

To: **Tom Dalziel**  
From: Dan Cloak  
Subject: **Stormwater C.3 Guidebook, 5<sup>th</sup> Edition—Final Draft**  
Date: 12 October 2010

Here is the complete final draft of the Fifth Edition.

## **Background**

The previous Fourth Edition was published in October 2008. In March 2010 the CCCWP Development Committee directed the Guidebook be updated to:

- Comply with the Municipal Regional Permit (MRP).
- Consolidate and incorporate changes made since the 4th Edition was published in October 2008.
- Make additional changes as part of the continuous improvement process.

The MRP requires the CCCWP submit—either individually or collectively with fellow participants in the Bay Area Stormwater Management Agencies Association (BASMAA)—various reports and proposals to clarify and refine implementation of the new C.3 requirements. These reports and proposals must address where and when stormwater treatment facilities other than LID may be used, where and when treated stormwater may be discharged rather than retaining the specified amount of runoff on-site, and provide model specifications for bioretention soils and for green roofs.

Last March, the Development Committee considered delaying publication of a new edition until after these submittals were developed jointly with other BASMAA agencies and delivered to the Water Board. However, it was decided to proceed with development of a 5<sup>th</sup> Edition because:

- The 4<sup>th</sup> Edition already has a significant addendum and an appendix that should be consolidated into the *Guidebook*.
- Other necessary improvements in guidance have been identified by the Development Committee.
- Most changes required by the MRP are already well-defined and can be incorporated in a new edition.
- The updated *Guidebook* will better inform applicants of upcoming start dates for new MRP requirements and explain the relationship of new requirements to existing requirements.
- MRP requirements that are not yet known will affect a relatively small number of projects.
- Preparing and adopting a new Guidebook edition that is in compliance with the MRP could put the Program in a stronger position for negotiating MRP policies yet to be decided.

### **What's New in the 5<sup>th</sup> Edition**

The 5<sup>th</sup> Edition includes the following changes:

#### *Chapter 1*

Table 1-1 has been revised to implement the changes to applicability in MRP Provisions.

The discussion of Alternative Compliance Options has been updated to incorporate MRP Provision C.3.e., which is simpler and easier to apply than the alternative compliance provisions in the previous permit.

#### *Chapter 2*

The regulatory background in this chapter has been updated to incorporate background and discussion of MRP Provision C.3 requirements. Chapter 2 includes an explanation of the Program approach to compliance with Provision C.3.c.'s dictates that "LID treatment measures are harvesting and reuse, infiltration, evapotranspiration, or biotreatment," and "A properly engineered and maintained bioretreatment system may be considered only if it is infeasible to implement harvesting and re-use, infiltration, or evapotranspiration at a project site."

#### *Chapter 3*

The Stormwater Control Plan Checklist has been updated throughout for style, clarity, and to be more consistent with the step-by-step instructions. The checklist and step-by-step instructions now include assessment of the feasibility of storage for later use.

#### *Chapter 4*

The overall approach to creating and documenting LID designs has been retained. However, significant changes have been made to incorporate MRP LID requirements and to consolidate the 2009 supplement.

Under the heading "Analyze Your Project for LID, a fifth "LID Strategy" has been added: "Store runoff and use it later for irrigation or other non-potable use."

Beginning with Step 4, "Select and Lay Out IMPs on Site Plan," the instructions for developing and documenting a drainage design have been updated to include the two additional IMPs from the 2009 Supplement and to make the selection process more clear (particularly as to the distinction between treatment-only and treatment-plus-flow-control design).

The design sheets for the Cistern + Bioretention and Bioretention + Vault IMPs from the October 2009 supplement are now incorporated into Guidebook.

Other design sheets include new graphics, with new cross-sectional sketches illustrating key required components and features of bioretention, flow-through planter, and bioretention + vault facilities.

### *Chapter 5*

This chapter is new and responds to the need—identified by stormwater coordinators—for minimum standards for construction plan submittals for IMPs. In addition, the Program’s IMP Construction Checklist, developed in 2008-2009, has been adapted for inclusion in the *Guidebook*.

### *Chapter 6*

The previous Chapter 5 has not been changed except to update the enumeration of the table at the beginning of the chapter. The MRP has additional requirements for Operation and Maintenance, but these apply to the tracking and inspection of facilities by the municipality. Existing requirements for O&M Plans appear to be sufficient for ongoing compliance.

### *Appendices*

Appendix B, “Soils, Planting, and Irrigation,” published in January 2009 as a separate document, in has now been incorporated into the *Guidebook*.

### **Drafting and Review Process**

The first draft of the 5<sup>th</sup> Edition was distributed to the Development Committee on 10 May 2010. Comments were incorporated into a 20 September draft. A committee comprised of David Swartz, Carlton Thompson, and Cathleen Terentieff reviewed a pre-final 10 October draft.

### **Future Updates and Revisions**

The current draft is designed for compliance with the MRP’s many changes to Provision C.3. Water Board staff have suggested they may propose to amend the MRP during its term. Revisions to the *Guidebook* could be required in response to those amendments or to other actions by the Water Board.