

SECTION C-1

INTRODUCTION

PROGRAM EFFECTIVENESS ASSESSMENT





C-1.0 INTRODUCTION

C-1.1 Introduction (LIP Section A-1.0)

The Municipal Stormwater Permittees in Orange County (**Section C-1.2** below) have developed a common Program Effectiveness Assessment (PEA) framework in order to better report to the Regional Boards the implementation and performance the Permittees' stormwater quality programs, individually and collectively.

The objectives of the PEA are to:

- Facilitate the collection and compilation of specific stormwater program implementation and validation data necessary for the submittal of the Annual Progress Reports;
- Provide for annual data analyses by which the Permittees can, on a jurisdictional, watershed and/or countywide basis, compile and analyze the program data. These analyses will allow for comparison with subsequent evaluations as well as the identification of data gaps and/or trends;
- Ensure that the iterative evaluation and improvement process is applied on a jurisdictional, watershed and/or countywide level to each of the program components and is used as an effective management tool in determining where modifications within the Drainage Area Management Plan (DAMP) and/or Local Implementation Plan (LIP) may be necessary; and
- Provide a mechanism for the Permittees to identify and report modifications that have or will be made to their LIP.

C-1.2 Background

The 1972 Federal Water Pollution Control Act, subsequently known as the Clean Water Act (CWA), established the National Pollutant Discharge Elimination System (NPDES) permitting program. An amendment to the Clean Water Act, the Water Quality Act, was approved in 1987, which brought stormwater discharges into the NPDES Program. EPA issued subsequent regulations on November 16, 1990.

In response to those regulations, the County of Orange, the Orange County Flood Control District and the incorporated cities of Orange County have obtained, renewed and complied with the following NPDES Stormwater Permits from the Santa Ana and San Diego Regional Water Quality Control Boards (subsequently referred to as the Santa Ana Regional Board, the San Diego Regional Board or collectively as the Regional Boards):



NPDES Stormwater Permits

Permit Term	Santa Ana Regional Board			San Diego Regional Board		
	Order No.	NPDES No.	Date Adopted	Order No.	NPDES No.	Date Adopted
First (1990-1996)	90-71	CA 8000180	July 1990	90-38	CA 0108740	July 1990
Second (1996-2002)	96-31	CAS618030	March 1996	96-03	CAS0108740	August 1996
Third (2002-2007)	R8-2002-0010	CAS618030	January 2002	R9-2002-0001	CAS0108740	February 2002

Each permit renewal has required the Permittees to continue to implement ongoing stormwater quality management programs and develop additional programs in order to eliminate non-stormwater discharges and control pollutants in stormwater discharges.

As a result of the Third Term Permit requirements, the Permittees are currently enhancing existing program elements as well as developing additional ones and have finalized the draft 2000 DAMP as the 2003 DAMP during 2003. One of the major challenges for the Permittees in updating the programs is the reconciliation between the two Regional Board permits and the resulting program requirements which have significant differences for the first time.

This reconciliation has been accomplished by revising the structure of the draft 2000 DAMP to include model programs and templates for LIPs (also termed Jurisdictional Urban Runoff Management Programs (JURMP) in the San Diego Regional Board Third Term Permit) and Watershed Chapters (these have been developed for the San Diego Regional Board area where they are also known as Watershed Urban Runoff Management Plans (WURMPs) and are in development in the Santa Ana Regional Board area), which will assist the Permittees in implementing the program within their individual jurisdiction and at a watershed scale as well as recognize the differences between the two sets of permit requirements.

This PEA is a joint submittal of the County of Orange and the Orange County Flood Control District. The PEA in most instances will reference the County to cover both entities, since the District is managed within the County Public Facilities and Resources Department.

This PEA covers the period from July 1, 2002 to June 30, 2003 and therefore covers a period of transition from the Second Term Permits to the Third Term Permits.