

San Diego Water Board
July 1, 2014 Proposed Permit Modification Presentation Matrix

ROWD Recommendations*	Proposed Permit Modification Presented during July 1, 2014 OC ROWD Meeting*	Supporting Rationale
<p style="text-align: center;">* For discussion purposes only. This matrix contains a subset of the recommendations in the Orange County ROWD presented during the July 1, 2014 ROWD meeting, together proposed permit modifications and staff's determinations that certain recommendations can be accommodated without permit modifications. The proposed permit modifications and staff's determinations about necessity are preliminary and subject to reconsideration or revision as the permit reissuance process progresses.</p>		
Develop comprehensive Watershed Plan to prioritize implementation efforts and resources	Not Needed	Supported by Regional MS4 Permit Provision B Water Quality Improvement Plan.
Reinstate an approach such as the Dry Weather Reconnaissance Program	Not Needed	An approach similar to the Dry Weather Reconnaissance Program that includes rationale for prioritizing monitoring and response actions at the high priority storm drains with discharges as part of the ID/IC program is supported by Provision E.2.d.
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	Not Needed	Accommodated under Provision E.4.d(1)
Incorporate integrated water resources management element into land planning and land development processes.... which will require equivalency of on-site BMPs	Not Needed	Accommodated in Regional MS4 Permit Provision B.3.b(4) Watershed Management Area Analysis Provision E.3.c(3) Alternative Compliance Option
Implement an approach to hydromodification management that is informed by a watershed analysis and channel-specific protection and restoration goals	Potential Addition of Interim Provision	Consider including interim hydromodification management provision to address channel-specific protection in the interim period until Water Quality Improvement Plan is developed and accepted.

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Develop model water retention credit program(s) to facilitate off-site BMP implementation where appropriate and to address existing developed areas	Not Needed	Accommodated in Regional MS4 Permit Provision B.3.b(4) Watershed Management Area Analysis and Provision E.3.c(3) Alternative Compliance Option
Create exemption from Project WQMP criteria for stream and watershed restoration projects	Not Supported	Regional MS4 Permit does not include a strict exemption for stream and watershed restoration projects. Stream and watershed restoration projects do not typically reach a Priority Development Project status thus triggering the sized BMP and hydromodification control requirements. Should a future stream restoration project. Provision B.3.b(4) Watershed Management Area Analysis Provision and E.3.c(3) Alternative Compliance Option the Copermittees have been provided the option to perform a Watershed Management Area Analysis for the purpose of characterizing the watershed, identifying alternative compliance projects that PDPs may use in lieu of implementing structural BMPs onsite, and identifying areas within the watershed where it is appropriate to exempt PDPs from implementing hydromodification management BMPs. Exemptions, then, would be applicable on a watershed-specific basis, and would require supporting rationale.

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<p>Create exemption from Project WQMP criteria for emergency public safety projects where delay would compromise public safety, health, and the environment</p>	<p style="text-align: center;">Not Supported</p>	<p>Regional MS4 Permit does not include a strict exemption for public safety projects. Provision E.3 describes requirements that pertain to development planning. Emergency situations, by definition, are not planning exercises and therefore do not involve the design, approval, and construction of a building or structure. The San Diego Water Board believes that it may be appropriate to relax the structural BMP standards for, or altogether exempt flood control projects, but not before projects are evaluated on a case-by-case basis. In many instances, environmentally friendly practices may be appropriate for implementation in flood control projects, but a variety of options would not be evaluated by the project proponent if the Tentative Order allowed a blanket exemption.</p>

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<p>Aliso Creek Watershed : “(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.”</p>	<p>Supported</p>	<p>The San Diego Water Board storm water staff is consulting its Monitoring Assessment Research Unit (MARU) regarding multiple recommendations pertaining to monitoring. Consider including provision to address reduced reporting frequency until Water Quality Improvement Plan is developed and accepted.</p>
<p>Monitoring</p>	<p>Generally Not Needed</p>	<p>The San Diego Water Board storm water staff is consulting its Monitoring Assessment Research Unit (MARU) regarding multiple recommendations pertaining to monitoring.</p>