

Beaches and Creeks TMDL Cost-Benefit Analysis
Steering Committee Meeting
June 6, 2016

Committee Members Present

Jimmy Smith, San Diego Regional Water Quality Control Board
Jeremy Haas, San Diego Regional Water Quality Control Board
Ruth Kolb, City of San Diego, Storm Water and Transportation
Todd Snyder, County of San Diego, Watershed Protection Program
Jeff Van Every, City of San Diego Public Utilities Division
Ted Shaw, Atlantis Group, representing San Diego County Taxpayers Association
Jian Peng, County of Orange, Stormwater Water Quality Planning

Supporting Roles

Lewis Michaelson, Katz & Associates
Bree Robertoy, Katz & Associates
Cynthia Gorham, San Diego Regional Water Quality Control Board
Michelle Mata, San Diego Regional Quality Control Board
Jo Ann Weber, County of San Diego
Mark Buckley, Eco Northwest
Chad Praul, Environmental Incentives

Policy Decisions and Scenarios Discussion

- The consultant provided a handout for committee discussion listing possible scenarios and analyses to be considered in the cost-benefit analysis (CBA) as well as policy decisions the CBA may inform.

Policy Decisions

- J. Smith: The policy decisions identified in the handout do make sense, but schedule implementation is part of the regulatory approach.
 - C. Praul: The implementation schedule is called out specifically because it is possibly a key policy decision that could be impacted by the CBA.
- T. Snyder: 'Change schedule of implementation' should be rewritten to say 'change schedule of compliance.' I envisioned the CBA informing policy decisions for the regional water board as well as implementation decisions.
- The consultant is working with the Environmental Protection Agency (EPA) on guidelines for schedule changes. Based on EPA guidance, a date change won't be approved without a financial capability analysis (FCA). The scope of work for the CBA can be expanded to include the FCA.
 - T. Snyder: The FCA would determine the endpoint for compliance based on when cost would reach 2 or 3 percent of household income. It's a worthwhile exercise.
 - J. Smith: It makes sense for wet weather especially.
 - R. Kolb: It's very important to the City of San Diego that a FCA is completed.

Possible Scenarios

- Legal or budget constraints could prevent some of the listed scenarios from being considered in the CBA.
- The consultant proposed using the 2014/2015 as the current conditions scenario, as that is when the best data are available.
- J. Haas: The regional water board is trying to identify the most efficient solution using the CBA and results of scientific studies. The CBA won't be useful if it doesn't integrate with the other studies by looking at environmental outcomes as well as scenarios that achieve health.
- J. Smith: The nation is struggling to compile data to back these scenarios.
- M. Buckley: We're trying to understand what people are concerned with to determine benefit (e.g., looking at benefits associated with the water's appearance). Reducing bacteria count may not necessarily yield more benefit.
- C. Praul: One possible scenario is moving compliance points downstream in wet weather from the outfalls to places where people are recreating.
 - T. Shaw: People recreate in fresh water areas as well. Compliance points should be moved up the river to ensure clean water for the people living along the river.
 - J. Smith: The benefit of clean water is lost if the compliance point is further down.
 - T. Snyder: If the compliance point is moved to where people are recreating in the ocean the CBA needs to quantify the lost benefit to the people who are using the stream.
- J. Haas: Add planning for spill response to the 'repair leaking sewer pipes and failing sewer systems' scenario.
- C. Praul: One scenario would be to look at changing compliance dates to possibly 2028 for dry weather and 2081 for wet weather. The dates would be determined based on the FCA.
 - J. Haas: The board hasn't heard too much concern from copermittees about meeting existing dry weather regulations.
 - J. A. Weber: It's nearly impossible to meet dry weather regulations in the creeks.
- J. Smith: Some regulations are already in place and being implemented separately. If these practices contribute to load reduction, those costs should not be counted towards the cost of meeting the REC-1 Bacteria Total Maximum Daily Load (TMDL) regulation.
 - T. Shaw: The new permit won't be implemented for another year or more, so the benefit can't be measured yet.
 - J. Smith: The water quality improvement plans (WQIP) are predicated on models. Retrofitting opportunities can be analyzed in the models. This should be worked into the current conditions scenario.
- J. Haas: Will the CBA include other water regulations in the analysis?
 - M. Buckley: Current regulations will be part of the baseline scenario. The baseline is not just a point in time; it looks at what improvement will be made if no changes are made.

Scenarios and Analyses Ranking Activity

- Committee members were asked to rank the different scenarios on a one-to-five scale, with one being 'do not include' and five being 'must have.' The goal of the activity was to confirm the need for analyses and identify the priority of scenarios to include.
- Scenario: current conditions

- The rank assigned by the committee ranged from three to five. The scenario was categorized as a ‘must have.’
- T. Snyder: The CBA needs a point of comparison for incremental analysis.
- J. Haas: We can assume the 2012 regulations are coming into effect, so it seems redundant to analyze current conditions in addition to compliance with the 2012 regulation.
- T. Shaw: It’s important to elected officials and ratepayers to see the difference in costs and benefits.
- Scenario: 2010 TMDL, WQIP implementation
 - The rank assigned by the committee ranged from three to five. The scenario was categorized as a ‘must have.’
- Scenario: 2012 REC standards
 - The rank assigned by the committee was five. The scenario was categorized as a ‘must have.’
- Scenario: move compliance points
 - The rank assigned by the committee ranged from four to five. The scenario was categorized as a ‘must have.’
- Scenario: flow-based regulatory suspensions
 - The rank assigned by the committee ranged from one to five. The scenario was categorized as ‘important’ as a compromise.
 - J. Smith: This would not be assessing compliance. It sends the wrong message that we’re giving up on parts of the watershed.
 - J. Peng: Orange County is concerned about how to have a pathway to compliance, particularly for wet weather. It is a challenge to control all sources.
 - T. Snyder: This scenario overlaps with moving compliance points.
- Scenario: use site-specific standards
 - The rank assigned by the committee ranged from one to five. The committee determined the scenario would be covered in the ‘adjust wet weather beach water quality objective’ scenario.
 - T. Snyder: This is consistent with EPA’s 2012 guidance. Money was invested in the epidemiology study, and the CBA needs to use it.
 - J. Smith: Data from the epidemiology study are only for two beaches. It doesn’t seem like a worthwhile analysis because there are no site-specific data.
 - R. Kolb: The City of San Diego has very specific info about health risks during storms at all beaches. The California standards are based on a study of one beach; regional standards can be based on a study of two beaches.
- Scenario: adjust wet weather beach water quality objective
 - The rank assigned by the committee was five. The scenario was categorized as a ‘must have.’
- Scenario: address transient community contributions
 - The rank assigned by the committee ranged from three to five. The scenario was categorized as ‘important.’
- Scenario: repair leaking sewer pipes and failing septic systems

- The rank assigned by the committee was five. The scenario was categorized as a ‘must have.’
- Scenario: comprehensive stream restoration
 - The rank assigned by the committee ranged from one to five. The scenario was categorized as ‘important.’
 - J. Haas: This analysis is necessary to inform the collection of policy decisions the regional water quality board deals with (e.g., fund allocation) and broader elected officials and constituents.
 - C. Praul: Are there data to suggest removing human pathogen sources is related to a reduction in bacteria.
 - J. Haas: The data are really site-specific, but the risk is higher in non-restored creeks.
 - T. Snyder: There are too many examples of creek restorations not reducing bacteria levels.
 - T. Shaw: There is a benefit to creek restoration, but not as related to the CBA.
 - R. Kolb: This would be good information to have, particularly for dry weather.
- Scenario: dry weather compliance by 2021, wet weather compliance by 2031
 - The committee categorized this as ‘add if feasible,’ as it would be covered by the ‘2010 TMDL, WQIP implementation’ scenario.
- Scenario: dry weather compliance by XX, wet weather compliance by XX (changing compliance dates based on the FCA)
 - The rank assigned by the committee ranged from three to five. The scenario was categorized as ‘must have’ for wet weather and ‘add if feasible’ for dry weather.
- Analysis: financial capability analysis
 - This analysis was categorized as a ‘must have.’
- Analysis: separate costs of bacteria compliance from other SW requirements
 - The rank assigned by the committee ranged from one to five.
 - T. Snyder: This would be included in current conditions. It’s not necessary as its own scenario.
- Analysis: strengths and weaknesses of cost estimates
 - The rank assigned by the committee ranged from three to five. The analysis was categorized as straddling ‘important/must have.’
 - J. Smith: The San Diego Regional Water Quality Control Board is concerned that the cost estimates submitted by copermitees seem high, so a third party review is needed.
 - T. Snyder: The models the copermitees used to create estimates were pre-approved by the Los Angeles Regional Water Quality Control Board, but this analysis could be important.

Work Plan Content and Process

- The draft internal work plan has been developed. It is due to the committee for review June 15.
- The June 15 meeting will be a general overview of the work plan from 9:30 a.m. to noon and a more detailed look at the work plan from 1:30 to 4 p.m. for those who wish to participate.
- M. Buckley: Who can provide more information regarding the water quality data and how it represents all beaches and points of measurement?

- T. Snyder: Southern California Coastal Water Research Project can provide more information.
 - J. Haas: South Orange County beaches formed a workgroup from last year; Chris Crompton could provide more information about it.
- A list of data gaps was included on the handout provided by the consultant. Committee members who could provide information regarding the gaps were encouraged to reach out to the consultant.