



**New Development Subcommittee
Proposed Agenda
December 7, 1:30 to 3:30 pm
Redwood Shores Library, Meeting Room A
399 Marine Parkway
Redwood City**

- I. Introductions, Announcements, Minutes & Agree on Agenda – Matt Fabry, All (5 min.)**
Objective: Meet attendees, review and approve previous meeting summary, make announcements, and agree on agenda.
- II. Confirm that Municipalities Will Print their Copies of C.3 Technical Guidance – Laura, All (5 min.)**
Objective: Confirm that the Subcommittee is comfortable with having municipalities print their copies of the C.3 Technical Guidance, version 2, instead of having the Program provide copies.
- III. Update on BASMAA Development Committee - Matt, Laura, Everyone (5 min)**
Objective: Hear how the Bay Area Stormwater Management Agencies Association's committee is proceeding on regional MRP tasks, including special projects for low impact development (LID) treatment reduction, soil specifications, LID feasibility/infeasibility, and green roof specifications.
- IV. Construction Site Compliance Training - Laura, All (5 min.)**
Objective: Consider options for providing construction site compliance training in 2011, including the possibility of meeting the MRP training requirements with Qualified SWPPP Practitioner (QSP) training pursuant to the Construction General Permit.
- V. Programs Related to Green Streets – Matt, All (10 min.)**
Objective: Hear about grant funding available through EPA's Water Quality Improvement Fund, as well as C/CAG's programs that may be available to assist local efforts in implementing green streets.
- VI. Brainstorm on Potential Green Streets Opportunities – Matt, All (15 min.)**
Objective: In view of potential funding availability, including funds from the countywide vehicle registration fee, discuss potential green street project ideas, such as a countywide green streets plan, or other suggestions.

- VII. Review Sections C.3 and C.6 of the Annual Report Form** – Laura, All (15 min.)
Objective: Share information about any difficulties in completing the C.3 (New and Redevelopment) and C.6 (Construction Site Control) sections of the Annual Report form and offer suggestions for improved guidance for 2010/11.
- VIII. Erosion Control Plan Review** – Laura, All (15 min.)
Objective: Share information about local erosion control plan review processes and identify any need for guidance in implementing the MRP Provision C.6.d requirements for review of erosion control plans before issuing grading permits.
- IX. Consider Need for Updating Flow Duration Control Review Worksheet for HM Submittals** – Laura, All (15 min.)
Objective: Provide input on whether this form is being used, to determine whether to update it for consistency with the MRP.
- X. Pumped Groundwater from Small Construction Sites** - Laura, All (5 min.)
Objective: The Santa Clara Valley Urban Runoff Pollution Prevention Program is preparing a flyer on BMPs for pumped groundwater for small (< 1 acre) construction sites and would like info on projects with constraints for discharging to land.
- XI. Update on Union City Audit and Notice of Violation** - Laura, (5 min.)
Objective: Hear about the Water Board staff's audit of Union City with regard to Provision C.3 and C.6 requirements, and issuance of an NOV to Union City regarding BMP implementation at a construction site viewed during the audit.
- XII. Municipal Case Studies: O&M Verification Inspection Plans** – All (10 min)
Objective: Hear how other municipalities are implementing the Provision C.3.h.ii(6) requirement to implement, by December 1, 2010, a prioritized plan for operation and maintenance verification inspections of treatment and HM measures.
- XIII. Next Meeting** – Matt, Everyone (5 min.)
Objective: Schedule next meeting for February 1, 2011.

New Development Subcommittee (NDS)

Meeting Date: October 5, 2010

Present: Duncan Jones, Atherton; Gilbert Yau and Dalia Corpus, Belmont; Matt Fabry, Brisbane; Kiley Kinnon, Burlingame; Muneer Ahmed, Colma and Half Moon Bay; Jeanne Naughton, Daly City; Laura Prickett, EOA; Catherine Chan, Hillsborough; Shaun Mao, Menlo Park; Anthony Riddell and Tanya Benedik, Millbrae; Paul Willis, Redwood City; Laura Russell, San Bruno; Gavin Moynahan, San Carlos; Martin Quan, City of San Mateo; Rob Lecel, S. San Francisco

Subcommittee Actions:

1. Approved summary of August Subcommittee meeting.
2. Approved the revised draft of C.3 Technical Guidance, Version 2.0
3. Approved the draft O&M Verification Inspections Plan Template, with revisions to be made by Matt Fabry and Laura Prickett to clarify the requirements for inspecting newly installed facilities.
4. Agreed to explore the possibility of using vehicle registration fees to develop a countywide plan to identify green streets and parking lots projects in specific areas selected by each municipality.

Requested Technical Advisory Committee Action or Feedback/Guidance (if any): None

Other Information/Announcements:

1. Reminder to attend the **O&M Verification Inspections briefing**, following this meeting, and a discussion regarding the municipalities' need to prepare a tracking table, spreadsheet or database, in order to meet Provision C.3.h.ii(5) requirements for tracking O&M verification inspections.
2. Discussion of BASMAA's efforts to begin preparing criteria to determine **feasibility/infeasibility of meeting LID requirements** with rainwater harvesting/use, infiltration or evapotranspiration. Input was requested on the proposed scope of work.
3. Discussion of BASMAA's efforts to propose criteria to identify transit-oriented development and smart growth "**special projects**" for which LID requirements will be reduced. Input was requested on revised draft criteria.
4. Discussion of Nevue Ngan's proposal to update the **Green Streets and Parking Lots Design Guidebook**. Any update is postponed until after LID feasibility/infeasibility criteria are developed; future updates will work toward integrating this guidebook and the C.3 Technical Guidance.
5. Reminder of Provision C.6.e.ii(2) requirement for **monthly wet season inspections** of (1) construction sites that disturb one acre or more, and (2) sites identified as "high priority sites."
6. Reviewed the requirements in the **Construction General Permit (CGP)** for training and credentials needed for "Qualified SWPPP Practitioners" (QSP) who implement SWPPPs on construction sites subject to the CGP, and "Qualified SWPPP Developers" (QSD) who prepare SWPPPs.
7. **BASMAA** Development Committee update:
 - a. Is sending RFP to short list to select consultant for green street project tracking
 - b. Preliminary draft green roof submittal is available for review by co-permittees.
 - c. Update of construction BMP plan sheet is scheduled for this winter.

Work That Affects Other Subcommittees: None

Next Steps:

- C.3 Technical Guidance, Version 2, will be posted on the Countywide Program's public website.
- Final O&M Verification Inspection Plan Template will be posted on the password protected site.
- Laura Prickett will coordinate with the Santa Clara Valley Urban Runoff Pollution Prevention Program regarding the possibility of offering QSP/QSD training on the Peninsula.

Next Meeting: December 7, from 1:30 to 3:30 PM

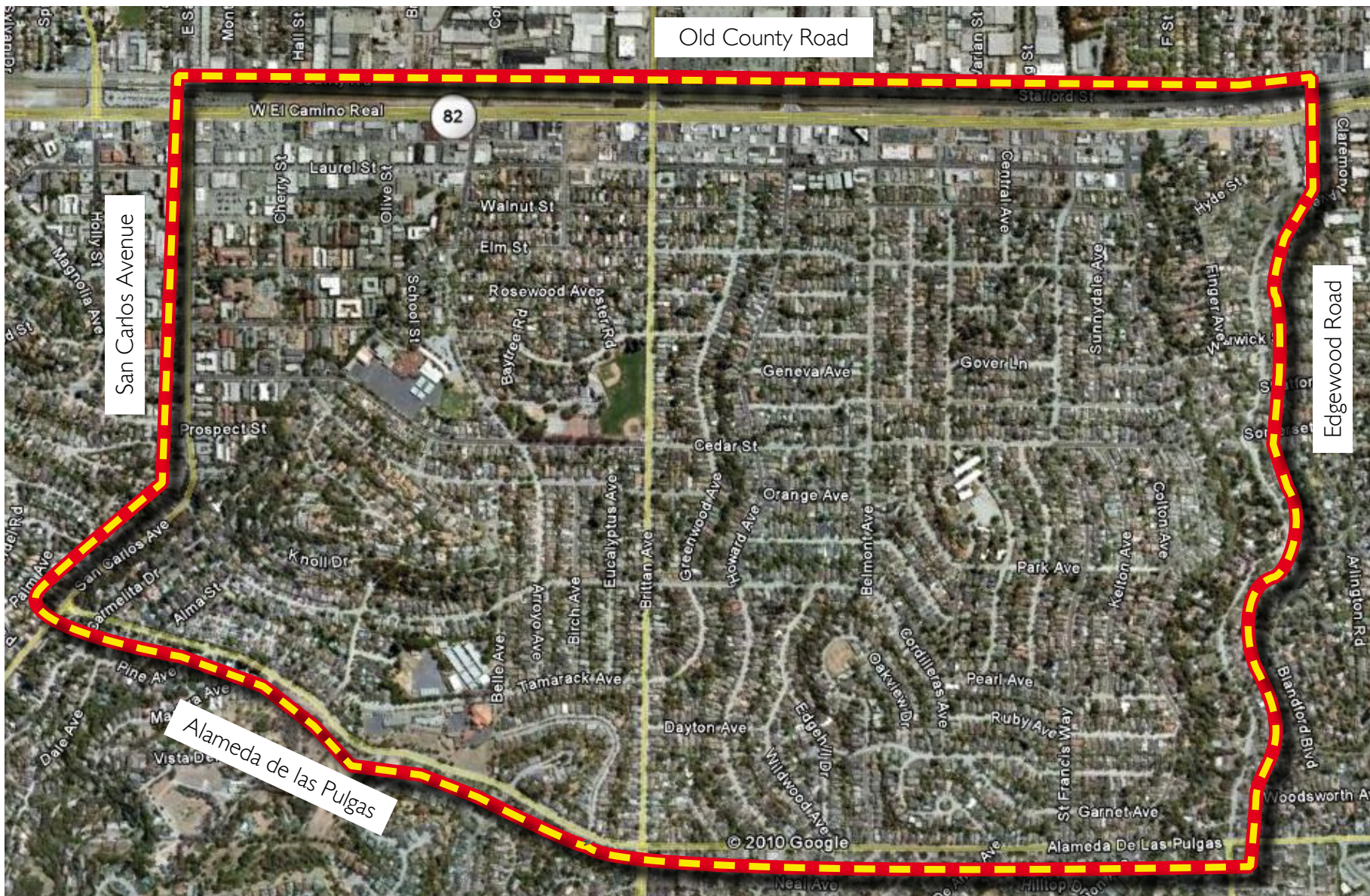
City of San Carlos and Redwood City

URBAN GREENING PLAN

PROPOSED WORK PLAN



SAN CARLOS/ REDWOOD CITY URBAN GREENING PLAN AREA BOUNDARY





URBAN GREENING PLAN COMPONENTS

Consultant Request for Technical Services

Deliverables: Not Applicable

- SMCWPPP will issue a Request for Proposals soliciting technical assistance to enhance existing staff capabilities for developing the plan. Key considerations will include expertise in green infrastructure, green streets, urban design, civil engineering, bicycle and pedestrian planning and design, landscape architecture, and public involvement.

Information Inventory/Needs Assessment

Deliverables: Summary of background information and findings.

- Initial assessment of existing green spaces within the plan area to evaluate opportunities for expansion/enhancement.
- Initial assessment of existing green spaces within the plan area to evaluate opportunities for expansion/enhancement.
- Opportunities and constraints analysis to retrofit new green space within existing “grey space.”
- Bicycle and pedestrian transportation system needs.
- Traffic studies and plans as applicable.
- Infrastructure conditions, drainage issues.
- Existing private and public projects that would affect the plan.
- Citizen, business, community stakeholders, school surveys to assess existing conditions.
- Existing plant palette information related to green infrastructure systems.
- County and municipal assessment of resources for funding catalyst projects and maintaining built projects.
- Gather public health and groundwater monitoring information.

Public Participation Process

Deliverables: Summary of public participation process and findings.

- In order to effectively involve the public, affected agencies/jurisdictions, and interested stakeholders in developing the plan, the Urban Greening Plan will incorporate a public participation process consisting of:

Example of Grant Proposal for Discussion Purposes

- Establishing a Technical Steering Committee (TSC) composed of interested agency and jurisdictional staff representatives.
- Establishing a Citizens Advisory Committee (CAC) with community and stakeholder overlay committees for identified “green focus areas.”
- Creating monthly e-notification process for updates on project status and opportunities for citizen participation.
- Providing (7) seven CAC/TSC committee meetings coordinated with key plan development steps and public open house events.
- Providing (4) four Public Open House Events at key planning stages (e.g., Project Introduction/Information Gathering, Preliminary Plan Alternatives, Draft Plan, and Draft Review Plan).

Development of Preliminary Urban Greening Plan Alternatives

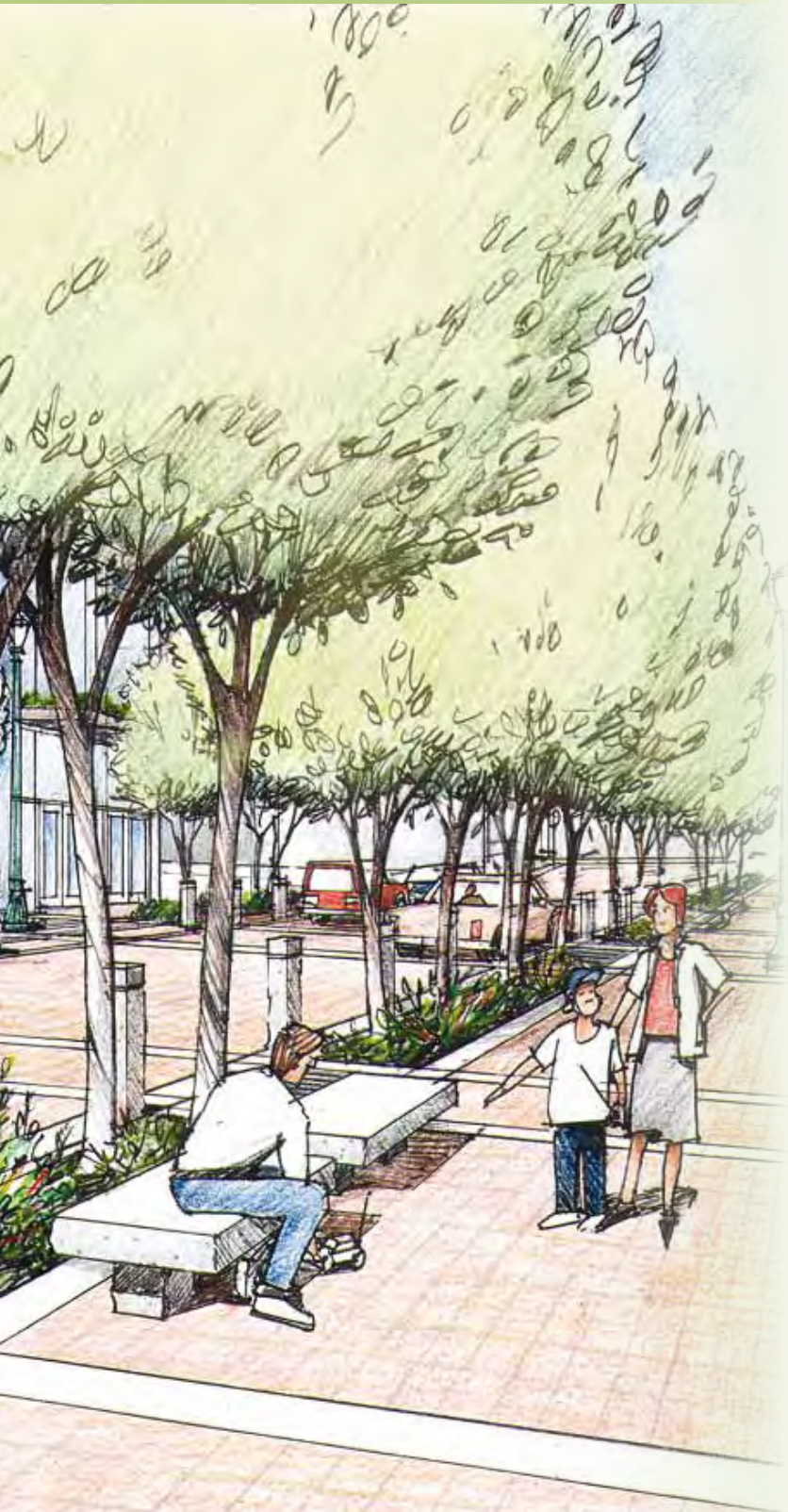
Deliverables: Preliminary plan alternatives, drawings, maps, and text.

- Refine preliminary work plan goals, objectives, and action steps based on input from technical steering committee and CAC
- Provide initial feedback and analysis from information gathering and needs assessment. Summarize background information and feedback so that it can be incorporated into the final plan.
- Provide a preliminary location of all green street and green space locations throughout the planning site.
- Prepare concept planning and design strategies for “green focus areas.”
- Identify bike boulevards and recommend suggestions for enhancing existing bikeway infrastructure.
- Provide a preliminary “toolbox” of green street design options.
- Provide a preliminary plant palette and irrigation methodology for all proposed and enhanced green spaces, building off of SMCWPPP’s existing plant palette for stormwater treatment measures.
- Provide a preliminary street tree plan for entire planning site.
- Assemble drainage catchment areas to determine stormwater facility sizing and design parameters.

Development of Draft Urban Greening Plan

Deliverables: Draft Plan including drawings, maps, photos, and text.

- Refine all green street/green space locations throughout the planning site. Size all stormwater facilities to meet goals of the Urban Greening Plan.
- Refine planning and design of “green focus areas” and begin linking these areas via the green street network of bike boulevards/pedestrian routes.
- Refine the “toolbox” of green street design options, plant palette, and street tree locations.
- Refine preliminary plant palette.
- Identify preliminary location, funding, partners, and maintenance needs for initial catalyst demonstration projects.
- Provide preliminary strategies for implementing the Urban Greening Plan at the 2-year, 5-year, 10-year, and 20-year build-out scenarios.
- Provide draft analysis that the Urban Greening Plan is consistent with State and local planning priorities.



Example of Grant Proposal for Discussion Purposes

Complete Draft Urban Greening Plan for Review

Deliverables: Draft Review Plan including drawings, maps, photos, and text.

- Complete all green street/green space locations throughout the planning site. Size all stormwater facilities to meet goals of the plan.
- Complete planning and design of “green focus areas” and begin linking these areas via the green street network of bike/pedestrian routes.
- Complete the “toolbox” of green street design options, plant palette, and street tree locations.
- Determine final location, funding, partners, and maintenance needs for initial catalyst demonstration projects.
- Provide final strategies for implementing the Urban Greening Plan at the 2-year, 5-year, 10-year, and 20-year build-out scenarios.
- Document that the Urban Greening Plan is consistent with State and local planning priorities.

Jurisdictional Review of Draft and Final Plans

Deliverables: Summary of review comments.

- City of San Carlos Transportation and Circulation Commission
- San Carlos School District Board
- City of San Carlos City Council
- Redwood City City Council
- County Health System
- C/CAG Stormwater NPDES TAC, Congestion Management and Environmental Quality Committee, and C/CAG Board
- SamTrans and CalTrans
- Joint Powers Board
- Strategic Growth Council/Natural Resources Agency

Completion of Final Urban Greening Plan

Deliverables: Published Final Urban Greening Plan

- Submittal to Strategic Growth Council
- Presentation for acceptance/approval by City Councils for San Carlos and Redwood City
- Presentation to C/CAG Board Members for consideration as a countywide urban greening template.

URBAN GREENING PLAN COMPONENTS

The Urban Greening Plan will be a written document supplemented with a significant number of illustrative drawings, maps, photos, and documentation of the community involvement process and background information. The plan will be a visually-engaging document with a mixture of both planning and design elements that provides a simple and clear path towards implementation. The Urban Greening Plan would detail the project within three different scales: Community-wide scale, Block-by-Block Scale, and the Site-Specific Scale.

Community-Wide Scale

The community-wide scale shows area-wide maps of the entire project boundary with all elements catalogued within a legend. At this scale, the plan would show the entire network of green streets and green spaces, street trees, urban hydrology, bicycle/pedestrian/bus/rail routes and nodes, and public school greening sites. Within the community-wide scale, metrics would be presented (e.g., number of trees planted, number of stormwater facilities, drainage area removed, number of bike lanes, crosswalks, public health measures, etc.)

Block-by-Block Scale

The community-wide scale would be divided into sub-areas to provide a greater level of planning detail for residential streets, retail areas, arterial corridors, open space, transit hubs, and school sites.

Site-Specific Scale

This scale moves beyond the planning realm and into site design elements for green streets and “green focus areas.” For green streets, a specific toolbox of design strategies would be illustrated to help supplement sub-areas at the Block-by Block Scale (e.g., designs for vegetated curb extensions in residential or commercial areas). Overall plant lists, irrigation strategies, and bike and pedestrian enhancements would be developed. For school sites, detailed concept plans showing all new green spaces would be developed at this scale.



Large-Scale Planning



Site Design



Flow Duration Control Review Worksheet for HM Submittals

(To be completed by agency staff reviewing HM submittals for projects that include flow duration controls. Projects that must comply with the HM site design requirement¹, without flow duration controls, do NOT use this form. Terms in bold text are defined in the glossary section of the HM Applicability Worksheet Guidance and Glossary.)

1. Project Location or Address: _____, CA
2. Project Name (if applicable): _____
3. Design Engineer: _____ 3a. Phone No.: _____ 3a. Email: _____
4. Parcel/Tract No.: _____ 4a. Lot No.: _____ 4b. APN # _____

Required Project Information

5. Check the "Included" box if the submittal includes the following documents, or check "NA" if NOT applicable. All applicable documents must be included.	Included	NA
5a. Site plans with pre- and post-project impervious areas, surface flow directions of entire site, locations of flow duration controls and site design measures per HM site design requirement ² .	<input type="checkbox"/>	<input type="checkbox"/>
5b. Soils report or other site-specific document showing soil types at all parts of site.	<input type="checkbox"/>	<input type="checkbox"/>
5c. If project uses the Bay Area Hydrology Model (BAHM), a list of model inputs.	<input type="checkbox"/>	<input type="checkbox"/>
5d. If project uses custom modeling, a summary of the modeling calculations with corresponding graph showing curve matching (existing, post-project, and post-project with HM controls curves), goodness of fit, and (allowable) low flow rate.	<input type="checkbox"/>	<input type="checkbox"/>
5e. If project uses the Impracticability Provision, a listing of all applicable costs and a brief description of the alternative HM project (name, location, date of start up, entity responsible for maintenance).	<input type="checkbox"/>	<input type="checkbox"/>
5f. If the project uses alternatives to the default BAHM approach or settings, a written description and rationale (see also Question 7 below).	<input type="checkbox"/>	<input type="checkbox"/>

Hydromodification Management (HM) Site Design Requirement²

6. Do plans include appropriate site design measures that minimize and/or slow rate of runoff from site?	
<input type="checkbox"/> Yes. <i>Continue to Question 7.</i>	
<input type="checkbox"/> No. Incorporate appropriate site design measures prior to approval, or explain why this is impracticable:	

Bay Area Hydrology Model (BAHM)

7. Is the Bay Area Hydrology Model used to demonstrate compliance with the HM standard?	
<input type="checkbox"/> Yes. <i>Continue to Question 8.</i>	
<input type="checkbox"/> No. <i>Describe the method used to comply with the HM standard and attach an evaluation of the method and results, indicating whether the HM standard has been met. Skip to Question 29.</i>	
Alternative method(s):	<input type="checkbox"/> Modified design criteria in BAHM <input type="checkbox"/> Alternate modeling software <input type="checkbox"/> In-stream measures <input type="checkbox"/> Full channel stability assessment <input type="checkbox"/> Other: _____
8. Soil types used for BAHM are based on:	<input type="checkbox"/> Project geotechnical report by _____ <input type="checkbox"/> NRCS soils map <input type="checkbox"/> Other/unknown (describe): _____

Checklist for BAHM Project Review (All boxes must be checked Yes for approval.)

	Yes	No
9. Were required project files (WDM, WHM, WD2) received?	<input type="checkbox"/>	<input type="checkbox"/>
10. Was the BAHM report (DOC) file received?	<input type="checkbox"/>	<input type="checkbox"/>
11. Do the project files load to reviewer's computer properly?	<input type="checkbox"/>	<input type="checkbox"/>

¹ The HM site design requirement is to implement site design measures that maximize infiltration (where appropriate), provide retention or detention, slow runoff, and minimize impervious surfaces (also called hydrologic source controls). Each agency should have a procedure to confirm that appropriate site design measures are included in projects that do not require flow duration control.

Checklist for BAHM Project Review (All boxes must be checked Yes for approval.)	Yes	No
12. Does the project location in submittal match location on the BAHM screen?	<input type="checkbox"/>	<input type="checkbox"/>
13. Does the Pre-Project scenario run properly?	<input type="checkbox"/>	<input type="checkbox"/>
14. Does the Post-project Mitigated scenario run properly?	<input type="checkbox"/>	<input type="checkbox"/>
15. Compare BAHM Report screen with report file:		
15a. Project location descriptions match.	<input type="checkbox"/>	<input type="checkbox"/>
15b. Precipitation gages and precipitation factors match.	<input type="checkbox"/>	<input type="checkbox"/>
15c. Flow frequency results match.	<input type="checkbox"/>	<input type="checkbox"/>
15d. All flow duration values PASS. (Flow values are non-zero.)	<input type="checkbox"/>	<input type="checkbox"/>
15e. Any pervious area (PERLND) changes?	<input type="checkbox"/>	<input type="checkbox"/>
15f. Any impervious area (IMPLND) changes?	<input type="checkbox"/>	<input type="checkbox"/>
15g. Any scaling factor changes?	<input type="checkbox"/>	<input type="checkbox"/>
15h. Any duration criteria changes?	<input type="checkbox"/>	<input type="checkbox"/>
15i. Pond (or vault or tank) dimensions match.	<input type="checkbox"/>	<input type="checkbox"/>
15j. Pond Discharge Structure information matches.	<input type="checkbox"/>	<input type="checkbox"/>
16. Do the BAHM pond/vault/tank dimensions match drawings?	<input type="checkbox"/>	<input type="checkbox"/>
17. Compare Discharge Structure(s) in BAHM report to drawings:		
17a. Do configuration and dimensions match, including low-flow orifice?	<input type="checkbox"/>	<input type="checkbox"/>
17b. If low-flow orifice is enlarged on plans, is the difference mitigated via design features consistent with Appendix D of the User Manual?	<input type="checkbox"/>	<input type="checkbox"/>
18. Is the pond surface area included in the Post-project Mitigated basin?	<input type="checkbox"/>	<input type="checkbox"/>
19. Are the Precipitation Applied and Evaporation Applied options used appropriately for each type of element?	<input type="checkbox"/>	<input type="checkbox"/>
20. Infiltration: a. Is this turned ON for each infiltration pond or LID element?	<input type="checkbox"/>	<input type="checkbox"/>
b. Is selection of Infiltration Reduction Factors consistent with Appendix D?	<input type="checkbox"/>	<input type="checkbox"/>
21. Does total BAHM drainage area match drainage maps/drawings?	<input type="checkbox"/>	<input type="checkbox"/>
22. Does Post-project Mitigated drainage area(s) match Pre-project?	<input type="checkbox"/>	<input type="checkbox"/>
23. Is Pre-project vegetation correct? (e.g. lawns shown as Urban, not Grass)	<input type="checkbox"/>	<input type="checkbox"/>
24. Are Post-project Unmitigated land use areas correct?	<input type="checkbox"/>	<input type="checkbox"/>
25. Do low impact development (LID) options correspond to the site design measures to minimize/reduce runoff rate, or other stormwater management measures shown on plans?	<input type="checkbox"/>	<input type="checkbox"/>
26. Are the routing and connectivity of drainage areas and LID or stormwater management measures consistent with plans?	<input type="checkbox"/>	<input type="checkbox"/>
27. Does the pond usually drain in 5 days or less, according to the Drawdown Table?	<input type="checkbox"/>	<input type="checkbox"/>
28. If claiming treatment credit on a volume basis for the pond, are documentation or calculations provided and consistent with volumes shown in Drawdown Table?	<input type="checkbox"/>	<input type="checkbox"/>

HM Submittal Approval	Yes	No	N/A
29. Is documentation provided for any required review or approval by other agencies (e.g. Flood Control District, local groundwater managers)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
30. Do other issues need correction before project is approved? Describe: _____ _____	<input type="checkbox"/>	<input type="checkbox"/>	
31. Is the HM submittal APPROVED? NOTE: Operation & maintenance agreement required prior to occupancy.	<input type="checkbox"/>	<input type="checkbox"/>	

- ambient stream turbidity for a flowing stream with turbidities greater than 50 NTU, or 5 NTU above ambient turbidity for flowing streams with turbidities less than or equal to 50 NTU.
- (iv) pH of the discharged groundwater shall be maintained within the range of 6.5 to 8.5.
- (c) **Reporting** – The Permittees shall maintain records of these discharges, BMPs implemented, and any monitoring data collected.
- (2) **Pumped⁵² Groundwater, Foundation Drains, and Water from Crawl Space Pumps and Footing Drains**
- (a) Proposed new discharges of uncontaminated groundwater at flows of 10,000 gallons/day or more and all new discharges of potentially contaminated groundwater shall be reported to the Water Board so that they can be subject to NPDES permitting requirements.
- (b) Proposed new discharges of uncontaminated groundwater at flows of less than 10,000 gallons/day shall be encouraged to discharge to a landscaped area or bioretention unit that is large enough to accommodate the volume.
- (c) If the discharge options in C.15.b.i.(2)(b) above are not feasible and these discharges must enter a storm drain, sampling shall be done to verify that the discharge is uncontaminated.
- (i) The discharge shall meet water quality standards consistent with the existing effluent limitations in the Water Board's NPDES General Permits, such as NPDES Nos. CAG912002 and CAG912003 for Discharge or Reuse of Extracted and Treated Groundwater Resulting from the Cleanup of Groundwater Polluted by fuel and VOCs, respectively, and NPDES No. CAG912004 for discharges of low-level, incidental, and potentially contaminated groundwater.
- (ii) The Permittees shall require that water samples from these discharge types be analyzed using approved USEPA Methods (e.g., (a) USEPA Method 160.2 for total suspended solids; (b) USEPA Method 8015 Modified for total petroleum hydrocarbons; (c) USEPA Method 8260B and 8270C or equivalent for volatile and semi-volatile organic compounds; and (d) USEPA Method 3005 for metals.
- (d) **Required BMPs** – When the discharge has been verified as uncontaminated per sampling completed in C.15.b.i.(2)(c) above, the Permittees shall require the following during discharge:
- (i) Proper control and maintain to prevent erosion at the discharge point and at a rate that avoids scouring of banks and excess sedimentation in the receiving waterbody.
- (ii) Appropriate BMPs to render pumped groundwater free of pollutants and therefore exempted from prohibition may include

⁵² Pumped groundwater not exempted in C.15.a or conditionally exempted in C.15.b.i.(1).

the following: filtration, settling, coagulant application with no residual coagulant discharge, minor odor or color removal with activated carbon, small scale peroxide addition, or other minor treatment.

- (iii) Testing of water samples for turbidity and pH on the first two consecutive days of dewatering.
- (iv) Turbidity of discharged groundwater shall be maintained below 50 NTU for discharges to dry creeks, 110 percent of the ambient stream turbidity for a flowing stream with turbidities greater than 50 NTU, or 5 NTU above ambient turbidity for a flowing stream with turbidities less than or equal to 50 NTU.
- (v) pH of discharged water shall be maintained within the range of 6.5 to 8.5.
- (e) If a Permittee determines that a discharger or a project proponent is unable to comply with the above criteria, the discharger shall be directed to obtain approval or permits directly from the Water Board.
- (f) **Reporting** – The Permittees shall maintain records of these discharges, BMPs implemented, and any monitoring data collected.

ii. Discharge Type – Air Conditioning Condensate

Required BMPs – Condensate from air conditioning units shall be directed to landscaped areas or the ground. Discharge to a storm drain system may be allowed if discharge to landscaped areas or the ground is not feasible.

iii. Discharge Types – Planned,⁵³ Unplanned,⁵⁴ and Emergency Discharges of the Potable Water System

(1) **Planned Discharges** – Planned discharges are routine operation and maintenance activities in the potable water distribution system that can be scheduled in advance, such as disinfecting water mains, testing fire hydrants, storage tank maintenance, cleaning and lining pipe sections, routine distribution system flushing, reservoir dewatering, and water main dewatering activities. The following requirements only apply to those Permittees that are water purveyors and pertain to their planned discharges of potable water to their storm drain systems.

- (a) **Required BMPs**⁵⁵ – The Permittees shall implement appropriate BMPs for dechlorination, and erosion and sediment controls for all planned potable water discharges.

⁵³ Planned discharges typically result from required routine operation and maintenance activities that can be scheduled in advance. Planned discharges are easier to control than unplanned discharges, and the BMPs are significantly easier to plan and implement.

⁵⁴ Unplanned discharges are non-routine, the result of accidents or incidents that cannot be scheduled or planned for in advance.

⁵⁵ Reference for BMPs, monitoring methods: *Guidelines for the Development of Your BMP Manual for Drinking Water System Releases*. Developed by the California-Nevada Sections of the American Water Works Association (CA-NV AWWA), Environmental Compliance Committee (ECC) 2005.