Potential Modifications
Regional MS4 Permit
based on
Orange County Copermitters
ROWD
Shifted Focus of Requirements

* From Actions to Outcomes of Actions
* Emphasize Planning and Adaptive Management
* Allows for Custom Jurisdictional / Watershed Monitoring
* Allows Copermittees to be More Strategic
Goal –
To further the Clean Water Act’s objective to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state.
Accomplish the Goal –
* Adaptive planning and management process
* Prioritization within a watershed
* Implement strategies through the JRMP
* Achieve improvement in the quality of discharges from the MS4s and receiving waters
Report of Waste Discharge

Submitted by

The County of Orange, Orange County Flood Control District and Cities of Aliso Viejo, Dana Point, Laguna Beach, Laguna Hills, Laguna Niguel, Laguna Woods, Lake Forest, Mission Viejo, Rancho Santa Margarita, San Clemente, and San Juan Capistrano

May 20, 2014
Plan Development

**Recommendation:** “Develop comprehensive Watershed Plan to prioritize implementation efforts and resources”

**Proposed Permit Modification:** Not Needed
Illegal Discharges / Illicit Connections

Recommendation: “Reinstate an approach such as the Dry Weather Reconnaissance Program”

Proposed Permit Modification: Not Needed
**Recommendation:** “Reduce inspection frequency for “high” priority sites from bi-weekly to twice during the wet season and for “medium” priority sites from monthly to once during the season”

**Proposed Permit Modification:** Not Needed
Recommendation: “Incorporate integrated water resources management element into land planning and land development processes.... which will require equivalency of on-site BMPs”

Proposed Permit Modification: Not Needed
Recommendation: “Implement an approach to hydromodification management that is informed by a watershed analysis and channel-specific protection and restoration goals.”

Proposed Permit Modification: Add Provision allowing use of Interim Hydromodification Management requirements until Water Quality Improvement Plan is developed.
Land Development

**Recommendation:** “Develop model water retention credit program(s) to facilitate off-site BMP implementation where appropriate and to address existing developed areas”

**Proposed Permit Modification:** Not Needed
Recommendation: “Create exemption from Project WQMP criteria for stream and watershed restoration projects”

Proposed Permit Modification: Not Supported
Land Development

Recommendation: “Create exemption from Project WQMP criteria for emergency public safety projects where delay would compromise public safety, health, and the environment”

Proposed Permit Modification: Not Supported

Regional MS4 Permit does not include strict exemption
Recommendation:
“(1) Reduce quarterly reporting to annual
(2) Continue Program implementation to Dec 2015,
(3) Reevaluate Program relative to bacteria TMDLs,
Comprehensive Load Reduction Plan, and related
NPDES programs.”

Proposed Permit Modification: Not Needed
Recommendations: Many Recommendations

Proposed Permit Modification: Generally Not Needed

Further Consultation - Monitoring Assessment Research Unit (MARU)
Potential Modifications to Regional MS4 Permit based on Orange County Copermittees ROWD

Questions & Discussion
Meeting to Discuss
Orange County MS4 ROWD
And
Regional MS4 Permit

Closing Comments