

August 3, 2011 Regional Advisory Committee

A Local Perspective on Stormwater Permitting

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Watershed Protection Program

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Permit Reissuance Process

- Copermittee visioning workshops (September – November 2010)
- Meetings with RWQCB Staff (Feb. – April 2011)
- Copermittee reissuance meetings / workshops (March – June 2011)

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Report of Waste Discharge (ROWD)

REPORT OF WASTE DISCHARGE Application for Renewal of NPDES Municipal Stormwater Permit for San Diego County

Submitted to the San Diego Regional Water Quality
Control Board on behalf of the Copermittees in Order
No. RW-2007-0002

County of San Diego
City of Chula Vista
City of Escondido
City of Imperial Beach
City of La Mesa
City of San Marcos
City of San Diego
City of Vista

City of National City
City of Poway
City of San Marcos
City of San Diego
City of San Marcos
City of Vista
City of Vista
San Diego Unified Port District
San Diego County Regional Airports
Authority

JUN 24, 2011

Prepared with the Assistance of Lorry Walker Associates

KEY RECOMMENDATIONS

- Simplified reporting
- Streamlined and more meaningful assessment
- Better coordinated water quality monitoring
- Enhanced watershed and Total Maximum Daily Load (TMDL) focus
- Increased emphasis on strategic planning

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Key Drivers for Continued Discussion



- Single region-wide permit
- Watershed emphasis
- Adaptive management

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General Approach to Municipal Stormwater Management



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A Watershed-centric Permit

WATERSHED MANAGEMENT AREA	STORMWATER UNIT (SUA)	MAJOR RECEIVING WATER BODIES
San Marcos River	San Marcos SW (1974)	San Marcos River and Estero, Pacific Ocean
Carlsbad	Carlsbad SW (1974)	San Marcos River and Estero, Pacific Ocean
San Marcos River	San Marcos SW (1974)	San Marcos River and Estero, Pacific Ocean
Phlegon	Mountain Reservoir SW (1974), Phlegon SW (1974)	San Marcos River and Estero, Pacific Ocean
Mission Bay	Mission Bay SW (1974), Mission Bay SW (1974)	Mission Bay, Pacific Ocean
San Diego Bay	San Diego Bay SW (1974)	San Diego Bay, Pacific Ocean
San Diego Bay	Public, San Diego SW (1974), Mission Bay SW (1974)	San Diego Bay, Mission Bay, Pacific Ocean
Escondido	Escondido SW (1974)	Escondido River and Estero, Pacific Ocean

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Potential Benefits of a Watershed Approach

- Narrower geographic focus
- Well-defined set of problem conditions
- Movement in emphasis away from preventive approaches
- Fewer plans and reports
- Flexibility in implementation approaches (jurisdictional, watershed, & regional)
- Alignment with Total Maximum Daily Loads (TMDLs)

- Conceptual simplicity

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Individual and Group Functions Under a Hypothetical Watershed Urban

San Diego River Watershed Urban Runoff Plan (5 Copermittees)

Potential GROUP Functions (Functional Unit = WMA)	Potential JURISDICTIONAL Functions (Functional Unit = Copermittee-WMA)
<ul style="list-style-type: none"> ✓ Water Quality Assessment / Priorities ✓ Source Priorities 	<ul style="list-style-type: none"> ✓ Water Quality Assessment / Priorities ✓ Source Priorities
<ul style="list-style-type: none"> ✓ Program Implementation Strategy ✓ Effectiveness Assessment 	<ul style="list-style-type: none"> ✓ Source / Target Audience Requirements (BMPs, etc.) ✓ Program Implementation Strategy ✓ Effectiveness Assessment

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RESPONSIBLE WATERSHED COPERMITTEE(S)	WATERSHED MANAGEMENT AREA	HYDROLOGIC UNIT (HUA)	WATERSHED WATER BEBEES
1. City of San Diego	San Marcos River	San Marcos HU	San Marcos River and Estuary, Pacific Ocean
2. City of Escondido	San Luis Rey River	San Luis Rey HU (2017-08)	San Luis Rey River and Estuary, Pacific Ocean
3. City of Vista			
4. County of San Diego			
5. City of Carlsbad			
6. City of Encinitas			
7. City of Escondido			
8. City of San Marcos	Cardinal	Cardinal HU (2014-08)	Raymond Laguna, San Diego Estuary
9. City of San Marcos	San Simeon River	San Simeon HU (2017-08)	San Simeon River and Estuary, Pacific Ocean
10. City of San Marcos			
11. City of San Diego			
12. City of Escondido			
13. City of Escondido			
14. County of San Diego	Philippines	Mission River HU (2016-08)	San Felipe Creek
15. City of San Diego			
16. City of San Diego			
17. City of Del Mar	Philippines	Mission River HU (2016-08)	San Felipe Creek
18. City of Poway			

- 21 Copermittees
- 9 Watershed Management Areas (WMAs)



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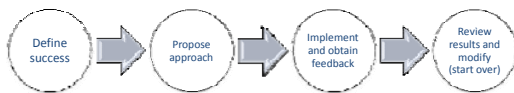
Where is this inevitably leading us?

- Potential for more complexity / cost increases
- Need for tradeoffs / prioritization / increases in efficiency
- Need for strategic and adaptive approaches

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Adaptive Management

“learning to manage by managing to learn”

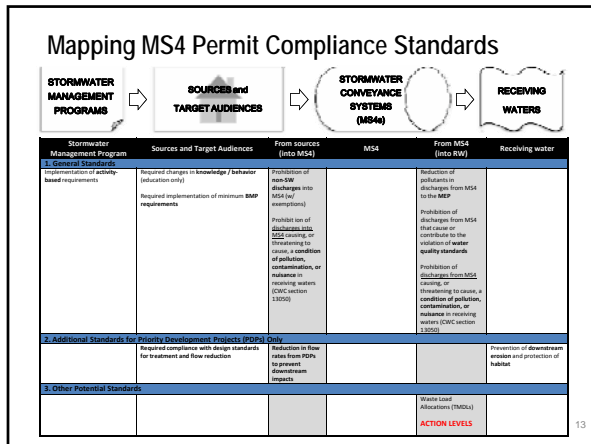


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Compliance versus Success

- Success can be defined as compliance with Water Quality Standards, but only on a long-term basis.
- Compliance and success cannot be equated on a permit timeframe.
- Permits don't require success: they set compliance standards
- Compliance standards set minimums (and maximums)

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Desirable Attributes of Compliance Standards

- Clear and enforceable
- Actionable (rather than immediately enforceable)
- Achievable (within immediate, intermediate, or longer-term time frames)
- Measurable and supported by feedback

- Useful in guiding program design, assessment, and modification

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MS4 Action Levels (South Orange and Riverside Permits)

- Clear and enforceable?
- Actionable (rather than immediately enforceable)?
- Achievable (within immediate, intermediate, or longer-term time frames)?
- Measurable and supported by feedback?

- Useful in guiding program design, assessment, and modification?

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Many Options for Defining success

- Targeted Changes**
 - Have program implementation commitments been met?
 - Have changes occurred in sources / target audiences (knowledge, behavior, source reductions)
 - Have urban runoff and receiving water quality improved?
 - Has interim progress toward established objectives been achieved?
- Process / Program Improvement**
 - More strategic (priorities, etc.)?
 - More effective?
 - More measurable?
- Learning**
 - Hypothesis testing?
 - Adaptation?

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Questions?

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