Suggestions to be considered by TRAC: "R List"
(Unprioritized)

Suggestions on this list are categorized as making the Basin Plan more "Reasonable" (R). They will be prioritized by the Triennial Review Advisory Committee (TRAC).

#	Name	Suggested Action (factual)	Reason (may be opinion)	Surface / Ground	Specific Waters
R-1	Chollas Creek BUs	Evaluate BUs in Chollas Creek; consider de-designation of WARM and WILD.	Much of the creek is channelized or underground; WARM and WILD do not appear to be supported.	S	Chollas Creek
R-2	Salt Creek BUs	Evaluate BUs in the Salt Creek area; consider de-designation of MUN and AGR from the site of the former Omar Class I hazardous waste storage facility.	TDS levels are high. An adjacent area was excepted from MUN in 1988.	G	Otay Valley (HU 910.20)
R-3	Shallow Urban Groundwater BUs	Evaluate BUs of shallow, brackish, "urban" groundwater; consider de-designation of BUs.	Such waterbodies do not meet the definition of an aquifer.	G	
R-4	San Luis Rey BUs	Evaluate BUs in the San Luis Rey watershed; add BU for ground water recharge (GWR).	There may be plans to enhance and develop groundwater resources for additional municipal supply.	S,G	San Luis Rey watershed
R-5	Tiered Aquatic Life BUs	Establish tiered aquatic life BUs that take into account the condition of a waterbody and specify the highest attainable water quality for the waterbody; develop corresponding WQOs to support the tiered BUs.	Some existing BU designations may no longer appropriate. Tiered BUs establish realistic water quality goals in urban streams.	S	
R-6	REC-1 in Ocean	Evaluate and clarify the area to which REC-1 applies in ocean waters. Limit applicability of REC-1 to waters within 1,000 feet of shore and the 30 foot depth contour, and waters within the La Jolla and Point Loma kelp beds.	It may not be appropriate to apply REC-1 bacterial objectives to all marine waters within three nautical miles and all depths and/or to require municipal dischargers of treated wastewater to meet the REC-1 bacterial objectives.	S	ocean, coastal
R-7	Restricted Access REC-1	Evaluate REC-1 in areas with engineered channels and other areas with restricted public access.	REC-1 should not be identified as a BU in these areas because conditions are unsafe and/or public access is restricted or not allowed.	S	some flood control areas; some drinking water supply reservoirs

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R-8	Wildlife Impacted REC-1	Establish a sub-category of REC-1 for areas affected by wildlife wastes.	Wildlife wastes make it difficult or impossible for REC-1 fecal indicator bacteria objectives to be met in these areas	S	areas affected by wildlife wastes
R-9	Frequency of Use REC-1	Establish tiers of REC-1 based on defined frequency of use designations.	It may not be appropriate to apply the same bacterial objectives to both frequently- and infrequently-used waterbodies.	S	ocean and fresh waters
R-10	Turbidity WQO	Evaluate the WQO for turbidity, and modify to take into account natural processes and background conditions.	Existing objective often is not met, even in reference streams.	S,G	
R-11	Flouride WQO	Evaluate the flouride WQO, and modify to take into account fluoridation.	Existing objective is based on irrigation limits and is inconsistent with (more stringent than) the human health-based MCL. The addition of flouride to water will make it difficult for wastewater plants to meet the existing WQO.	S,G	drinking water, wastewater
R-12	Seasonal Variation WQOs	Establish WQOs that take into account seasonal flow conditions, setting different objectives for high and low flow conditions (i.e., wet weather and dry weather).	Some WQOs are not met under natural background conditions under some flow conditions (e.g., bacteria, phosphorus, TSS and turbidity).	S	seasonal flows
R-13	Dissolved Oxygen WQO for Enclosed Bays and Estuaries	Evaluate the WQO for dissolved oxygen as it applies to Enclosed Bays and Estuaries. Consider site-specific dissolved oxygen WQOs for various ecoregions (e.g., in San Diego Bay).	It may not be appropriate to apply the WQO for Inland Surface Waters to Enclosed Bays and Estuaries, or the same WQO for all areas of the bay.	S	Santa Margarita Estuary, San Diego Bay, other bays and estuaries
R-14	WQOs for Sweetwater and Loveland Reservoirs	Establish site-specific WQOs for aluminum, dissolved oxygen, and pH that take into account naturally occurring levels.	Existing objectives are too stringent and/or inappropriate.	S	Sweetwater and Loveland Reservoirs

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R-15	Site Specific Objectives for Metals	Establish site-specific objectives for copper (and other metals such as nickel and zinc) for use instead of those in the California Toxics Rule (CTR).	Nationwide criteria in the California Toxics Rule (CTR) may be too stringent; Biotic Ligand Model (BLM) and Water Effects Ratio (WER) suggest less stringent WQOs are protective.	S	San Diego Bay, marine, fresh
R-16	Nutrient WQOs in Surface Water	Establish WQOs for nitrogen and phosphorus (biostimulatory substances) that take into account natural background levels, using the Numeric Nutrient Endpoint (NNE) framework to inform the process. [The NNE framework is based on the response of a waterbody to nutrient enrichment (e.g., algal blooms, low dissolved oxygen).]	Existing objectives are not realistic. Existing WQOs may not reflect a waterbody's response to nutrient input.	S	streams and lakes, estuaries, Santa Margarita watershed, other
R-17	Nutrient WQOs in Groundwater	Develop site-specific WQOs for nutrients in high-priority groundwater basins, using the Salt and Nutrient Management Plans currently under development by regional stakeholders pursuant to the State Board Recycled Water Policy to inform the process.	Existing objectives are not realistic.	G	groundwater basins that have been slated for development of future municipal water supply
R-18	TDS WQO	Evaluate the TDS WQOs for surface and groundwater, and modify to take into account the TDS levels in background conditions and imported water.	Existing objective is not realistic and not well aligned with background conditions. Imported water frequently exceeds the WQO for TDS prior to entry into reservoirs.	S,G	waters within County Water Authority distribution region

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R-19	Regionwide TDS and Nutrient Management Plan	Develop a region-wide TDS and Nutrient Management Plan to address impacts from recycled and imported waters on both ground and surface waters. Revise the Basin Plan as necessary to implement the plan.	A comprehensive plan is needed to address both recycled and imported water, and both ground and surface water. Such a plan would go beyond the "Salt/Nutrient Management Plan" for each groundwater basin required by the State Board Recycled Water Policy, and would provide the most cost effective BU protection and attainment.	S,G	
R-20	TDS WQO in the Lower Ysidora HAS	Determine if the area in which the TDS WQO does not apply can be extended to further east of its current boundary at Interstate 5.	Applying the TDS objective to areas influenced by the Pacific Ocean but east of the current boundary prevents the use of reclaimed water.	G	Lower Ysidora HSA near the ocean (Santa Margarita HU)
R-21	Imported Water in Municipal Reservoirs	Establish an implementation provision or variance from certain WQOs for municipal reservoirs that takes into account the quality of imported water.	Imported water does not meet WQOs for several constituents prior to entry into local reservoirs.	S	municipal reservoirs
R-22	Indirect Potable Reuse and Municipal Reservoirs	Establish an implementation provision or variance from certain WQOs for municipal reservoirs to promote potable reuse.	Treated wastewater for indirect potable reuse does not meet WQOs for several constituents.	S	municipal reservoirs
R-23	Indirect Potable Reuse and Groundwater	Establish an implementation policy or variance from certain WQOs to facilitate storage of indirect potable reuse supplies in groundwater basins.	Treated wastewater for potable reuse does not meet WQOs for several constituents.	G	treated wastewater
R-24	Iron and Manganese WOQs in Groundwater	Evaluate WQOs for iron and manganese to determine if they can be modified or removed, and/or establish implementation provisions that promote the use of recycled water within the region (e.g., for irrigation).	Existing WQOs for iron and manganese are too stringent and do not accommodate the expanded use of recycled wastewater.	G	recycled water

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R-25	All BUs and WQOs in Groundwater	Evaluate all BUs and WQOs for groundwater to determine if any can be modified or removed to facilitate the use of recycled water.	Existing standards do not facilitate the use of recycled water.	G	areas outside the alluvial basins
R-26	All BUs and WQOs	Evaluate all BUs and WQOs using factors in California Water Code section 13241. Update all based on current science and monitoring.	Some factors may not have been considered when establishing BUs and WQOs, especially with respect to regulation of nonpoint sources. BUs based on decades-old assumptions may be over-conservative. Protection of certain BUs under certain conditions (e.g., imported water) is unreasonable and a waste of resources.	S,G	
R-27	Potential BUs	Evaluate current 'Potential' BU designations to determine if they conform to 'Most Probable Future Use' BUs as defined in California Water Code section 13241.	BU designations may not be consistent with current legal standards.	S,G	
R-28	Translators for San Diego Bay	Develop site specific translators for San Diego Bay for copper, nickel and zinc. [Translators are not WQOs; they are used to convert receiving water numeric objectives (e.g., dissolved Cu form) to numeric effluent limits (total Cu form).]	Even when waters in San Diego Bay appear to meet the WQO, the standard nationwide translator provided in the California Toxics Rule (CTR) results in a low effluent limit that is difficult for dischargers to comply with.	S	San Diego Bay
R-29	Waiver for On-site Treatment Systems	Amend Conditional Waiver No.1 (Discharges from On-site Disposal Systems) to include criteria for advanced treatment systems for domestic wastewater.	Covering advanced treatment systems under the waiver allows deferral of regulation of such systems to the Counties and simplifies the application process for property owners proposing such systems.	G	
R-30	Septic Tank Nitrate Exemption	Establish an implementation provision that exempts septic tank owners from WQOs for nitrates in groundwater.	Standard septic tanks cannot meet the nitrate objectives and additional treatment to remove nitrate is costly.	G	
R-31	Prioritization Policy	Establish a policy for the prioritization of surface and groundwaters and water quality problems for planning purposes.	Prioritization will ensure that limited funding is directed to the most critical problems and threats.	S,G	

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R-32	Constructed Wetlands Policy	Establish a policy for applicability of water quality standards to constructed wetlands.	There is need for clarification regarding the regulation of constructed wetlands.	S	constructed wetlands
R-33	Atmospheric Deposition Policy	Establish a policy that takes into consideration the levels of pollutants in surface waters due to atmospheric deposition, and includes a framework for coordination with agencies responsible for air quality.	There is need for guidance on atmospheric deposition, particularly in context of stormwater permit compliance and TMDLs.	S	

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Abbreviations

Beneficial Uses:

- MUN: municipal and domestic water supply
- REC1: water contact recreation
- REC2: non-contact water recreation, including aesthetic enjoyment
- COMM: commercial and recreational fishing / shellfishing
- WILD: terrestrial wildlife habitat
- RARE: habitat for rare, threatened & endangered species
- BIOL: Areas of special biological significance
- WARM: warm freshwater habitat
- COLD: cold freshwater habitat
- EST: estuarine habitat
- MAR: marine habitat
- SPWN: spawning habitat
- NAV: navigation
- GWR: ground water recharge

Other:

- BU - Beneficial Use
- WQO - Water Quality Objective
- TSS - Total Suspended Solids
- TDS - Total Dissolved Solids
- N - Nitrogen
- P - Phosphorus
- MCL - Maximum Contaminant Level
- HBCL - Health-Based Cleanup Levels
- CAO - Cleanup and Abatement Order
- ACL - Administrative Civil Liability