PRIORITIES AND ALLOCATION OF RESOURCES

SWRCB and RWQCB priorities should be established and resources should be allocated on the basis of what is most important and effective for purposes of protecting and restoring water quality and beneficial uses. A variety of different types of priorities are important to protection of water quality and beneficial uses. These include:

Type 1:   Priorities between programs (i.e. which program is a higher priority?)
Type 2.   Priorities within a program (i.e. which activity in a particular program is a higher priority?)
Type 3:   Priorities between water quality and beneficial use problems and threats (i.e. which problem / threat is a higher priority?)
Type 4:   Priorities between sources / causes of water quality and beneficial use problems and threats (i.e. which source / cause is a higher priority?)
Type 5:   Geographic priorities (i.e. which site, place, area, body of water, water body type, watershed, or portion of a watershed is a higher priority?)

Setting one type of priority may be useful in setting another type of priority. For example, determining Type 4 priorities may help determine Type 1 priorities. The following paragraphs briefly discuss current priorities for the San Diego region. SDRWQCB staff intends to further define different types of priorities in the future.

The Type 1 priority question of which program is a higher priority is, for practical purposes, a question of where additional funding is most needed. In other words, it is a question of where an additional increment of resources (i.e. beyond current levels) would do the most to protect water quality and beneficial uses. The following programs are most in need of additional funding:

1.   Water Quality Certification (Wetlands) Program
2.   Nonpoint Source Program
3.   Water Quality Assessment Program
4.   NPDES Program (storm water portion)
5.   Basin Planning Program

These programs are critical to addressing most of the San Diego region's most pressing water quality and beneficial use problems and threats. Although funding for some, if not all, of these programs has recently increased or is expected to increase, additional funding is needed for these programs in order to address these problems and threats effectively. The longstanding shortage of funding for these programs should not be interpreted to mean that these programs or the problems or threats they are intended to address are low priorities for the SDRWQCB. The shortage is, instead, a reminder that (1) the funding sources which provide the limited resources available for water quality / beneficial use protection generally require that the funds be used in specific programs and/or for specific activities and (2) that the SDRWQCB is obligated to fulfill its legal mandates. Consequently, discretionary resources and grant funds are quite small and the SDRWQCB has little flexibility in allocating resources to where they are most needed to protect water quality and beneficial uses.

Table 12 lists priorities for activities in various SDRWQCB programs, as well as some priorities that involve multiple programs or cross program lines. In general, these priorities represent work that would be done (or done sooner) if an additional increment of funding (i.e. beyond current levels) were to become available for the listed SDRWQCB programs. As such, **Table 12** provides an indication of both Type 1 and Type 2 priorities. Some of these priority activities have been briefly discussed in previous sections of this document. In some cases (particularly some of the multi-program and cross-program items), the listed priorities represent needed changes that are entirely or partially beyond the control of the SDRWQCB to accomplish (i.e. other entities would need to be involved and/or take action). It is apparent from **Table 12** that oversight of new development (e.g. by participation in the CEQA process) and oversight of compliance with existing requirements are priority activities.

SDRWQCB staff understands that joint efforts of SWRCB and RWQCB staff are underway to better define Type 3 and Type 4 priorities statewide. However, priorities in a particular region may not coincide with statewide priorities. **Tables 8 through 11** provide different ways of looking at water quality / beneficial use problems and threats in the San Diego region, typical sources or causes of those problems and threats, and the stressors involved in those problems and threats. In some cases, the distinction between a problem or threat, a source or cause, a stressor, and a pathway is somewhat blurred. For example, urban runoff is sometimes identified as a problem or threat, sometimes as a source or cause. However, urban runoff might better be considered a pathway by which certain pollutants (which are stressors) enter bodies of water, rather than a problem or threat or a source or cause *per se.* **Table 11** indicates the San Diego region watershed management areas where the problems and threats listed in **Table 8** occur. SDRWQCB staff plans to refine and update these tables and to use them to better define priorities.

Targeted watersheds and the Unified Watershed Assessment priority watersheds represent geographic (Type 5) priorities. However, they should not be viewed as the only geographic priorities in the region. Geographic priorities may be defined in other ways, e.g. as specific to a portion of a watershed management area, to a particular water body, or to a particular type of water body. It would be a mistake to consider all waters, beneficial uses, problems and threats, discharges, activities, and programs in targeted watersheds or Unified Watershed Assessment priority watersheds to be higher priority than those in any other watershed (see previous section on Watershed Management Scale.) For example, there may be potential 205(j), 319(h), and/or Proposition 13 projects in non-targeted watersheds that warrant a higher priority (e.g. because they would be more effective in protecting water quality and beneficial uses) than such projects in targeted watersheds. With 205(j), 319(h), and Proposition 13 proposals, among other watershed-oriented, stakeholder-initiated activities, timing and windows of opportunity are often of the essence. In other words, it is important to take

advantage of promising initiatives and efforts when they arise. A good project deserves support, whether or not it is in a targeted or priority watershed, and whether or not it is identified in RFPs for 205(j), 319(h), or Proposition 13 grants. SDRWQCB staff intends to rate projects on their merits (i.e., for protecting / restoring water quality and beneficial uses), regardless of whether they are located in targeted or priority watersheds and whether they are identified in the RFPs for 205(j) / 319(h) / Proposition 13 grants. Although SDRWQCB staff strives to identify worthwhile projects for grant funding, it would be presumptuous to think that SDRWQCB staff has thought of or is aware of all such projects. In other words, SDRWQCB staff is committed to being open to worthwhile projects, whether or not SDRWQCB staff had the idea for the project or whether the project is identified in an RFP or some other list of projects. (All other factors being equal, lists of targeted watersheds and projects identified in the RFP could be used as a "tie-breakers.")

Historically, the SDRWQCB has established its priorities and allocated its resources on a program basis, with only limited consideration of resource allocations towards specific watersheds or to specific water quality or beneficial use problems or threats. The SDRWQCB cannot devote all of its resources to one watershed or to a few watersheds to the exclusion of all other watersheds. Neither can the SDRWQCB ignore its legal mandates nor the conditions attached to various funding sources. Accordingly, resources must be allocated to regionwide activities and to activities in each of the of the nine designated watershed management areas in order to accomplish work that the SDRWQCB is required to do (e.g. issue permits for new discharges, take necessary enforcement action, respond to citizen complaints etc.). It is also important to recognize that the "watershed approach" is not an end in and of itself. The desired end result is efficient and effective protection and restoration of water quality and beneficial uses. Prioritizing and doing work on the basis of hydrologic boundaries is appropriate only to the degree that it is advantageous for purposes of this end result. Some work may best be prioritized and done on some basis other than on hydrologic boundaries. Under the watershed management approach, the SDRWQCB will emphasize allocation of discretionary resources [e.g., 205(j), 319(h), and Proposition 13 grants] to where funding would be most effective in protecting water quality and beneficial uses.

Although the shift to a watershed management approach is a functional change for the SDRWQCB, it does not necessarily dictate a change in organizational structure. For some watersheds where there are numerous and complex issues with a high workload, it may be desirable for the SDRWQCB to make an "organizational" change to set up a permanent unit to work specifically on issues in the watershed. In other watersheds with less complex issues, a temporary "team" of staff members with a staff coordinator may be designated to work on the watershed issues for a distinct period of time outside of the framework of a formal or permanent organizational unit. With the recent availability of additional resources and the resulting increase in SDRWQCB staffing levels, reorganization of SDRWQCB staff is occurring incrementally. One of the recent

changes has been the creation of two sub-regional units (one for the northern portion of the region, the other for the southern portion) that are responsible for several different programs (or portions of programs) in those two parts of the region. Another recent change is to create two units that would be responsibleregionwide for several different programs (or portions of programs) that apply to a particular type or category of facility. It is hoped that these changes will facilitate integration and coordination of programs and activities, improve efficiency and effectiveness, and enable additional resources to be directed to activities most critical to addressing the greatest water quality and beneficial use problems and threats. Most staff, including supervisors, in the recently reorganized units will need to become familiar with a number of different programs in which they do not have experience. Staff in the sub-regional (waterhed) units will also need to become familiar with the geographic areas to which they are assigned. Since moving through these learning curves will take time, it will also take time for the benefits of the reorganization to be achieved.

The shift to watershed management will also require strong leadership and consensus building skills on the part of staff appointed to direct or participate in watershed management activities. The following important early steps for implementing the watershed management approach are currently underway at the SDRWQCB:

•   Identification of key staff to participate in watershed management activities;

•   Training staff on the principles of watershed management;

•   Establishing an efficient means of communication among various watershed team staff members to ensure that staff work is consistent with the priorities and goals;

•   Budgeting sufficient time for key staff to do priority work;

•   Implementing functional or organizational changes as necessary; and

•   Designating roles and responsibilities of each SDRWQCB organizational unit for implementation of the watershed management approach.