Offsite Storm Water Alternative Compliance Program: Progress Update (TAC 7 Meeting)
Progress Update Agenda

- Opening Remarks
- Overview of Offsite Storm Water Alternative Compliance Program
- Review of Program Development
- Progress Update [TAC Meetings 1 to 6]
- Ongoing and Next Steps
- Public Involvement – Future Opportunities
Purpose of Progress Update Meeting

- Update on development of offsite storm water alternative compliance program through FY-2016 and first half of FY-2017.

- Lay out plan for completing and implementing the program.

- Obtain input from additional stakeholders and public participants.
Overview of Offsite Storm Water Alternative Compliance Program
What is Alternative Compliance

- Method of storm water mitigation
  - Allowed as part of San Diego’s 2013 Municipal Storm Water Permit in Section II.E.3.c.(3)

Optional program with specific requirements

- Offsite structural Best Management Practices (BMPs)
- Reduce post-development storm water impacts
  - Water Quality: Pollutant Control
  - Hydromodification: Flow Control
PDP and ACP

- **Priority Development Project (PDP)**
  - Exceeds square footage threshold of impervious surface and/or supports specific uses (requires numerically-sized structural BMPs)

- **Alternative Compliance Project (ACP)**
  - Implemented *in lieu* of structural BMPs onsite; flow-thru BMPs onsite
Why consider Alternative Compliance

Potential benefits to the City of San Diego and its stakeholders include:

- Water Quality
  - Improvements to water quality for discharges generated by existing development

- Concurrent Compliance with Multiple Regulations for Storm Water Discharges
  - Regional MS4 Permit
  - Clean Water Act Sections 401 and 404
  - California Department of Fish and Wildlife - Section 1602

- Flexibility for Land Development
Why consider Alternative Compliance

- Potential Benefits
  - Flood Control
  - Habitat Restoration
Why consider Alternative Compliance

Potential Benefits

- Aesthetic and Pedestrian Improvements
- Education
- Recreation
- Reliability of BMPs
  - Ease of maintenance
  - Ease of inspection by City staff

What type of projects

 Structural BMPs
  ➢ Retrofit BMP
  ➢ Regional BMP
  ➢ Water Supply BMP

 Natural System Management Practices
  ➢ Stream Rehabilitation
  ➢ Land Restoration
  ➢ Land Preservation
Structural BMPs

- **Retrofit BMP**
  - Adds or modifies structural BMPs in areas of existing development where practices do not already exist, are ineffective, or can be significantly enhanced.
Structural BMPs

¢ Regional BMP

➢ Treats Stormwater from a tributary consisting of more than one development.
➢ Has the potential to function as a Multiuse Treatment Area (MUTA)
Structural BMPs

Water Supply BMP

- Captures storm water and infiltrates, pumps, or otherwise replenishes groundwater, surface water reservoirs, or other water supply systems.
Natural System Management Practices

- Stream Rehabilitation
  - restores a stream to a natural, stabilized condition that can accommodate both legacy and future hydromodification impacts
Natural System Management Practices

- **Land Restoration**
  - Permanently restores currently developed land back to a stabilized predevelopment condition

Source: https://www.flickr.com/photos/portofsandiego/5303189753/in/album-72157625695969222

Source: http://sandiegoriver.org/images/photos/rivergarden.jpg
Natural System Management Practices

- **Land Preservation**
  - Permanently preserves undeveloped land in its current state.

Source: https://kpbs.media.clients.ellingtoncms.com/img/photos/2012/11/30/SD_Canyon_t700.jpg?f40c0e74b997dbb01ce524758e0d04a31382c8af

Source: http://sandiegoriver.org/images/photos/upperriver.jpg
What are the requirements

- Onsite, flow-thru treatment control BMPs, **Plus the ACP:**
  - located in the same watershed and within the City of San Diego jurisdiction,
  - provide greater water quality benefits, and
  - include funding for ongoing operations and maintenance.
Questions and Discussion
Review of Program Development
Program Development Timeline

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<th>Phase 1</th>
<th>Phase 2</th>
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<td>Feb 2016 Applicant (Developer) Implemented Projects Available</td>
<td>Feb 2016 to Jun 2016* Credit System Work Plan Development</td>
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<td>Jul 2016 to Dec 2017* Credit System Work Plan Execution</td>
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<td>Jan 2018 to Jun 2018* RWQCB Approval and Local Adoption</td>
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<td>Jul 2018* Program Availability</td>
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* Draft timeline and is subject to change
Overall Program Implementation Process

- BMPDM: BMP Design Manuals
  - Permit Required
  - Developed

- WQIP: Water Quality Improvement Plans
  - Permit Required
  - Developed

- WMAA: Watershed Management Area Analysis
  - Optional

- WQE: Water Quality Equivalency
  - Optional

For Discussion Purposes Only: Progress Update #1
Subject to Change: February 15, 2017
Storm Water Standards Manual

- Technical guidance for complying with 2013 Permit
- Part 3 of City’s BMP Design Manual
Water Quality Improvement Plans (WQIPs)

- Improve water quality in MS4 discharges and receiving waters
- Establish priorities and goals
- Propose implementation strategies
Watershed Management Area Analysis (WMAA)

- Information on physical characteristics of WMA
- Candidate watershed-scale projects
- Identify hydromodification exemptions
Water Quality Equivalency (WQE) Document

- Automated WQE calculation worksheets
- Assess benefits of different structural BMPs and NSMPs
- Evaluate equivalent offsite mitigation projects
Program Development Process

**Regional Elements**
- Watershed Management Area Analysis (Feb 2016)
- Water Quality Equivalency (WQE; Dec 2015)
- Additional WQE (Future tasks)
  - Onsite Alternative Compliance
  - Flow-thru Treatment Efficiency
  - Partial Hydromodification

**City Specific**
- Phase 1: Applicant (Developer) Implemented Projects
- Phase 2: Credit System*

* To be developed through the City TAC effort
Program Development Process

Citywide Workgroup

Technical Advisory Committee

Public Input
Citywide Workgroup

- Members assure operability
  - Attend technical advisory committee meetings
  - Participate in the public process
  - Provide real-time feedback regarding impacts to City procedures and operations, and
  - Meet on a monthly basis to shape the program

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Technical Advisory Committee (TAC)

- Involves key stakeholders
  - 12 public meetings, bi-monthly
  - Open to all, with comment opportunities
  - Feb 2016 to Dec 2017

- RWQCB
- Resource Agency
- Other Agencies in SD County
- Environmental (2)
- Development (2)
- Engineering / Storm Water
- Credit System (2)
- At-Large (4)
Public participation shapes the process

- **Meetings**
  - February 2017
  - October 2017*

- **Opportunities for written comments:**
  - Public review of Draft Program Standards: October 2017*
  - City Planning Commission: Early 2018*
  - City Council Meeting: Early 2018*
  - Regional Water Quality Control Board Review

* Draft timeline and is subject to change
Progress Update
[Technical Advisory Committee Meetings 1 to 6]
Process update: where we are

- Mid-point in the TAC process
- Six meetings, February 2016 through December 2016
- Today is meeting seven
- Each meeting focuses on one key element of alternative compliance
- Each meeting allows TAC members and the public to provide feedback
Progress update: TAC 1-3

- Established TAC and work plans for In-Lieu Fee Program and Credit Trading Program

- In-Lieu Fee Program
  - Direct payments by applicants to fund City-led offsite projects.
  - Fee covers design, construction, and ongoing maintenance.

- Credit Trading Program
  - Allows generation of credits by City or private entities.
  - Provides rules for exchanging credits between buyers and sellers.
  - Must be approved by Regional Board.

Selected as Preferred Alternative
Credit Program Basics

- **Credits generated by installation of:**
  - Structural BMPs
  - Natural System Management Practices (NSMP)

- **Credits purchased/exchanged by:**
  - City and Developers - redeem for compliance
  - Brokers/Aggregators - bundle for resale
  - Environmental Advocacy Groups - retire for net environmental benefit
Progress update: TAC 4-6

- Began Executing Credit System Work Plan
- Guest Presentations
  - Evaluation of Potential Types of ACPs
  - Army Corps Mitigation Rule
  - Lessons Learned from Other Credit Programs
- Evaluated Credit System Characteristics
- Collected Case Study Data
  - Cost
  - Design Information
- Presented Initial Case Study Results
Initial Findings and Preliminary Conclusions

- Credit program allows fastest path towards Phase 2 implementation
- Water quality benefit of offsite BMPs significantly exceeds water quality benefit of onsite BMPs
- Cost of offsite BMPs, per impervious acre treated, compare favorably to onsite BMP cost
Questions and Discussion
Ongoing and Next Steps
Draft Program Docs - Under Development

- Document program rules
- Provides guidance for participation
- Requires approval by Regional Board
Tracking System Options - Under Development

- Facilitate transactions and provide transparency, ensure compliance, facilitate annual reporting by tracking:
  - Credit generation
  - Credit redemption
  - Credit transactions
  - Available credits
Next Steps: TAC 8-12

- Project submittal and tracking tool
- Draft credit program standards
- Legal agreements for system implementation
- Phase 2 Public Workshop
- Final program development meeting
Public Involvement: Future Opportunities
Public Participation Opportunities

- TAC Meetings are open to the public
  - April 19, 2017*
  - June 7, 2017*
  - August 16, 2017*
  - October 4, 2017*
  - December 8, 2017*

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Public Participation Opportunities

❖ Meetings
  ➢ October 2017*

❖ Opportunities for written comments:
  ➢ Public review of Draft Program standards: October 2017*
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  ➢ Regional Water Quality Control Board Review

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