

C-13.0 RECOMMENDED PROGRAM CHANGES

C-13.1 Introduction

In mid-2006 the Permittees prepared ROWDs in anticipation of permit renewal in early 2007. The proposed program modifications in the ROWD addressed three themes, specifically:

Demonstrating the iterative management approach: Adapting the management program to more effectively address urban sources of pollutants that are causing or contributing to exceedances of water quality standards;

Enhancing Implementation: Improving program implementation through incorporation of auditable environmental management system concepts; and

Establishing watershed-based water quality planning: On a Countywide basis, creating two separate, but nonetheless highly inter-related, water quality planning processes to address urban sources of pollutants.

Preparation of this review has provided an opportunity to again examine these recommendations using a seventh year of program performance data. Progress on effecting these proposed modifications has been limited pending adoption of Fourth Term Permits and a statewide Construction General Permit. However, with adoption of a Fourth term Permit by the Santa Ana Regional Board on May 22, 2009, many of the proposed modification became permit requirements with mostly either a six month or 12 month compliance schedule as discussed in the preceding sections

Proposed Program Modifications:

Demonstrating Iterative Management Approach

- Develop Model Integrated Pest Management, Pesticide and Fertilizer Guidelines into a Model Program (rather than guidelines) with implementation goals and including model contract language (see **Section C-5.3**).
- Develop recommendations for the selection and installation of drain inlet screens (see **Section C-5.3**).
- Develop model language for municipal trash collection and haulage contracts that address water quality protection issues (see **Section C-5.3**).
- Develop and implement BMPs for architectural uses of copper and zinc (see **Section C-7.3**).

Enhancing Implementation

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- Prepare a training schedule and define expertise and competencies for jurisdictional program manager positions (see **Section C-2.3**).
- Prepare a fiscal reporting strategy based upon an audit of the fiscal analysis reporting section of the PEA, to better define the expenditure and budget line items included in the fiscal report (see **Section C-2.3**).
- Prepare metric definitions and guidance to improve efficacy of the assessment process.
- Standardize SDR and SAR definitions of “High” priority and develop prioritization process that is better predicated on the threat (diminished by BMP implementation) posed by the facility, and consider the presence of “constituents of concern” (see **Section C-5.3**).
- Redefine IPM (pesticide use) indicators (see **Section C-5.3**).
- Prepare guidance documentation and clarify requirements or conceptual Project WQMP (see **Section C-7.3**).
- Prepare guidance and training as needed on the recordation process (timing and appropriate documents to use) and develop recommendations for appropriate methods to employ to enable the Permittees to enforce the approved WQMP against subsequent property owners (see **Section C-7.3**).
- Develop library of BMP performance reports (see **Section C-7.3**).
- Develop standard design checklist/plans/details for source and treatment control BMPs (see **Section C-7.3**).
- Develop recommendations/guidance for enhanced Model WQMP language regarding Site Design BMPs (see **Section C- 7.3**).
- Evaluate the NTS approval process and develop recommendations for streamlining regulatory agency approval of regional treatment control BMPs (see **Section C-7.3**).
- Prepare a training schedule including defined expertise and competencies for staff with WQMP review and approval responsibilities (see **Section C-7.3**).
- Prepare a training schedule including defined expertise and competencies for construction inspectors (see **Section C-8.3**).
- Develop a more detailed prioritization process to improve standardized reporting and to support re-direction of inspection resources to significant sources of priority constituents of concern (see **Section C-9.3**).

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- Develop effective alternative to re-inspection such as self-certification (see **Section C-9.3**).
- Prepare defined expertise and competencies for authorized inspector positions and develop a training schedule to meet these requirements (see **Section C-9.3**).
- Revise the DAMP for greater consistency with established Environmental Management System (EMS) principles and improved accessibility to different constituencies and levels or readership (see **Section C-2.3**).
- Revise **DAMP Section 3.0** to detail iterative process for DAMP improvement (see **Section C-3.3**).
- Defined “fixed facilities,” “field programs,” and “drainage facility sites” (see **Section C-5.3**).
- Eliminate Environmental Performance Reporting (EPR) program (which is duplicative of Model Municipal Activities Program) (see **Section C-5.3**).
- Revise Model WQMP Table 7.II.6 for latest information on BMPs and clarity (see **Section C-7.3**).
- Evaluate and revise (as necessary) prioritization provisions for Countywide consistency (see **Section C-7.3**).
- Provide definitive construction site prioritization guidance (see **Section C-8.3**).
- Clarify inspection frequencies; violation definitions and re-inspection (see **Section C-9.3**).
- Provided definitive industrial and commercial facility descriptions (see **Section C-9.3**).
- Complete DAMP/Watershed Action Plans for all 11 Orange County watersheds (see **Section C-12.3**).

With adoption of a Fourth Term MS4 Permit by the Santa Ana Regional Board and pending adoption of a Fourth Term Permit by the San Diego Regional Board the focus of program development in 2009-10 will be on the proposed modifications that are now specific permit requirements and any additional permit requirements that will need to be addressed in the next reporting period. The 6 and 12 month compliance requirements of the Santa Ana Fourth term permit are listed in **Tables C-13.1** and **C-13.2**.

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Table C-13.1, Principal Permittee Deliverables [Santa Ana Region]

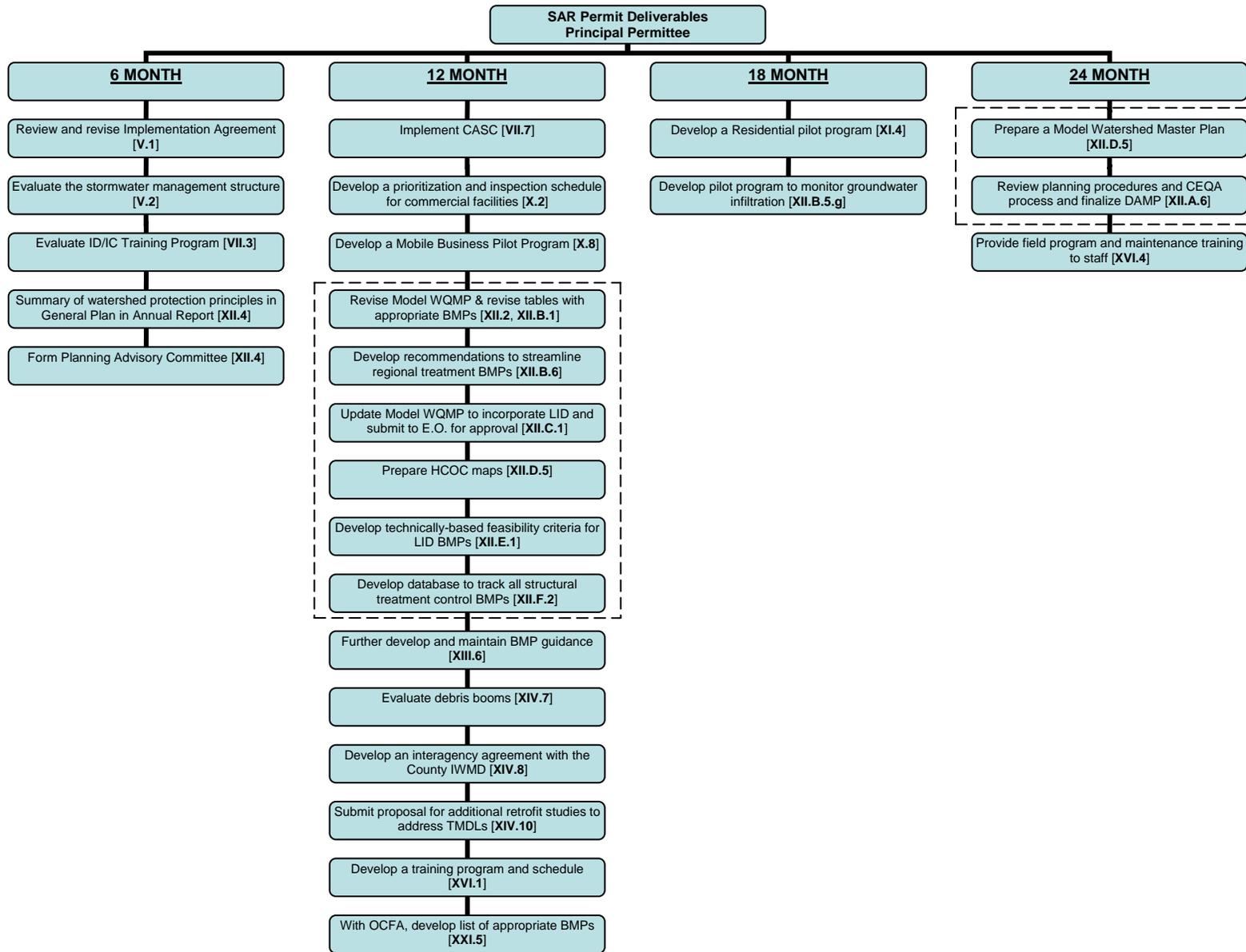


Table C-13.2, Co-Permittee Deliverables [Santa Ana Region]

