“Watershed” Based Storm Water Permits

Buzzword or Beneficial?

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Watershed Approach: Here to stay?

Agenda

Watershed-Based Storm Water Permits

- What are they?
- Considerations
  1. Consider regulatory context
  2. Establish efficient copermittee coordination
  3. Minimize administrative burden
  4. Determine appropriate watershed scale
- Conclusions

Watershed-Based Storm Water Permits

What are they?

What are they?

- **<u>Voluntarily</u> selected**
- **Drainage areas define boundaries**
- **Multiple copermittees**
- **Structure for sound science**
  - Source identification
  - Prioritize efforts

California's Permit Approach

- CWA administered by State
- State Board
- 9 Regional Boards
- Hydrologic Units

San Francisco Bay Area Municipal Regional Permit

- **5 year process**
- **76 Copermittees**
- **Combined 6 Permits**
- **Copermittees called for:**
  - Consistency with adopted Total Maximum Daily Loads (TMDLs)
  - Consistent requirements
  - Prioritization of requirements
  - Reduced administrative burden

San Diego Region's Municipal Permit

- **21 Copermittees**
- **Portions of 9 watersheds**
- **Programs:**
  - Jurisdictional
  - 9 Watershed
  - Regional

Considerations

Consider Regulatory Context

Consider Regulatory Context

- **Consider compliance standards**
  - TMDLs: water quality targets (“ends”)
  - Storm Water Permits: methods (“means”)
- **If TMDLs, retain discretion on means**
  - *How*
  - *At what scale*

Consider Regulatory Context

- **If TMDL, consider aligning permit with TMDL's watershed(s)**
- **Watershed-based permit pros:**
  - Involves responsible agencies
  - Provides structure for sound science, dialogue, flexibility
  - Tool for future TMDL cost savings
- **Cons:**
  - Increased copermittee coordination
  - Increased permit, program layers

Sound Science Through Watershed Approach

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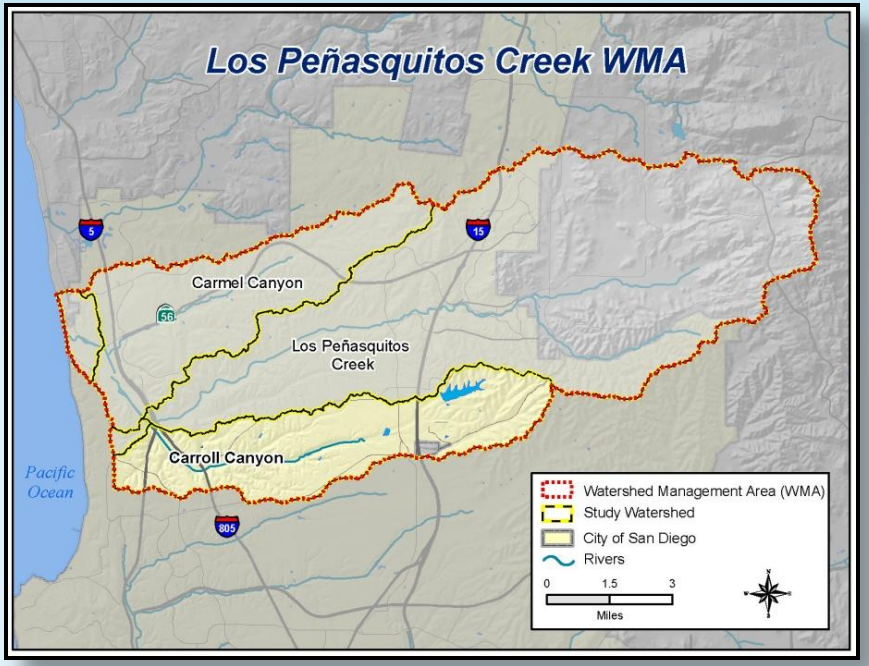
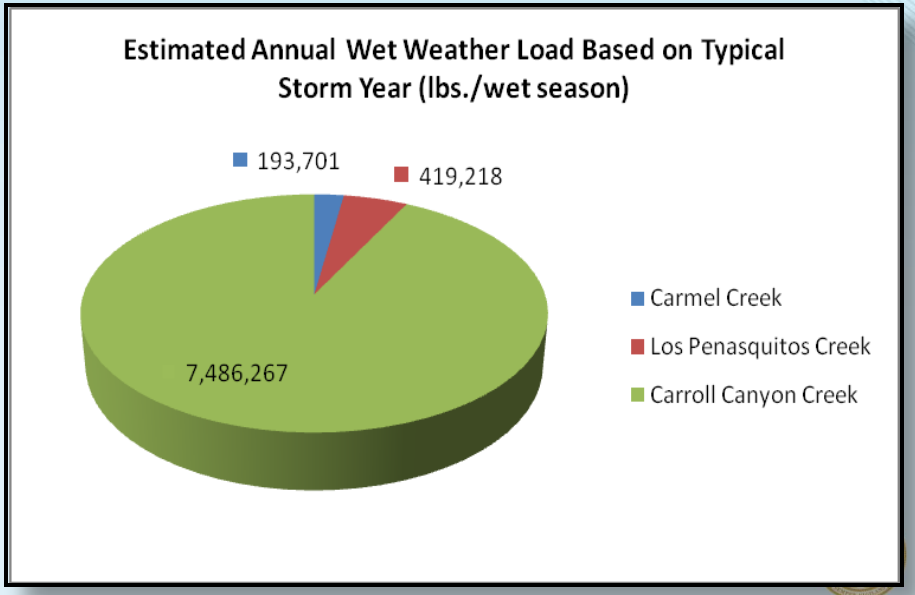
Understanding Pollutant Sources:

Los Peñasquitos Lagoon Sediment Study

- 93% of sediment from Carroll Canyon sub-watershed
- Lacks basins found in other sub-watersheds





Sound Science Through Watershed Approach

Aerial Deposition Study Phase III – Metals

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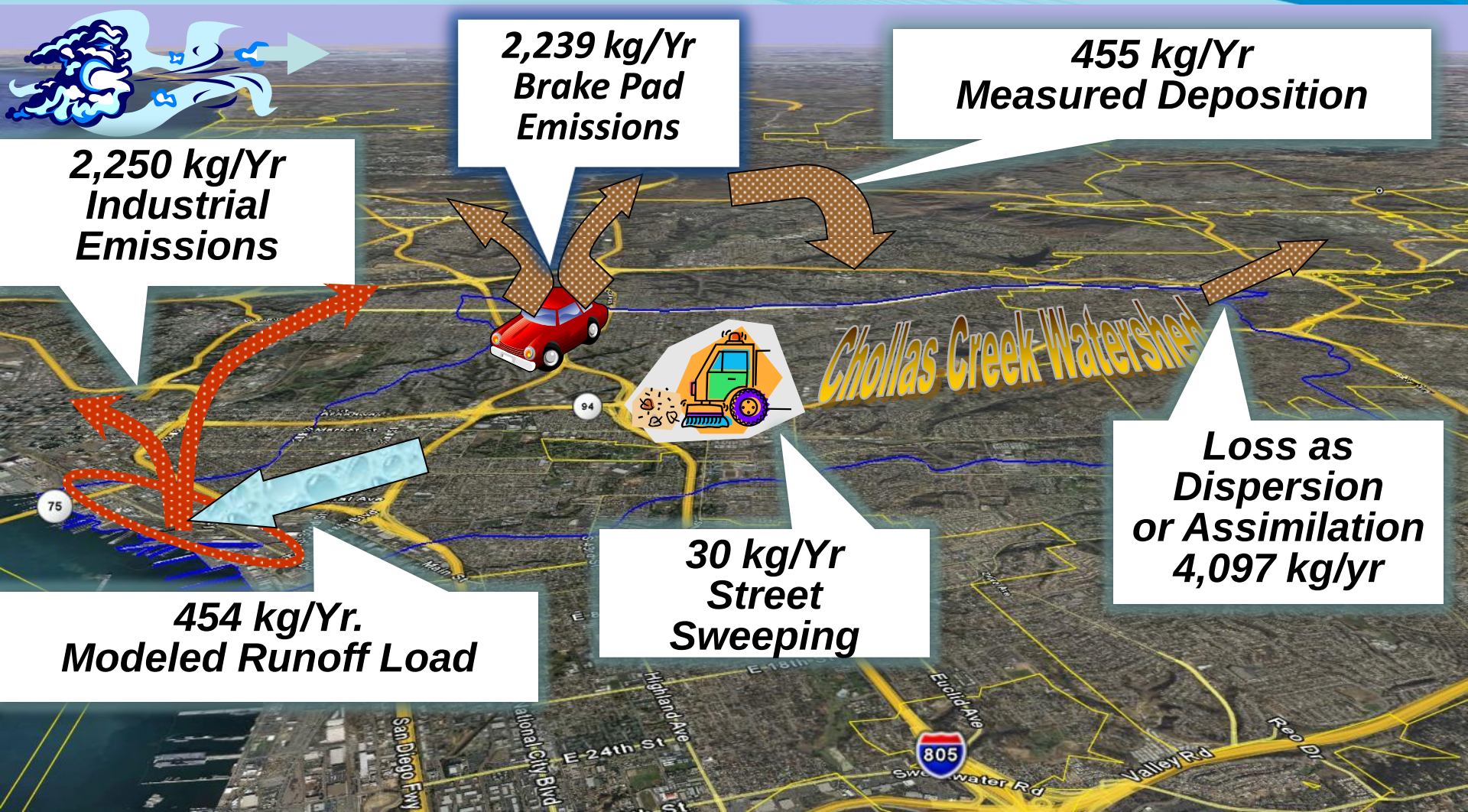


Considerations

Establish Efficient Copermittee Coordination

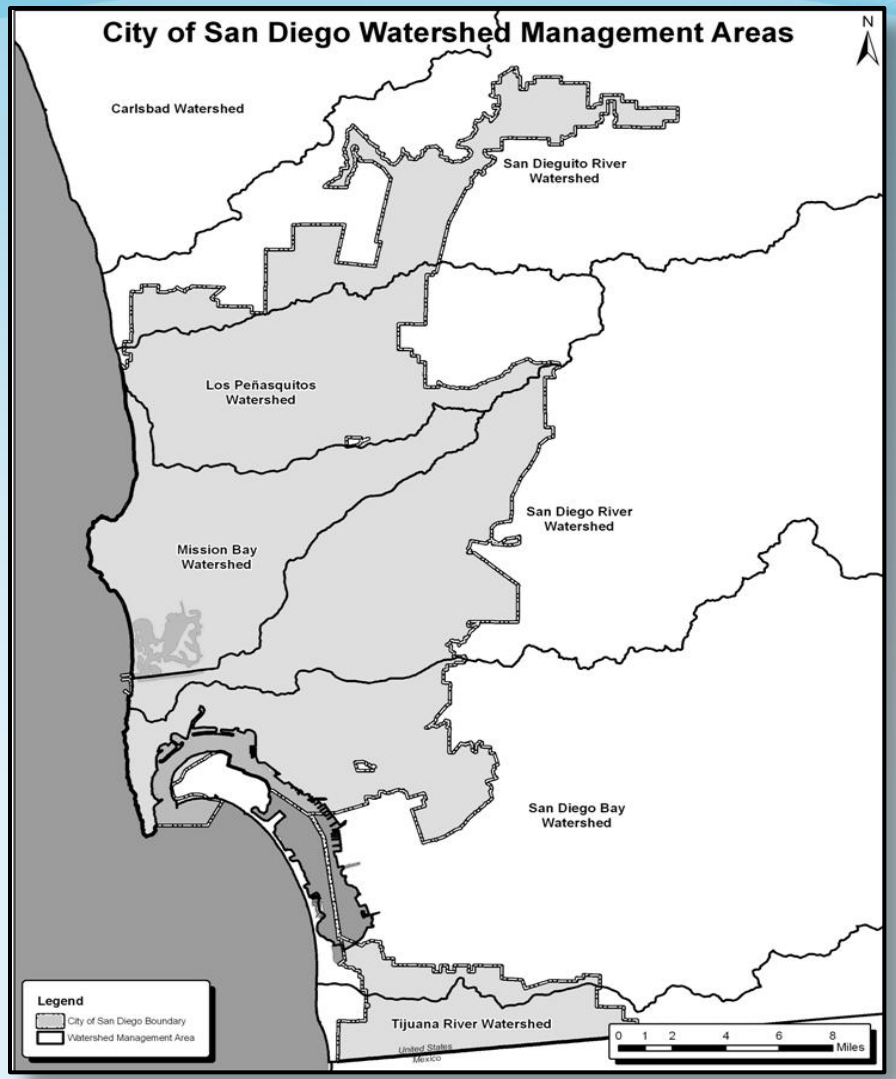
Copermittee Coordination

- **Establish cost-sharing and decisionmaking mechanism**
- **Identify principal copermittee**
- **Leverage economies of scale**
  - Water quality monitoring and assessment
  - Education and outreach

Considerations

Minimize Administrative Issues

Administrative Issues



City of San Diego's Permit Programs:

- –1 Jurisdictional
- –6 Watershed
- –1 Regional

Results in…

- **8 annual reports**
- **3-level implementation**

Administrative Issues

- **Minimize management programs, duplication:**
  - Annual reporting
  - Monitoring
  - Program assessment
- **Integrate with other drivers…**
  - Flood control
  - Storm drain asset management

Administrative Issues

City of San Diego's Draft Strategic Business Plan

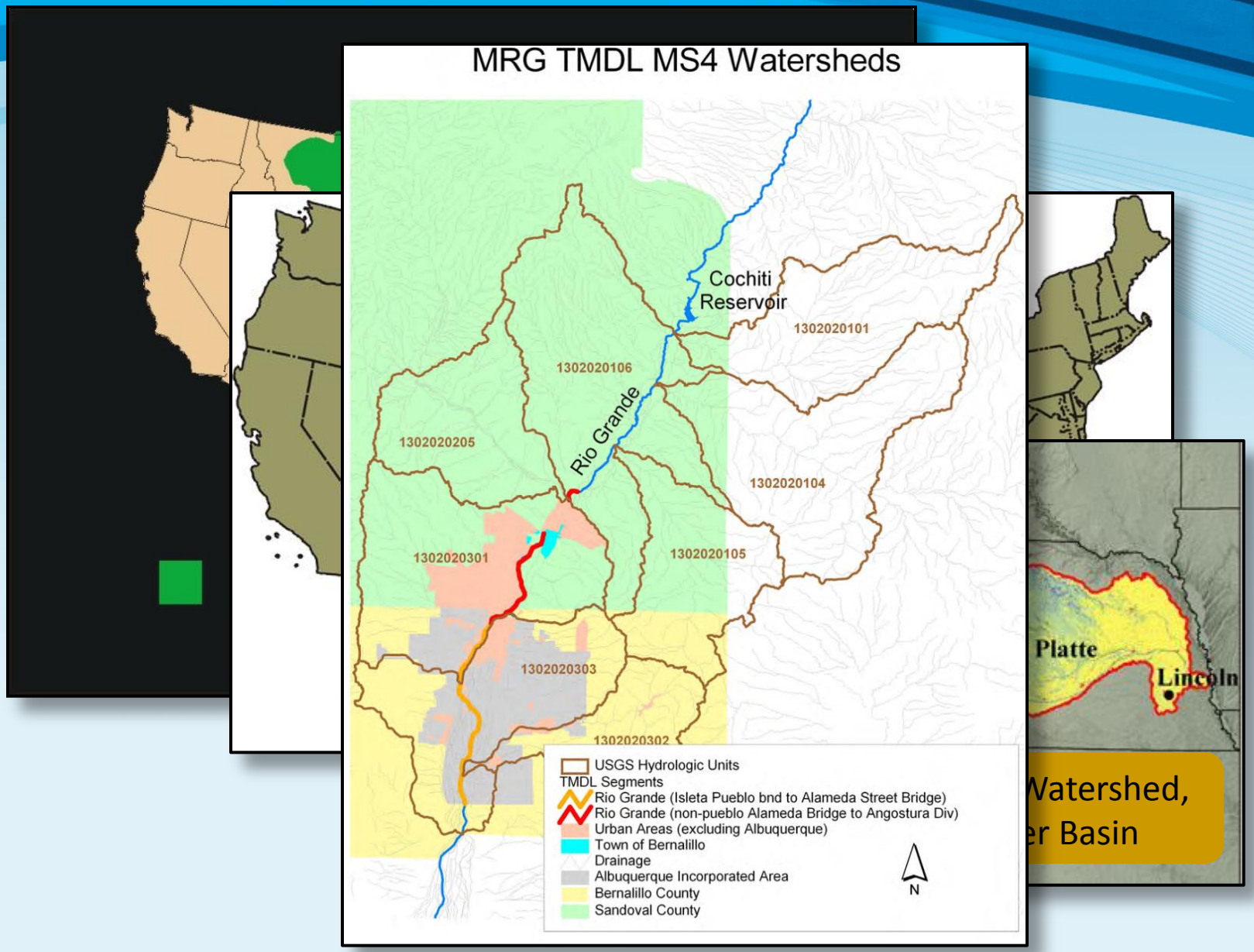
Integrated Planning:

- **Storm Water Permit**
- **TMDLs**
- **Drainage master plans**
  - Flood control
  - Asset management

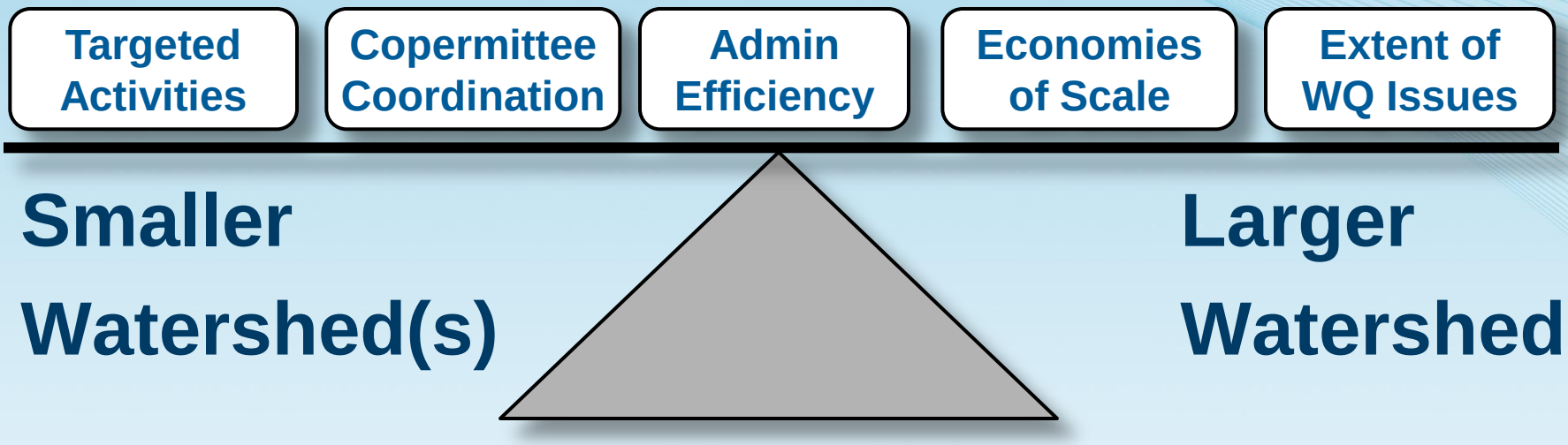
Considerations

Determine Appropriate Watershed Scale

Determine Watershed Scale



Determine Watershed Scale



Conclusions

- Watershed approach not going away
- TMDLs perhaps most important factor
- Tailor Permit to fit your conditions, enable sound science