

LA County MS4 Permit Implementation

LARWQCB Information Session #1

February 19, 2013

Watershed Management Program Provisions (Part VI.C., pp. 47-67)

- Voluntary; may be developed collaboratively or individually
- Vehicle for addressing requirements of Parts V.A. and VI.E. (Receiving Water Limitations & TMDL Provisions)
- Allows customization of control measures in Parts III.A.4. and IV.D.
- Must ensure that
 - MS4 discharges achieve applicable WQBELs in TMDL provisions
 - MS4 discharges do not cause or contribute to exceedances of RWL
 - MS4 discharges do not include non-storm water discharges that are a source of pollutants
 - Storm water controls are implemented to the maximum extent practicable

Watershed Management Program Elements

- Prioritization of water quality issues by watershed
- Identification and implementation of strategies, control measures, and BMPs
- Design and execution of integrated monitoring and assessment program
- Process to modify strategies, control measures, and BMPs as necessary based on monitoring and assessment
- Stakeholder input, including TAC to participate in development of WMPs

Permittee Options

1. Watershed Management Program (WMP)
 - a. Individual Basis
 - b. Collaborative among Permittees within a watershed
2. Enhanced Watershed Management Program (EWMP)
 - a. Assumes collaboration among Permittees and other partners (e.g., water suppliers) within a watershed
3. No Watershed Management Program

Enhanced Watershed Management Programs

- An EWMP is one that comprehensively evaluates opportunities, within the participating permittees' collective jurisdictional area in a watershed management area, for collaboration among permittees and other partners on multi-benefit regional projects that, wherever feasible, retain (i) all non-storm water runoff and (ii) all storm water runoff from the 85th percentile, 24-hour storm event for the drainage areas tributary to the projects, while also achieving other benefits including flood control and water supply, among others.

EWMPs (continued)

- Emphasis on multi-benefit regional projects that wherever feasible retain the storm water volume from the 85th percentile, 24-hour storm for the drainage areas tributary to the project
 - Emphasis on collaboration among permittees and other partners
- Where retention of 85th percentile storm is not feasible, EWMPs must include other watershed control measures to ensure that MS4 discharges achieve compliance with all WQBELs and do not cause or contribute to exceedances of RWLs

Benefits of Enhanced Watershed Management Programs (cont.)

Economic Benefits

- Opportunities to pool resources (financial, technical, available land, etc.) among permittees
- Opportunities to garner additional resources from other partners
- Projects have multiple benefits -- water quality, water supply, flood control, others

Compliance Demonstration

- Retention of the 85th percentile, 24-hour storm event, and all non-storm water, constitutes compliance with final WQBEL and RWL provisions associated with a TMDL for the tributary drainage area to the multi-benefit retention project

Implementation Timeline



Notification of Intent -- Requirements

WMP

- Notify Regional Board no later than June 28, 2013
- Specify requested submittal date (12 or 18* months)
- Identify applicable interim and final trash WQBELs
- Identify other applicable final WQBELs with deadlines prior to approval of WMP

EWMP

- Notify Regional Board no later than June 28, 2013
- Specify requested submittal date (18/30 months*)
- Identify applicable interim and final trash WQBELs
- Identify other applicable final WQBELs with deadlines prior to approval of EWMP

Notification of Intent -- Requirements

WMP

- Identify watershed control measures, where possible from existing TMDL implementation plans, that will be implemented concurrently with development of WMP to achieve compliance with WQBELs by the applicable deadlines

EWMP

- Identify watershed control measures, where possible from existing TMDL implementation plans, that will be implemented concurrently with development of EWMP to achieve compliance with WQBELs by the applicable deadlines

Additional Notification Requirements for EWMP

- Plan concept and geographical scope
- Cost estimate for plan development
- Executed MOU among participating permittees to fund plan development, or final draft MOU among participating permittees and signed letters of intent from each participating permittee
- Interim milestones for plan development and deadlines for their achievement*
- Identification of, and commitment to fully implement, one structural BMP or suite of BMPs at a scale that provides meaningful water quality improvement within each watershed within 30 months**
- Demonstration that early action requirements (LID and green streets) have been met in >50% of land area of watershed

Interim milestones for EWMP plan development & deadlines for their achievement

- Hallmarks of EWMPs are multi-benefit regional projects that retain at least the 85th percentile, 24-hour storm event for tributary drainage areas
- Additional year provided to develop EWMP to accommodate more complex planning and coordination
- One purpose of interim milestones is to ensure that plan development includes early initiation of evaluation of opportunities for multi-benefit regional projects
- Interim milestones also intended to ensure adequate pace of plan development; demonstrate progress toward final draft plan

WMP Development Deadlines

Deadline	Requirement
02/26/13	Commence development of LID ordinance & green streets policies <i>(where necessary & if pursuing 18-month schedule)</i>
06/28/13	Notification of intent
06/28/13	Complete draft LID ordinance and draft green streets policy <i>(for 18-month schedule)</i>
12/15/13	First annual report
12/28/13	Draft WMP <i>(if NO early actions)</i>
06/28/14	Draft WMP <i>(if early actions demonstrated)</i>

EWMP Development Deadlines

Deadline	Requirement
02/26/13	Commence development of LID ordinances & green streets policies (<i>where necessary</i>)
06/28/13	<ul style="list-style-type: none">- Notification of intent- Complete draft LID ordinance and draft green streets policy (<i>or document existing LID ordinances and green streets policies</i>)
12/15/13	First annual report
12/28/13	Fully executed MOU by all participating permittees
06/28/14	Submit detailed final work plan for development of EWMP
12/15/14	Second annual report
06/28/15	<ul style="list-style-type: none">- Submit draft EWMP- Fully implemented structural BMP or suite of BMPs within the watershed (<i>in addition to those required to achieve compliance deadlines occurring prior to approval of EWMP</i>)

Requirements During Development of WMP/EWMP

- Continue to implement six elements of existing SWMP and monitoring programs
- Implement necessary watershed control measures to achieve interim and final trash WQBELs per deadlines occurring prior to approval of WMP/EWMP
- Implement necessary watershed control measures to achieve other final WQBELs per deadlines occurring prior to approval of WMP/EWMP, or alternatively,
 - Request time schedule order for final WQBELs with deadlines occurring prior to approval of WMP/EWMP
- Meet all interim and final deadlines for development of a WMP/EWMP
- Target watershed control measures in existing SWMP, including watershed control measures to eliminate non-storm water discharges of pollutants, to address known contributions of pollutants from MS4 discharges