



## SECTION 8

# NEW AND REDEVELOPMENT CONTROL MEASURES

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## 8. NEW AND REDEVELOPMENT CONTROL MEASURES

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### INTRODUCTION

This section describes the Program's efforts during FY 02-03 to assist Co-permittees in controlling the impacts of development on stormwater quality and flow through the development project planning, review and approval process. Tasks related to construction inspection are described within Section 2 (Co-permittee Guidance and Performance Standards).

### BACKGROUND

On October 17, 2001, the Regional Board adopted Order 01-119 which amended the Program's Permit Provision C.3 (New and Redevelopment Requirements) to contain significant new requirements. These requirements include:

- Numeric design standards for sizing stormwater treatment controls;
- Limits on increases in peak stormwater discharge rates and/or durations from new or redevelopment sites that may result in increased potential for erosion or other adverse impacts in creeks;
- Requirements for operation and maintenance of stormwater controls;
- Requirements for site design and source control measures;
- Definition of a minimum project size, based on amount of impervious surface created, for which the design standards, control measures, peak flow limitations, and maintenance requirements apply;
- Requirements for changes to General Plans and environmental review processes to provide authority to implement the requirements;
- Reporting requirements; and
- Schedule for implementation.

In addition, Provision C.3 requires the Program and Co-permittees to submit specific work plans for: 1) modifications to the development project review process (C.3.b.); 2) implementation of Group 1 requirements (C.3.c.); and 3) site design standards review and revision (C.3.j.). In response, the Program and Co-permittees submitted work plans for implementing all C.3 requirements to the Regional Board on March 1, 2002 (as part of the Program's *FY 02-03 Draft Work Plan*, Volume II). To guide this effort, Program staff prepared a separate document entitled *Guidance for Work Plan Tasks Related to Implementation of Permit Provision C.3 (New and Redevelopment Requirements), FY 01-02 and 02-03* (referred to herein as C.3 Work Plan Guidance). This guidance identifies proposed actions to meet the requirements of Provision C.3 and whether the actions will be implemented at the Program level, Co-permittee level or both. The Program and Co-permittee tasks for FY 02-03 (listed in the C.3 Work Plan Guidance) are the basis of this Annual Report section.

In February 2003, the Regional Board adopted and/or amended the stormwater permits for the Contra Costa, Alameda, and San Mateo countywide stormwater programs with different requirements than those in the Program's permit. The Regional Board Executive Officer has

stated the Board's intention to make all of the permits consistent. As a result, the Regional Board extended the deadlines for implementation of certain C.3 provisions<sup>1</sup>.

## **IMPLEMENTATION OF FY 02-03 C.3 TASKS**

Table 8-1 presents the status of the Program's new and redevelopment (C.3.) tasks scheduled for completion in FY 02-03. The table includes tasks assigned to the Program in the C.3. Work Plan Guidance submitted March 1, 2002.

Highlights of accomplishments and evaluation of effectiveness of some of the key elements of the C.3 Work Plan are provided below.

### **Ad Hoc Task Group and Work Group Participation**

In FY 01-02, the Program formed the C.3. Provision Oversight Ad Hoc Task Group (C3PO AHTG) to oversee, coordinate and discuss Program guidance on implementation of C.3 tasks. This AHTG has been meeting approximately monthly since February 2002 (meeting frequency decreases when work groups are particularly active). The AHTG has provided valuable assistance to Program staff in developing the C.3 implementation tools (see below). In addition, it continues to be a useful forum for discussion of development review processes used by the various Co-permittees and sharing of ideas for implementing changes to meet C.3 requirements.

A number of work groups have been formed to work on specific issues required under Permit Provision C.3. A list of AHTG and work group members (and the missions of each group) is provided within Section 2, Table 2-2 of this Annual Report. During FY 02-03, four work groups were active: the Site Design, Infiltration, BMP O&M Verification and HMP Work Groups.

### **C.3. Implementation Tools**

In FY 02-03, Program staff, with the assistance of the C3PO AHTG, Work Groups and its consultants, developed the following tools or model documents to help Co-permittees implement the C.3 requirements:

- *Draft Model List of Source Control Measures* (submitted to the Regional Board September 16, 2002)
- *Selection of Stormwater Treatment Measures for Santa Clara Valley, Draft* (5/16/03)
- *Guidance for Use of Infiltration Measures for Stormwater Management in Santa Clara Valley, Draft* (May 16, 2003)
- GeoSyntec Consultants, *Sizing Criteria for Stormwater Treatment, Draft Report* (May 5, 2003)
- *Draft Guidance for BMP Operation and Maintenance Verification Programs (Permit Provision C.3.e)* (January 27, 2003)
- *Guidance for Implementing Permit Provision C.3.e (Operation and Maintenance of Treatment BMPs), Part 2- Ordinance or Policy Language Relating to Inspection and Maintenance of Stormwater Management Systems* (May 5, 2003)
- *Treatment Control Best Management Practice Fact Sheets* (May 7, 2003)

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<sup>1</sup> Letter to Beau Goldie, SCVURPPP Management Committee Chair, from Loretta K. Barsamian, Executive Officer, California Regional Water Quality Control Board, San Francisco Bay Region, Re: Extension of Specified Deadlines in Order 01-119, May 12, 2003.

- *Model Conditions of Approval for Pesticide Reduction in Landscaping Plans* (Revised December 9, 2002), including:
  - Landscaping Elements for Stormwater Treatment
  - Fact Sheet on “Landscape Maintenance Techniques for Pest Reduction”

These document, along with products developed in FY 01-02, were included in the Program’s *C.3 Handbook - Guidance for Implementing Stormwater Requirements for New Development and Redevelopment Projects*. The C.3 Handbook was distributed to Co-permittees, Regional Board staff and the public at the Program’s May 21 and 22, 2003 C.3 Workshop. The table of contents for the C.3 Handbook is provided as Appendix G-1. Additional information on the tools is provided in Table 8-1.

### **C.3 Workshops**

The Program conducted two workshops to educate Co-permittee staff and the public about the C.3 requirements and the tools developed by the Program. The first workshop, held on December 11, 2002 was for Co-permittee agencies and covered the tools developed to date; BASMAA’s “Using Site Design...” Manual; and case studies for selecting and sizing BMPs using actual local projects. The second workshop was held on May 21 and 22, 2003 (same workshop repeated the second day to allow more attendees) and was open to the public. The second workshop, which featured the release of the draft C.3 Handbook (Appendix G-1), included more guidance on site design and BMP operation and maintenance programs. In addition, information regarding the new CASQA Stormwater BMP Handbooks and additional case studies were presented.

On July 22, 2003, the Program also conducted a workshop entitled *Paving the Way towards Progress: Improving Storm Water Quality via Permeable Paving*. This workshop focused on the siting and design of permeable paving, particularly interlocking concrete pavers. Additional information on all three workshops (including the agendas and evaluation summaries) is presented within Section 2 and Appendix A.

### **Development Policies Comparison Project**

To assist Co-permittees in reviewing and improving their development policies (as they relate to Program goals and objectives), Program staff completed the Santa Clara Basin Municipal Development Policies Comparison Project during FY 02-03. Tasks included preparing a Development Policies, Codes and Ordinances Work Sheet (with assistance of the SCBWM I Land Use Subgroup). The work sheet was used to do the assessment of municipal policies, including stormwater-related requirements. In addition, Program staff collected and reviewed policy, code, ordinance and guidance documents from the Co-permittees and met with at least half of them to discuss the results of the reviews. Through these reviews, Program staff has helped Co-permittees begin the process of identifying additional steps or development policies, ordinances or other tools that could be improved to meet C.3 requirements. The Development Policies Comparison Project Report (April 2003) is available on the Program’s website ([www.scvurppp.org](http://www.scvurppp.org)).

### **Guidance for Site Design Standards Review**

Provision C.3.j. requires Co-permittees to review their local design standards and guidance for opportunities to revise site design measures which reduce impacts to water quality. By September 15, 2003, Co-permittees must submit a draft review and analysis of local standards and guidance; opportunities for revisions; and proposed revised standards and guidance for full implementation by September 15, 2004.

Working with the Site Design Work Group, Program staff developed guidance for conducting the site design standards review. The guidance outlines an approach to conducting the reviews that builds on the work completed for the Development Policies Comparison Project, specifically the site design-related questions in the Policies, Codes and Ordinance Worksheet for each Co-permittee. The guidance includes the following: example development policies and principles for improving water quality; model site design conditions of approval; and a reporting template based on the PCOW that Co-permittees can use to show the results of their analysis of existing design standards and proposed improvements. The guidance memorandum entitled *Site Design Guidance for Review of Local Standards* (dated July 11, 2003) and attachments are provided as Appendix G-2. (This represents an updated, final version of the document that was included in Section 4 of the C.3. Handbook)

The Co-permittees' completed reporting templates indicating the results of their site design standards review; the departments involved in the analysis; and the proposed improvements and schedules were submitted to the Regional Board on September 15, 2003 under separate cover.

### **Infiltration and Groundwater Protection**

Permit Provision C.3.i describes limitations on the use of infiltration treatment measures for groundwater protection and provides conditions for use of "BMPs that function primarily as infiltration devices". The Santa Clara Valley Water District (SCVWD) also has concerns about "infiltration devices" but has criteria for siting and design that are slightly different from those described in Provision C.3.i.

To address these issues, an Infiltration Work Group of the C3PO AHTG was formed to develop guidance for use of infiltration measures and devices in the Santa Clara Valley. The group consists of Program staff and representatives from the following jurisdictions: Los Altos, San Jose, Sunnyvale, San Jose and the SCVWD. Regional Board staff have also participated by phone and provided input to work products. During the FY 02-03, the Infiltration Work Group met five times.

The work group accomplishments during the year include developing an "infiltration device" definition that states: *A storm water infiltration device is any structure that is designed to infiltrate storm water into the subsurface and, as designed, bypasses the natural groundwater protection afforded by surface and near surface soil. The definition of storm water infiltration device does not include any type of septic system or other waste water disposal system, any infiltration of water other than storm water, District percolation ponds, lined sumps and basins, or any naturally-occurring body of surface water.*

The work group also approved a list of stormwater best management practices (BMPs) that met the definition (identified in Table 1 of Appendix G-3 as Category A BMPs). These devices are of particular concern to the SCVWD because they can potentially pose more risk to groundwater quality if they are not sited or designed properly. The concept is that if these devices are sited or designed according to guidelines agreed upon by the SCVWD and the Co-permittees, the risks to groundwater quality can be minimized to an acceptable level. BMPs in Category B are infiltration measures that are not defined as "infiltration devices" because they treat stormwater prior to infiltration into the subsurface. This category includes all landscape measures that utilize infiltration through surface soils. BMPs in Category C discharge treated stormwater directly to the storm drain system and do not infiltrate stormwater.

To protect groundwater quality, the group is also working on developing numeric and narrative guidelines for siting of infiltration devices. Infiltration devices associated with new and re-

development projects under review by municipal planners that do not meet the siting guidelines would be recommended to be reviewed by the SCVWD. A preliminary draft of these guidelines (dated 5/16/03) was included in the C.3 Handbook. However, the guidelines are still being discussed by the work group and consensus has not yet been reached.

In FY 03-04, the work group will complete the infiltration device guidelines and develop specific designs for certain infiltration devices (e.g., dry wells and small-scale infiltration trenches) that would minimize the potential for groundwater contamination and not need review by the SCVWD.

### **Guidance for Operation and Maintenance of Treatment BMPs**

Permit Provision C.3.e of the Program's NPDES permit requires each Co-permittee to implement a stormwater treatment BMP Operation and Maintenance (O&M) Verification Program. To address Provision C.3.e, the BMP O & M Verification Work Group was formed by the C3PO AHTG to develop guidance for implementing an O&M verification program. The Work Group consists of Program staff and representatives from the following jurisdictions: Cupertino, Los Gatos, Mountain View, Milpitas, Palo Alto, San Jose, SCVWD and Sunnyvale. The BMP O & M Verification Work Group has met six times since its inception.

During FY 02-03, Program staff developed several guidance documents to assist Co-permittees in implementing a BMP O&M verification program. They include the following:

- *Guidance for BMP Operation and Maintenance Verification Programs (Permit Provision C.3.e)* - This memorandum provides information and suggestions for implementing an Operation and Maintenance Verification Program for stormwater treatment BMPs.
- *Guidance for Implementing Permit Provision C.3.e (Operation and Maintenance of Treatment BMPs), Part 2- Ordinance or Policy Language Relating to Inspection and Maintenance of Stormwater Management Systems*- This memorandum suggests how to comply with Permit Provision C.3.e and provides example ordinance or policy language for establishing a long-term inspection and maintenance program of stormwater management systems. Example post-construction stormwater ordinance language, inspection and maintenance agreements and maintenance easement agreements developed by other stormwater programs were attached to the memorandum.
- *Treatment Control Best Management Practice Fact Sheets*- This memorandum provides and discusses the use of BMP fact sheets for the inspection and maintenance of treatment control BMPs. Sixteen of the fact sheets were compiled from the California Stormwater Quality Association (CASQA) Municipal BMP Handbook. Program staff developed fact sheets for an additional six stormwater treatment controls.
- *Guidance on Prioritization and Frequency of Stormwater Treatment Best Management Practice Inspections*- This memorandum provides guidance to municipal agencies for prioritizing treatment measures for inspection and determining inspection frequencies. This guidance will assist Co-permittee staff in developing a process for identifying specific stormwater treatment BMPs to be included in annual inspection programs, for compliance with Provision C.3.e.i.
- *Stormwater Treatment BMP Inspection Program Elements (Draft)* - This memorandum identifies the important elements of a municipal inspection program for stormwater treatment BMPs.

- *Utility of Existing Stormwater BMP Cost Estimates (Draft)* - The memorandum provides and evaluates existing cost information for the O & M of selected stormwater BMPs owned and/or operated by public and/or private owners. The information can assist Co-permittees in making recommendations to the development community regarding the selection of practical and effective treatment control BMPs.
- *Information Regarding the Disposal of BMP Residuals at County Landfills (Draft)* - This memorandum provides relevant information regarding the disposal of BMP residuals at landfills within Santa Clara County.

The first three documents were approved by the Work Group and C3PO AHTG and were included in the C.3 Handbook. The fourth document has been approved by the Work Group and is included as Appendix G-4. The remaining three documents are being reviewed by the Work Group and will be finalized in September 2003.

During FY 03-04, Program staff will create a model Microsoft® Access database for Co-permittee use. The database will be initially created to house all information gathered with the Reporting Form for Planning Procedures Performance Standard and Provision C.3.n. Reporting Requirements (Attachment 6 of the Planning Procedures Performance Standard). The database will then be expanded to include pertinent information regarding inspection results; follow-up/enforcement information; and a mechanism to track when the next inspection is needed. Reports detailing inspection results will need to be developed and submitted by individual Co-permittees with each Annual Report. In addition, the documentation of maintenance needs and repairs for each BMP over time will allow Co-permittee staff to evaluate effectiveness of treatment control measures.

### **Hydromodification Management Plan**

Permit Provision C.3.f. requires the Co-permittees to manage increases in runoff peak flows and volumes from Group 1 development projects through the implementation of a Hydromodification Management Plan (HMP). The HMP Draft Work Plan was developed by the Program's consultant, Geosyntec Consultants, Inc., in consultation with Program staff and the SCVWD. It was submitted to the Regional Board on March 1, 2002. A response to Regional Board staff comments were received May 14, 2002. A revised HMP Work Plan was submitted to the Regional Board on September 13, 2002 (see [www.scvurppp.org](http://www.scvurppp.org)).

In early FY 02-03, the GeoSyntec consultant team was expanded to include Philip Williams & Associates, Balance Hydrologics, Inc. and Raines, Melton and Carella, Inc. The addition of these consultants brought expanded expertise in geomorphology, stream function, hydrologic/hydraulic modeling and local knowledge to the team. The consultant team also recruited a panel of experts to provide outside technical review of HMP Work Plan products. They include Brian Bledsoe of Colorado State University, Thomas Dunne of University of California, Santa Barbara and Matt Kondolf of University of California, Berkeley. The Program formed an HMP Work Group to start reviewing products developed as part of the Plan.

During FY 02-03, the following HMP products were completed:

- *HMP Literature Review* (submitted September 15, 2002 as part of *FY 01-02 Annual Report*, Appendix G-4, per provision C.3.f.iv. and HMP Work Plan Tasks 1, 2, and 4);
- *Technical Memorandum #1, Recommended Assessment Method for Developing the Hydromodification Management Plan, Including Data Requirements* (completed per HMP Work Plan Task 5 in October 2002, presented to Regional Board staff and BASMAA NDC on December 5, 2002);

- *Hydromodification Management Plan, Working Draft Report, Lower Silver-Thompson Creek Subwatershed –Chapters 1-3* (submitted March 3, 2003 per provision C.3.f.viii.3. and HMP Work Plan Task 6)
- *HMP Draft Interim Report on the Assessment of the Lower Silver-Thompson Creek Subwatershed* (submitted July 30, 2003 per provision C.3.f.viii.3. and HMP Work Plan Task 6)

The *Hydromodification Management Plan Draft Interim Report Assessment of Lower Silver—Thompson Creek Subwatershed* was approved by the HMP Work Group and Management Committee in July 2003, prior to submittal to the Regional Board on July 30, 2003. A compilation of the expert panel review comments provided to date on various documents and portions of the assessment methodology were also submitted to the Regional Board and distributed to interested parties. This report superceded the *Hydromodification Management Plan, Working Draft Report, Lower Silver-Thompson Creek Subwatershed –Chapters 1-3* submitted to the Board on March 3, 2003. The content of the report, consistent with Program staff's discussions with Regional Board staff in an October 18, 2002 meeting, focuses on the application of a field investigation and assessment methodology for understanding the impacts of hydromodification on one watershed in Santa Clara Valley.

The Lower Silver-Thompson Creek Subwatershed was used to test a complex assessment method and investigate the importance of various parameters. The results will be used to define a cost-effective level of analysis that will be tested on other subwatersheds with different characteristics. The results of the assessments for these subwatersheds will then be used to develop a method that could be extrapolated or improved through a “lessons learned assessment” to other subwatersheds which are subject to HMP requirements.

The Draft Interim Report does not contain guidance to the Co-permittees for design criteria or management alternatives for control of runoff peak flows and volumes from new development subject to regulation under Permit Provision C.3. The HMP Guidance Manual will be completed following the completion of the assessment tasks. When the final HMP is submitted, each individual discharger may tailor the guidelines to individual circumstances. Delineation of exempt areas is still being completed and will be included in the final HMP.

The application of the HMP methodology to the second test watershed is currently underway. The final HMP report, including the assessments and the guidance to the Co-permittees, will be submitted to the Regional Board on January 15, 2004.

### **Revision of Planning Procedures Performance Standards**

Permit Provision C.3.k. requires Co-permittees to submit enhanced Planning Procedures Performance Standards (PPPS) which include source control requirements for new and redevelopment projects. The Program's C.3 Work Plan also calls for updating the 1997 PPPS to be consistent with all of the requirements of the provision.

During FY 02-03, Program staff worked with the C3PO AHTG to make changes and enhancements to the PPPS. The revised PPPS was approved by the Management Committee and submitted to the Regional Board on March 1, 2003 with the Program's *FY 03-04 Draft Work Plan*. The model list of source control measures was incorporated into the revised PPPS as Attachment 4. The requirements for source control measures were more explicitly expressed in Performance Standard #4, in fulfillment of Provision C.3.k.

Regional Board staff provided comments on the PPPS by electronic mail on June 10, 2003. The comments were discussed with the C3PO AHTG in July and August. A response to comments was submitted to Regional Board staff by electronic mail on August 15, 2003. The revised PPPS will be brought to the Management Committee for approval in September 2003. The PPPS will require future revisions to incorporate Group 2 requirements.

## **Other Tasks**

Other tasks that Program staff accomplished during FY 02-03 include the following:

- Program staff worked with CDM (subconsultant to the Program on behalf of BASMAA) and a BASMAA New Development Committee work group to complete the “Using Start at the Source to Comply with Development Standards” project. The final document, entitled *Using Site Design Techniques to Meet Development Standards for Stormwater Quality* was completed in May 2003. Electronic versions and hard copy originals were provided to each BASMAA member agency. The Program contributed more than fifty percent of the funding. The report was presented at both C.3 workshops and is included in the C.3 Handbook (Section 4) and is found on the Program’s website. This report is a very useful tool for Co-permittees trying to meet Permit Provisions C.3.d. and C.3.j.
- Program staff gave the following presentations on the C.3. requirements and Program’s implementation approach:
  - APWA Stormwater Workshop 2002: Current Issues for New Development and Redevelopment (11/14/02);
  - ABAG Stormwater Pollution Prevention – Sustainable Strategies Workshop (1/30/03);
  - SCVWD Landscape Advisory Committee Meeting (4/10/03); and
  - ABAG Spring General Assembly on Land and Water Use (4/24/03).
- Program staff reported on the Program’s C.3 implementation progress at BASMAA New Development Committee meetings.

## **EVALUATION OF EFFECTIVENESS**

Since the Program and Co-permittees are still in the planning stages for implementing Permit Provision C.3.; it is too early to evaluate the effectiveness of the Program’s work products in achieving the goals of C.3. The process of working with the Co-permittees to prepare for C.3 implementation appears to be working well. As mentioned, the C3PO AHTG has provided valuable assistance to Program staff in developing C.3 implementation tools. In addition, it has been a useful forum for the discussion of development review processes used by the various Co-permittees and sharing of ideas for implementing changes to meet C.3 requirements.

The tools in the C.3 Handbook were presented at the Program’s two C.3 workshops (May 21 and 22, 2003). Many participants have found them useful. The evaluation summaries from the two workshops are discussed in Section 2 and are provided within Appendix A.

Program staff will continue to work with the Co-permittees and Regional Board staff to evaluate the C.3 planning process and products during future C3PO AHTG meetings and C.3 workshops.

**Table 8-1  
Status of FY 02-03 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
<b><u>C.3.b. Development Project Approval Process</u></b>		
b.2. Assist Co-permittees to develop new or modify existing review policies, procedures, and/or conditions of approval to incorporate Group 1 requirements (based on results of tasks under C.3.c. through C.3.m.)	7/03	<p><b>Completed/Ongoing</b> – Developed guidance on: 1) changes to the review process to incorporate C.3. requirements; 2) data collection; and 3) model conditions of approval for site design measures, source control measures, and pesticide reduction measures (see SCVURPPP C.3. Handbook, May 2003).</p> <p><i>Guidance assisted Co-permittee compliance with regulatory requirements to modify development approval process (C.3.b.) and report on implementation of C.3. (C.3.n.).</i></p>
b.3. Train Co-permittee staff in planning, building, and engineering departments on the C.3. provisions and goals, the required changes in the approval process, and the use of appropriate tools.	6/03	<p><b>Completed/Ongoing</b> – Held two workshops for Co-permittee staff (second workshop was open to the public) on C.3. requirements and available tools, on December 11, 2002 and May 21 &amp; 22, 2003. Another C.3. workshop is being planned for Fall 2003.</p>
<b><u>C.3.c. Requirements for Group 1 and Group 2 Projects</u></b>		
c.4. Compile guidance being developed under other elements (i.e., project review procedures, site design measures, source control measures, numeric design criteria, O&M verification, etc.) into one guidance manual for implementation of Group 1 project requirements.	10/03	<p><b>In Progress</b> – Guidance documents developed during FY 02-03 was compiled into the SCVURPPP C.3. Handbook for distribution and use at the May 2003 workshop. The Table of Contents for the C.3. Handbook is included in Appendix G-1 of this Annual Report. Some sections are final; others are draft, and some remain to be completed. The C.3. Handbook will continue to be completed and updated during FY 03-04.</p> <p><i>Guidance assisted Co-permittee compliance with regulatory requirements to prepare to implement C.3. Group 1 requirements and report on incremental progress (C.3.c.i.).</i></p>

**Table 8-1, continued  
Status of FY 01-02 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
c.5. Revise portions of the model Planning Procedures Performance Standard to incorporate the Group 1 requirements and other C.3. requirements.	Completed 3/1/03; Revised 9/03	<b>Completed/Ongoing</b> – Program staff worked with the C3 Provision Oversight (C3PO) Ad Hoc Task Group (AHTG) to revise the Planning Procedures Performance Standard (PPPS) to incorporate C.3. requirements and include model source control conditions of approval. The revised PPPS was approved by the Management Committee and submitted to the Regional Board on March 1, 2003, as part of the Program’s <i>FY 03-04 Work Plan</i> . Regional Board staff provided comments via email on June 10, 2003. The comments were discussed with the C3PO AHTG in July and August, and will be brought to the Management Committee for approval in September. PPPS will need to be revised again in the future to incorporate Group 2 requirements.
<b>C.3.d. Numeric Sizing Criteria</b>		
d.1. Analyze local rainfall data and develop area-specific volume and flow based design criteria	Draft 12/02; Final draft 5/03; Final 10/03	<b>Completed/Ongoing</b> – The Program’s consultant, GeoSyntec, completed the analysis of local rainfall data and developed volume and flow design criteria. The draft report, “Sizing Criteria for Stormwater Treatment” is included in the May 2003 C.3. Handbook. The methodology and results were presented at both Program C.3. Workshops and to the C3PO AHTG. Final edits to the report and sizing worksheets will be completed in Fall 2003.  <i>Analysis of local rainfall data was performed in conjunction with Task f.1., to assist Co-permittee compliance with regulatory requirements in C.3.f.iv.3. and C.3.f.v.</i>
d.2. Develop guidance on appropriate criteria to use for each BMP type.	5/03	<b>Completed/Ongoing</b> – Guidance on appropriate criteria to use for each BMP type (volume or flow-based) was developed as part of the Program/BASMAA product “Using Site Design Techniques to Meet Development Standards for Stormwater Quality” (May 2003), Table 3. This report is included in the C.3. Handbook, Section 4 (see also C.3. Task j.3.) More guidance on this topic will be provided as part of the Treatment Measures section of the final C.3. Handbook.

**Table 8-1, continued  
Status of FY 01-02 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
<b>C.3.e. Operation and Maintenance of Treatment BMPs</b>		
e.1. Develop and implement a procedure for logging information about treatment BMPs installed at approved Group 1 projects, and for maintaining a list or database of properties, treatment BMPs, and responsible operators.	3/04	<b>In Progress</b> -- During FY 03-04, Program staff will work with the BMP O&M Work Group to create a model database for Co-permittee use. The database will be initially created to house all information gathered with the Reporting Form for Planning Procedures Performance Standard and Provision C.3.n. Reporting Requirements (Attachment 6 of the Planning Procedures Performance Standard). The database will then be expanded to include pertinent information regarding inspection results; follow-up/enforcement information; and a mechanism to track when the next inspection is needed.
e.2. Develop model language for documents assigning responsibility to the developer/owner of private projects for O&M of treatment BMPs, or to the appropriate agency for O&M of treatment BMPs at public projects. These documents may include O&M responsibility agreements, written conditions in sales/ lease agreements, use permit conditions, provisions in CC&Rs, etc.	5/03	<b>Completed</b> -- During FY 02-03, Program staff worked with the BMP O&M Work Group to develop several guidance documents to assist Co-permittees in implementing a BMP Operation and Maintenance Verification Program. The following documents were completed and included in the SCVURPPP C.3. Handbook (Section 9): <ul style="list-style-type: none"> <li>• <i>Draft Guidance for BMP Operation and Maintenance Verification Programs (Permit Provision C.3.e)</i></li> <li>• <i>Guidance for Implementing Permit Provision C.3.e (Operation and Maintenance of Treatment BMPs), Part 2- Ordinance or Policy Language Relating to Inspection and Maintenance of Stormwater Management Systems</i></li> <li>• <i>Treatment Control Best Management Practice Fact Sheets</i></li> </ul> See Section 8 for description of these documents.
e.4. Develop fact sheets on the O&M requirements and frequencies for various BMP types that can be used to educate parties responsible for O&M and attached to O&M agreements. Include fact sheets for pesticide reduction measures related to landscape maintenance.	5/03	<b>Completed</b> -- Sixteen BMP fact sheets were compiled from the California Stormwater Quality Association (CASQA) Municipal BMP Handbook. Program staff developed fact sheets for an additional six stormwater treatment controls (see SCVURPPP C.3. Handbook, Section 9). A landscape maintenance fact sheet is included as part of the <i>Model Conditions of Approval for Pesticide Reduction in Landscaping Plans</i> (Section 11 of the C.3. Handbook).



**Table 8-1, continued  
Status of FY 01-02 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
f.1. Complete the HMP and required interim products (cont'd): -- Draft HMP Work Plan and Schedule -- Revised HMP WorkPlan -- Draft HMP (Interim Submittal) -- Final HMP	3/1/02 9/13/02 7/30/03 1/15/04	<p><b>Completed</b> – In compliance with C.3.f.viii.1.</p> <p><b>Completed</b> – Revisions in response to Regional Board comments.</p> <p><b>Completed</b> – The <i>HMP Draft Interim Report, Assessment of the Lower Silver-Thompson Creek Subwatershed</i>, prepared by GeoSyntec Consultants and approved by the HMP Work Group and Management Committee, was submitted to the Regional Board on July 30, 2003.</p> <p><b>In Progress</b> – The application of the HMP methodology to the second test watershed is currently underway. The final HMP report, including the assessments and the guidance to the Co-permittees, will be submitted to the Regional Board on January 15, 2004.</p>
<b><u>C.3.g. Waiver and Compensatory Mitigation Program</u></b>		
g.1. Develop a model waiver (“alternative compliance”) program.	Draft 4/02 Final draft 10/02	<p><b>Completed</b> – Program staff and legal counsel drafted a model “alternative compliance program”, with the assistance of a Waiver Ad Hoc Task Group comprised of Co-permittee staff and attorneys. The draft model program was presented to the Management Committee at a special meeting on February 22, 2002. Program staff continued to work with the Waiver AHTG to revise the model language during FY 02-03. A revised model program was completed in February 2003, and this was accepted by the Ad Hoc Task Group as internal guidance.</p>

**Table 8-1, continued  
Status of FY 01-02 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
<b>C.3.j. Site Design Measures Guidance and Standards Development</b>		
j.1. Develop and submit a detailed work plan and schedule for review, revision, and implementation of revised site design standards and guidance.	3/1/02	<b>Completed</b> -- The Program submitted to the Regional Board its <i>Work Plan for Implementation of Permit Provision C.3. (New and Redevelopment Requirements)</i> in Volume II of its <i>FY 02-03 Work Plan</i> on March 1, 2002, in compliance with Permit Provision C.3.j.ii.1. This included a specific work plan and schedule for completion of Provision C.3.j. requirements (Site Design Measures Guidance and Standards Development). The work plan was revised to address Regional Board staff comments and resubmitted on September 13, 2002.
j.2. (Assist Co-permittees to) Review existing local design standards and guidance, and compare them to the list of areas to address in Provision C.3.j. and other references such as "Start at the Source" and the "Development Policies Comparison" work sheet. Prepare and submit an analysis of local standards, identified opportunities for revision, and proposed revisions. (Program to prepare guidance for Co-permittees on this work product.).	7/03	<b>Completed</b> – Program staff worked with the Site Design Work Group and the C3PO AHTG to define an approach to this task and to prepare guidance. The guidance document (Appendix G-3) utilizes the Development Policies Comparison Project worksheets as a starting point for Co-permittees to conduct the analysis of design standards. The worksheets were modified for use as reporting templates for each Co-permittee. These were combined into one Program submittal and delivered to the Regional Board on September 15, 2003.
j.3. Oversee completion of and work with the BASMAA work group on the BASMAA project "Using Start at the Source to Comply with Development Standards", which will evaluate how site design measures can be used to meet the numeric design standards in Provision C.3.d.	Draft 7/02 (workshop Fall 2002)  Final 5/03	<b>Completed</b> -- Program staff worked with the BASMAA "Using Start at the Source" Work Group and the consultant (CDM) to determine an approach to applying site design measures for reduction in the amount of flow subject to the numeric design standards. The draft report was presented to the BASMAA New Development Committee (NDC) in July 2002 and underwent extensive review and revision. The final report, entitled <i>Using Site Design Techniques to Meet Development Standards for Stormwater Quality</i> , was completed in May 2003. The contents of the report were presented at both SCVURPPP C.3. workshops (December 2002 and May 2003). The report is included in Section 4 of the C.3. Handbook.

