

SECTION C-1

INTRODUCTION

**PROGRAM EFFECTIVENESS ASSESSMENT
2006-07**





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 of 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;
- Provide an annual format by which the Permittees can, on a jurisdictional, watershed and/or countywide basis, compile and analyze program data. As data is collected and analyzed over time, it will enable 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 have significantly enhanced existing program elements and developed several additional ones. The updated DAMP has been finalized and submitted to the Regional Boards and is referred to as the 2003 DAMP. One of the major challenges for the Permittees in developing the 2003 DAMP was the reconciliation between the two Regional Board permits for Orange County which contained 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 Local Implementation Plans (also termed Jurisdictional Urban Runoff Management Programs (JURMP) in the San Diego Regional Board Third Term Permit) and Watershed Action Plans (formerly known as 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 programs 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 (OCFCD). The PEA in most instances will reference the County to cover both entities, since OCFCD is managed within the County's Resources and Development Management Department. The County's unincorporated jurisdiction consists of largely undeveloped and developing areas as well as fragmented unincorporated islands. OCFCD jurisdiction includes 266 miles of open flood control channels as well as 124 miles of underground stormdrain lines.

This PEA covers the period from July 1, 2006 to June 30, 2007 and therefore documents the fourth year of implementation of the 2003 DAMP programs within the Santa Ana and San Diego Regions.