



Public Comment Listing Policy Amendment Deadline: 12/22/14 by 12:00 noon

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December 22, 2014

Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, California 95814

Subject: Comment Letter – Listing Policy Amendment

Dear Ms. Townsend:

The Ports of Long Beach and Los Angeles (Ports) appreciate the opportunity to provide comments on the proposed amendment to the *Water Quality Control Policy for Developing the Clean Water Act Section 303(d) List* (Listing Policy). The Ports—along with the State Water Resources Control Board (State Water Board), Regional Water Quality Control Boards (Regional Water Boards), and Southern California Coastal Water Research Project (SCCWRP)—have formed the Harbor Technical Working Group (HTWG) and have been collaborating over the past 2 years in an effort, in part, to apply the Sediment Quality Objectives as an alternative compliance target for the *Dominguez Channel and Greater Los Angeles and Long Beach Harbor Waters Toxic Pollutants Total Maximum Daily Load* (TMDL).

The Ports recommend the proposed amendment provide clarification on the appropriate application of the narrative Sediment Quality Objectives for listing and delisting. The Ports support additional revisions that will provide for consistency between the *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality* (Sediment Quality Objectives Part 1) and the Listing Policy. The Ports' main comments are summarized as follows.

- A water segment should not be listed for sediment toxicity alone when the Sediment Quality Objectives apply. The use of sediment toxicity alone is scientifically unsupported to determine sediment quality and this is stated clearly in the Sediment Quality Objectives Part 1 adopted by the State Water Board.
- The use of binomial distribution for exceedance determinations in the Listing Policy might be applicable to traditional water column measurements but is not appropriate

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to determine exceedance of sediment-based criteria or objectives. Further, the use of the binomial distribution for listing and delisting decisions should only be applied to numeric water quality objectives, criteria, or standards, and it is not appropriate for narrative objectives such as the Sediment Quality Objectives. The Ports recommend that the assessment of sediment-based criteria or objectives be determined through an area-based assessment approach.

- When a water segment does not meet the Sediment Quality Objectives, additional confirmatory assessments or stressor identification studies should be allowed under the Regional Water Board's discretion prior to the water segment being listed. This is approach is supported in Section VII.F of the Sediment Quality Objectives Part 1, which states that when a water segment does not meet Sediment Quality Objectives, a confirmatory assessment or stressor identification studies should be allowed before the water segment is listed.
- The Listing Policy should provide a mechanism to incorporate future revisions and development of the Sediment Quality Objectives.
- The Listing Policy should incorporate a delisting provision in Section VII.E.8.3 of the Sediment Quality Objectives Part 1 for a water segment listed for water/sediment toxicity.
- Use of 90 percent minimum significant difference is not appropriate to determine whether or not a sediment sample is toxic to benthic organisms. Instead, a statistically based assessment approach should be used to determine toxic response, where a given sample toxicity is compared to toxicity of a reference sediment sample with similar physical characteristics.
- The Sediment Quality Objectives Part 1 should also be amended to remove the use of the binomial distribution for the exceedance determination and to incorporate an area-based assessment approach to assess an exceedance of the narrative Sediment Quality Objectives.

The Ports recommend that the State Water Board address these comments by:

• Providing clarification in the Listing Policy that a water segment should not be listed for sediment toxicity alone but should be determined using multiple lines of evidence as specified in the Sediment Quality Objectives Part 1 and when the Sediment Quality Objectives are not applicable, any line of evidence available (e.g., either sediment chemistry or benthic community) other than sediment toxicity should be also considered for the listing/delisting determination

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- Removing the use of the binomial distribution for sediment criteria or objective exceedance determination in listing and delisting and replacing it with an area-based assessment approach
- Providing language that directs the Sediment Quality Objective listing and delisting process to the Sediment Quality Objectives Part 1
- Providing language that allows future revisions and development in the Sediment Quality Objectives Part 1 to be upheld in the Listing Policy
- Providing language that allows a confirmatory assessment or stressor identification studies under the Regional Water Board's discretion prior to listing

Further details on these comments are provided in Attachment A, and example changes for the Listing Policy are provided as Attachment B.

The Ports appreciate the opportunity to provide these comments focused primarily on applying the Sediment Quality Objectives for listing and delisting and would appreciate additional opportunities in the future to address other aspects of the Listing Policy.

Should the State Water Board have any questions about these comments, please do not hesitate to contact the Port of Long Beach at (562) 283-7100 and the Port of Los Angeles at (310) 732-3681.

Sincerely,

Heather A. Tomley Director of Environmental Planning Port of Long Beach

Christopher Cannon Director of Environmental Management Port of Los Angeles

ATTACHMENT A

1. Sediment toxicity alone should not determine the listing/delisting of a water segment.

The Ports of Long Beach and Los Angeles (Ports) support the proposed change that "[i]f sediment quality objectives apply, the Regional Water Boards shall use the methods and procedures that were adopted to interpret the objectives" in Section 6.1.3 of the *Water Quality Control Policy for Developing the Clean Water Act Section 303(d) List* (Listing Policy). The Ports however request the State Water Resources Control Board (State Water Board) provide further clarification throughout the Listing Policy that only methods and processes specified in the *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1 Sediment Quality* (the Sediment Quality Objective Part 1) should be used to determine sediment listing/delisting for a water segment where the Sediment Quality Objectives apply. For instance, under the current Section 3.6 of the Listing Policy, a water segment can be still listed for sediment toxicity alone, which should be clarified to be applicable only when no Sediment Quality Objectives are available for a water segment.

The use of sediment toxicity alone is scientifically unsupported to determine sediment quality and this is stated clearly in the Sediment Quality Objectives Part 1 adopted by the State Water Board. At pp. 3 and 4 of the Sediment Quality Objectives Part 1, "[n]one of the individual LOE [line of evidence; sediment toxicity, benthic community condition, or sediment chemistry] is sufficiently reliable when used alone to assess sediment quality impacts due to toxic pollutants. Within a given site, the LOEs applied to assess exposure as described in Section V.A. may underestimate or overestimate the risk to benthic communities and do not indicate causality of specific chemicals. The LOEs applied to assess biological effects can response to stresses associated with natural or physical factors, such as sediment grain size, physical disturbance, or organic enrichment. Each LOE produces specific information that, when integrated with the other LOEs, provides a more confident assessment of sediment quality relative to the narrative objective."

The Ports believe the State Water Board was addressing this particular aspect of the Listing Policy in the development of the Sediment Quality Objectives. The Sediment Quality Objectives Part 1 states that "the section 303(d) listing policy was adopted prior to the development of SQOs and without the benefit of the scientific evidence supporting their development. The State Water Board recognizes the need to ensure that the listing policy and this plan are consistent." (State Board Resolution No. 2008-0070 it 10.) The State Board now uses the Sediment Quality Objectives, which provide an integrated assessment of concentration of selected chemicals, measured toxicity, and alterations in benthic organism assemblages for the evaluation of sediments quality. The Ports believe the State Water Board's resolution is recommending the Sediment Quality Objectives and not a sediment toxicity alone be used for listing/delisting.

The Ports recommend that the State Water Board provide clarification that sediment toxicity alone should not be used to determine sediment listing/delisting assessment when the Sediment Quality Objectives apply. The Ports have provided suggested language for this change in Attachment B.

2. The use of binomial distribution is inappropriate for the narrative Sediment Quality Objectives.

The Ports believe that the use of binomial distribution is neither applicable nor appropriate to determine sediment criteria or sediment objective exceedances.

The Ports believe that the use of binomial distribution is applicable to traditional water column measurements and it is not appropriate to determine exceedance of the narrative sediment quality objectives. We recommend that the Listing Policy be revised such that it no longer requires the use of binomial distribution when assessing sediment quality through the sediment quality objectives. Instead, an area-based approach should be used to determine the proportion of the water segment with an exceedance of the sediment quality objectives.

The Ports recommend that the State Water Board remove the use of the binomial distribution for sediment quality exceedance determinations for listing and delisting. The Ports also recommend adding language that directs listing and delisting per the Sediment Quality Objectives Part 1.

The Ports have provided suggested language for this change in Attachment B.

3. When a water segment does not meet Sediment Quality Objectives selected based on Section 6.1.3, additional confirmatory assessments or stressor identification studies should be conducted before the water segment is placed to the 303(d) list.

Section VII.F of the Sediment Quality Objectives Part 1 requires Regional Water Quality Control Boards (Regional Water Boards) to assign the highest priority to water segments with Clearly Impacted and Likely Impacted sites, states "where segments or reaches contain Possibly Impacted but no Clearly or Likely Impacted sites, confirmation monitoring shall be conducted prior to initiating stressor identification", and provides guidance on what types of investigation can be completed for the confirmation. This section also states that if a confirmatory assessment demonstrates that a Sediment Quality Objectives exceedance is not the result of a toxic pollutant, the water segment with the exceedance meets receiving water limitation.¹

The Ports suggest that a similar confirmatory assessment or stressor identification studies be allowed before listing under the Regional Water Board's discretion. This is approach is supported in Section VII.F of the Sediment Quality Objectives Part 1, which states that when a water segment does not meet Sediment Quality Objectives, a confirmatory assessment or stressor identification studies should be allowed before the water segment is listed.

The confirmatory assessment could include but is not limited to a reassessment using sitespecific data and a spatial and temporal trend assessment (e.g., if an exceedance to the Sediment Quality Objectives is limited to a small and confined area or a clear trend of sediment quality improvement is observed, the listing decision should be made under the consider of this site-specific additional information). As noted in Section 6.1.3 of the Listing Policy, additional information gathered from the confirmatory assessment and the stressor identification studies would provide additional lines of evidence, and it should be used to support the listing decision.²

The Ports recommend that the Listing Policy be updated to allow a confirmatory assessment or stressor identification studies per Section VII.F of the Sediment Quality Objectives Part 1 under the Regional Water Board's discretion prior to listing when a water segment does not meet the Sediment Quality Objectives.

The Ports have provided suggested language for this change in Attachment B.

4. The Listing Policy should provide a mechanism to incorporate future revisions and development of Sediment Quality Objectives.

The Sediment Quality Objectives Part 1 includes sediment quality methods and procedures for the benthic community protection (Phase 1). As stated in State Water Board Resolution No. 2008-0070,³ it is expected that the State Water Board will develop Sediment Quality

¹ "To further assess a site that is impacted by toxic pollutants, there are several lines of investigation that may be pursued, depending on site-specific conditions. These studies may be considered and evaluated in the work plan for the confirmation effort...If there is compelling evidence that the SQO exceedances contributing to a receiving water limit exceedance are not due to toxic pollutants, then the assessment area shall be designated as having achieved the receiving water limit." (Sediment Quality Objectives Part 1)

² "...the evaluation value selected shall be used in concert with other required lines of evidence to support the listing or delisting decision." (Listing Policy)

³ "8. The State Water Board recognizes this effort is an iterative process. Staff additionally have initiated a second phase of the sediment quality objectives program (Phase 2), which includes extensive sediment sampling in the Delta; further development of the estuarine chemistry, sediment toxicity, and benthic

Objectives methods and procedures applicable in the Delta (Phase 2) and for protection of fish and wild life (Phase 3). In addition, the State Water Board is developing the Sediment Quality Objectives Part 2 for indirect effect for human health protection via fish consumption, and soon these indirect effects will be incorporated in to the Sediment Quality Objectives.

Thus, the Ports believe that it is important to amend the Listing Policy in a manner that will not require updating the Listing Policy when the Sediment Quality Objectives are adopted and potentially revised in the future. The Ports recommend that the Listing Policy provide language to uphold the methods provided in the Sediment Quality Objectives when they apply. In other words, listing and delisting will be subject to the Sediment Quality Objectives adopted by the State Water Board. Also, if any discrepancy occurs between the Listing Policy and the Sediment Quality Objectives due to revisions in the Sediment Quality Objectives in the future, the revised Sediment Quality Objectives, including all versions subsequent to Part 1, will supersede the Listing Policy for listing and delisting per the Sediment Quality Objectives.

5. A delisting provision in the Sediment Quality Objectives Part 1 (Section VII.E.8.3) should be incorporated into the Listing Policy.

The Section VII.E.8.3 of the Sediment Quality Objectives Part 1 contains a delisting provision for a water segment that is listed under Section 3.6 of the Listing Policy (water/sediment toxicity). The Sediment Quality Objectives Part 1 allows for the reassessment of a listed water segment using the multiple line of evidence approach of the Sediment Quality Objectives. If the reassessment demonstrates the water segment does not meet Sediment Quality Objectives listing criteria, the Sediment Plan Part 1 requires the water segment be delisted.

The Ports request that the existing delisting section (Section 4.6) of the Listing Policy incorporate Section VII.E.8.3 of the Sediment Quality Objectives Part 1 to provide consistency between the Listing Policy and the Sediment Quality Objectives.

community indicators; and completion of a more prescriptive framework to address human health and exposure to contaminants in fish tissue. The tools, indicators, and framework developed under Phase 2 will be adopted into the draft plan in 2010. Phase 3 is proposed as the development, within available resources, of a framework to protect fish and/or wildlife from the effects of pollutants in sediment. During Phases 2 and 3, staff would continue to evaluate the tools developed during the initial phase and the implementation language. As the Water Boards experience grows, the draft plan would be updated and amended as necessary to more effectively interpret and implement the narrative objectives."

6. Use of 90 percent minimum significant difference is not appropriate for sediment toxicity evaluation.

For all sediment evaluations where the SQO policy does not apply, it is recommended that a statistically based assessment approach be used to determine toxic response. Section 3.6 of the Listing Policy defines reference conditions as response less than 90 percent of the minimum significant difference (MSD)⁴ which is predetermined for each test organisms instead of conducting control toxicity test in reference sediment. However, the use of 90 percent MSD as specified is not typical. It is recommended that sediment toxicity from a sample be compared to toxicity of a reference sediment sample, with similar physical characteristics. This is because sediment physical characteristics such as grain size, total organic carbon (TOC), and ammonia and sulfide concentrations may cause negative test responses not related to actual toxicity in sediment. For example, many species are tolerant of a particular grain size range and may not survive in sediments comprised of particle sizes outside of this range. In this case, reference sediments comprised of similar particle sizes should be included in the test to assess this confounding factor (ASTM 2008)⁵. Another example is if the TOC concentration is low, which may result in an inadequate food source, a reference sample should be selected with a similar TOC concentration to assess the possible effect on test results (ASTM 2008). Concurrent testing and statistical comparison of appropriate reference sediments is vital to obtaining accurate toxicity test results, and the subsequent determination of whether to include a water segment on the Section 303(d) list.

The Ports recommend removing the use of 90% MSD in Section 3.6 of the Listing Policy. The Ports provided proposed changes in Attachment B.

7. The Ports recommend that the State Water Board revise the Sediment Quality Objectives Part 1.

The Ports recommend that the State Water Board revise the Sediment Quality Objectives Part 1 to be consistent with the Listing Policy once it is amended. Revisions include removing the requirement of binomial distribution with an area-based assessment approach for Sediment Quality Objective exceedance determination and allowing for the confirmatory assessment or stressor identification studies under the Regional Water Board's discretion prior to listing.

⁴ The MSD is defined as the smallest difference between the control and another test treatment that can be determined as statistically significant in a given test. (US EPA, 2000. Method Guidance and Recommendations for Whole Effluent Toxicity (WET) Testing)

⁵ ASTM (2008) Standard Test Method for Measuring Toxicity of Sediment-Associated Contaminants with Estuarine and Marine Invertebrates. Method E1367.

As discussed in Comment 2, the use of the binomial distribution should be limited to numeric standards, criteria, and objectives for traditional water column measurements, and it is not appropriate for assessing narrative objective or criteria exceedances in sediment, such as the Sediment Quality Objectives. The use of an area-based assessment approach is appropriate for determining the proportion of a water segment with Sediment Quality Objectives exceedances and could be based on results from national- and state-wide regional monitoring programs (e.g., Environmental Monitoring and Assessment Program [EMAP] and Southern California Bight Regional Monitoring Program [Bight]). Thus, the Ports recommend that the State Water Board develop and incorporate an area-based assessment approach for determining Sediment Quality Objective exceedances within water segments as part of the Sediment Quality Objectives Part 1. This recommendation is consistent with State Water Board's Resolution No. 2008-0070, which encourages and supports updating the Sediment Quality Objectives for interpreting and implementing the narrative objectives as well as ensuring the listing policy and Sediment Quality Objectives are consistent.

The Ports recommend the State Water Board review potential assessment methodologies being developed by the Harbor Technical Working Group (HTWG) for area-based assessment approaches.

ATTACHMENT B

Section in the	Page	Recommended changes in the Water Quality Control Policy for Developing the Clean Water Act Section 303(d)
Listing Policy	No.	List (Listing Policy) are in redline format
3.6 Water/Sediment Toxicity	5	A water segment shall be placed on the section 303(d) list if the water segment exhibits statistically significant water or sediment-toxicity using the binomial distribution as described in section 3.1 ₇ or if the water segment has a sediment exceedance as determined by the Sediment Quality Objectives incorporating an area-based assessment approach as adopted by the State Water Board. Sediment toxicity alone shall not be used to determine the listing. When a water segment exceeds the Sediment Quality Objectives, confirmatory assessments or stressor identification studies based on approaches from Section VII.F of Sediment Quality Objectives Part 1 shall be allowed under Regional Water Board's discretion prior to the water segment being placed in the 303(d) list. If no Sediment Quality Objectives apply, The segment shall be listed if the observed toxicity is associated with a pollutant or pollutants. Waters may also be placed on the section 303(d) list for water toxicity alone. If the pollutant causing or contributing to the toxicity is identified, the pollutant shall be included on the section 303(d) list as soon as possible (i.e., during the next listing cycle). Reference conditions may include laboratory controls (using a t-test or other applicable statistical test), the lower confidence interval of the reference envelope or, for sediments, response less than 90 percent of the minimum significant difference for each specific test organism a statistically based assessment approach be used to determine toxic response.

Section in the	Page	Recommended changes in the Water Quality Control Policy for Developing the Clean Water Act Section 303(d)
Listing Policy	No.	List (Listing Policy) are in redline format
	6	Appropriate reference and control measures must be included in the toxicity testing. Acceptable methods include, but are not limited to, those listed in water quality control plans, the methods used by Surface Water Ambient Monitoring Program (SWAMP), the Southern California Bight Projects of the Southern California Coastal Water Research Project, American Society for Testing and Materials (ASTM), U.S. EPA, the Regional Monitoring Program of the San Francisco Estuary Institute, and the Bay Protection and Toxic Cleanup Program (BPTCP).
		Association of pollutant concentrations with toxic or other biological effects should be determined by any one of the following:
		 A. Sediment quality guidelines (satisfying the requirements of section 6.1.3) <u>other than the Sediment Quality Objectives</u> are exceeded using <u>the binomial distribution as described in section 3.1 an area-based assessment approach as adopted by the State Water Board</u>. In addition, using rank correlation, the observed effects are correlated with measurements of chemical concentration in sediments. If these conditions are met, the pollutant shall be identified as "sediment pollutant(s)." <u>If the Sediment Quality Objectives Part 1 shall be used identify the pollutant that may cause exceedance of the Sediment Quality Objectives.</u> B. For sediments, an evaluation of equilibrium partitioning or other type of toxicological response that identifies the pollutant that may cause the observed impact. Comparison to reference conditions within a watershed or ecoregion may be used to establish sediment impacts. C. Development of an evaluation (such as a toxicity identification evaluation) that identifies the pollutant
3.8 Adverse Biological Response	6	that contributes to or caused the observed impact. A water segment shall be placed on the section 303(d) list if the water segment exhibits adverse biological response measured in resident individuals as compared to reference conditions and these impacts are associated with water or sediment concentrations of pollutants as described in section 3.6. Endpoints for this factor include reduction in growth, reduction in reproductive capacity, abnormal development, histopathological abnormalities, and other adverse conditions.
		If Sediment Quality Objectives apply, the listing assessment process will be subject to the Sediment Quality Objectives adopted by the State Water Board and adverse biological response alone shall not determine the listing.

Section in the	Page	Recommended changes in the Water Quality Control Policy for Developing the Clean Water Act Section 303(d)
Listing Policy	No.	List (Listing Policy) are in redline format
3.9 Degradation of	7	A water segment shall be placed on the section 303(d) list if any of the following conditions are met:
Biological Populations		• If no Sediment Quality Objectives apply, the water segment exhibits significant degradation in biological
and Communities		populations and/or communities as compared to reference site(s) and is associated with water or
		sediment concentrations of pollutants including but not limited to chemical concentrations,
		temperature, dissolved oxygen, and trash. This condition requires diminished numbers of species or
		individuals of a single species or other metrics when compared to reference site(s). The analysis should
		rely on measurements from at least two stations. Comparison to reference site conditions shall be
		made during similar season and/or hydrologic conditions.
		If Sediment Quality Objectives apply, the listing assessment process will be subject to the Sediment
		Quality Objectives adopted by the State Water Board and degradation of biological populations and
		communities alone shall not determine the listing. When a water segment exceeds the Sediment
		Quality Objectives, confirmatory assessments or stressor identification studies based on approaches
		from Section VII.F of Sediment Quality Objectives Part 1 shall be allowed under Regional Water Board's
		discretion prior to the water segment being placed in the 303(d) list.
		Association of chemical concentrations, temperature, dissolved oxygen, trash, and other pollutants shall be
		determined using sections 3.1, 3.2, 3.6, 3.7, 6.1.5.9, or other applicable sections. If the Sediment Quality
		Objectives apply, stressor identification process in Section VII.F in the Sediment Quality Objectives Part 1 shall be
		used identify the pollutant that may cause exceedance of the Sediment Quality Objectives.
		For population or community degradation related to sedimentation, the water segment shall be placed on the
		section 303(d) list if degraded populations or communities are identified and effects are associated with clean
		sediment loads in water or with loads stored in the channel when compared to evaluation guidelines (satisfying
		the conditions of section 6.1.3) using the binomial distribution as described in section 3.1 or as compared to
		reference sites.
		Discourse to the word for listing desiring shall be apprictuated with particular CAEO. For history
		Bioassessment data used for listing decisions shall be consistent with section 6.1.5.8. For bioassessment,
		measurements at one stream reach may be sufficient to warrant insting provided that the impairment is associated
A.C. Water/Codiment	10	Water (Sediment Travisity or associated water quality guidelines or sediment quality guidelines are not eveneded.
4.0 water/Sediment	12	water /seument +toxicity or associated water <u>quality guidelines</u> or seament quality guidelines are not exceeded
TUXICITY		עאווא נווב אווטווואו עוצנוואענוטוו אל עבצנוואבע ווו צבננוטוו 4.1.
		Sediment is determined to no longer meet the listing criteria either using an area based assessment approach as
		adopted by the State Water Poard if no Sediment Quality Objectives apply or using the delicting procedures in the
		auopieu by me state water Board in no sediment Quality Objectives apply or using the delisting procedures in the
		<u>Sediment Quanty Objectives Part 1 if Sediment Quanty Objectives apply</u> .

Section in the	Page	Recommended changes in the Water Quality Control Policy for Developing the Clean Water Act Section 303(d)
Listing Policy	No.	List (Listing Policy) are in redline format
4.8 Adverse Biological	12	Adverse biological response is no longer evident or associated water or sediment numeric pollutant-specific
Response		evaluation guidelines are not exceeded using the following method:
		 the binomial distribution as described in section 4.1 for water exceedance,
		an area based assessment approach adopted by the State Water Board for sediment exceedance
4.9 Degradation of	12	Biological populations and communities degradation in the water segment is no longer evident as compared to
Biological Populations		reference site(s) or associated water or sediment numeric pollutant-specific evaluation guidelines are not
and Communities		exceeded as demonstrated through the following methods:
		 the binomial distribution as described in section 4.1 for numeric water exceedance,
		an area based assessment approach adopted by the State Water Board for sediment exceedance
6.1.3 Evaluation	20	Narrative water quality objectives shall be evaluated using evaluation guidelines. When evaluating narrative water
Guideline Selection		quality objectives or beneficial use protection, the Regional Water Boards and the State Water Board shall identify
Process		evaluation guidelines that represent standards attainment or beneficial use protection. The guidelines are not
		water quality objectives and shall only be used for the purpose of developing the section 303(d) list.
		To select an evaluation guideline, the Regional Water Board or the State Water Board shall:
		 Identify the water body, pollutants, and beneficial uses;
		 Identify the narrative water quality objectives or applicable water quality criteria;
		 Identify the appropriate interpretive evaluation guideline that potentially represents water quality objective
		attainment or protection of beneficial uses. If this Policy requires evaluation values to be used as one line of
		evidence, the evaluation value selected shall be used in concert with the other required line(s) of evidence to
		support the listing or delisting decision. Depending on the beneficial use and narrative standard, the
		following considerations shall be used in the selection of evaluation guidelines:
		1 Sediment Quality Quidelines for Marine, Estuarine, and Freshwater Sediments:
		1. Sediment Quality Guidelines for Marine, Estuarnie, and Freshwater Sediments.
		A. If Sediment Quality Objectives apply, the Regional Water Boards shall use the methods and procedures that were adopted to interpret the objective. When Sediment Quality Objectives apply, the licting and
		delisting will be subject to the direct and indirect effects the Sediment Quality Objectives adopted by the
		State Water Board, Listing/delisting evaluation guidelines other than Sediment Quality Objectives are to
		be used only if no Sediment Quality Objectives apply. If any discrepancy occurs between the Listing
		Policy and the Sediment Quality Objectives due to revisions in the Sediment Quality Objectives in the
		future, the Sediment Quality Objectives will supersede the Listing Policy for the listing and delisting per
		the Sediment Quality Objectives.