

Santa Ana Water Quality Management Plan (WQMP)

Comment Response Document for Draft Regional Water Quality Control Board Comments – 9.25.12

Regional Board Comment	Response	Revised Section:
<p>1. Guidance, Page 4, last paragraph: Please revise as follows: “If your project is not a ‘Priority Development Project,’ <u>and does not have a potential for significant adverse water quality impacts</u>, a Project-Specific WQMP is generally not required. However, Co-Permittee staff may choose to will require Project-Specific WQMPs for projects not within the categories in Table 1-1, based on local staff’s assessment of <u>if the proposed project may pose</u> significant potential for the proposed project to impact stormwater quality based on local staff’s assessment. Such projects are required to incorporate appropriate Site Design, Source Control and LID BMPs which may or may not include Treatment Control BMPs.”</p> <p>Also, please revise Exhibit E to indicate if an assessment of a proposed non-priority project’s potential to impact storm water quality has been conducted. Indicate if the potential for storm water quality impact is significant or not. These revisions are consistent with the intent of Section XII.D.6 of the MS4 Permit and Section 6.4.4 of the DAMP.</p>	<p>First Part: Language modification as follows: “Other Development Projects are required to incorporate appropriate LID Principles (Site Design), Source Control, and other BMPs which may or may not include Treatment Control BMPs. Co-Permittee staff will require Project-Specific WQMPs for these Other Development Projects not within the categories in Table 1-1, if deemed necessary to ensure the potential for significant adverse water quality impacts to stormwater are mitigated.”</p> <p>Second Part: Added checkbox to Exhibit E for consistency between Section XII.D.6 of the Permit, Section 6.5.4 of the DAMP.</p>	<p>  Exhibit E - Checklist.pdf  Santa Ana WQMP 9.28.12 9.pdf </p>
<p>2. The above revision is also applicable to public projects implemented by the Permittees that are not similar to Priority Development Projects but has the potential for significant impact to storm water quality. Please revise page 8, Section 1.2.4 to add the following: “However, Co-Permittee staff will require Project-Specific WQMPs for projects not within the categories in Table 1-1, if the proposed project may pose significant potential to impact stormwater quality based on local staff’s assessment. Such projects are required to incorporate appropriate Site Design, Source Control and LID BMPs which may or may not include Treatment Control BMPs.”</p>	<p>Text revised same as above.</p>	<p>  Santa Ana WQMP 9.28.12 13.pdf </p>

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<p>3. Guidance, Page 34, last sentence of the section on Infiltration Characteristics: Please revise as follows: “Amended soils may be appropriate are highly recommended for self-retaining areas...”</p>	<p>Text revised.</p>	 Santa Ana WQMP 9.28.12 39.pdf
<p>4. Template, page 12: The K_L factor considers plant species into 2 types – conservation and non-conservation categories. The <i>LID Guidance Manual for Southern California</i> Appendix A lists some plants such as <i>Mimulus cardinalis</i>, <i>Juncus patens</i>, <i>Distichlis spicata</i>, and <i>Eleocharis</i> that all have a check mark in the bioretention box, but according to RCRC staff, transpire a lot in the late spring and summer. Some plants in the list in Appendix A grow more in early spring and in summer when wet: <i>Muhlenbergia rigens</i>, <i>Achillea millefolium</i>, and <i>Amorpha fruticosa</i> (winter deciduous). Finally some will grow mostly in winter to spring, and may go dormant in dry summer months: <i>Leymus triticoides</i>, <i>Leymus condensatus</i>, and <i>Sporobolus airoides</i>. Ideal plants selected are native plants that evapotranspire significantly in winter yet would be drought tolerant in the summer. That may be specialized knowledge that requires consultation with a licensed landscape architect or experts with equivalent qualifications. Please provide additional guidance/reference on what constitutes landscape conservation design or require consultation with a licensed landscape architect or experts/agencies with the appropriate qualifications</p>	<p>Footnote added to the Guidance (pg. 42) to clarify that Conservation Design and Active Turf Area K_L were derived from Appendix X, Harvest and Use Demand Calculations and Feasibility Screening, of Orange County’s approved 2011 Technical Guidance Document.</p> <p>In addition, language was in place in page 55 of the draft WQMP that assists the preparer in determining the difference between conservation design and active turf areas. This language was also added to page 37 to assist the preparer.</p>	 Santa Ana WQMP 9.28.12 42.pdf  Santa Ana WQMP 9.28.12 60.pdf
<p>5. Guidance, page 41, Table 2-5: Please include a link and page number for the reference quoted in footnote number 2.</p>	<p>A link to this document is not available on San Bernardino County’s website. When a link is available, we will revise.</p>	<p>N/A – See adjacent comment.</p>
<p>6. Guidance, page 52, Table 3-3: Please provide links and page numbers for the Contra County C3 Design Handbook and the San Diego Model SUSMP discussed in the comment response for the data in Table 3-3.</p>	<p>This comment is from the original response to comments which was in error. The data in the table is example data only.</p>	<p>N/A – See adjacent comment.</p>

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<p>7. Template, page 12, Section D.2, 1st checkbox: Please include a follow-up requirement if this box is checked, to demonstrate the volume captured credited towards the DCV.</p>	<p>This checkbox and subsequent text has been removed. Legacy text leftover from an earlier draft. Text was added to 2.4.6 of the Guidance to ensure code compliance with tanks.</p> <p>In addition, a specific reference to industrial water use was included in the 'Other Non-Potable Use Feasibility' Section of the Template.</p>	 EXHIBIT B - WQMP Template 12.pdf  EXHIBIT B - WQMP Template 13.pdf
<p>8. Template, page 12: Step 3 refers to Table 2-2, the appropriate reference is Table 2-3, Harvest and Use Data for Irrigation Use.</p>	<p>Reference corrected.</p>	 EXHIBIT B - WQMP Template 12.pdf
<p>9. Template, page 17, Section E, Alternative Compliance: Co-Permittees' approval of LID technical infeasibility must indicate the unavailability of sub-regional or regional LID BMPs</p>	<p>Section revised per comment.</p>	 EXHIBIT B - WQMP Template 17.pdf
<p>10. Template, page 21: Please revise HCOC exemption 2 and Table F.1 to include time of concentration¹ and provide instructions in the template and/or in the Guidance on how that maybe calculated for a project.</p>	<p>Provision added per XII.E.9.b.ii. T_c will be calculated utilizing the same methods identified in HCOC Exemption 2. Text revised.</p>	 EXHIBIT B - WQMP Template 21.pdf
<p>11. Template, page 21, Section I, Operation, Maintenance and Funding: Please include the bulleted list from page 82 of the Guidance, Section 5.3.3 on the list to be included in Appendix 9 of the Project-Specific WQMP as follows: <u>"Figures delineating and designating pervious and impervious areas, Figures showing location and type of Stormwater BMPs on the site (please include latitude and longitude on the figures or on a separate list) and Tables of impervious areas served by each facility"</u>.</p>	<p>Section revised per comment, inclusion of LAT and LON data recommended.</p>	 EXHIBIT B - WQMP Template 25.pdf

¹ http://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2010/10_033_RC_MS4_Permit_01_29_10.pdf, page 96 of 117, Section XII.E.9.b.ii).

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<p>12. Template, page 21: If not included in comment 11 above, please add the following to the information to be included in Appendix 9 of the Project-Specific WQMP” <u>“A separate list and location of self-retaining areas or areas addressed by LID Principles that do not require specialized O&M or inspections but will require typical landscape maintenance. Please include a brief description of what constitutes typical landscape maintenance for these areas.”</u> Comment response 24 also stated that further clarification in this matter will be included in Chapter 5; please include a cross-reference in the template with the page number.</p>	<p>Section revised per comment. In addition, the appropriate references were added back to the WQMP Guidance document. The Guidance document was revised for inclusion of this reference.</p>	 EXHIBIT B - WQMP Template 25.pdf  Santa Ana WQMP 9.28.12 90.pdf
<p>13. As part of WQMP Template Exhibit F (WQMP reviewer checklist) to be prepared upon WQMP approval, please add a reminder note to the WQMP reviewer that: <u>“A waiver of LID infeasibility along with waiver justification documentation must be submitted to the Executive Officer for approval in writing within 30 days prior to Permittee approval”</u></p>	<p>Noted. This will be included upon preparation of the WQMP Reviewer Checklist.</p>	<p>N/A – See adjacent comment.</p>
<p>14. Transportation Guidance, page 2-2, Table 2-1: Median improvement projects provide green infrastructure opportunities. Please revise the category 2 exemption to state “Median improvement projects with no new road surface <u>that do not increase the overall median imperviousness by more than 5%.</u>”</p>	<p>Text revised.</p>	 Transportation Project Guidance_RE\
<p>15. Transportation Guidance, page 3-4, Section B: Please add the following statement as a second paragraph in this section. <u>“The transportation template on page 6-11, Table 5.2 and page 6-28 provide LID BMP green streets design information implemented within the permit area and in other U.S. Jurisdictions. In evaluating the feasibility of these designs for the transportation project, please consider designs implemented in areas with hydrologic regime similar</u></p>	<p>Text revised.</p>	 Transportation Project Guidance_RE\

² http://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2010/10_033_RC_MS4_Permit_01_29_10.pdf, page 98 of 117, Section XII.G.1i

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<p><u>to the Santa Ana Region. Additionally, alternative street width designs and specifications must meet appropriate local agency and fire department requirements.”</u></p>		
<p>16. Transportation Guidance page 2-2, Table 2-1: Bridge projects are not addressed by the USEPA Green Streets Guidance and the transportation guidance. Please provide references to design considerations and channel stability assessments that Permittees will evaluate to meet permit requirements for hydromodification³</p>	<p>Link provided for FHA HEC No. 14, Hydraulic Design of Energy Dissipaters for Culverts and Channels and Publication NO FHWA-HRT-05-072, Assessing Stream Channel Stability at Bridges in Physiographic Regions.</p>	<p> Tranportation Project Guidance_RE1</p>
<p>17. Transportation Guidance, page 6-17: At the conclusion of the LID feasibility assessment, please include an evaluation of the transportation project’s compliance with the design capture volume and hydromodification performance standards of the permit⁴. Where the DCV is not captured or treated using LID BMPs onsite or offsite, conventional treatment devices will be required. Please include a note to specify that waiver of infeasibility for LID or treatment BMP along with waiver justification documentation must be submitted to the Executive Officer for approval in writing within 30 days prior to Permittee approval</p>	<p>Revisions made based upon the agreed use of Orange County’s Technical Guidance document section for sizing BMPs for Category 3 and 4 projects. No waiver required; however, notification to the Regional Board is required for Category 4 projects that cannot meet the BMP sizing criteria.</p>	<p> App I Road Guidance Template_REV_92012</p>

³ Each Permittee shall ensure that appropriate BMPs to reduce erosion and mitigate Hydromodification are included in the design for replacement of existing culverts or construction of new culverts and/or bridge crossings to the MEP, http://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2010/10_033_RC_MS4_Permit_01_29_10.pdf, page 84 of 117, section XII.A.5

⁴ http://www.waterboards.ca.gov/santaana/board_decisions/adopted_orders/orders/2010/10_033_RC_MS4_Permit_01_29_10.pdf, Section XII.F.1