Transportation & Storm Water Department

Permit Recommendations to Support the Evolution of Storm Water Programs

CASQA Annual Conference
Riverside, CA
October 17, 2018

The City of SAN DIEGO

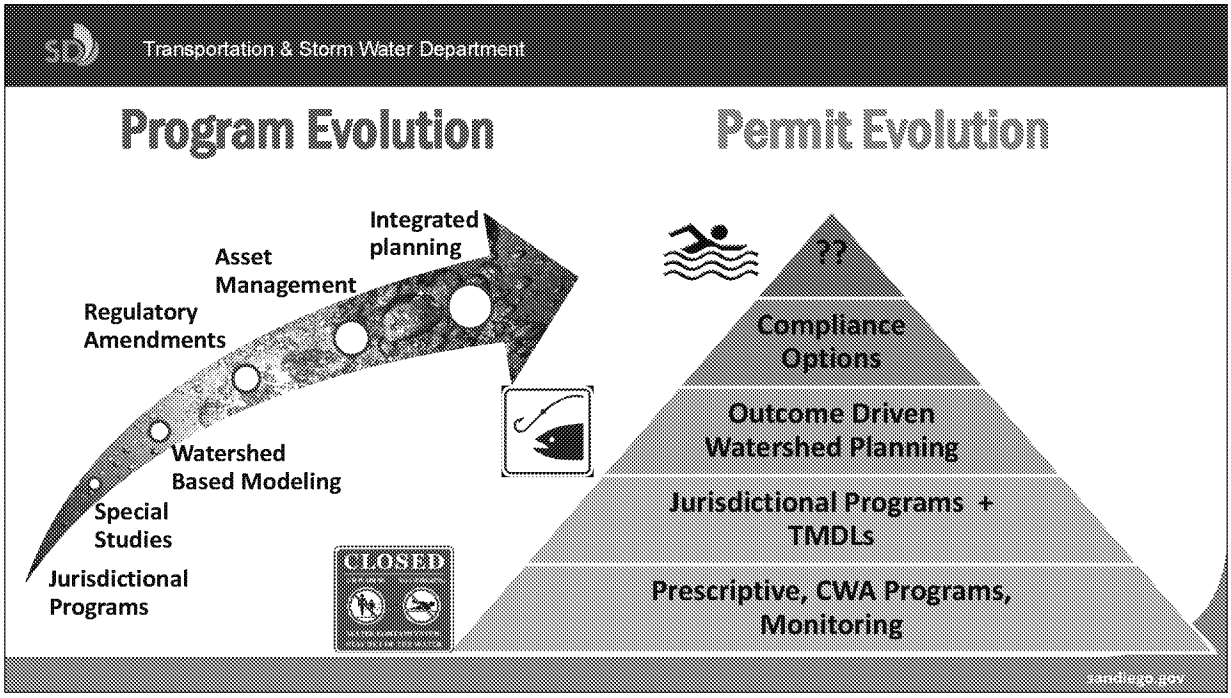
Municipal Perspective on achieving water quality goals

Key issue we are all facing: How to pay

Agenda
City's Program Background & funding needs
Efforts to close funding gap
Initial thoughts on Permitting

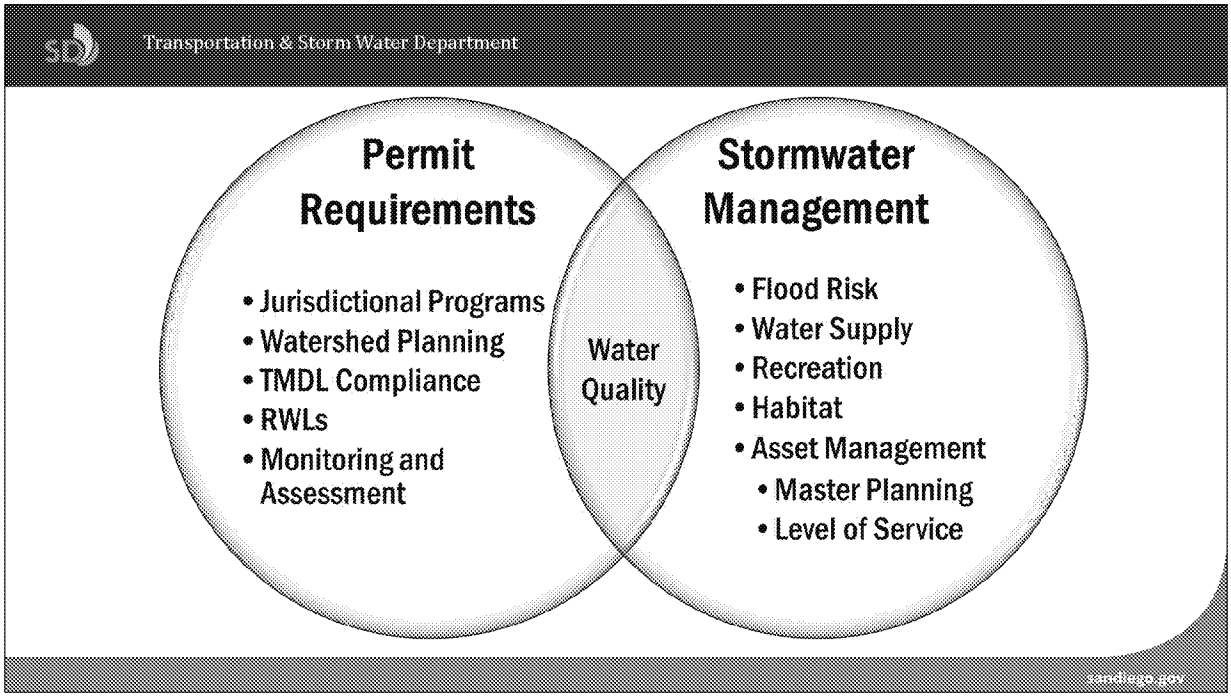
Conclusion: IPF may present an opportunity to reduce annual costs by extending TMDL compliance schedules

However, its new, so I will close with thoughts and questions to consider



Early MS4 Permits – Prescriptive Programs, based on CWA minimums, monitoring focused on characterization of RWs
TMDLs – Pesticides, Metals, Bacteria
Watershed Planning – Prioritization, Focused Implementation
Compliance Options – Receiving Water Limitations

The result:
- City has developed a number of planning documents over the past 5 -10 years.
- Stormwater started with CLRPs
- Progressed to an asset management approach (infrastructure management + WQ) WAMP
- 2013 MS4 Permit – watershed based permitting process with our WQIP
- At this point we've got a variety of planning documents (required and not) and we are in a place where we have the tools in place to manage our system and improve WQ
- Biggest challenge moving forward managing for efficiency and effectiveness and developing adequate resources to support implementation
- Resources are really constrained by timelines/schedules
- These schedules probably can't be supported through increased funding



What has happened is that now we're seeing a difference between the permit requirements and our traditional stormwater management responsibilities. Within the Permit Requirements, we're implementing programs to address <<<REVIEW SLIDE>>>
Within the broader context of Stormwater Management, we're addressing <<<REVIEW SLIDE>>>

What we see in our evolution is that we're starting to realize that there is a bigger difference between our permit requirements and our stormwater needs, and the overlap is predominantly water quality.

One of the outcomes of this is disparate planning documents (e.g., WAMPS and WQIPs) which don't fully integrate. By not fully recognizing these other obligations, we create a barrier to implementing this multi-objective vision.

The City is trying to move to a place where our programs can take a more holistic approach and address multiple benefits more effectively.

As an example, one of the ways we're looking at multiple objectives is through refined, higher resolution drainage master planning efforts that address flood risk and water quality, and where possible include opportunities for restoration, habitat enhancement, water supply, and/or recreation. These planning exercises are intended to provide the linkage between the higher level watershed plans and the CIP, as they will identify unique, specific projects that will meet the needs of the watershed. At this time, these efforts are in the pilot stages and are focused on one or two high priority drainage areas, but over time, we're hoping to expand these efforts City wide.

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Build Capacity for and Incentivize Asset Management (3.1.4, 3.6.1)

- Provides a strategic, comprehensive tool to manage system
- Efficient capital investment, operations, and maintenance
- Long term planning, budgeting
- Improved internal communication – typical municipal operations
- Provides the ability to replace/modify MCMs

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Next step in permit evolution is to incentivize

Funding is drawn to compliance, not good planning. However, good planning is essential to be effective and efficient. Therefore, we should deliberate how permits can be structured to link compliance with good, comprehensive, multi objective plans.

Permits have also evolved to outcome based approaches. This is an improvement. However, it is so open-ended that funding does not have specific requirements to be drawn to. Therefore, permits should focus on linking compliance with demonstrating how outcomes will be achieved with annual funding in mind… more on that with adaptation.

One of the biggest elephants in the room is affordability. Cause for much consternation and debate. However, to be effective we have to understand how we will pay for this. This is the critical step between good planning and implementation.

Based on the affordability, permits must then allow for mechanisms to set schedules based on affordability, along with the design, permitting and policy considerations affecting implementation timelines.

long term, holistic planning that provides clear, stable regulatory structure and timelines.
innovative approaches by providing clear expectations, risk sharing, realistic schedules, and adaptation frameworks
Typically compliance and time are key to support funding initiatives
Build off of existing compliance based planning concepts (e.g., WQIPs, EWMPs)

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Incorporation of TMDLs into MS4 Permits (3.8.2)

- Include TMDL and non-TMDL alternatives
- Incorporate flexibility into schedules
- Guidance to identify options and pathways

Guidance on Addressing Bacteria (3.4.2)

- Focus on human sources of bacteria; tailored IDDE programs
- Need methods to target and control sources of human pathogens
- Linkage to compliance through permits

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Build Capacity Related to Funding (3.1.2)

- Permits require long-term plans without identified funding strategies
- Long-term planning linked to compliance will support funding strategies

Options for Longer Planning Timeframes (3.2.4)

- Short term accountability and ability to plan/implement over long term
- May be appropriate to look at 20-30 year planning horizons
  - Greater stability and regulatory certainty
  - Facilitates capital project financing – consider financial capacity

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Take Home Messages

- The building blocks are there in current Permits
- Funding gravitates to compliance; link compliance to key permit components (e.g., implementation)
- Incentivize more sophisticated, long range and integrated planning, including asset management
- How TMDLs are included in MS4 Permits is critical

(this is what SD did, we're the 8th largest city in the Country, we need to make it scalable for other cities that don't have the resources or the political support to take it to this level)

For things that don't improve WQ, get rid of them…