

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

 Transportation & Storm Water



Credit Seller

Exchange/Database

Credit Buyer

Offsite Storm Water Alternative Compliance Program
Progress Update Meeting
Wednesday, Feb. 15, 2017 • 2 to 4 p.m.
City Concourse, Silver Room • 202 C Street, San Diego



Meeting Location

You are invited to attend a progress update meeting regarding the City of San Diego's offsite storm water alternative compliance program that will allow public and private development projects to use offsite projects to comply with regional permit requirements. This new program, currently in the development phase, will provide greater benefits to regional watersheds and can supplement or entirely replace onsite structural best management practices.

Please RSVP to rngo@sandiego.gov by Feb. 8, 2017. We hope to see you there!



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



PDP



ACP

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

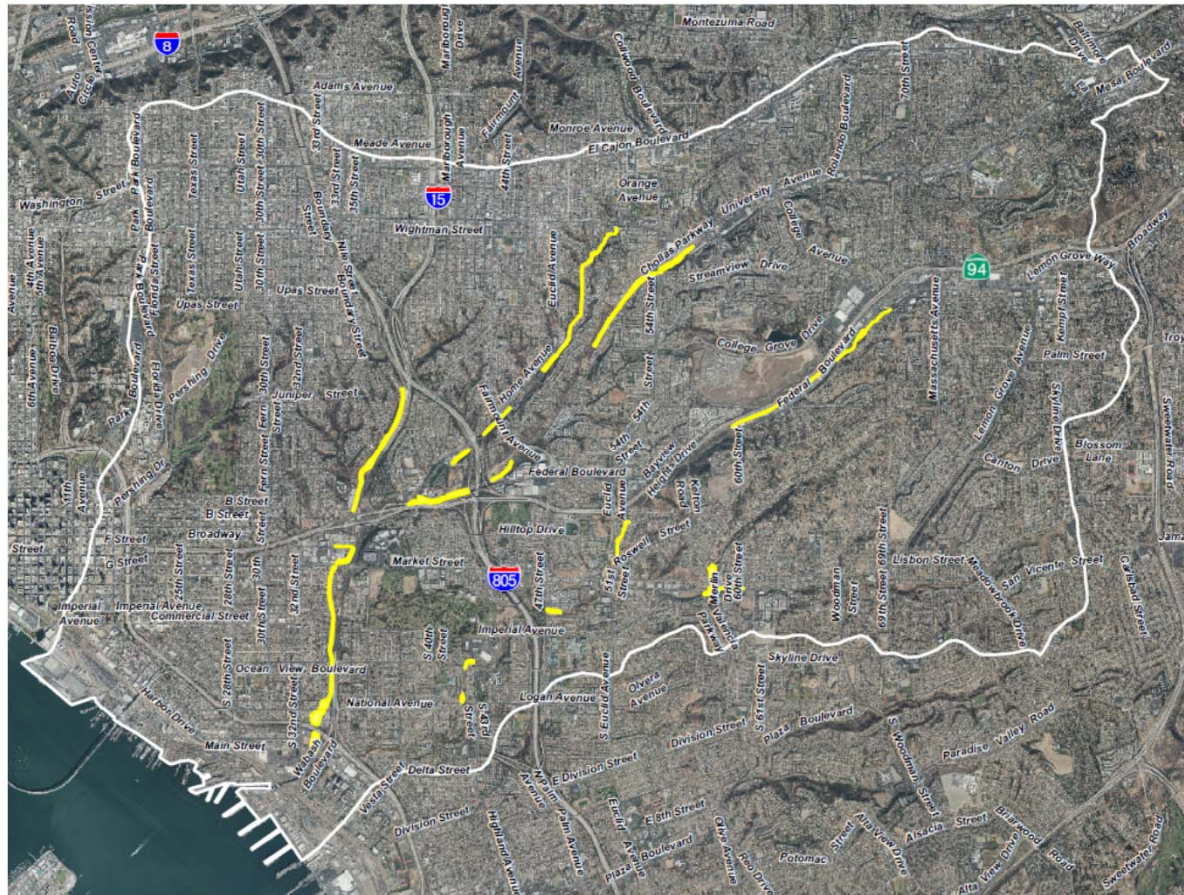
➤ Flexibility for Land Development

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



Source: https://42mzqz26jebqf6rd034t5pef-wpengine.netdna-ssl.com/wp-content/uploads/2011/10/asla_pa11_sandiegoriver_02.jpg

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-7215_7625699596922



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?f4_0c0e74_b997dbb_01ce524758e0d04a31382c8af



Source: <http://sandiegoriver.org/images/photos/upperriver.jpg>

What are the requirements

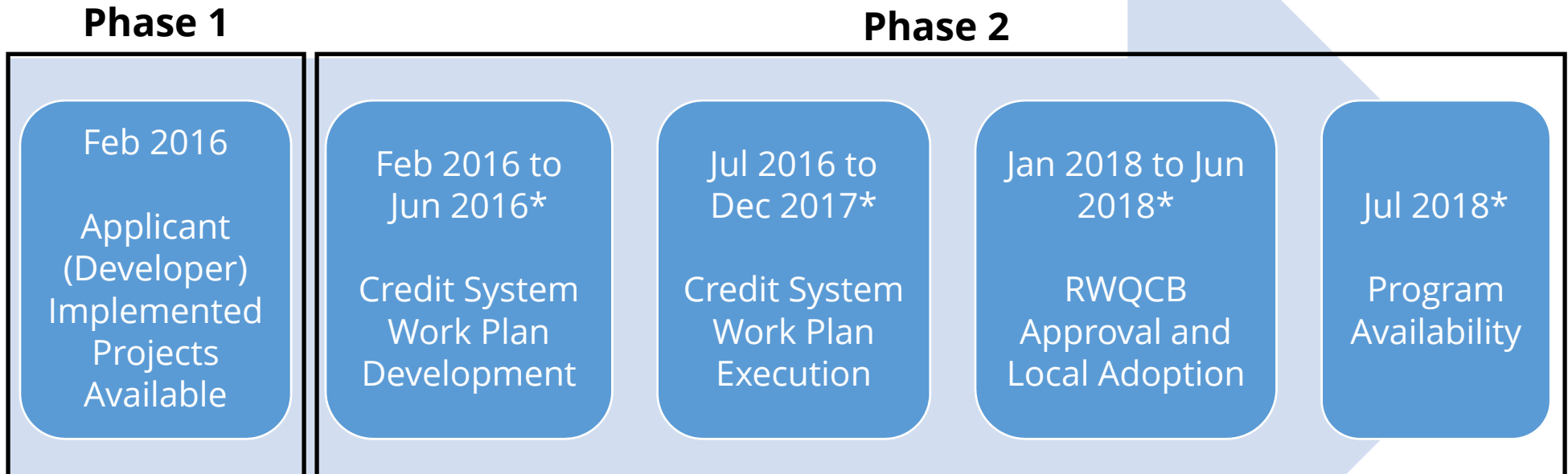
- ❖ Onsite, flow-thru treatment control BMPs, **Plus the ACP:**
 - located in the same watershed and within the City of San Diego jurisdiction,
 - provide greater water quality benefits, and
 - include funding for ongoing operations and maintenance.



Questions and Discussion

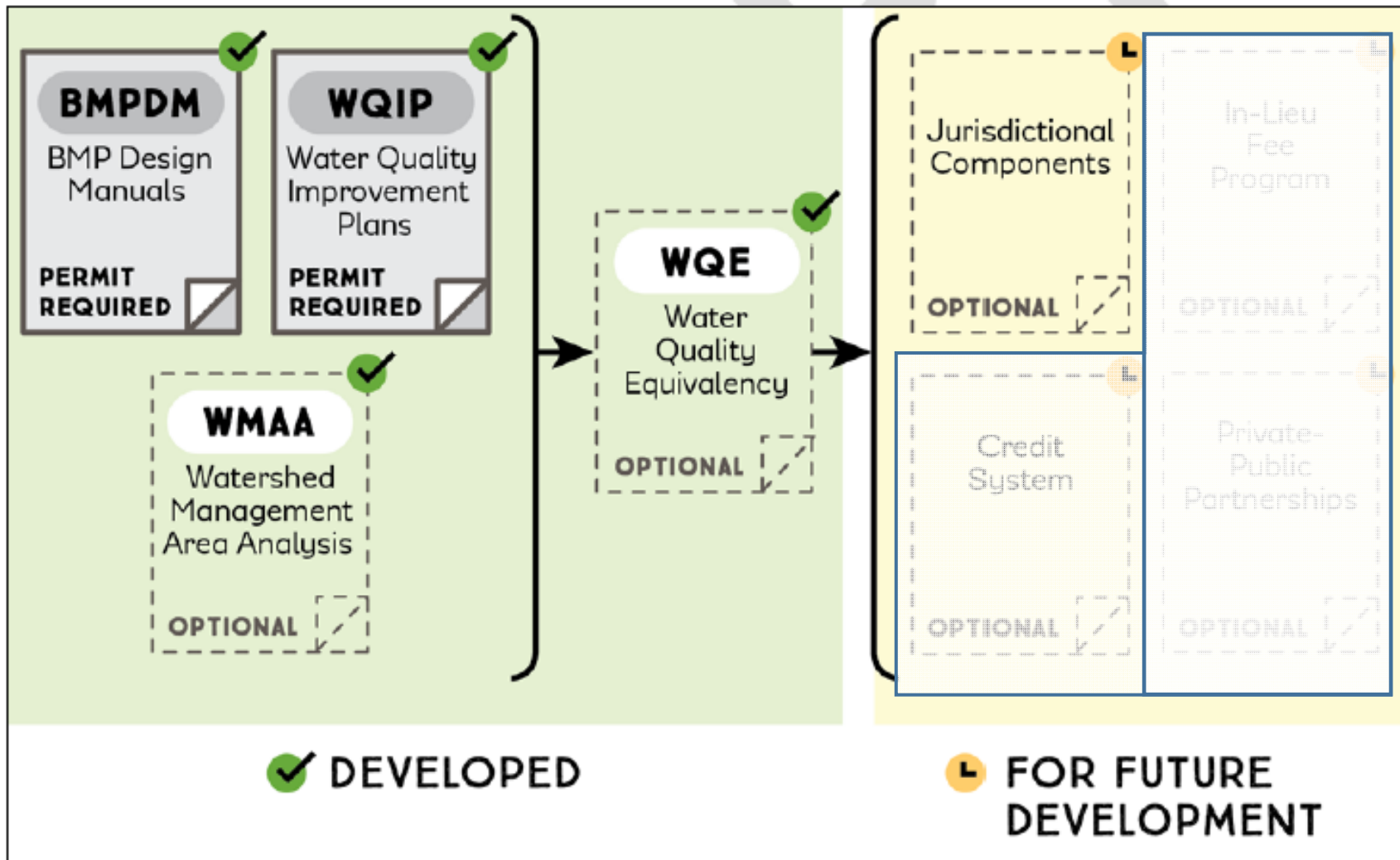
Review of Program Development

Program Development Timeline



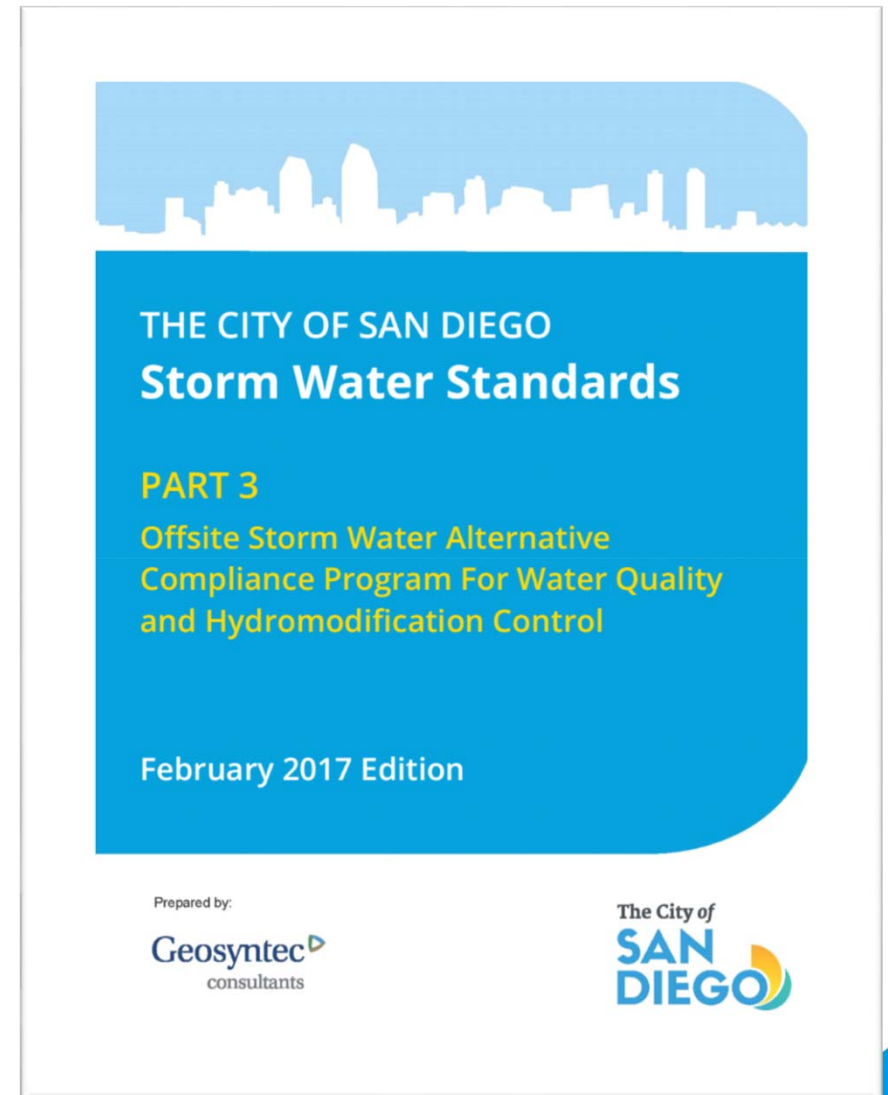
* Draft timeline and is subject to change

Overall Program Implementation Process



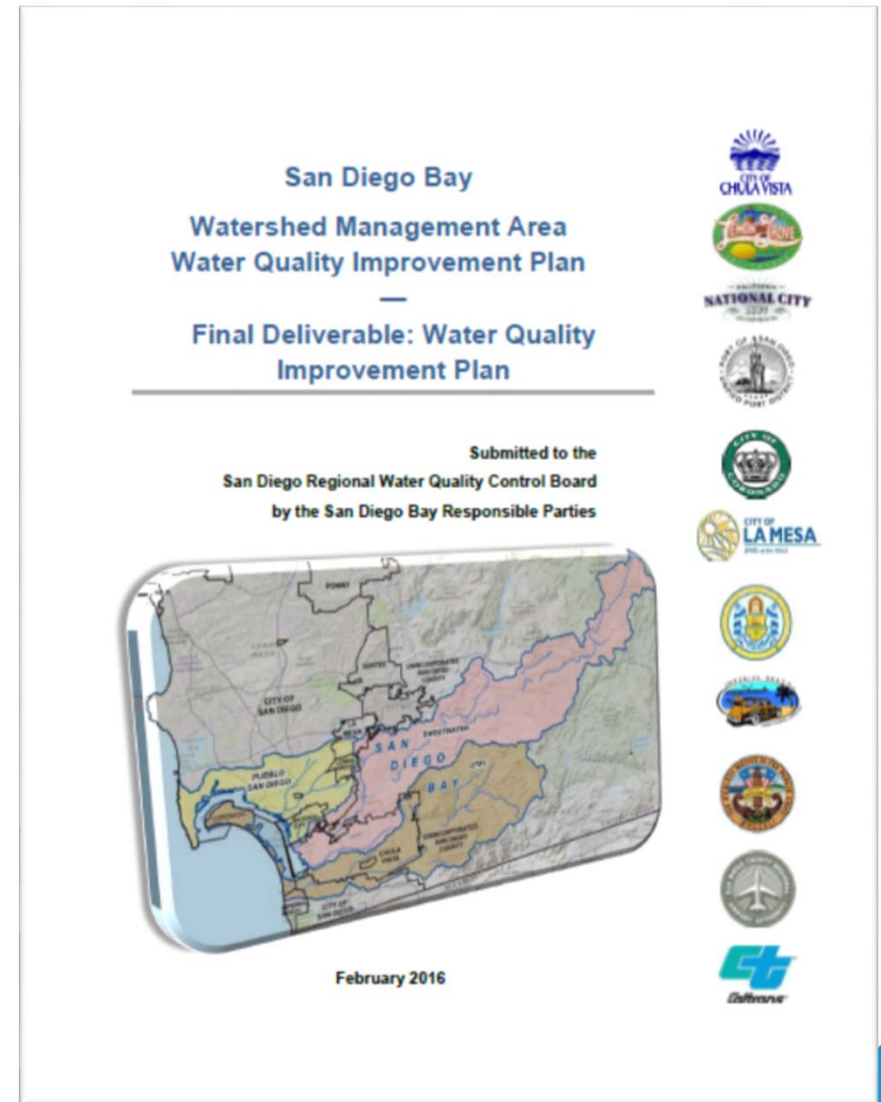
Storm Water Standards Manual

- ❖ Technical guidance for complying with 2013 Permit
- ❖ Part 3 of City's BMP Design Manual



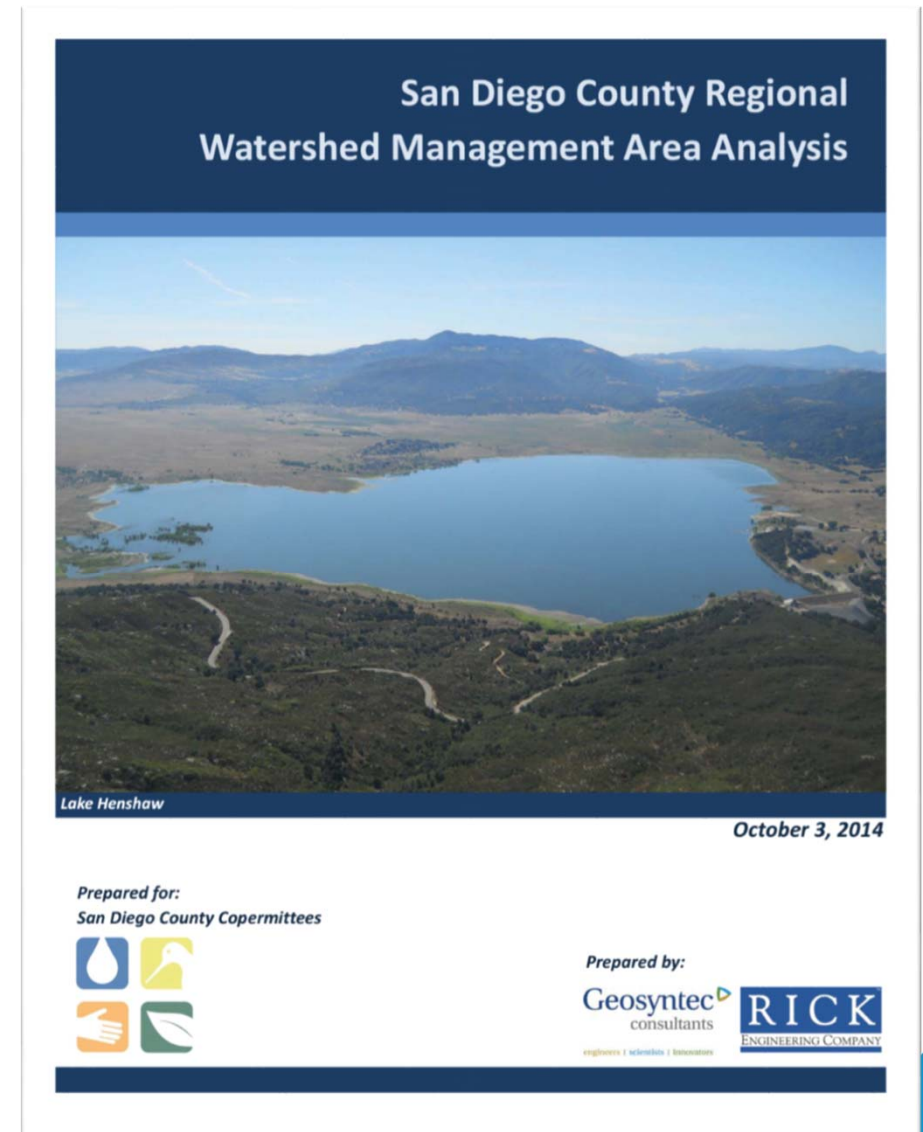
Water Quality Improvement Plans (WQIPs)

- ❖ Improve water quality in MS4 discharges and receiving waters
- ❖ Establish priorities and goals
- ❖ Propose implementation strategies



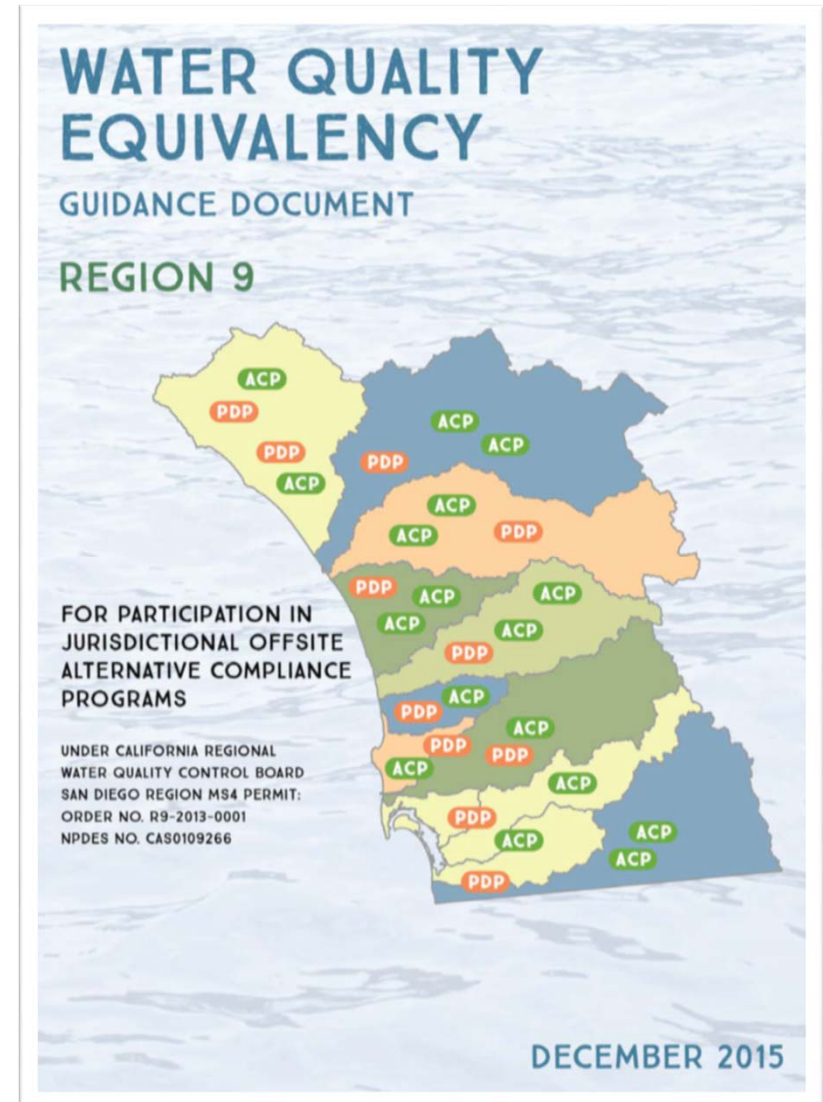
Watershed Management Area Analysis (WMAA)

- ❖ Information on physical characteristics of WMA
- ❖ Candidate watershed-scale projects
- ❖ Identify hydromodification exemptions



Water Quality Equivalency (WQE) Document

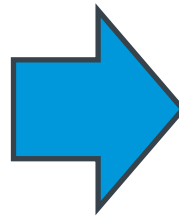
- ❖ Automated WQE calculation worksheets
- ❖ Assess benefits of different structural BMPs and NSMPs
- ❖ Evaluate equivalent offsite mitigation projects



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



Transportation &
Storm Water

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

Transportation and Storm Water

Development Services

Public Works

Office of the City Attorney

Facility Finance

Public Utilities

Park and Recreation

Fire-Rescue

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.

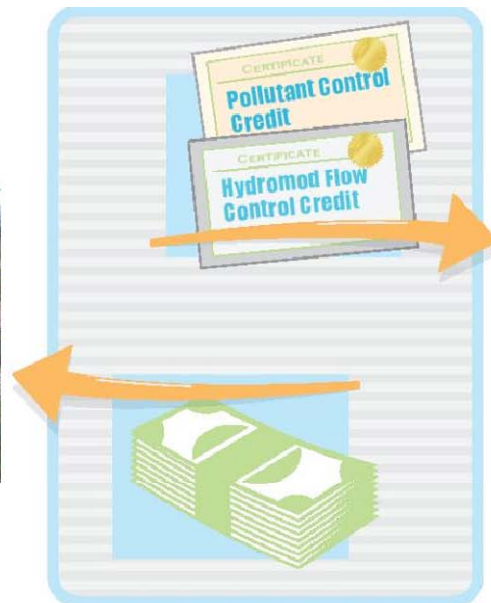
Selected as Preferred Alternative

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



Credit Seller



Exchange/Database



Credit Buyer

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

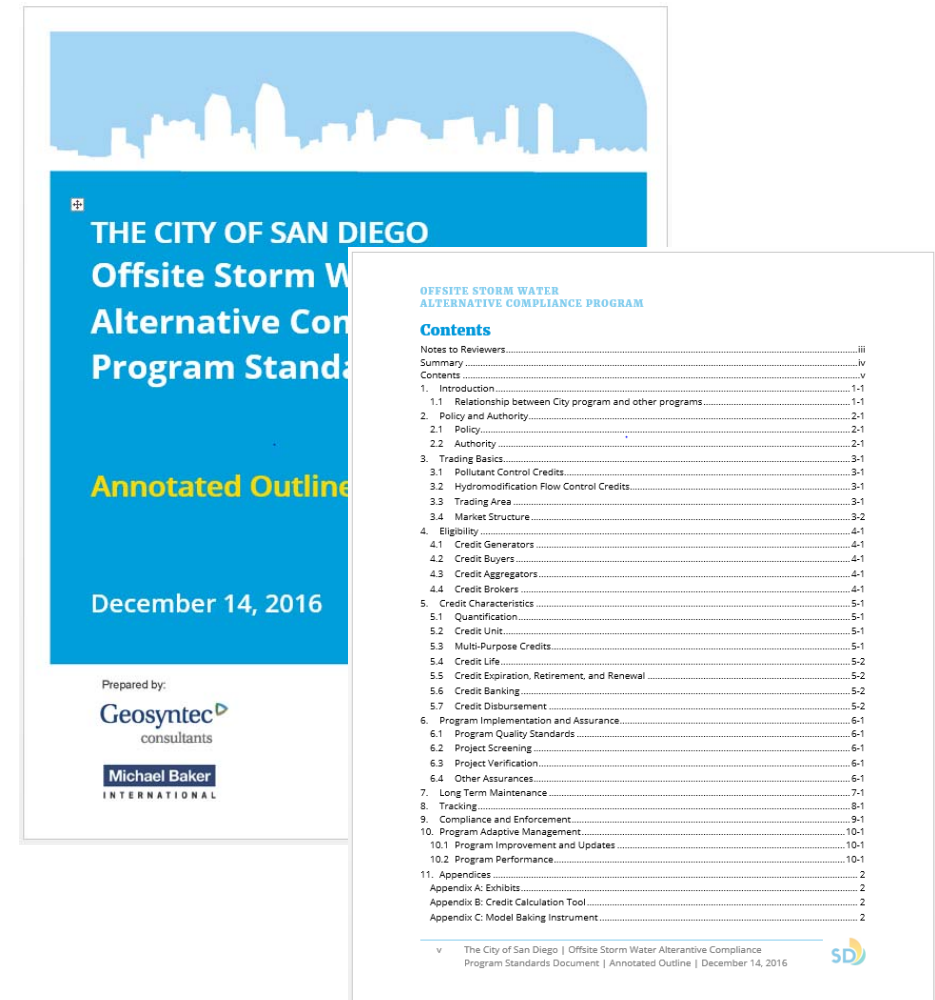
- ❖ Credit program allows fastest path towards Phase 2 implementation
- ❖ Water quality benefit of offsite BMPs significantly exceeds water quality benefit of onsite BMPs
- ❖ Cost of offsite BMPs, per impervious acre treated, compare favorably to onsite BMP cost

Questions and Discussion

Ongoing and Next Steps

Draft Program Docs-Under Development

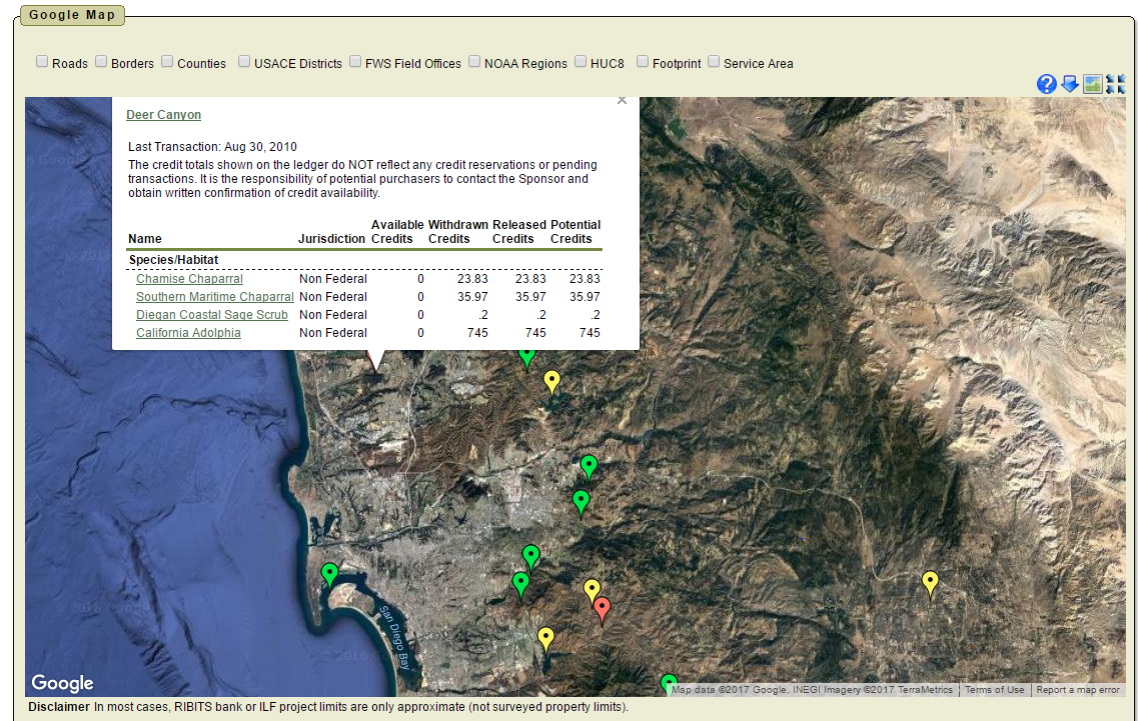
- ❖ Document program rules
- ❖ Provides guidance for participation
- ❖ Requires approval by Regional Board



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*

* Draft timeline and is subject to change

Public Participation Opportunities

❖ Meetings

- October 2017*

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