

Cities of Arcadia, Claremont and Sierra Madre

Comments on Draft State Water Resources Control Board Order WQ 2015-XXXX

State Water Resources Control Board Workshop

Metropolitan Water District of Southern California – December 16, 2014

PRESENTED BY:

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Claremont

Policy Decisions

- State Board's decision to require compliance with Water Quality Standards discretionary



- California one of the only states in the Nation to require strict compliance in MS4 permits
 - State and Federal law give the State Board discretion
 - State and Federal law prohibit abuse of discretion – requirements must be attainable
- Given decision to require compliance with WQS, cities support inclusion of WMP/EWMP compliance option

Policy Decisions

- Immediate compliance with RWLs not feasible



- Basis for State Board's 2005 Blue Ribbon Panel Report has not changed
- Municipal stormwater is fundamentally different from other sources of pollution
- Cities need time and flexibility for all pollutants, including those covered by TMDLs

Compliance Option: Only path forward

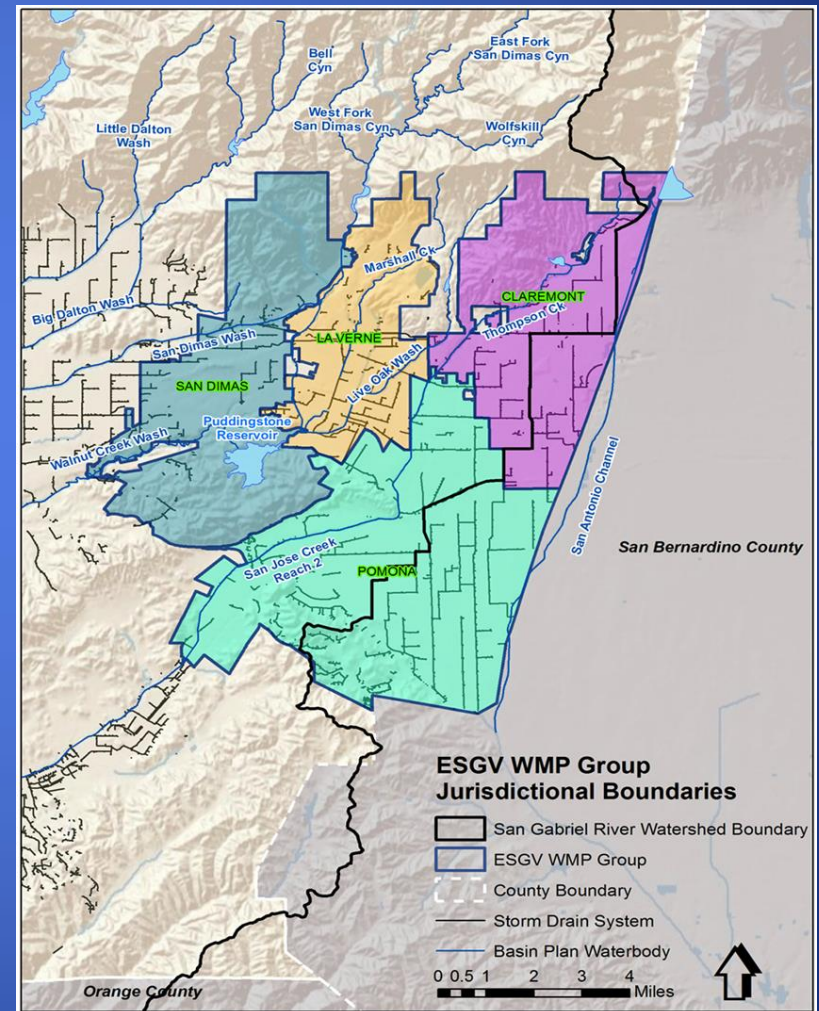
- Many WQS are not met today – attaining will take time, resources, and cooperation
 - Stormwater is a diffuse source
 - Limited control over system input
 - Nature of system confuses responsibility and point of compliance
 - Far from perfect but WMP and EWMP provides a path forward



Compliance Option: Not a Safe Harbor and not a Free Pass

East San Gabriel Watershed Group WMP:

- 4 participants
- Compliance attained through regional, structural BMPs and LID redevelopment
- Will require 20 times more annual stormwater spending



Compliance Option: Not a Safe Harbor and not a Free Pass

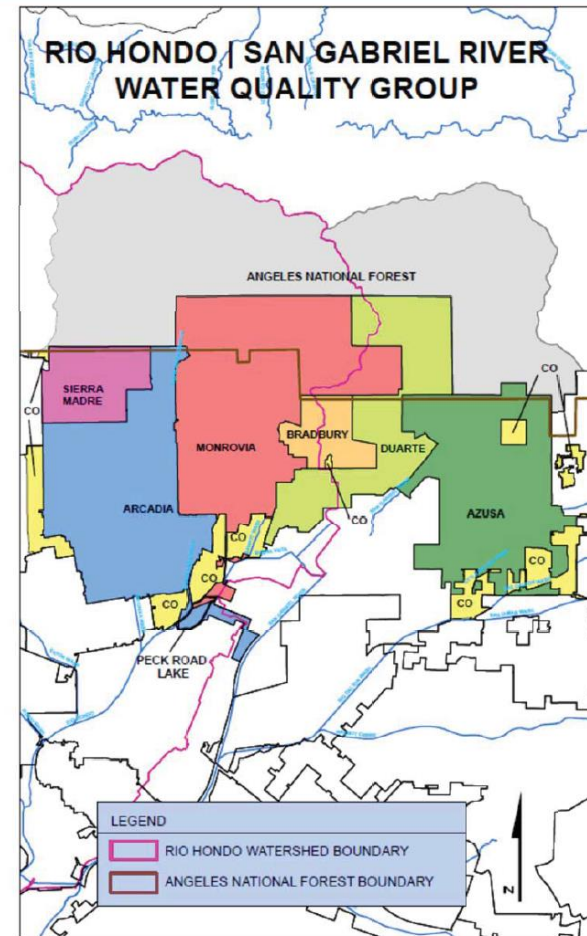
Water Body	Category 1	Category 2	Category 3
Walnut Creek Wash	Lead (wet weather)	Indicator Organisms, Benthic-Macroinvertebrates, pH	Selenium
San Gabriel River Reach 2	Lead (wet weather)	Indicator Organisms, Cyanide	Cyanide, Selenium, Copper, Lead, Zinc, Mercury, Sulfate, Chloride, Total Dissolved Solids (TDS), Polycyclic Aromatic Hydrocarbons (PAH)
San Gabriel River Reach 3	Lead (wet weather)	Indicator Organisms	Copper, PAH, Dissolved Oxygen (DO), Cyanide
San Jose Creek Reach 1	Selenium (dry weather), Lead (wet weather)	Indicator Organisms, pH, Toxicity, Ammonia, TDS	PAH, DO, Cyanide, Lead, Zinc, Lindane
San Jose Creek Reach 2	Selenium (dry weather), Lead (wet weather)	Indicator Organisms	PAH, DO, Copper
Inflow to Puddingstone Reservoir	Total Nitrogen, Total Phosphorus, Total Mercury, PCB*, Chlordane*, Dieldrin*, DDT*		Copper, Lead, Zinc, Mercury
San Gabriel River Reach 1	Copper (dry weather)	Indicator Organisms, pH	DO, Selenium
San Gabriel Estuary	Copper (dry weather)	DO, Dioxin, Nickel	DO, Selenium, Silver, Lindane
Santa Ana River	Fecal Coliform and E. coli (wet and dry weather)		

Compliance Option: Not a Safe Harbor not a Free Pass

Upper San Gabriel Water Quality Group:

- 8 participants
- EWMP: Attainment through regional infiltration BMPs that will capture the 85th percentile event
- Development of EWMP & CIMP - \$1.7M
- Implementation of CIMP - \$2.3M
- Includes project management and coordination and all monitoring required for the EWMP
- Total cost of implementation not yet known
- Allocation among participants in flux

Figure 1. RH/SGRWQG



Changes to EWMP Process removes largest incentive for the Option

Original EWMP

- Cities adopt plan that captures 85th percentile storm events in plan area
- Deemed compliance with RWL requirements

Draft Revisions

- Cities adopt plan that captures 85th percentile storm events in plan area
- Must include monitoring
- If WQS not met, additional projects or actions will be required

Thank you!