MSAR WATERSHED TMDL TASK FORCE

Limited Revision to MSAR TMDLs: Project Status

September 4, 2024
Richard Meyerhoff, GEI Consultants
Steven Wolosoff, GEI Consultants





PRESENTATION OUTLINE

- Review of where we have been and where we are today
- Summarize key comments on Draft Technical Report
- Phase 2 Implementation Tasks
 - Current version
 - Planned revisions based on comments
- Next Steps & Schedule



9/4/2024

PROPOSED REVISIONS TO TMDLS

- Extend Wet Winter Condition compliance date 20 years from December 31, 2025 to December 31, 2045
- Incorporate Phase 2 Implementation Plan to replace the completed Phase 1 Implementation Plan (existing TMDL implementation plan)
- Clarify applicability of Basin Plan High Flow Suspension provision to MSAR TMDLs
- Clarify applicability of REC1 use to Cucamonga Creek

9/4/2024

STATUS OF TECHNICAL REPORT

- July 2023 Draft Technical Report submitted to Task Force for review
- September 2023 Received comments on Draft Technical Report
- October/November 2023 Discussion with Regional Board staff and Task Force regarding request for additional justification for proposed 20-year extension of Wet Winter Condition TMDLs
- January 2024 Additional justification for 20-year extension submitted to Regional Board staff
- May 31, 2024 Regional Board staff provided comments on 20-year justification and also provided additional comments on Draft Technical Report
- July 16, 2024 Meeting with Regional Board staff to discuss comments

JUSTIFICATION FOR 20-YEAR PROPOSED EXTENSION

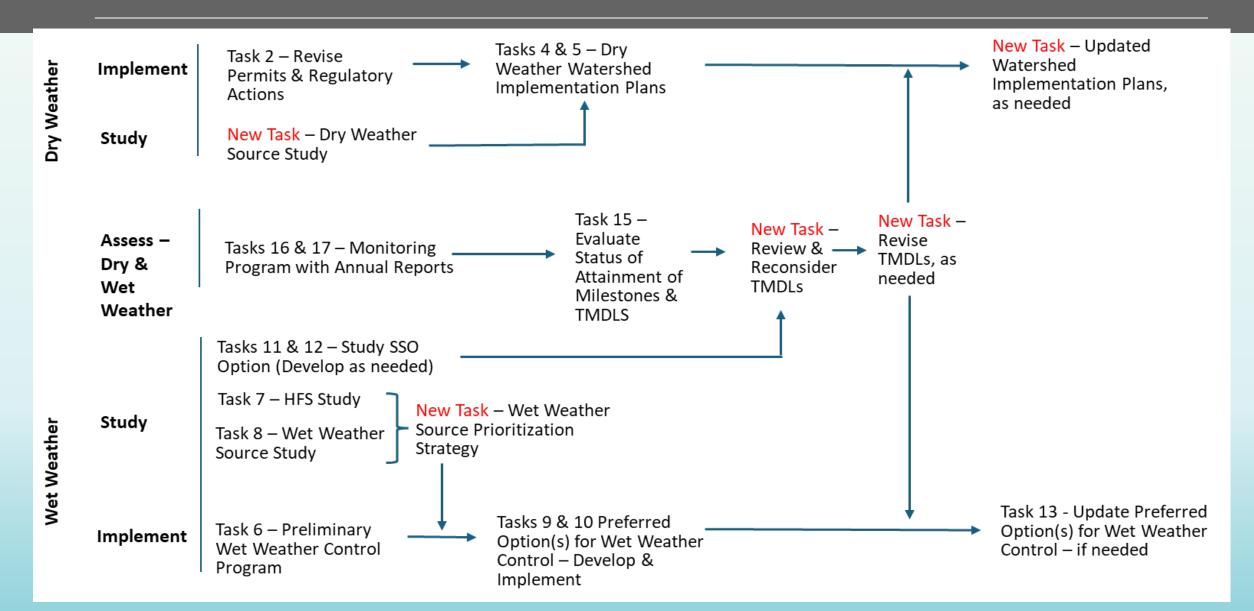
- Revisit the findings of dry and wet weather compliance analysis included in the 2012 Basin Plan amendment (established current *E. coli* water quality objectives and High Flow Suspension[HFS])
- Prepare pilot-level analysis of what could potentially be required to comply with TMDLs applicable to wet weather runoff, even with consideration of the HFS:
 - Focused only on implementation of treatment controls (combination of regional treatment projects and neighborhood-level bioretention)
 - Relied on the City of Riverside as the "test case" or example for the analysis
 - Estimated (a) urban runoff volume needed to be captured (considering HFS); (b) capital costs of treatment control projects; (c) O&M needs; and (d) potential time to implement multiple treatment controls across a jurisdiction

SUMMARY OF KEY REGIONAL BOARD STAFF COMMENTS

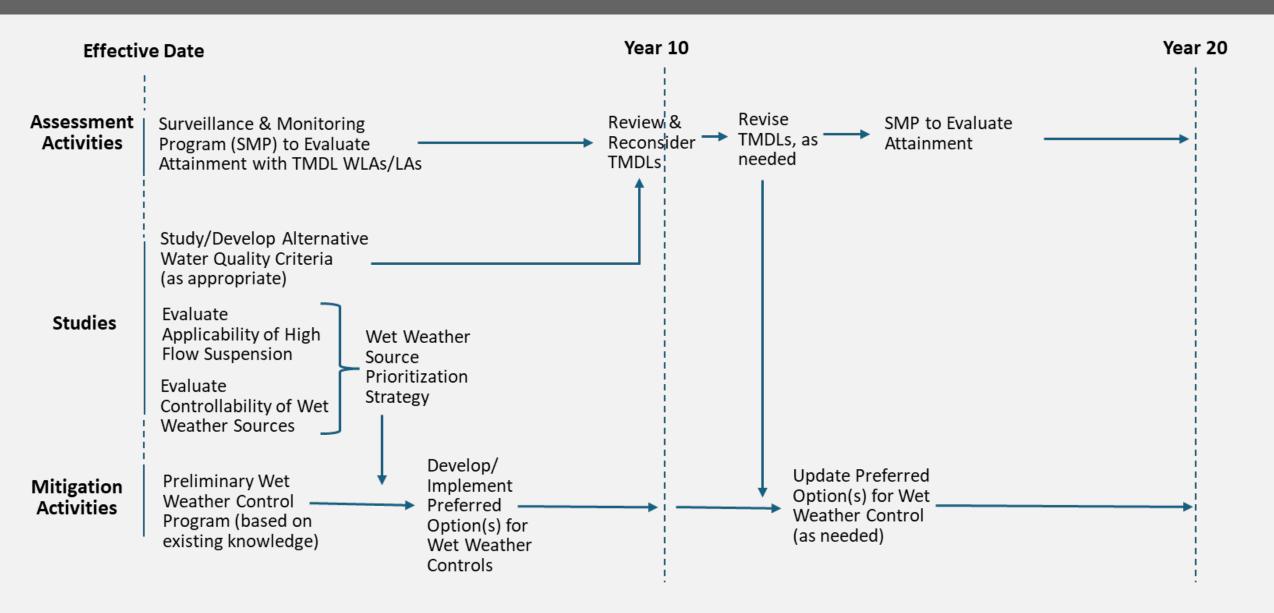
- 20-year Justification (to be incorporated into Technical Report as an appendix)
 - Based on older data (e.g., CBRP, 2012 BPA findings/costs) update to 2024, to the extent possible
 - Focused solely on time/effort to implement treatment controls; broaden justification to incorporate other key activities, e.g., studies, consideration of site-specific objectives
- Draft Technical Report (focused primarily on proposed Phase 2 Implementation Plan)
 - Incorporate prioritization strategy into wet weather control program to target most significant sources within first 10 years of Phase 2 implementation
 - Add in a "Review and Reconsider" TMDLs task by Year 10 to assess progress
 - Add additional dry weather task to further study "unaccounted for" bacteria
 - For Surveillance & Monitoring Program and Phase 2 studies incorporate additional human-related indicators, e.g., human markers, noroviruses
 - Add new section to discuss compliance pathways (similar to LECL TMDL Technical Report)

6

PLANNED REVISIONS TO PHASE 2 IMPLEMENTATION PLAN TO ADDRESS REGIONAL BOARD STAFF COMMENTS – BIG PICTURE/NO TIMELINE



PHASE 2 IMPLEMENTATION PLAN – WET WEATHER EMPHASIS OVER 20-YEAR PERIOD



NEXT STEPS & SCHEDULE

- Update/broaden 20-year justification narrative as requested
- Incorporate justification into Technical Report as an appendix
- Revise Technical Report to address comments and align with new appendix
- Provide Revised Technical Report with Appendix for review in October



9/4/2024