the draft WQIP Section B.3 previously sent to you; they are included as Attachment A and Attachment B respectively to this document for your reference and convenience.

Interim Numeric Goals for Current Permit Term and 1st 5-Year Period

The SDR Participating Agencies are mainly focusing on the implementation of the WQIP as a compliance pathway and will utilize other compliance pathways for some strategies, and in future years, that are applicable to specific strategies. The WQIP compliance pathway involves an adaptive management process that calls for an annual assessment of progress towards the Bacteria TMDL interim and final goals to determine whether modifications to the strategies or jurisdictional interim goals, and/or implementation of any of the optional strategies are needed to achieve the Bacteria TMDL goals. Because of this, the Participating Agencies are focusing on solidifying the interim numeric goals for the current Permit Term and the first 5 year period after WQIP acceptance. The SDR Participating Agencies are providing our draft reasonable interim numeric goals to the Consultation Panel for your review and are soliciting your comments and feedback. Tables A – D below are Jurisdictional Interim goals. The full goals that include the required Bacteria TMDL interim and final compliance goals are included in Attachment C.

Draft Jurisdictional Interim Numeric Goals for Current Permit Term and 1st 5 Year Period

Table A. City of El Cajon

Title	Current Permit Term Goal 2013-2018	1st 5 Year Period Goal (Following Acceptance of WQIP)
Dry Weather		
Reduce controllable dry weather persistent flows	Reduce the volume of dry weather flows or the number of storm drains with dry weather flows by 10%[1].	Maintain 10% reduction in flows or the number of storm drains with dry weather flows and expand reduction based on results of previous actions and availability of funds[1].
Over-irrigation outreach program	Conduct over-irrigation outreach pilot study, disseminate literature and engage with the general public regarding impacts to receiving waters from over-irrigation.	Expand over-irrigation outreach efforts based on results of pilot study and availability of funds. Develop incentive program(s) to help conserve and reduce over-irrigation flows.
Compliance with Landscape Ordinance	Review projects that require landscape and irrigation plans for compliance with the City's Landscape Ordinance aimed at reductions in water use.	Expand the review of high priority development projects that would require a landscape and irrigation plan for compliance with the City's Landscape Ordinance aimed at reducing water usage and over-irrigation.
Coordination with water utilities	Coordinate with water utility companies to disseminate "mailer inserts" educate and help reduce over-irrigation flows. Develop incentive program(s) to help conserve and reduce over-irrigation	Continue to coordinate with water utility companies to disseminate "mailer inserts" to educate and help reduce over-irrigation flows. Develop incentive program(s) to help conserve and reduce over-irrigation

	flows.	flows.
Coordination with water utilities	Coordinate with water utility companies to disseminate “mailer inserts” to help educate on importance of collecting and properly disposing of pet waste materials.	Coordinate with water utility companies to disseminate “mailer inserts” to help educate on importance of collecting and properly disposing of pet waste materials.
Transient sweeps	Conduct and coordinate transient sweeps throughout drainage channels within jurisdiction.	Continue to conduct and coordinate transient sweeps throughout drainage channels within jurisdiction.
Sanitary sewer overflow program	Survey, clean laterals and implement spill response plan for Sanitary Sewer Overflows (SSOs) throughout jurisdiction.	Continue to survey, clean laterals and implement spill response plan for Sanitary Sewer Overflows (SSOs) throughout jurisdiction.
Wet Weather		
Pet waste outreach	Expand pet waste management outreach to 1 focused management area; or to large properties owners (i.e. apartments, commercial facilities).	Expand pet waste management outreach to 1 focused management area; or to large properties owners (i.e. apartments, commercial facilities).
Clean-up sponsorships	Sponsor, coordinate with jurisdictions creek clean up events in 1 focused management area, bi-annually; segregate and quantify waste materials.	Sponsor, coordinate with jurisdictions creek clean up events in 1 focused management area, bi-annually; segregate and quantify waste materials.
Small scale bioretention / infiltration incentive programs	Develop pilot residential incentive program to encourage rain water use through rain barrels, roof downspouts redirected to landscaped areas, rain gardens & other small scale bioretention / infiltration BMPs.	Implement pilot residential incentive program to encourage small scale bioretention / infiltration BMPs.
Structural BMPs feasibility study	Develop feasibility study to assess dry/wet weather treatment control BMPs (i.e. high capacity filters) to help achieve interim/final MS4/creek effluent limits. Draft Environmental Impact Report for treatment control BMPs (i.e. high capacity filters) to treat wet weather bacterial loads.	Complete Environmental Impact Report for treatment control BMPs. Design treatment control BMPs (i.e. high capacity filters) to help treat wet weather bacterial loads.

Regional Structural BMPs feasibility study		Collaborate with the other watershed Jurisdictions for planning, conceptual design and full design for select BMPs, engineering, siting, and environmental review for Regional Structural BMP, as funding becomes available.

Table B. City of La Mesa

Title	Current Permit Term Goal 2013-2018	1st 5 Year Period Goal (Following Acceptance of WQIP)
Dry Weather		
Creek restoration project	Perform Creek Restoration project on Alvarado Creek upstream of Box Culvert at SR-125 Freeway.	
Residential irrigation reduction program	Perform a residential irrigation reduction program on one or more sub-basins within the San Diego River Watershed.	
Wet Weather		
Creek restoration project	Perform Creek Restoration project on Alvarado Creek upstream of Box Culvert at SR-125 Freeway.	Conduct Alvarado Trunk Main Sewer Replacement Project which will replace approx. 0.75 miles of trunk sewer located under or in very close proximity to Alvarado Creek.
Enhanced inspection program	Implement Modified Inspection Program. 200% more Commercial/ Industrial Inspections per year will result in higher rates of compliance.	

Table C. City of San Diego

Numeric Goal	Unit of Measure	Assessment Period and Fiscal Year	
		Current Permit Term Goal 2013-2018	1st 5 Year Period Goal* (Following Acceptance of WQIP)
Dry Weather		FY18	
MS4 Discharges Dry Weather Flow, Bacteria Reduction	Green Infrastructure Policy	Approve a Green Infrastructure Policy	
		Identify and start design on green infrastructure projects to capture and treat drainage from 159 acres, **OR**	
MS4 Discharges Reduce Pollutants in Dry Weather Discharges Managed by HOAs and BOAs	# of HOAs and BOAs targeted per year	Provide education and outreach to 4 HOAs and/or BOAs per year	

MS4 Discharges Reduce Pollutants in Dry Weather Discharges	Attendance at community events	Attend at least 1 community event in each watershed per year
	# of community groups receiving informational material per year	Distribute information materials to at least 1 community group per year
	# of Watershed Education Brochures distributed per year	Distribute 500 watershed specific educational brochures to libraries, recreation centers, and community groups
	# Storm Drain Stenciling Day events	Coordinate at least 1 Storm Drain Stenciling Day event in each watershed every three years, **OR**
	% Increase in BMP implementation compliance through targeted, property-based Inspection Program	5%, **OR**
MS4 Discharges Reduce or Eliminate Over-Irrigation Jurisdiction-Wide	# of radio spots scheduled to air about over-irrigation	1 radio spot about over-irrigation for the entire City of San Diego
Wet Weather		FY18
MS4 Discharges % Wet Weather Flow, Bacteria Reduction	Green Infrastructure Policy	Approve a Green Infrastructure Policy
		Identify and start design on green infrastructure projects to capture and treat drainage from 159 acres
MS4 Discharges Reduce Pollutants in Wet Weather Discharges Managed by HOAs and BOAs	# of HOAs and BOAs targeted per year	Provide education and outreach to 4 HOAs and/or BOAs per year
MS4 Discharges Reduce Pollutants in Wet Weather Discharges	Attendance at community events	Attend at least 1 community event in each watershed per year
	# of community groups receiving informational material per year	Distribute information materials to at least 1 community group per year
	# of Watershed Education Brochures distributed per year	Distribute 500 watershed specific educational brochures to libraries, recreation centers, and community groups
	# Storm Drain Stenciling Day events	Coordinate at least 1 Storm Drain Stenciling Day event in each watershed every three years, **OR**

	% Increase in BMP implementation compliance through targeted, property-based Inspection Program	5%

Table D. City of Santee

Title	Current Permit Term Goal 2013-2018	1st 5 Year Period Goal* (Following Acceptance of WQIP)
Dry Weather		
Reduce loads at storm drain outfalls	Reduce the number of storm drain outfalls with dry weather flows by 10% in the areas tributary to Woodglen Vista Creek (1); or	Maintain 10% reduction in the number of storm drains with dry weather flows in areas tributary to Woodglen Vista Creek. Expand efforts to include those areas tributary to Sycamore Creek (1); or
Partner with water district to address outdoor water use	In partnership with Padre Dam Municipal Water District, develop and disseminate outreach materials addressing outdoor water use, water conservation, and water quality to 75% of residential communities; or	Enhance outdoor water use outreach efforts to address 75% landscape contractors and property management associations; or
Compliance inspections	Dedicate 10% of compliance inspection hours to conduct investigations of dry-weather flows; or	Dedicate 15% of compliance inspection hours to conduct investigations of dry-weather flows; or
Bacteria load reduction	Achieve measurable bacteria load reduction at confluence of Woodglen Vista Creek during summer dry weather (1) ;or	Achieve measurable bacteria load reduction at confluence of Woodglen Vista Creek and Sycamore Creek during summer dry weather (1) ;or
Establish partnerships for non-native plant removal	Establish partnerships for preventing and mitigating arundo or other non-native plant removal from the San Diego River or tributary; or	Collaborate with partner agencies to remove 1 acre of arundo or other non-native plants from the San Diego River or tributary, as funding becomes available; or
Compliance with Landscape Ordinance	Review 50 % of projects that require landscape and irrigation plans for compliance with the City's Landscape Ordinance aimed at reductions in water use; or	Review 75 % of projects that require a landscape and irrigation plan for compliance with the City's Landscape Ordinance aimed at reductions in water use; or
Partner with school districts	Partner with Santee School District to create awareness about bacteria for SD River. Target 50% school employees.	Partner with Santee School District to target behaviors likely to contribute or produce bacteria pollution (ie: cafeteria's, dining areas, and trash enclosures). Implement programs at 50% of campuses.

Wet Weather		
	Enhance parks and river trail pet stations to include 10% additional trash bins and implement routine O&M; or	Enhance parks and river trail pet stations to include 25% additional trash bins and implement routine O&M; or
Sponsor clean-up event	Partner on one (1) annual clean up event at area identified with highest bacteria levels (ie: SDR between Cuyamaca & Carlton Hills Blvd); or	Partner on bi-annual clean up events at areas identified with highest bacteria levels (ie: SDR between Cuyamaca & Carlton Hills Blvd); or
Retrofit projects	Retrofit a total of 1.6 acres of drainage area (through projects that occurred from 2003-2009).	Conduct planning, conceptual design, for structural BMPs, as funding becomes available.

Table E. County of San Diego

Compliance Pathway	Title	Current Permit Term Goal	1st 5 Year Period Goal – 2020 (Following Acceptance of WQIP)
Dry Weather			
1 or	Meet bacteria allowable exceedance frequency of receiving water objectives	Attain 75% compliance with AB411 bacteria standards at the TMDL ocean compliance point at the mouth of San Diego River during summer dry weather; (part of compliance pathway 6)	Bacteria exceedances at the receiving water compliance points, as defined in the TMDL monitoring plan, must be less than or equal to the allowable exceedance frequencies (e.g., fecal coliform AEF = 6.3%); OR
2 or	No discharge from stormwater drain outfalls	Reduce the volume of dry weather flows or the number of storm drain outfalls with dry weather flows by 10% in the Paseo Vista community [(a)]; (part of compliance pathway 6)	There are no discharges from the County of San Diego's storm drain outfalls to the receiving water as demonstrated through the storm drain outfall monitoring program (Provisions D.2.a, D.2.b); OR
3 or	Reduce loads at storm drain outfalls	See compliance pathway 6;	Bacteria loads in discharges from the County of San Diego's storm drain outfalls must be reduced by ≥ 34.72% for fecal coliform and ≥ 46.98% for enterococcus as compared to 2001-2002 baseline; OR

4 or	Storm drain outfalls meet receiving water objectives	See compliance pathway 6;	Bacteria concentrations in the discharges from storm drain outfalls must be less than the single sample maximum and 30-day geometric mean water quality objectives for the receiving water (creek or beach); OR
5 or	Natural source exclusion	Mitigate human sources for 25 % of storm drain outfalls consistently detected above reporting limits for human markers; (part of compliance pathway 6)	County of San Diego demonstrates that exceedances of the final receiving water limitations are due to loads from natural sources and pollutant loads from the County's storm drain outfalls are not causing or contributing to the exceedances: OR
6	Implement WQIP and use adaptive management	Implement the Water Quality Improvement Plan supported by reasonable assurance as accepted by the RWQCB.	Implement the Water Quality Improvement Plan supported by reasonable assurance that the implementation of BMPs will meet interim compliance and it is accepted by the RWQCB.
Wet Weather			
Implement WQIP and use adaptive management supported by reasonable assurance as accepted by the RWQCB.			
Focus on Programmatic BMPs; and		a. Expand residential large property pet waste management outreach to 1 focused management area; or to 15 large properties; and	a. Expand residential large property pet waste management outreach based on results of pilot project and availability of funds; and
		b. Sponsor clean up events in 1 focused management area, bi-annually; and	b. Sponsor clean up events in 1 focused management area, bi-annually; and
Focus on Distributed BMPs		a. Retrofit a total of 392 acres of drainage area (through treatment control BMP projects that occurred from 2003-2009); and	a. Conduct planning and conceptual design, as funding becomes available, for distributed (green) BMPs; and
		b. Redevelopment implementation requirements (treatment control BMPs) 2009-2018; and	b. Redevelopment implementation requirements (treatment control BMPs) 2018-2023; and
		c. Evaluate feasibility of a pilot residential incentive program to encourage rain water use through rain barrels, roof downspouts redirected to landscaped areas, rain gardens & other small scale bioretention/ infiltration BMPs.	d. If feasible, implement pilot residential incentive program to encourage small scale bioretention/infiltration BMPs; and

Focus on Regional BMPs		Conduct planning, full design, engineering, siting, and environmental review for select BMPs, as funding becomes available.

How to Submit Comments to the Participating Agencies
Please use the attached comment table to provide your input and recommendations on these draft jurisdictional goals. Submit your comments to Ruth de la Rosa using the contact information below. Your input and recommendations are due on or before **October 30, 2014**.

Contact Information:

Ruth de la Rosa
County of San Diego
DPW Watershed Protection Program
5510 Overland Ave, M.S. O332
San Diego CA 92123

Email: ruth.delarosa@sdcounty.ca.gov
Phone: (858) 694-2752

Attachments:
A. Table 2 from Water Quality Improvement Plan, Provision B.3 Chapter
B. Table 3 from Water Quality Improvement Plan, Provision B.3 Chapter
C. Jurisdictional Goals
D. Comment Table

ATTACHMENT A

Table 1 from Water Quality Improvement Plan, Provision B.3 Chapter Pathway to Achieve Interim TMDL Goals

Pathway	Title	Interim Target	Metric	Measurement		
				Indicator	Dry[c]	Wet
1 OR	Meet bacteria allowable frequency of receiving water objectives	No exceedances of the interim receiving water limitations in the receiving water; OR	Exceedance frequencies in receiving waters must be less than or equal to allowable exceedance frequencies.	Total Coliform[a]	.28% AEF[d]	46% AEF
				Fecal Coliform	0% AEF	43% AEF
				Enterococcus	1.5% AEF	49% (creeks) 51% (beaches) AEF
2 OR	No discharge from stormwater outfalls	No direct or indirect discharge from the Participating Agencies' MS4s to the receiving water; OR	Assessment of presence/absence of flow and connectivity with receiving water.	Flow observations or measurements.		
3 OR	Reduce loads at storm drain outfalls	The pollutant load reductions for discharges from the Participating Agencies' MS4 outfalls are greater than or equal to the interim effluent limitations; OR	Load reductions in discharges greater than or equal to required load reductions.	Total Coliform	37.02% reduction	19.07% reduction
				Fecal Coliform	34.72% reduction	26.61% reduction
				Enterococcus	46.98% reduction	21.37% reduction
4	Implement WQIP and use adaptive management	The Participating Agencies develop and implement the Water Quality Improvement Plan.[b]	Implementation of jurisdictional strategies designed to meet interim goals 1, 2, and/or 3.	Implementation of jurisdictional strategies as developed in WQIP.		

a Receiving water limitations for total coliform only apply to beaches.
b The WQIP must provide reasonable assurance that the interim TMDL compliance requirements in Attachment E of the Permit will be met via implementation, must be accepted by the San Diego Regional Water Board, and must be fully implemented by the Participating Agencies.
c Dry weather measurements at beaches
d AEF - allowable exceedance frequency is the percent of samples that can exceed the single sample maximum of geometric mean and still be in compliance; the AEF is calculated based on the presence of bacteria loading from natural sources

ATTACHMENT B
Table 2from Water Quality Improvement Plan, Provision B.3 Chapter
Pathways to Achieve Final Bacteria TMDL Goals

<table>
<tr><th rowspan="3">Compliance Pathway</th><th rowspan="3">Final Target</th><th rowspan="3">Final Metric</th><th colspan="6">Measurement</th></tr>
<tr><th>Indicator</th><th colspan="3">Dry Weather</th><th colspan="2">Wet Weather</th></tr>
<tr><td rowspan="5">1</td><td rowspan="5">No exceedances of the final receiving water limitations in the receiving water; OR</td><td rowspan="5">Bacteria concentrations (MPN or CFU/100 ml) and exceedance frequencies in receiving waters are less than or equal to allowable values; OR</td><td></td><td>SSM[a]</td><td>GM[b]</td><td>AEF[c]</td><td>SSM</td><td>AEF</td></tr>
<tr><td>Total Coliform[d]</td><td>10,000</td><td>1,000</td><td>0%</td><td>10,000</td><td>22%</td></tr>
<tr><td>Fecal Coliform</td><td>400</td><td>200</td><td>0%</td><td>400</td><td>22%</td></tr>
<tr><td>Enterococcus (beaches)</td><td>104</td><td>35</td><td rowspan="2">0%</td><td>104</td><td rowspan="2">22%</td></tr>
<tr><td>Enterococcus (creeks)</td><td>61</td><td>33</td><td>61</td></tr>
<tr><td>2</td><td>No direct or indirect discharge from the Participating Agencies’ storm drain outfalls to the receiving water; OR</td><td>Assessment of presence/absence of flow and connectivity with receiving water; OR</td><td colspan="6">Flow observations or measurements.</td></tr>
<tr><td rowspan="5">3</td><td rowspan="5">There are no exceedances of the final effluent limitations at the Participating Agencies’ storm drain outfalls; OR</td><td rowspan="5">Bacteria concentrations (MPN or CFU/100 ml) and exceedance frequencies in discharges are less than or equal to allowable values; OR</td><td rowspan="2"></td><td colspan="3">Dry</td><td colspan="2">Wet</td></tr>
<tr><td>SSM</td><td>GM</td><td>AEF[e]</td><td>SSM</td><td>AEF[f]</td></tr>
<tr><td>Total Coliform[g]</td><td>10,000</td><td>1,000</td><td>0%</td><td>10,000</td><td>22%</td></tr>
<tr><td>Fecal Coliform</td><td>400</td><td>200</td><td>0%</td><td>400</td><td>22%</td></tr>
<tr><td>Enterococcus (beaches)[h]</td><td>104</td><td>35</td><td rowspan="2">0%</td><td>104</td><td rowspan="2">22%</td></tr>
<tr><td>Enterococcus (creeks)[i]</td><td>61</td><td>33</td><td>61</td></tr>
<tr><td rowspan="3">4</td><td rowspan="3">The pollutant load reductions for discharges from the Participating Agencies’ storm drain outfalls are greater than or equal to the final effluent limitations; OR</td><td rowspan="3">Load reductions in discharges are greater than or equal to required load reductions. The calculation requires an understanding of the baseline load[j], which can be used to estimate a target load reduction[k]; OR</td><td></td><td colspan="3">Percent Reduction (Dry)</td><td colspan="2">Percent Reduction (Wet)</td></tr>
<tr><td>Total Coliform</td><td colspan="3">74.03%</td><td colspan="2">34.7%</td></tr>
<tr><td>Fecal Coliform</td><td colspan="3">69.44%</td><td colspan="2">34.7%</td></tr>
</table>

Compliance Pathway	Final Target	Final Metric	Measurement		
			Indicator	Dry Weather	Wet Weather
			Enterococcus	93.96%	34.7%
5	Exceedances of the final receiving water limitations in the receiving water are due to loads from natural sources and pollutant loads from the Participating Agencies' storm drain outfalls are not causing or contributing to the exceedances; OR	Microbial source tracking results show human waste markers are below the limits of reporting in the receiving water at the time of exceedance in most samples and thus the storm drain outfall is not causing or contributing to observed exceedances in receiving waters; OR	Microbial source tracking results show human waste markers are below the limits of reporting in the receiving water at the time of the exceedance in most samples.		
6	The Participating Agencies develop and implement an adopted Water Quality Improvement Plan that includes a reasonable assurance of achieving target load reductions.	Implementation of jurisdictional strategies designed to meet goals. Use an adaptive management approach to improve implementation of jurisdictional strategies to reach goals.	Implementation of jurisdictional strategies as outlined in the WQIP, and of the required monitoring and assessment program.		

a SSM = single sample maximum or the highest allowable concentration of bacteria contained in one discreet sample

b GM = geometric mean calculated based on multiple samples over a given time frame as defined by the Ocean Plan

c AEF = allowable exceedance frequency is the percent of samples that can exceed the single sample maximum of geometric mean and still be in compliance; the AEF is calculated based on the presence of bacteria loading from natural sources

d Receiving water limitations for total coliform only apply to beaches.

e For dry weather days, the dry weather bacteria densities must be consistent with the single sample maximum REC-1 water quality objectives in the Ocean Plan for discharges to beaches and the Basin Plan for discharges to creeks and creek mouths.

f The 22% single sample maximum allowable exceedance frequency only applies to wet weather days.

g Total coliform effluent limitations only apply to storm drain outfalls that discharge to the Pacific Ocean Shorelines and creek mouths listed in Table 6.0 of Attachment E of Order R9-2013-0001.

h This enterococcus effluent limitation applies to storm drain discharges to segments of areas of the Pacific Ocean Shoreline listed in Table 6.0 of Attachment E of Order R9-2013-0001.

i This enterococcus effluent limitation applies to storm drain discharges to segments of areas of the creeks or creek mouths listed in Table 6.0 of Attachment E of Order R9-2013-0001.

j The baseline loads for the lower SDR watershed were determined through modeling, and are presented in Appendix C. Wet weather target load reductions (TLRs) for this WQIP were taken from the City of San Diego Phase II CLRP (Tetra Tech 2013). Fecal coliform was used to represent all bacteria for the purposes of this modeling. Based on this analysis, the TLR is 34.7%.

k The baseline enterococcus load (1993 water year) for the County of San Diego, City of El Cajon, City of Santee, City of La Mesa equals $5,043 * 10^{12}$ MPN resulting in a target load reduction of $1,750 * 10^{12}$ MPN for wet weather.

ATTACHMENT C

JURISDICTIONAL GOAL

Dry Weather Goals for Bacteria for City of El Cajon Forrester Creek - San Diego River Watershed

1st Permit Term (2013 - 2018)	2nd Permit Term (2018 - 2023)	
	2020: Meet TMDL Interim Compliance Date[2]	**2021**: Meet TMDL Final Compliance Date
	Meet interim dry weather compliance targets at compliance points outlined in the required monitoring and assessment program (see SDR WQIP Prov. B.3 Table 2); or implement Regional Water Quality Control Board accepted WQIP.	Meet final dry weather compliance targets at compliance points outlined in the required monitoring and assessment program (see SDR WQIP Prov. B.3 Table 2); or implement Regional Water Quality Control Board accepted WQIP.
Reduce the volume of dry weather flows or the number of storm drains with dry weather flows by 10%[1].	Maintain 10% reduction in flows or the number of storm drains with dry weather flows and expand reduction based on results of initial actions and availability of funds[1].	Maintain 10% reduction in flows or the number of storm drains with dry weather flows and expand reduction based on results of previous actions and availability of funds[1].
Conduct over-irrigation outreach pilot study, disseminate literature and engage with the general public regarding impacts to receiving waters from over-irrigation.	Expand over-irrigation outreach efforts based on results of pilot study and availability of funds. Develop incentive program(s) to help conserve and reduce over-irrigation flows.	Expand over-irrigation outreach efforts based on results of pilot study and availability of funds. Develop incentive program(s) to help conserve and reduce over-irrigation flows.
Review projects that require landscape and irrigation plans for compliance with the City's Landscape Ordinance aimed at reductions in water use.	Expand the review of high priority development projects that would require a landscape and irrigation plan for compliance with the City's Landscape Ordinance aimed at reducing water usage and over-irrigation.	Expand the review of high priority development projects that would require a landscape and irrigation plan for compliance with the City's Landscape Ordinance aimed at reducing water usage and over-irrigation.
Coordinate with water utility companies to disseminate "mailer inserts" educate and help reduce over-irrigation flows. Develop incentive program(s) to help conserve and reduce over-	Continue to coordinate with water utility companies to disseminate "mailer inserts" to educate and help reduce over-irrigation flows. Develop incentive program(s) to help conserve and reduce over-irrigation flows.	Implement a WQIP that is accepted by the San Diego Regional Board and that provides reasonable assurance that the interim TMDL compliance requirements (i.e., 6.b.(2)(c)) will be achieved.

irrigation flows.		
Coordinate with water utility companies to disseminate "mailer inserts" to help educate on importance of collecting and properly disposing of pet waste materials.	Coordinate with water utility companies to disseminate "mailer inserts" to help educate on importance of collecting and properly disposing of pet waste materials.	Coordinate with water utility companies to disseminate "mailer inserts" to help educate on importance of collecting and properly disposing of pet waste materials.
Continue to conduct and coordinate transient sweeps throughout drainage channels within jurisdiction.	Continue to conduct and coordinate transient sweeps throughout drainage channels within jurisdiction.	Continue to conduct and coordinate transient sweeps throughout drainage channels within jurisdiction.
Continue to survey, clean laterals and implement spill response plan for Sanitary Sewer Overflows (SSOs) throughout jurisdiction.	Continue to survey, clean laterals and implement spill response plan for Sanitary Sewer Overflows (SSOs) throughout jurisdiction.	Continue to survey, clean laterals and implement spill response plan for Sanitary Sewer Overflows (SSOs) throughout jurisdiction.

(1) The term "dry weather flows" excludes groundwater, other exempt or permitted non-stormwater flows, and sanitary sewer overflows.

(2) Request moving Interim TMDL Compliance Date from April 4, 2018 (per Attachment E, 6.c(1)) to April 4, 2020 to allow adequate time to investigate and mitigate dry weather flows through the adaptive management process of the WQIP.

Wet Weather Goals for Bacteria for City of El Cajon Forrester Creek - San Diego River Watershed

Wet Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition				
GOALS	**1st Permit Term 2013-2018**	**2nd Permit Term 2018- 2023**	**3rd Permit Term 2023-2028**	**4th Permit Term 2028-2033**
Bacteria TMDL			Meet TMDL Interim Compliance Date **April 4, 2028**[1]	Meet TMDL Final Compliance Date **April 4, 2031**
			Meet interim wet weather compliance targets at compliance points (see SDR WQIP Prov. B.3 Table 2); or	Meet final wet weather compliance targets at compliance points (see SDR WQIP Prov. B.3 Table 2); or
Non-Structural BMPs	Expand pet waste management outreach to 1 focused management area; or to large properties owners (i.e. apartments, commercial facilities).	Expand pet waste management outreach to 1 focused management area; or to large properties owners (i.e. apartments, commercial facilities).	Expand pet waste management outreach to 1 focused management area; or to large properties owners (i.e. apartments, commercial facilities).	
	Sponsor, coordinate with jurisdictions creek clean up events in 1 focused management area, bi-annually; segregate and quantify waste materials.	Sponsor, coordinate with jurisdictions creek clean up events in 1 focused management area, bi-annually; segregate and quantify waste materials.	Sponsor, coordinate with jurisdictions creek clean up events in 1 focused management area, bi-annually; segregate and quantify waste materials.	Sponsor, coordinate with jurisdictions creek clean up events in 1 focused management area, bi-annually; segregate and quantify waste materials.
	Develop pilot residential incentive program to encourage rain water use through rain barrels, roof downspouts redirected to landscaped areas, rain gardens & other small scale bioretention/infiltration BMPs	Implement pilot residential incentive program to encourage small scale bioretention/infiltration BMPs.	Expand pilot residential incentive program to encourage small scale bioretention/infiltration BMPs based on results of pilot study and availability of funds; or	Expand residential incentive program to encourage small scale bioretention/infiltration BMPs based on results of previous actions and availability of funds; or

	Redevelopment and low impact development/bioretention implementation requirements 2009-2018	**Redevelopment and low impact development/bioretention implementation requirements 2018-2023**	**Redevelopment and low impact development/bioretention implementation requirements 2023-2028**	**Redevelopment and low impact development/bioretention implementation requirements 2028-2031**
Distributed BMPs	Develop feasibility study to assess dry/wet weather treatment control BMPs (i.e. high capacity filters) to help achieve interim/final MS4/creek effluent limits. Draft Environmental Impact Report for treatment control BMPs (i.e. high capacity filters) to treat wet weather bacterial loads.	Complete Environmental Impact Report for treatment control BMPs. Design treatment control BMPs (i.e. high capacity filters) to help treat wet weather bacterial loads.	Construct treatment control BMPs (i.e. high capacity filters) to help treat wet weather bacterial loads.	
Regional BMPs		Collaborate with the other watershed Jurisdictions for planning, conceptual design and full design for select BMPs, engineering, siting, and environmental review for Regional Structural BMP, as funding becomes available.	Collaborate with the other watershed Jurisdictions to construct Regional Structural BMP (2) or equivalent, as needed to meet interim compliance load reduction goals (as demonstrated through modeling), if needed, and as funding becomes available (see SDR WQIP Provision B.3, Appendix C, Regional BMPs).	Collaborate with the other watershed Jurisdictions to construct Regional Structural BMP (2) or equivalent, as needed to meet final compliance load reduction goals (as demonstrated through modeling), if needed, and as funding becomes available (see SDR WQIP Provision B.3, Appendix c, Regional BMPs).

				Collaborate with the other watershed jurisdictions to coordinate construction of Multi-Jurisdictional Regional Structural BMP or equivalent(2), as needed to meet final compliance requirements, as funding becomes available (see SDR WQIP Provision B.3, Appendix C, Regional BMPs).

Footnotes:

(1) Request moving Interim TMDL Compliance Date from April 4, 2021 (per Attachment E, 6.c(1)) to April 4, 2028 to allow adequate time to plan, design and construct BMPs , as funding is available, and monitor to evaluate progress through the adaptive management process of the WQIP.

(2) Suite of structural BMPs based on preliminary modeling run and will be updated and may change in the final Provision B.3 report due December 2015.

Dry Weather Goals for bacteria for City of La Mesa – San Diego River Lower Watershed

1st Permit Term (2013 – 2018)	2nd Permit Term (2018 – 2023)	
Perform Creek Restoration project on Alvarado Creek upstream of Box Culvert at SR-125 Freeway.	**2020** (2): Meet TMDL Interim Compliance Requirements [Attachment E, 6.c(3)], which are:	**2021**: Meet TMDL Final Compliance Requirements [Attachment E, 6.b(3)], which are:
Perform a residential irrigation reduction program on one or more sub-basins within the San Diego River Watershed.	(a)No direct or indirect discharge of dry weather flows from storm drain outfalls to streams or river; or	(a)No direct or indirect discharge of dry weather flows from storm drain outfalls to streams or river; or
	(b) No exceedances of final receiving water limitations for bacteria (i.e., 30-day geometric mean and single sample maximum for TC [1,000 MPN/100 mL, 10,000 MPN/100 mL], FC [200 MPN/100 mL, 400 MPN/100 mL] and ENT [35 MPN/100 mL, 104 MPN/100 mL]) in the Pacific Ocean at the mouth of San Luis Rey; or	(b) No exceedances of final receiving water limitations for bacteria (i.e., 30-day geometric mean and single sample maximum for TC [1,000 MPN/100 mL, 10,000 MPN/100 mL], FC [200 MPN/100 mL, 400 MPN/100 mL] and ENT [35 MPN/100 mL, 104 MPN/100 mL]) in the Pacific Ocean at the mouth of San Luis Rey; or
	(c) No exceedances of the final effluent limitations for bacteria (30-day geometric mean and single sample maximum for TC [1,000 MPN/100 mL, 10,000 MPN/100 mL], FC [200 MPN/100 mL, 400 MPN/100 mL] and ENT [35 MPN/100 mL, 104 MPN/100 mL]) at the MS4 outfalls; or	(c) No exceedances of the final effluent limitations for bacteria (30-day geometric mean and single sample maximum for TC [1,000 MPN/100 mL, 10,000 MPN/100 mL], FC [200 MPN/100 mL, 400 MPN/100 mL] and ENT [35 MPN/100 mL, 104 MPN/100 mL]) at the MS4 outfalls; or
	(d) Reduce the load of bacteria from MS4 discharges to the river by at least 38.13% for TC, 39.09% for FC and 87.38% for ENT (i.e., meet final load reductions); or	(d) Reduce the load of bacteria from MS4 discharges to the river by at least 38.13% for TC, 39.09% for FC and 87.38% for ENT; or
	(e) Demonstrate that exceedances of the final receiving water limitations in the	(e) Demonstrate that exceedances of the final receiving water limitations in the

	receiving water are due to loads from natural sources, AND pollutant loads from MS4 outfalls are not causing or contributing to the exceedances; or	receiving water are due to loads from natural sources, AND pollutant loads from MS4 outfalls are not causing or contributing to the exceedances; or
	(f) No exceedances of interim receiving water limitations for bacteria (i.e., reduce the "existing" (2002) exceedance frequency of the 30-day geometric mean by 50%) in the Pacific Ocean at the mouth of St. Luis Rey River; or	(f) Implement a WQIP that is accepted by the Regional Board and that provides reasonable assurance that the final TMDL compliance requirements (i.e., 6.b.(3)(a) through 6.b.(3)(e)) will be achieved.
	(g) Reduce the load of bacteria from MS4 discharges to the river by at least 19.07% for TC, 19.55% for FC and 43.69 % for ENT (i.e., meet interim load reductions); or	
	(h) Implement a WQIP that is accepted by the Regional Board and that provides reasonable assurance that the interim TMDL compliance requirements (i.e., 6.c.(3)(a) through 6.b.(3)(h)) will be achieved.	

Footnotes:
(1) Here and throughout this table, the term "dry weather flows" excludes groundwater, other exempt or permitted non-stormwater flows, and sanitary sewer overflows.
(2) Request moving Interim TMDL Compliance Date from April 4, 2017 (per Attachment E, 6.c(1)) to April 4, 2020 to allow adequate time to investigate and mitigate dry weather flows through the adaptive management process of the WQIP.
TC= Total Coliforms; FC= Fecal Coliforms; and ENT= Enterococci

Wet Weather Goals for bacteria for City of La Mesa – San Diego River Lower Watershed

1st Permit Term (2013 – 2018)	2nd Permit Term (2018 – 2023)	3rd Permit Term (2023 – 2028)	4th Permit Term (2028 – 2033)
Perform Creek Restoration project on Alvarado Creek upstream of Box Culvert at SR-125 Freeway.	Conduct Alvarado Trunk Main Sewer Replacement Project which will replace approx. 0.75 miles of trunk sewer located under or in very close proximity to Alvarado Creek.	**2028** (1): Meet TMDL Interim Compliance Requirements [Attachment E, 6.c(3)], which are:	**2031**: Meet TMDL Final Compliance Requirements [Attachment E, 6.b(3)], which are:
Implement Modified Inspection Program. 200% more Commercial/Industrial Inspections per year will result in higher rates of compliance.		(a) No direct or indirect discharge from storm drain outfalls to streams or river; or	(a) No direct or indirect discharge from storm drain outfalls to streams or river; or
		(b) No exceedances of final receiving water limitations for bacteria (i.e., 22% allowed exceedance frequency of single sample maximum for TC [10,000 MPN/100 mL], FC [400 MPN/100 mL] and ENT [104 MPN/100 mL for beaches, 61 MPN/100 mL for creeks]) in the Pacific Ocean at the mouth of San Diego River or in the River; or	(b) No exceedances of final receiving water limitations for bacteria (i.e., 22% allowed exceedance frequency of single sample maximum for TC [10,000 MPN/100 mL], FC [400 MPN/100 mL] and ENT [104 MPN/100 mL for beaches, 61 MPN/100 mL for creeks]) in the Pacific Ocean at the mouth of San Diego River or in the River; or
		(c) No exceedances of the final effluent limitations for bacteria (i.e., 22% allowed exceedance frequency of single sample maximum for TC [10,000	(c) No exceedances of the final effluent limitations for bacteria (i.e., 22% allowed exceedance frequency of single sample maximum for TC [10,000

	MPN/100 mL], FC [400 MPN/100 mL] and ENT [104 MPN/100 mL for beaches, 61 MPN/100 mL for creeks]) at the MS4 outfalls; or	MPN/100 mL], FC [400 MPN/100 mL] and ENT [104 MPN/100 mL for beaches, 61 MPN/100 mL for creeks]) at the MS4 outfalls; or
	(d) Reduce the load of bacteria from MS4 discharges to the river by at least 34.7% for FC and 28.2% for ENT (i.e., meet final load reductions per Phase II CLRP); or	(d) Reduce the load of bacteria from MS4 discharges to the river by at least 34.7% for FC and 28.2% for ENT (i.e., meet final load reductions per Phase II CLRP); or
	(e) Demonstrate that exceedances of the final receiving water limitations in the receiving water are due to loads from natural sources, AND pollutant loads from MS4 outfalls are not causing or contributing to the exceedances; or	(e) Demonstrate that exceedances of the final receiving water limitations in the receiving water are due to loads from natural sources, AND pollutant loads from MS4 outfalls are not causing or contributing to the exceedances; or
	(f) No exceedances of the interim receiving water limitations for bacteria, which are the following allowed exceedance frequencies and single sample maximum (SSM) concentrations for TC, FC, and ENT, respectively: Forrester Creek (lower 1 mi): 46%, 43%, 49% San Diego River (lower 6 mi): 46%, 43%, 49% SDR mouth at Dog Beach:	(f) Implement a WQIP that is accepted by the Regional Board and that provides reasonable assurance that the final TMDL compliance requirements (i.e., 6.b.(3)(a) through 6.b.(3)(e)) will be achieved.

	46%, 43%, 51% SSM: 10,000 MPN/100 mL, 400 MPN/100 mL, 104 MPN/100 mL for ocean and 61 MPN/100 mL for creeks; or	
	(g) Reduce the load of bacteria from MS4 discharges to the river by at least 17.4% for FC and 14.1% for ENT per Phase II CLRP (i.e., meet interim load reductions); or	
	(h) Implement a WQIP that is accepted by the Regional Board and that provides reasonable assurance that the interim TMDL compliance requirements (i.e., 6.c.(3)(a) through 6.b.(3)(h)) will be achieved.	

Footnotes:
(1) Request moving Interim TMDL Compliance Date from April 4, 2021 (per Attachment E, 6.c(1)) to April 4, 2023 to allow adequate time to implement and monitor proposed BMPs through the adaptive management process of the WQIP.
TC= Total Coliforms; FC= Fecal Coliforms; and ENT= Enterococci

Table X

***DRAFT* - Wet Weather Numeric Goals for the City of San Diego for San Diego River WMA**

Proposed Goals for Consideration

Numeric Goal	Unit of Measure	Assessment Period and Fiscal Year				
		Current Permit Term	FY 16-20	FY 21-25	FY 26-30	FY 31-36
PERFORMANCE MEASURES						
Performance Measures		FY 18				
MS4 Discharges % Wet Weather Flow, Bacteria Reduction	Green Infrastructure Policy	Approve a Green Infrastructure Policy				
		Identify and start design on green infrastructure projects to capture and treat drainage from 159 acres				
OR						
MS4 Discharges Reduce Pollutants in Wet Weather Discharges Managed by HOAs and BOAs	# of HOAs and BOAs targeted per year	Provide education and outreach to 4 HOAs and/or BOAs per year				
MS4 Discharges Reduce Pollutants in Wet Weather Discharges	Attendance at Community Events	Attend at least 1 community event in each watershed per year				
	# of Community Groups Receiving Informational Material per Year	Distribute information materials to at least 1 community group per year				
	# of Watershed Education Brochures Distributed per Year	Distribute 500 watershed specific educational brochures to libraries, recreation centers, and community groups				

	# Storm Drain Stenciling Day Events	Coordinate at least 1 Storm Drain Stenciling Day event in each watershed every three years				
	OR					
	% Increase in BMP implementation compliance Through Targeted, Property-Based Inspection Program	5%				
TMDL COMPLIANCE MEASURES						
Year		2019	2024[1]	2029	2031[1]	
Receiving Water % Days Exceeding WQO	Fecal coliform	72%	43%	35%	22%	
	Enterococcus- San Diego River	78%	49%	36%	22%	
	Enterococcus- Pacific Ocean Shoreline	81%	51%	37%	22%	
OR						
MS4 Discharges % Days Exceeding WQO	Fecal coliform	22%	22%	22%	22%	
	Enterococcus	22%	22%	22%	22%	
OR						
MS4 Discharges % Load Reduction	Fecal coliform	5.2%	17.3%	23.9%	34.7%	
	Enterococcus	4.2%	14.1%	19.5%	28.2%	
OR						
# of Direct or Indirect MS4 Discharges to Receiving Water	Discharges	0	0	0	0	
OR						
% of Exceedances of Final Receiving Water WQOs due to Natural Sources[2]	Fecal coliform	100%	100%	100%	100%	
	Enterococcus	100%	100%	100%	100%	
OR						

Implement Accepted WQIP	Strategies	See Appendix F for jurisdiction specific schedule

1. Denotes total maximum daily load (TMDL) interim and final water quality-based effluent limitation (WQBEL).
2. Demonstration of exceedances due to natural sources includes demonstration that pollutant loads from MS4s are not causing or contributing to exceedances.

% = percent; FY = fiscal year; WQO = Water Quality Objective; HOA = Homeowners Association; BOA = Business Owner Association

Table X

***DRAFT* - Dry Weather Numeric Goals for the City of San Diego for San Diego River WMA**

Proposed Goals for Consideration

Numeric Goal	Unit of Measure	Assessment Period and Fiscal Year		
		Current Permit Term	FY 16-20	FY 21-25
Performance Measures		FY18		
MS4 Discharges Dry Weather Flow, Bacteria Reduction	Green Infrastructure Policy	Approve a Green Infrastructure Policy		
		Identify and start design on green infrastructure projects to capture and treat drainage from 159 Acres		
OR				
MS4 Discharges Reduce Pollutants in Dry Weather Discharges Managed by HOAs and BOAs	# of HOAs and BOAs Targeted per Year	Provide education and outreach to 4 HOAs and/or BOAs per year		
MS4 Discharges Reduce Pollutants in Dry Weather Discharges	Attendance at Community Events	Attend at least 1 community event in each watershed per year		
	# of Community Groups Receiving Informational Material per Year	Distribute information materials to at least 1 community group per year		
	# of Watershed Education Brochures Distributed per Year	Distribute 500 watershed specific educational brochures to libraries, recreation centers, and community groups		
	# Storm Drain Stenciling Day Events	Coordinate at least 1 Storm Drain Stenciling Day event in each watershed every three years		
	OR			
	% Increase in BMP Implementation Compliance Through Targeted, Property-Based Inspection Program	5%		
	OR			
MS4 Discharges Reduce or Eliminate Over-Irrigation Jurisdiction-Wide	# of Radio Spots Scheduled to Air about Over-Irrigation	1 radio spot about over-irrigation for the entire City of San Diego		

TMDL COMPLIANCE MEASURES			
Numeric Goal	**Unit of Measure**	2019[1]	2021[1]
Receiving Water % Days Exceeding WQO	Fecal coliform	6.3%	0%
	Enterococcus	9.5%	0%
OR			
MS4 Discharges % Days Exceeding WQO	Fecal coliform	0%	0%
	Enterococcus	0%	0%
OR			
MS4 Discharges % Load Reduction	Fecal coliform	49.4%	98.8%
	Enterococcus	49.9%	99.9%
OR			
# of Direct or Indirect MS4 Discharges to Receiving Water	Discharges	0	0
OR			
% Exceedances of Final Receiving Water WQOs due to Natural Sources[2]	Fecal coliform	100%	100%
	Enterococcus	100%	100%
OR			
Implement Accepted WQIP Based on RAA	Strategies	See Appendix F for jurisdiction specific schedule	

1. Denotes total maximum daily load (TMDL) interim and final water quality-based effluent limitation (WQBEL).
2. Demonstration of exceedances due to natural sources includes demonstration that pollutant loads from MS4s are not causing or contributing to exceedances.

% = percent; FY = fiscal year; WQO = Water Quality Objective; HOA = Homeowners Association; BOA = Business Owner Association

Dry Weather Multi-Benefit Numeric Goals for HPWQC			
5 year period	**1st Permit Term 2013-2018**	**2nd Permit Term 2018- 2023**	
Bacteria TMDL Goals		Meet TMDL Interim Compliance Date **April 4, 2020 (2)**	Meet TMDL Final Compliance Date **April 4, 2021**
		Meet interim dry weather compliance targets at compliance points outlined in the required monitoring and assessment program (see SDR WQIP Prov. B.3 Table 2); or implement Regional Water Quality Control Board accepted WQIP.	Meet final dry weather compliance targets at compliance points outlined in the required monitoring and assessment program (see SDR WQIP Prov. B.3 Table 2); or implement Regional Water Quality Control Board accepted WQIP.
Goal	Reduce the number of storm drain outfalls with dry weather flows by 10% in the areas tributary to Woodglen Vista Creek (1); or	Maintain 10% reduction in the number of storm drains with dry weather flows in areas tributary to Woodglen Vista Creek. Expand efforts to include those areas tributary to Sycamore Creek (1); or	Maintain 10% reduction in the number of storm drains with dry weather flows in areas tributary to Woodglen Vista Creek and Sycamore Creek. Expand reduction targets based on effectiveness of previous actions and availability of funds (1); or
	In partnership with Padre Dam Municipal Water District, develop and disseminate outreach materials addressing outdoor water use, water conservation, and water quality to 75% of residential communities; or	Enhance outdoor water use outreach efforts to address 75% landscape contractors and property management associations; or	Expand outdoor water use outreach efforts based on results of previous actions and availability of funds; or
	Dedicate 10% of compliance inspection hours to conduct investigations of dry-weather flows; or	Dedicate 15% of compliance inspection hours to conduct investigations of dry-weather flows; or	Dedicate 20% of compliance inspection hours to conduct investigations of dry-weather flows.
	Achieve measurable bacteria load reduction at confluence of Woodglen Vista Creek during summer dry weather (1) ;or	Achieve measurable bacteria load reduction at confluence of Woodglen Vista Creek and Sycamore Creek during summer dry weather (1) ;or	Establish incrementally increasing bacteria load reductions at confluence of Woodglen Vista Creek and Sycamore Creek during summer dry weather (1) ;or

Dry Weather Multi-Benefit Numeric Goals for HPWQC			
5 year period	**1st Permit Term 2013-2018**	**2nd Permit Term 2018- 2023**	
	Establish partnerships for preventing and mitigating arundo or other non-native plant removal from the San Diego River or tributary; or	Collaborate with partner agencies to remove 1 acre of arundo or other non-native plants from the San Diego River or tributary, as funding becomes available; or	Collaborate with partner agencies to remove 2 acres of arundo or other non-native plants from the San Diego River or tributary, as funding becomes available; or
	Review 50 % of projects that require landscape and irrigation plans for compliance with the City's Landscape Ordinance aimed at reductions in water use; or	Review 75 % of projects that require a landscape and irrigation plan for compliance with the City's Landscape Ordinance aimed at reductions in water use; or	Review 99 % of projects that require a landscape and irrigation plan for compliance with the City's Landscape Ordinance aimed at reductions in water use; or
	Partner with Santee School District to create awareness about HPWQC for SD River (bacteria). Target 50% school employees.	Partner with Santee School District to target behaviors likely to contribute or produce bacteria pollution (ie: cafeteria's, dining areas, and trash enclosures). Implement programs at 50% of campuses.	Partner with Santee School District to include pollution prevention messaging throughout school campuses.

Footnotes:

(1) Here and throughout this table, the term "dry weather flows" excludes groundwater, other exempt or permitted non-stormwater flows, and sanitary sewer overflows.

(2) Request moving Interim TMDL Compliance Date from April 4, 2018 (per Attachment E, 6.c(1)) to April 4, 2020 to allow adequate time to investigate and mitigate dry weather flows through the adaptive management process of the WQIP.

Wet Weather Multi-Benefit Numeric Goals for HPWQC				
GOALS	**1st Permit Term 2013-2018**	**2nd Permit Term 2018- 2023**	**3rd Permit Term 2023-2028**	**4th Permit Term 2028-2033**
Bacteria TMDL			Meet TMDL Interim Compliance Date **April 4, 2028**[1]	Meet TMDL Final Compliance Date **April 4, 2031**
	Reduce bacteria loading by 110 MPN/YR		Meet interim wet weather compliance targets at compliance points (see SDR WQIP Prov. B.3 Table 2); or	Meet final wet weather compliance targets at compliance points (see SDR WQIP Prov. B.3 Table 2); or
Non-Structural BMPs	Enhance parks and river trail pet stations to include 10% additional trash bins and implement routine O&M; or	Enhance parks and river trail pet stations to include 25% additional trash bins and implement routine O&M; or		
	Partner on one (1) annual clean up event at area identified with highest bacteria levels (ie: SDR between Cuyamaca & Carlton Hills Blvd); or	Partner on bi-annual clean up events at areas identified with highest bacteria levels (ie: SDR between Cuyamaca & Carlton Hills Blvd); or	Partner on bi-annual clean up events at areas identified with highest bacteria levels (ie: SDR between Cuyamaca & Carlton Hills Blvd); or	
Distributed BMPs	Retrofit a total of 1.6 acres of drainage area (through projects that occurred from 2003-2009).	Conduct planning, conceptual design, for structural BMPs, as funding becomes available.	Construct distributed structural BMPs as needed to meet interim load reduction goals (as demonstrated through modeling), as funding becomes available.	Construct distributed structural BMPs as needed to meet final load reduction goals (as demonstrated through modeling), as funding becomes available.

Footnotes:

(1) Request moving Interim TMDL Compliance Date from April 4, 2021 (per Attachment E, 6.c(1)) to April 4, 2028 to allow adequate time to plan, design and construct BMPs , as funds available, and monitor proposed BMPs through the adaptive management process of the WQIP.

Dry Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition - Bacteria				
Compliance Pathway	**Title**	**1st Permit Term Goals 2013-2018**	**2nd Permit Term Goals 2018- 2023**	
			Meet TMDL Interim Compliance Date April 4, 2020 [b]	**Meet TMDL Final Compliance Date April 4, 2021**
1. OR	Meet bacteria allowable exceedance frequency of receiving water objectives	Attain 75 % compliance with AB411 bacteria standards at the TMDL ocean compliance point at the mouth of San Diego River during summer dry weather; (part of compliance pathway 6)	Bacteria exceedances at the receiving water compliance points, as defined in the TMDL monitoring plan, must be less than or equal to the allowable exceedance frequencies (e.g., fecal coliform AEF = 6.3%); OR	Bacteria concentrations at the receiving water compliance points, as defined in the TMDL monitoring plan, must be less than the single sample maximum and 30-day geometric mean water quality objective; OR
2. OR	No discharge from stormwater drain outfalls	Reduce the volume of dry weather flows or the number of storm drain outfalls with dry weather flows by 10% in Paseo Vista community [a]; (part of compliance pathway 6)	There are no discharges from the County of San Diego's storm drain outfalls to the receiving water as demonstrated through the storm drain outfall monitoring program (Provisions D.2.a, D.2.b); OR	There are no discharges from the County of San Diego's storm drain outfalls to the receiving water as demonstrated through the storm drain outfall monitoring program (Provisions D.2.a, D.2.b); OR
3. OR	Reduce loads at storm drain outfalls	See compliance pathway 6;	Bacteria loads in discharges from the County of San Diego's storm drain outfalls must be reduced by ≥ 34.72% for fecal coliform and ≥ 46.98% for enterococcus as compared to 2001-2002 baseline; OR	Bacteria loads in discharges from the County of San Diego's storm drain outfalls must be reduced by ≥ 69.44% for fecal coliform and 93.96% for enterococcus as compared to 2001-2002 baseline; OR
4. OR	Storm drain outfalls meet receiving water objectives	See compliance pathway 6;	Bacteria concentrations in the discharges from storm drain outfalls must be less than the single sample maximum and 30-day geometric mean water quality objectives for the receiving water (creek or beach); OR	Bacteria concentrations in the discharges from storm drain outfalls must be less than the single sample maximum and 30-day geometric mean WQOs for the receiving water (creek or beach); OR

Dry Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition - Bacteria				
Compliance Pathway	**Title**	**1st Permit Term Goals 2013-2018**	**2nd Permit Term Goals 2018- 2023**	
			Meet TMDL Interim Compliance Date April 4, 2020 (b)	**Meet TMDL Final Compliance Date April 4, 2021**
5. OR	Natural source exclusion	Mitigate human sources for 25 % of storm drain outfalls consistently detected above reporting limits for human markers; (part of compliance pathway 6)	County of San Diego demonstrates that exceedances of the final receiving water limitations are due to loads from natural sources and pollutant loads from the County's storm drain outfalls are not causing or contributing to the exceedances: OR	County of San Diego demonstrates that exceedances of the final receiving water limitations are due to loads from natural sources and pollutant loads from the County's storm drain outfalls are not causing or contributing to the exceedances; OR
6. (See Appendix K for Full List)	Implement WQIP and use adaptive management	Implement Water Quality Improvement Plan supported by reasonable assurance and accepted by the RWQCB.	Implement the Water Quality Improvement Plan supported by reasonable assurance that the implementation of BMPs will meet interim compliance and it is accepted by the RWQCB.	Implement the Water Quality Improvement Plan supported by a watershed model or other analytical tools to demonstrate that the implementation of BMPs will result in final compliance and it is accepted by the RWQCB.
		a. Establish partnerships for arundo or other non-native vegetation removal from the San Diego River to discourage encampments & increase stream integrity;	a. Collaborate with partner agencies to remove 1 acre of arundo or other non-native vegetation from the San Diego River as funding becomes available to discourage encampments & increase stream integrity.	b. Collaborate with partner agencies to remove 1 acre of arundo or other non-native vegetation from the San Diego River as funding becomes available to discourage encampments & increase stream integrity.

Footnotes:

(a) Here and throughout this table, the term “dry weather flows” excludes groundwater, other exempt or permitted non-stormwater flows, and sanitary sewer overflows.

(b) Request moving Interim TMDL Compliance Date from April 4, 2018 (per Attachment E, 6.c(1)) to April 4, 2020 to allow adequate time to investigate and mitigate dry weather flows through the adaptive management process of the WQIP.

Wet Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition -Bacteria

Compliance Pathway	Title	1st Permit Term Goals 2013-2018	2nd Permit Term Goals 2018- 2023	3rd Permit Term Goals 2023-2028	4th Permit Term Goals 2028-2033
				Meet TMDL Interim Compliance Date April 4, 2028[(c)(d)]	Meet TMDL Final Compliance Date April 4, 2031
1. OR	Meet bacteria allowable exceedance frequency of receiving water objectives	See compliance pathway 6;		Bacteria exceedances at the receiving water compliance points, as defined in the TMDL monitoring plan, must be ≤ allowable exceedance frequencies (e.g., fecal coliform AEF = 43%); OR	Bacteria exceedances at the receiving water compliance points, as defined in the TMDL monitoring plan, must be ≤ allowable exceedance frequencies (e.g., fecal coliform AEF = 22%); OR
2. OR	No discharge from storm drain outfalls	See compliance pathway 6;		There are no discharges from the County of San Diego's storm drain outfalls to the receiving water as demonstrated through the storm drain outfall monitoring program (Provisions D.2.a, D.2.b); OR	There are no discharges from the County of San Diego's storm drain outfalls to the receiving water as demonstrated through the storm drain outfall monitoring program (Provisions D.2.a, D.2.b); OR
3. OR	Reduce loads at storm drain outfalls	See compliance pathway 6;		Bacteria loads in discharges from the County of San Diego's storm drain outfalls must be reduced by ≥ 26.61% for fecal coliform and ≥ 21.37% for enterococcus as compared to 2001-2002 baseline; OR	Bacteria loads in discharges from the County of San Diego's storm drain outfalls must be reduced by ≥ 34.7% for fecal coliform and for enterococcus as compared to 2001-2002 baseline; OR
4. OR	Storm drain outfalls meet receiving water objectives	See compliance pathway 6;		Bacteria concentrations in the discharges from the County of San Diego's storm drain outfalls must be < the single sample maximum WQO for the receiving water (may be creek or beach) > 78% of the time; OR	Bacteria concentrations in the discharges from the County of San Diego's storm drain outfalls must be < the single sample maximum WQO for the receiving water (may be creek or beach) >78% of the time; OR
5. OR	Natural source exclusion	See compliance pathway 6;		County of San Diego demonstrates that exceedances of the final receiving water limitations are due to loads from natural sources and	County of San Diego demonstrates that exceedances of the final receiving water limitations are due to loads from natural sources and

Wet Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition -Bacteria

Compliance Pathway	Title	1st Permit Term Goals 2013-2018	2nd Permit Term Goals 2018- 2023	3rd Permit Term Goals 2023-2028	4th Permit Term Goals 2028-2033
				Meet TMDL Interim Compliance Date April 4, 2028[c][d]	Meet TMDL Final Compliance Date April 4, 2031
				pollutant loads from the County's storm drain outfalls are not causing or contributing to the exceedances: OR	pollutant loads from the County's storm drain outfalls are not causing or contributing to the exceedances; OR
6.	Implement WQIP and use adaptive management	Implement the Water Quality Improvement Plan supported by reasonable assurance and accepted by the RWQCB.	Implement the Water Quality Improvement Plan supported by reasonable assurance and accepted by the RWQCB.	Implement the Water Quality Improvement Plan supported by reasonable assurance that the implementation of BMPs will meet in interim compliance and it is accepted by the RWQCB.	Implement the Water Quality Improvement Plan supported by a watershed model or other analytical tools to demonstrate that the implementation of BMPs will result in final compliance and it is accepted by the RWQCB.
6.a Non-Structural BMPs (See Appendix K for Strategies)		a. Expand residential large property pet waste management outreach to 1 focused management area; or to 15 large properties; and	a. Expand residential large property pet waste management outreach based on results of pilot project and availability of funds; and	a. Expand residential large property pet waste management outreach based on results of additional actions and availability of funds; and	a. Expand residential large property pet waste management outreach based on results of additional actions and availability of funds; and
		b. Sponsor clean up events in 1 focused management area, bi-annually; and	b. Sponsor clean up events in 1 focused management area, bi-annually; and	b. Sponsor clean up events in 1 focused management area, bi-annually; and	
6.b Distributed BMPs		a. Retrofit a total of 392 acres of drainage area (through treatment control BMP projects that occurred from 2003-2009); and	a. Conduct planning and conceptual design, as funding becomes available, for distributed (green) BMPs; and	a. Construct Distributed Structural BMPs as needed to meet interim load reduction goals (as demonstrated through modeling), as funding becomes available; and	a. Construct Distributed Structural BMPs as needed to meet final load reduction goals (as demonstrated through modeling), as funding becomes available; and

Wet Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition -Bacteria					
Compliance Pathway	**Title**	**1st Permit Term Goals 2013-2018**	**2nd Permit Term Goals 2018- 2023**	**3rd Permit Term Goals 2023-2028**	**4th Permit Term Goals 2028-2033**
				Meet TMDL Interim Compliance Date April 4, 2028[c][d]	**Meet TMDL Final Compliance Date April 4, 2031**
		b. Redevelopment implementation requirements (treatment control BMPs) 2009-2018; and	b. Redevelopment implementation requirements (treatment control BMPs) 2018-2023; and	b. Redevelopment implementation requirements (treatment control BMPs) 2023-2028; and	b. Redevelopment implementation requirements (treatment control BMPs) 2028-2031; and
		b. Evaluate feasibility of a pilot residential incentive program to encourage rain water use through rain barrels, roof downspouts redirected to landscaped areas, rain gardens & other small scale bioretention/ infiltration BMPs.	b. If feasible, implement pilot residential incentive program to encourage small scale bioretention/infiltration BMPs; and	c. Expand pilot residential incentive program to encourage small scale bioretention/infiltration BMPs based on results of pilot project and availability of funds; and	c. Expand residential incentive program to encourage small scale bioretention/infiltration BMPs based on results of previous actions and availability of funds; and

Wet Weather Multi-Benefit Numeric Goals for Highest Priority Water Quality Condition -Bacteria

Compliance Pathway	Title	1st Permit Term Goals 2013-2018	2nd Permit Term Goals 2018- 2023	3rd Permit Term Goals 2023-2028	4th Permit Term Goals 2028-2033
				Meet TMDL Interim Compliance Date April 4, 2028[(c)(d)]	Meet TMDL Final Compliance Date April 4, 2031
6.c Regional BMPs			a. Conduct planning, full design, engineering, siting, and environmental review for select BMPs, as funding becomes available.	a. Conduct planning, full design, engineering, siting, and environmental review for select BMPs, as funding becomes available.	a. Construct Regional Structural BMP[(b)] or equivalent, as needed to meet final compliance load reduction goals (as demonstrated through modeling), if needed, and as funding becomes available (see SDR WQIP Provision B.3, Appendix c, Regional BMPs); and on modeling analysis • Code: SDCo-R-1 Project Name: Lakeside River Park Conservancy BMP: Subsurface Wetland

Footnotes:

(c) Request moving Interim TMDL Compliance Date from April 4, 2021 (per Attachment E, 6.c(1)) to April 4, 2028 to allow adequate time to plan, design, construct and maintain BMPs , as funding is available, and monitor to evaluate progress through the adaptive management process of the WQIP.

(d) Progress toward final goals will be monitored and if implemented distributed BMPs and regional BMPs are not enough, then additional structural BMPs based on quantitative modeling conducted as part of the WQIP will be considered. To prepare for this contingency additional design and planning work will be conducted during Permit Term 2 and are included in the optional jurisdictional strategies of Provision B.3 Goals, Strategies and Schedule report. The County of San Diego is concerned that a funding source to construct, operate and maintain structural controls is not identified.

ATTACHMENT D
COMMENT TABLE

Consultation Panel Comments on Jurisdictional Goals		
Commenter's Name:		Date:
Table #	Comment, recommendation, input	Acknowledgment/response