

Municipal Regional Stormwater NPDES Permit

Overview of Requirements, Recommended Changes, and Assistance Needed

March 12, 2009

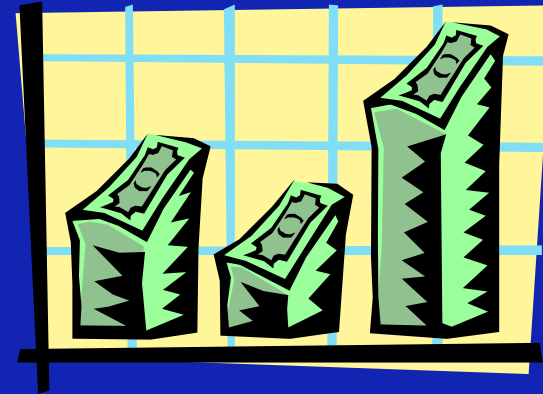


Municipal Regional Stormwater Permit – Revised Draft 2/11/09

- Important Dates:
 - Submit written comments by – **April 3**
 - Attend hearing (potential adoption) – **May 13**
- Consolidates six Phase 1 municipal stormwater permits in one regional permit (77 permittees)
- Seeks a consistent level of implementation and reporting
- Some improvements since 2007 draft permit, but **much of permit is unchanged.**



Cost Implications



- Requirements of the Municipal Regional Stormwater Permit are, as before, expected to about **double** the cost to implement the countywide stormwater program
- Municipalities are still evaluating local cost implications – City of Dublin has estimated its costs would increase 125%

Overall Concerns with Draft Stormwater Permit



- Lacks prioritization of goals and **needs phasing** over multiple 5-year, permit cycles
- Contains many **unfunded state mandates**
- Increases monitoring, **special studies, and pilot projects** that **are expensive** and will trigger more requirements
- Still contains many **impractical requirements**
- Shows a lack of understanding of municipalities' **economic problems and what is reasonable**

Specific City of X Concerns with Draft Stormwater Permit

- List specific permit concerns and why they are an issue for your city



Examples of Key Issue Areas

- Water quality monitoring, special studies, & pilot projects
- Trash and litter controls
- Conditionally exempt discharges – minor discharges to storm drains



Recommended Changes: Water Quality Monitoring, Special Studies & Pilot Projects

- *Reduce and Phase Monitoring and Studies to Reduce \$900K/year Cost Increase*
 1. Decrease frequency and locations of monitoring
 2. Prioritize pollutants for emphasis now and handle others in subsequent permit periods
 3. Redirect monitoring we already pay for through the Regional Monitoring Program to meet permit requirements



Recommended Changes: Trash and Litter

- *Reduce and Phase Trash Clean Up Requirements to Reduce 350k/year **Cost Increase** and Potential Liability*
 - Reduce number of hot spots and focus on trash-impaired waterways
 - Reduce hot spot monitoring
 - Make clean up level a goal
 - Focus trash requirements on trash from storm drains
 - Reduce amount of area requiring use of full-capture trash removal devices



Recommended Changes: Conditionally Exempt Discharges

- *Retain requirements Water Board approved in 2004 permit amendment*
- *Eliminate impractical and unnecessary notification, monitoring and reporting requirements*
 - Pumped groundwater,
 - Water from crawl space pumps
- *Retain allowance for individual residential car washing*
- *Eliminate requirement for municipalities to regulate **potable water discharges** to storm drains*



Your Assistance Is Needed



- **Make Sure Your Municipality Understands Permit and Submits Written Comments by April 3 Due Date**
- Send **Elected Officials** and Other City Management Staff to Permit Adoption Hearing on **May 13**
 - **Verify Hearing Attendance by April 30**
 - Testify About Local Economic Problems
 - Support Recommended Changes to Permit
- Support Bay Area Stormwater Management Agencies Association's Efforts to Work with Water Board's Executive Officer to Incorporate Recommended Permit Changes Needed in Current Economy