Municipal Regional Permit 2.0

Overview of Key Revisions

Stormwater Committee
October 16, 2014

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SF Bay Regional
Water Quality Control Board

MRP 2.0 - Goals

- Consistency, accountability, flexibility
  - Room to move for good actors
  - Enforceable (for bad actors)
- Collaboration (internal / external)
  - Focus on green infrastructure
- Elimination or revision of requirements with limited water quality benefit and without other benefits

Permit Elements

Municipal Operations	New and Re-Development	Trash / PCBs Mercury Pesticides
Illicit Discharge Elimination	Industrial/ Commercial Controls	Public Information & Participation
Allowed Nonstormwater	Construction Site Control	Monitoring

New and Redevelopment

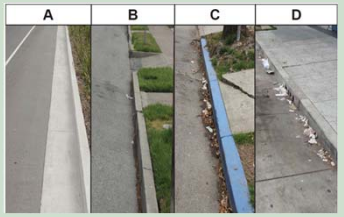
- Lower regulated project threshold to 5000 ft^2
  - Green infrastructure plan exception
- Include road reconstruction treatment requirement
  - Green (streets) infrastructure plan exception

New and Redevelopment

- (LID) system inspections at time of installation
  - Rather than within 45 days
- O&M enforcement response plan
- Pervious pavement/pavers design specs/O&M rqmt's
- Require recurring inspections of pervious pavement/pavers

Trash Load Reduction

- Attain 70% reduction (by July 2019?) based on areal% of trash management areas managed with full trash capture or verified equivalents
  - Equivalence based on observed trash condition



Trash Load Reduction

- Mandatory minimum amount of full trash capture?
  - Possibly tie to bad actors
- Mandatory minimum amount of trash hot spot cleanups✓

PCBs TMDL Urban Runoff Requirements

- TMDL Plan requires focused implementation
- Urban runoff load allocation is 2 kg/y
  - Load estimate is 20 kg/y

PCBs Control

Focused implementation framework

- X% reduction in Y watersheds for cumulative benefit of Z kg/y
- X has to be measurable
- Starting level for Z is 5 kg/y
  - May be adjusted up or down based on implementation timing

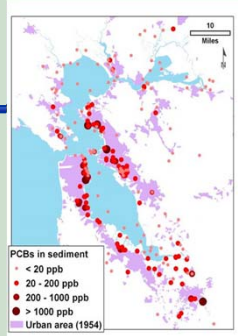
Focused Implementation in Two Types of Watersheds

- High PCBs watersheds (Y_H)
  - Bay margin areas with high PCBs
  - High PCBs reduction per unit of action
- Moderate PCBs watersheds (Y_M)
  - Drain mixed land uses
  - Lower PCBs reduction per unit of action
  - Other benefits of retrofit of LID measures (green infrastructure)

PCBs Controls

High PCBs watersheds (Y_H)

- Implementation within permit term
- ΣY_H reductions = 2 kg/y
- Possibly more time with hard implementation commitment



PCBs Controls

Moderate PCBs watersheds (Y_M)

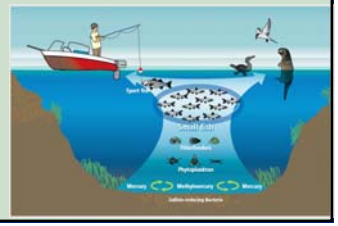
- Robust (green infrastructure) plans within permit term
  - Reasonable assurance to attain ΣY_M reductions = 3 kg/y
- Begin implementation within permit term

PCBs Controls

- Program to manage PCBs in building materials
  - ~10,000 kg!
  - ~ 5 kg per building

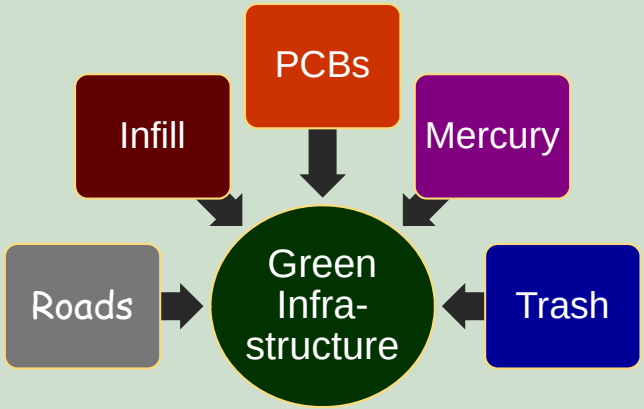
Mercury TMDL Urban Runoff Requirements

- Urban runoff allocation is 80 kg/y
  - Load estimate is 160 kg/y
- TMDL Plan requires 50% load reduction within 20 years
  - More time with demo of best effort and robust implementation plan



Mecury Controls

- Robust (green infrastructure) plans within permit term
- Reasonable assurance to attain reductions = 80 kg/y within realistic time
- Begin implementation within permit term



Green Infrastructure

- Political and management support
- Integrate water quality with other plans
  - Complete streets
  - Priority development areas
  - Aging infrastructure replacement
- Public participation
- Triple bottom line
  - Social
  - Environmental
  - Economic

MRP 2.0 Timeline

- Admin draft permit – Fall 2014
- Public notice draft permit – Winter 2015
- Water Board hearing(s) – Spring 2015
- Effective Date - July 1, 2015