

SECTION C-1

INTRODUCTION

**PROGRAM EFFECTIVENESS ASSESSMENT
2009-10**





C-1.0 INTRODUCTION

C-1.1 Introduction (LIP Section A-1.0)

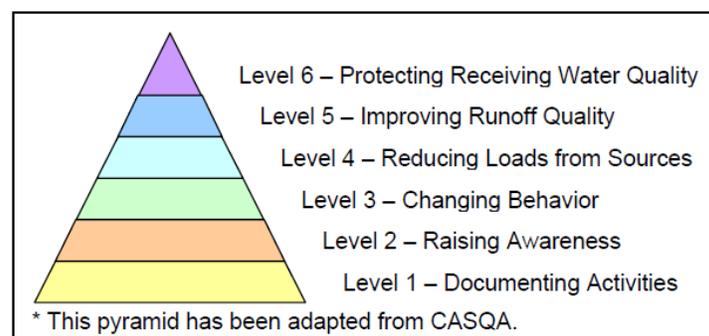
The municipal stormwater Permittees in Orange County (**Section C-1.2** below) have developed a common Program Effectiveness Assessment (PEA) framework in order to better report to the Regional Boards the implementation and performance of the Permittees' stormwater quality programs, individually and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

The objectives of the PEA are to:

- Facilitate the collection and compilation of specific stormwater program implementation and validation data;
- Provide a common format by which the Permittees annually 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.

During the 2004-05 reporting period, the Orange County Stormwater Program adopted the California Stormwater Quality Association (CASQA) approach to effectiveness assessment described in a white paper. In May of 2007, CASQA finalized its *Municipal Stormwater program Effectiveness Assessment Guidance* manual and in April of 2008, the Orange County Stormwater Program became the first municipal stormwater program to receive effectiveness assessment training directly from CASQA.

The County's 2007-08 PEA represented a shift to the CASQA method of effectiveness assessment in order to demonstrate if program elements, activities, BMPs, etc., are resulting in desired outcomes. CASQA identifies six Outcome Levels (see pyramid below) and throughout this report, for each measure the County reports, the corresponding Outcome Level (more than one level may apply) is indicated by a colored triangle with a number.





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For a detailed discussion on this program effectiveness assessment approach, please see Section C-2.5 of this 2009-10 PEA.

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 Phase I Municipal Separate Storm Sewer System (MS4) 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):

Phase I MS4 Permits Adopted for Orange County

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 (2002-2009)	R8-2002-0010	CAS618030	January 18, 2002	R9-2002-0001	CAS0108740	February 13, 2002
Fourth (2009-2014)	R8-2009-0030	CAS618030	May 22, 2009	R9-2009-0002	CAS0108740	December 16, 2009

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 Third Term Permit requirements, the Permittees significantly enhanced existing program elements and developed several additional ones. An updated DAMP was finalized and submitted to the Regional Boards in 2003 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 MS4 permits for Orange County which contained significant differences for the first time.



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This reconciliation was 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 Action Plans (formerly known as Watershed Chapters) 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 will reference the County to cover both entities, since OCFCD is managed within OC Public Works. 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 spans the period from July 1, 2009 to June 30, 2010 and therefore documents the eighth year of implementation of the 2003 DAMP programs within the Santa Ana and San Diego Regions, and the initiation of new activities, pursuant to the Fourth Term Permits, that will likely be finalized in an updated 2011 DAMP.