



# **C.3 Regulated Projects: Basic Training on MRP Provision C.3**

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San Mateo Countywide Pollution  
Prevention Program**

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# Outline of Presentation

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- Water quality impacts of urbanization
- Regulatory background
- Current stormwater control measure requirements
- Low Impact Development (LID) approach
- LID and non-LID control measure types and applications
- Green infrastructure requirements

# Water Quality Impacts of Urbanization



- Uses of San Francisco Bay and many local creeks are impaired by numerous pollutants
- Stormwater runoff is the largest pollutant conveyance
- Stormwater discharge regulations require pollutant and flow controls



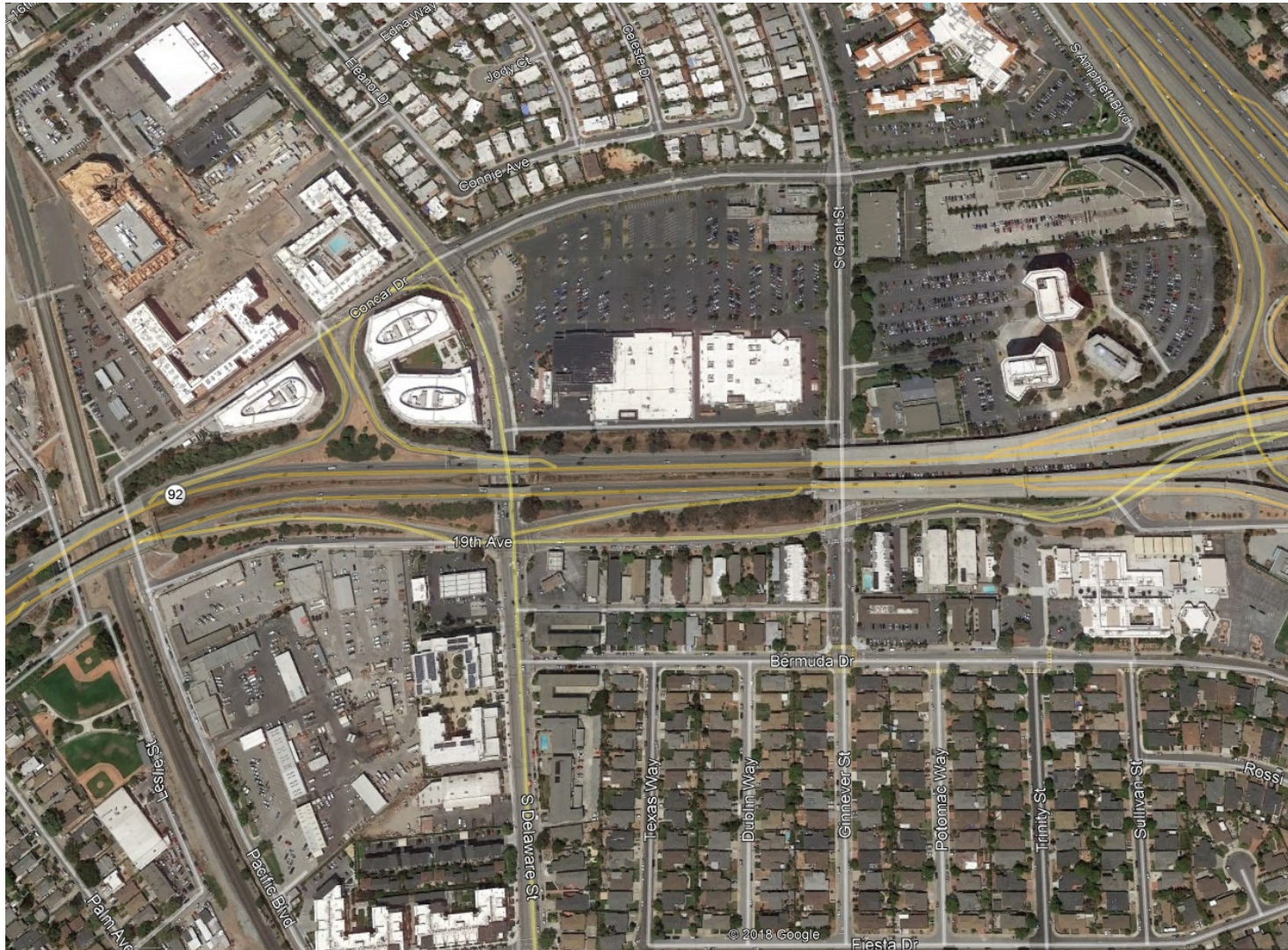
# What happens during land development?

- Natural land forms changed
- Soil moved and compacted
- Vegetation removed
- Impervious surface created
- Natural drainage patterns are changed
- Land uses generate pollutants





# The Biggest Culprit: Impervious Surface





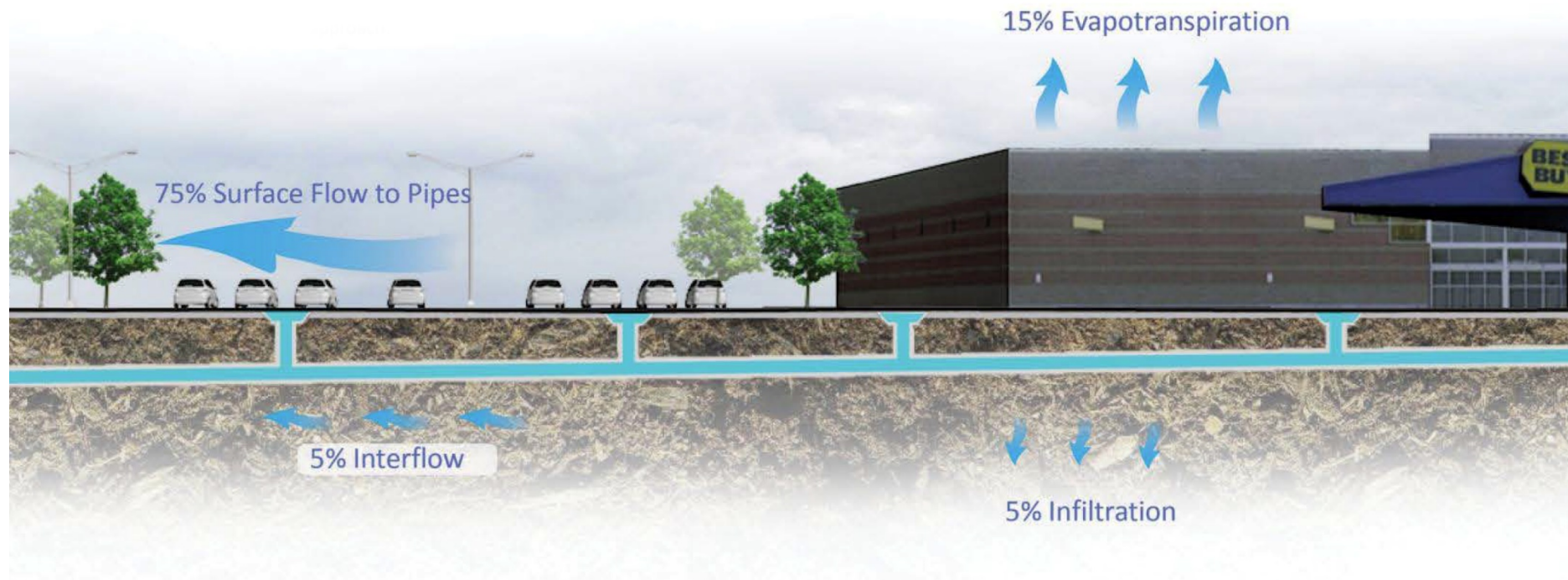
# How does urban development affect the hydrologic cycle?

- Pre-Urban Development



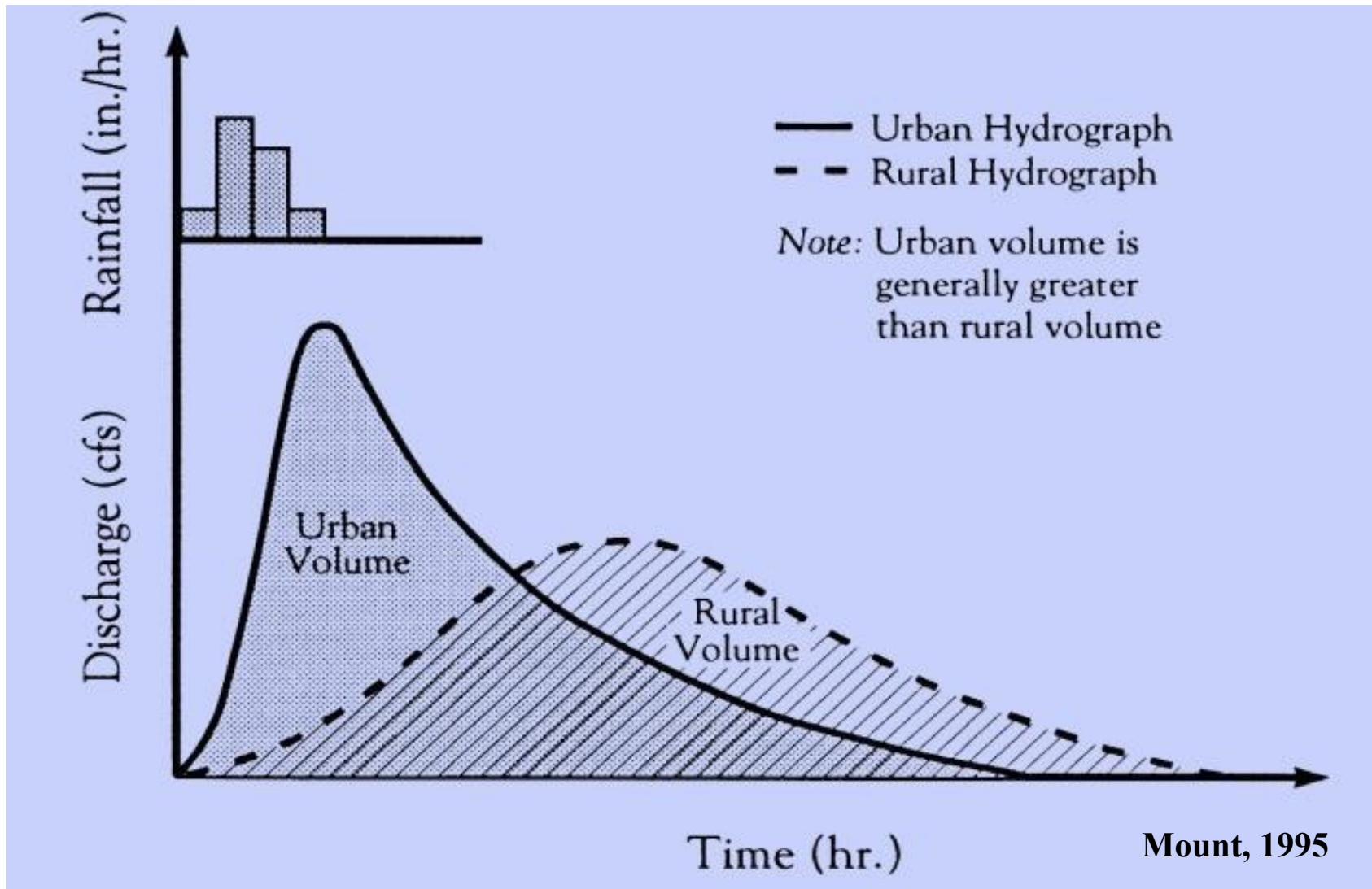
# How does urban development affect the hydrologic cycle?

- Urban Development





# Urbanization Increases Volume and Peak Flows



# How do increases in flow affect creeks?

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Yerba Buena Creek – upstream reach





Channel incision on lower  
Yerba Buena Creek  
(tributary to Lower Silver  
Creek and Coyote Creek)





Lower Silver Creek  
(Erosion undermining outfall protection  
structure on left bank)



Concrete Lining with Floodwall in  
Lower Matadero Creek

# Regulatory Background: Municipal Stormwater Permits

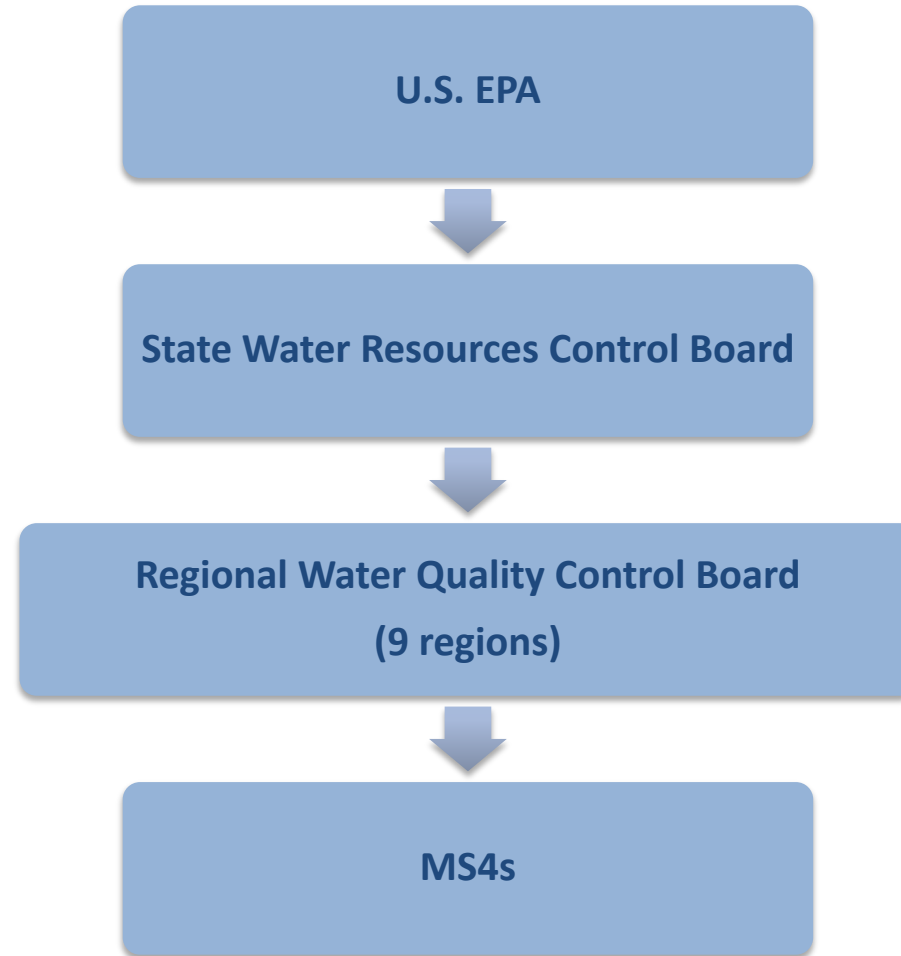
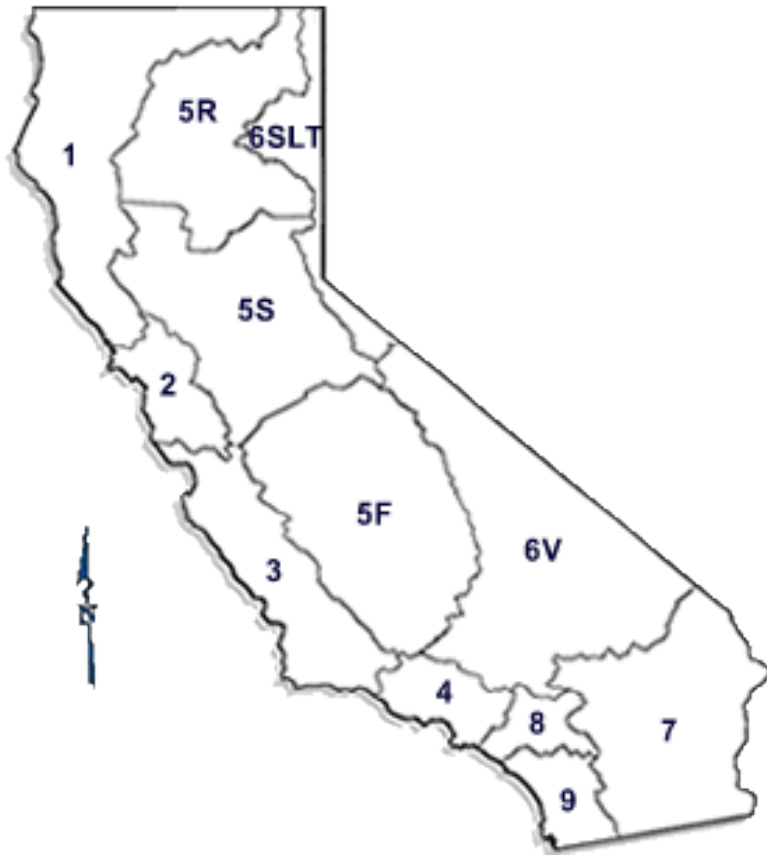
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- Since 1987 the federal Clean Water Act has required municipalities to obtain permits to discharge stormwater from municipal storm drain systems
- These are National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permits
- Phase I permits were for large “municipal separate storm sewer systems” in urban areas (MS4s)
- Phase II permits are for small MS4s and non-traditional permittees that discharge to MS4s





# NPDES Permitting Authority



MS4 = Municipal separate storm sewer system

# Regulatory Framework for NPDES Permits in CA

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- State Water Resources Control Board
  - Construction General Permit
  - Industrial General Permit
  - Municipal Phase II General Permit (Small MS4s)
  - Caltrans Statewide Permit
- Regional Water Quality Control Boards
  - Municipal Phase I Stormwater Permits
  - Wastewater Treatment Plant Permits
  - Individual Industrial Permits
  - Permit Enforcement within Region

# Bay Area Municipal Regional Permit (MRP)

- One regional permit for urbanized areas (total of 79 permittees):
  - San Mateo, Santa Clara, Alameda, and Contra Costa Counties, Fairfield-Suisun, and Vallejo
- Current MRP effective 1/1/16 - 12/31/20
  - Administratively extended to 6/30/22
- Key requirements:
  - Low Impact Development; Green Infrastructure
  - Monitoring and control measures for pollutants of concern: trash, mercury, PCBs, pesticides, copper, bacteria





# MRP Provisions

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- Municipal Operations
- New Development and Redevelopment (“C.3”)
- Industrial/Commercial Site Controls
- Illicit Discharge Controls
- Construction Site Controls
- Public Education/Outreach
- Water Quality Monitoring
- Pollutant of Concern Controls
  - Pesticides
  - Trash
  - Mercury
  - PCBs
  - Copper
- Exempted/Conditionally Exempted Non-Stormwater Discharges

# Stormwater Control Measures: Construction-phase vs. Post-construction



Construction best management practice (BMP) is temporary (construction-phase only)



Post-construction stormwater control measure is permanent (for the life of the project)

# Current Provision C.3 Requirements

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- **Regulated Projects**

- Public and private projects that create and/or replace  $\geq 10,000$  sq.ft. of impervious surface
- 5,000 sq.ft. threshold for certain land uses (parking lots, gas stations/automotive, restaurants)

- **Non-regulated Projects**

- Retrofit projects done on a “voluntary” basis; e.g., “green infrastructure” (GI) projects on public property and in public rights-of-way





# Other C.3 Regulated Projects

- Road and trail projects that create and/or replace 10,000 sq. ft. of contiguous impervious surface
  - New roads, and sidewalks and bikeways built as part of new roads
  - Widening of existing roads with traffic lane(s)
  - Trails >10 feet wide or < 50 feet from creek bank



# The following are NOT Regulated Projects (do not require treatment):

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- Detached single family home;
- Roadway reconstruction within same footprint;
- Road widening that does not add a travel lane;
- Sidewalks and bike facilities along existing roads;
- Impervious trails >10' wide and >50' from creek;
- Sidewalks, bike lanes and trails that drain to vegetated areas or made of pervious paving;
- Interior remodels;
- Routine maintenance and repair;
- Pavement resurfacing within existing footprint.

# Small Project and Single-Family Home Requirements

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- Single family homes (>2,500 sq. ft. of impervious area) and small projects (between 2,500 and 10,000 sq. ft. of impervious area) must implement at least one of six site design measures:
  - Direct roof runoff into cisterns or rain barrels
  - Direct roof runoff onto vegetated areas
  - Direct sidewalk and patio runoff onto vegetated areas
  - Direct driveway and parking lot runoff onto vegetated areas
  - Construct sidewalks and patios with pervious surfaces
  - Construct bike lanes, driveways, and parking lots with pervious surfaces



# Regulated Project Requirements

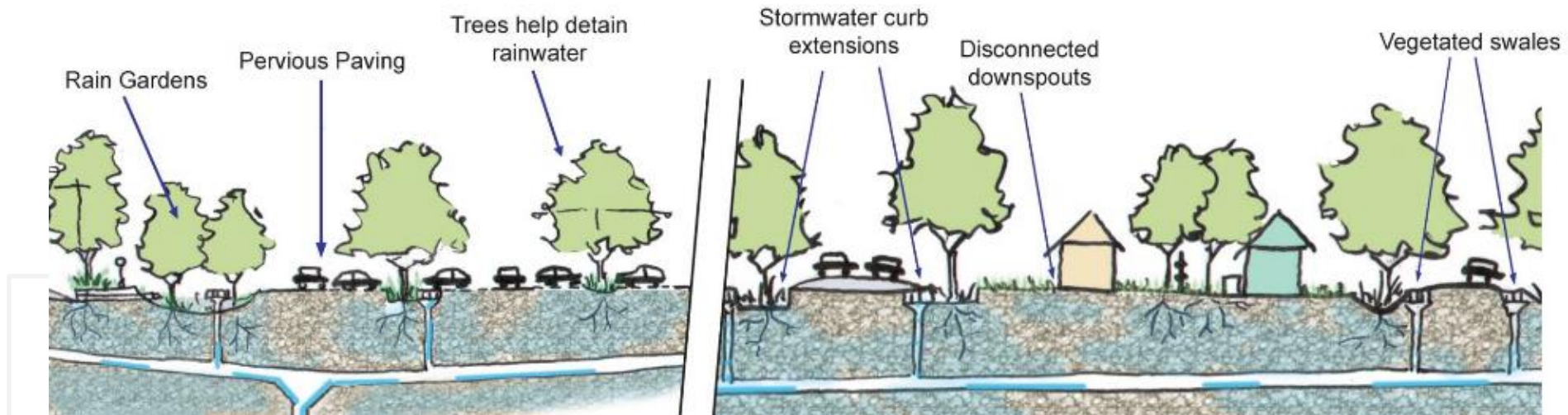
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- Must include permanent stormwater controls that are maintained for the life of the project
- Types of stormwater controls required:
  - Source control measures
  - Site design measures
  - Stormwater treatment
  - Hydromodification management
- Focus on Low Impact Development approach



# Low Impact Development (LID)

- Approach to reduce runoff and mimic a site's predevelopment hydrology:
  - Minimize disturbed areas and impervious surfaces
  - Retain and treat stormwater runoff using infiltration, evapotranspiration, rainwater harvesting/use or biotreatment



# Source Control Measures



- **Structural Source Controls** are permanent design features that reduce pollutant sources
  - Covered trash enclosures
  - Storm drain labeling
  - Drought-tolerant native plants (reduced pesticide & water needs)
- **Operational Source Controls** are practices to be conducted on an ongoing basis after construction is completed
  - Street sweeping
  - Catch basin cleaning
  - Reduced pesticide use



# Site Design Measures

- Permanent design features that:

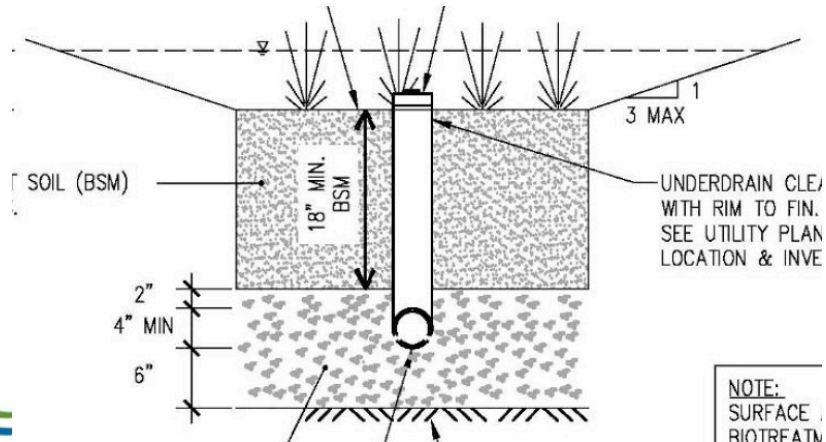
- Reduce impervious surfaces
- “Disconnect” impervious surfaces
- Preserve/protect natural features

- Examples include:

- Runoff directed to landscaping
- Pervious pavement



# Treatment Measures



- Engineered systems that remove pollutants from stormwater
- Sized to treat stormwater runoff from **frequent, small storm events**
- Provision C.3.d of the MRP specifies numeric sizing criteria for water quality design based on flow and/or volume
- Maintenance assurance required for life of project



# How Much Runoff Must Be Treated?



- Must treat 100% of project area but not 100% of runoff
- Focus on frequent, small storm events
- Water quality design criteria:
  - 80% of average annual runoff (for volume-based treatment measures)
  - Flow of runoff from a rain event of 0.2 inches per hour intensity (for flow-based treatment measures)

# LID Treatment Requirements

- LID treatment methods required since 12/1/11
- LID treatment defined as:
  - Biotreatment
  - Infiltration
  - Evapotranspiration
  - Rainwater harvesting/use
- Non-LID treatment only allowed in certain cases



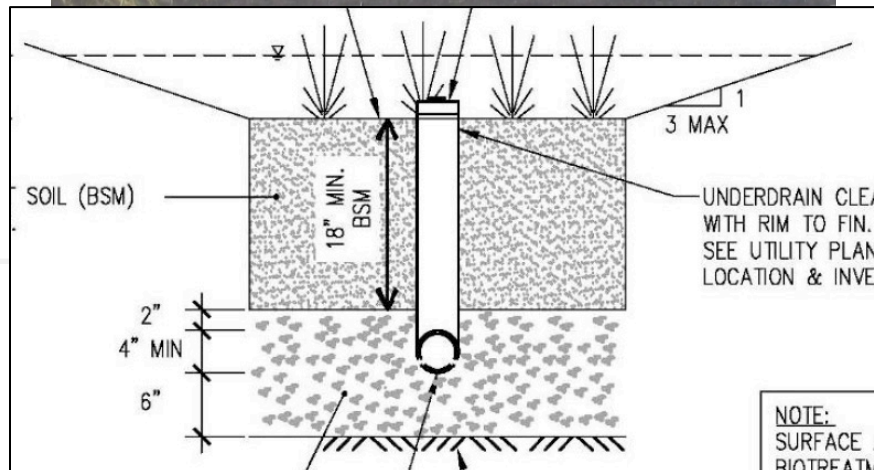
# Biotreatment Measures

- Most common treatment measure type
  - Bioretention areas/rain gardens
  - Linear bioretention areas (aka stormwater planters or “bioswales”)
  - Flow-through planters





# Bioretention Area/Rain Garden



- Concave landscaped area of any shape, with sloped sides
- Engineered biotreatment soil media with specified long-term infiltration rate (minimum of 5 in/hr)
- Underdrain required if clayey underlying soils
- Raise underdrain to maximize infiltration, if conditions allow



# Bioretention Areas

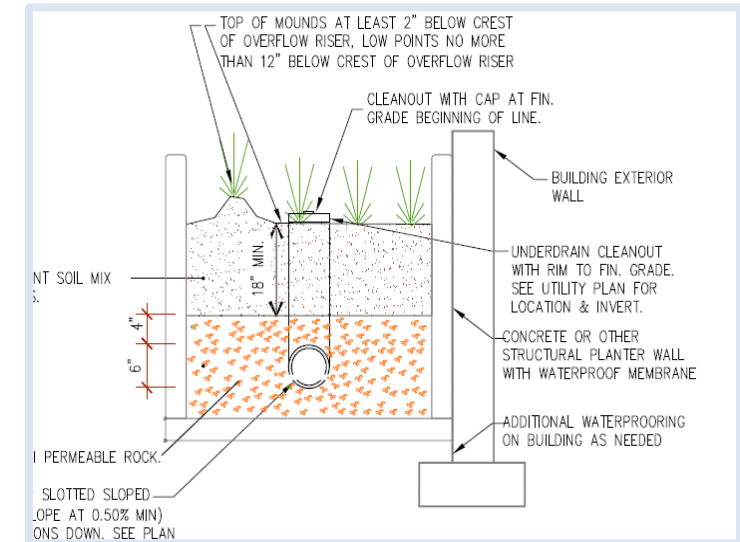




# Flow-through Planter

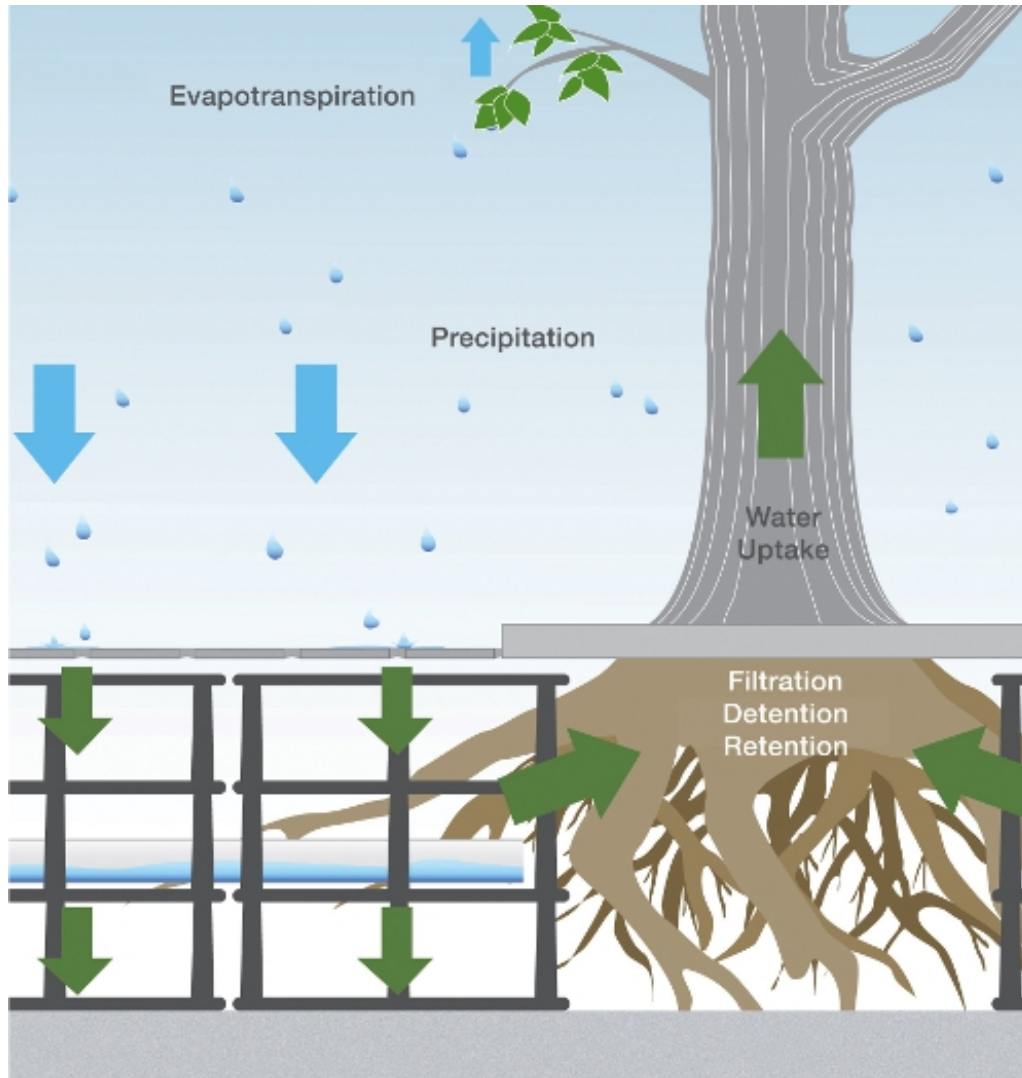


- Lined planter box with vertical sides
- No infiltration to underlying soils
- Stormwater filters through specified biotreatment soil mix and released through underdrain
- OK to place next to building or on podium if waterproofed





# Biotreatment in Tree Trench



# Rainwater Harvesting and Use

- Captured stormwater used for non-potable uses, such as toilet flushing and irrigation



Cisterns installed underground



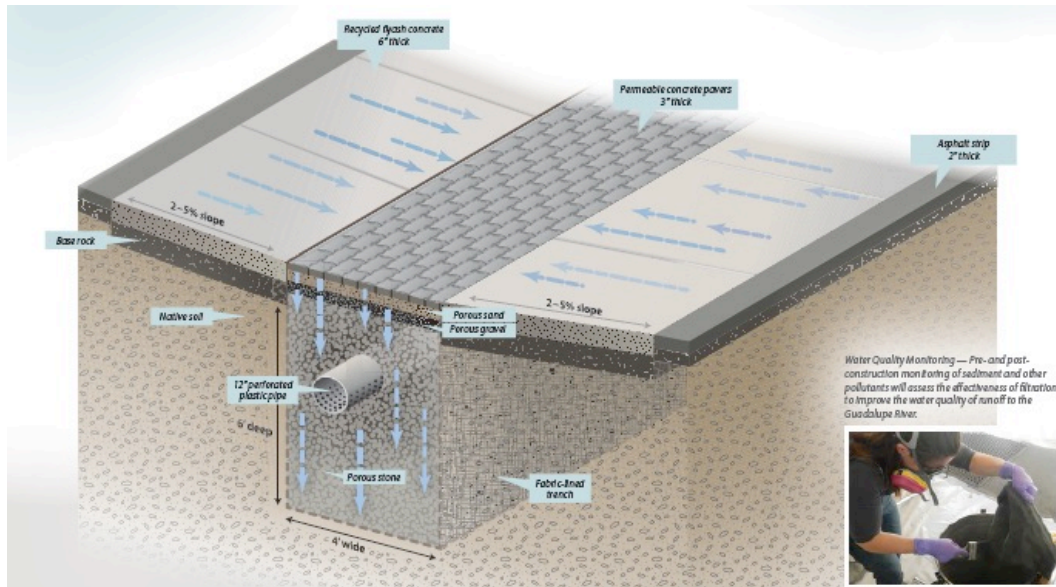
# Rainwater Harvesting and Use





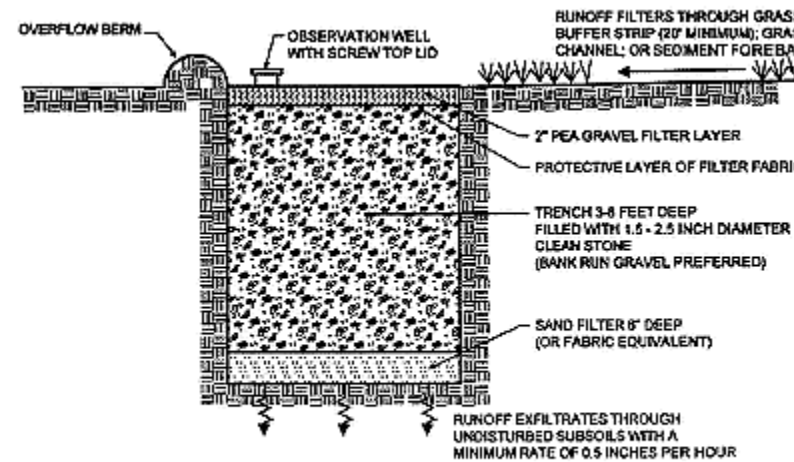
# Infiltration Trench

- Store water in void space of drain rock, allowing it to infiltrate to native soils
- Requires well-draining soils ( $>0.5$  in/hr)



Martha Gardens Green  
Alleys Project,  
City of San Jose

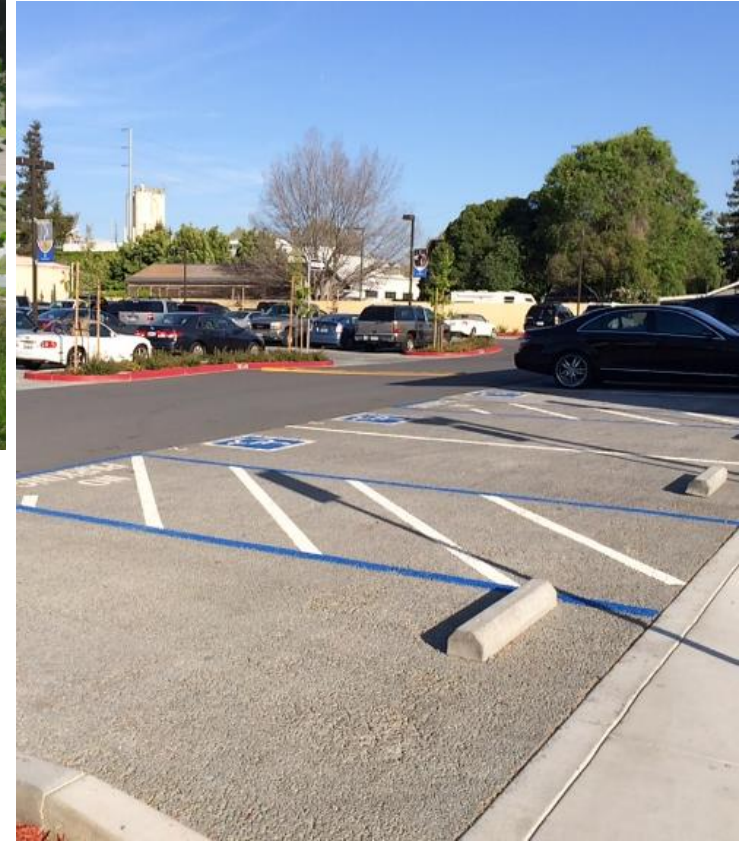
# Infiltration Trenches



A schematic of an infiltration trench (Source: MDE, 2000)



# Pervious Pavement





# Green Roofs

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- Green roofs are considered site design measures that remove runoff largely through plant evapotranspiration processes
- Planting media needs to be sufficiently deep to:
  - Provide capacity within the pore space of the media for the water quality design volume (typically < 3")
  - Support the long-term health of the vegetation selected for the green roof, as specified by a landscape architect or other professional





# Green Roofs





# “Special Projects”

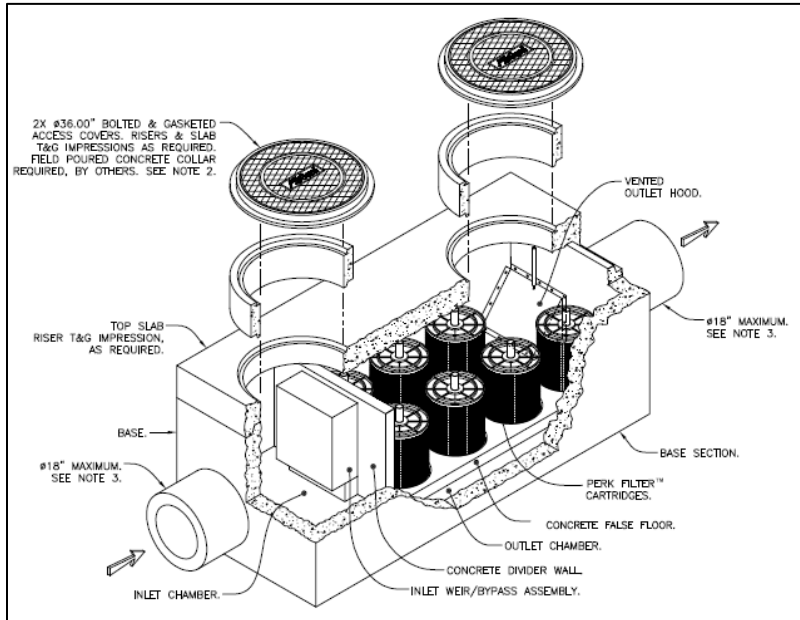
- Special Projects are high density and transit-oriented development projects that may receive LID treatment reduction credit, i.e., allowed limited use of “non-LID” treatment measures
- Amount of credit is based on size of project, lot coverage, location, density, and amount of surface parking
- Non-LID measures are limited to tree box filters and media filters





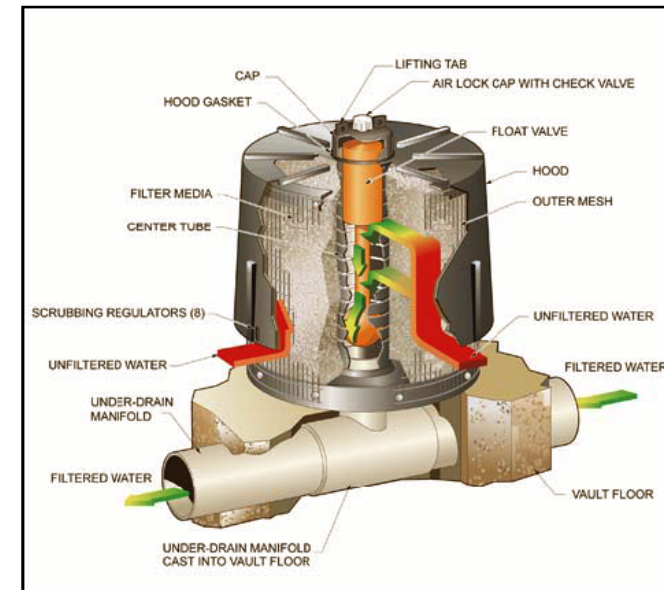
# Non-LID: Media Filters

## (Limited use ONLY in “Special Projects”)



- Media cartridges installed in manholes or in vaults
- Vaults designed to allow settling of large particles before water enters the filter

- Fine particles are filtered by filter media (see example cartridge at right)



# Non-LID Tree Well Filters

(Limited use ONLY in “Special Projects”)

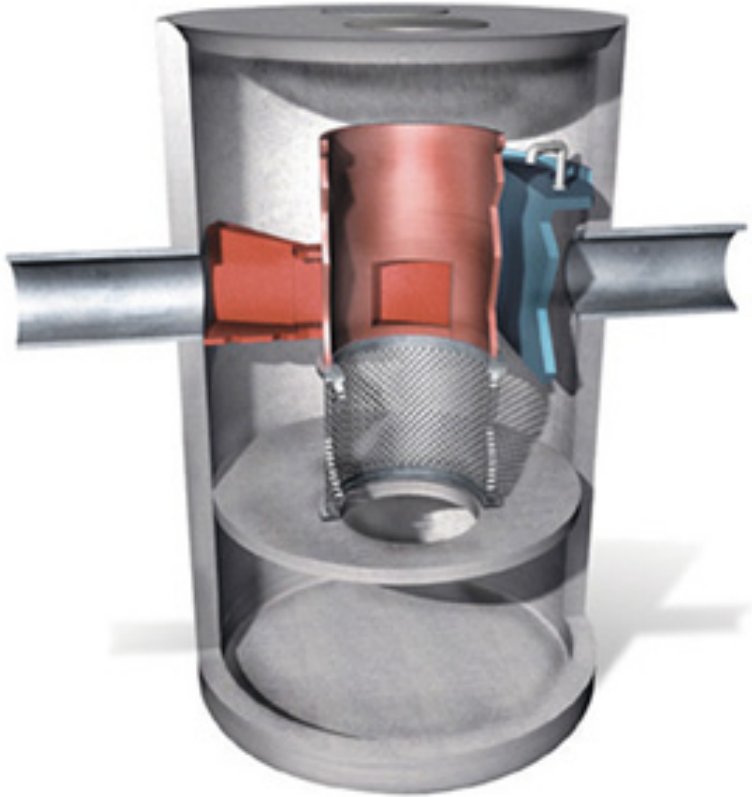


- Manufactured tree well filter with proprietary planting media
- Planting media has extremely high infiltration rate (50-100 in/hr)
- Unit now available with biotreatment soil to meet LID requirements (but treats smaller area).

# Non-LID: Hydrodynamic Separators

(NOT a stand-alone treatment measure)

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- Vault system
- Settling or separation unit to remove sediments
- Effective for trash and large particles
- Not designed to remove finer particles



# Non-LID: Vegetated Swale

(NOT a stand-alone treatment measure)



- Linear, shallow, vegetated channel
- Filters stormwater as it flows through dense vegetation on the surface
- Relatively short detention time prior to discharge into storm drain inlet
- Not as effective as a linear bioretention system

# Non-LID: Detention Basin

(NOT a stand-alone treatment measure)



- Basin with specially designed outlet to detain stormwater for at least 48 hours
- Used to be allowed to treat stormwater by settling out solids/sediments
- OK if used for storage upstream of LID measure or hydromodification control



# Hydromodification Management

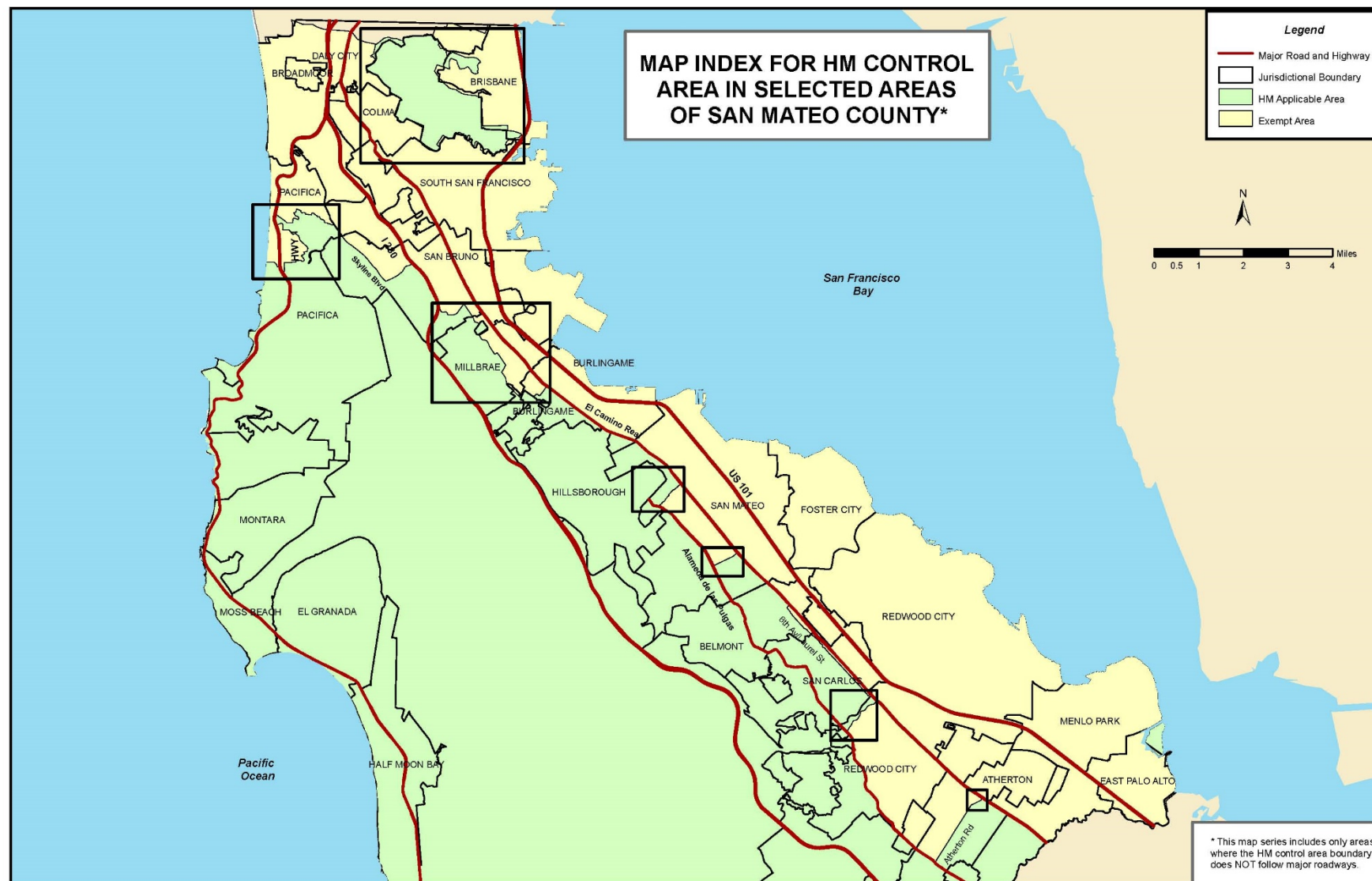
- Purpose: Reduce erosive flows in creeks
- Goal: Match post-project runoff rates, volumes and durations to pre-project condition for a range of storms.
- Required for projects that:
  - Create/replace 1 acre of more of impervious area
  - Increase impervious area over pre-project condition, AND
  - Drain to creeks susceptible to erosion





# HM Applicability Map for San Mateo County

**Applicable areas  
(with creeks  
susceptible to  
erosion) are  
shown in green**



# Hydromodification Management Control Measures

- Hydrologic source controls

- Site design measures to reduce imperviousness
- LID treatment measures



- Flow duration controls

- Pond, detention basin, tank or vault
- Specialized outlet to control rate and duration of flow



# What is Green Infrastructure?

## (or Green Stormwater Infrastructure)

- Systems that use vegetation, soils, and natural processes to manage stormwater, integrated into urban streetscapes, parking lots and other urban areas



Photo courtesy of C/CAG

# Green Infrastructure (GI)

- Over the long term, municipalities are required to retrofit existing public streets, roofs, and parking lots to divert runoff to:
  - Vegetated areas
  - Pervious pavements
  - Biotreatment and infiltration facilities
- These measures supplement current requirements for LID on regulated projects





# Green Infrastructure Benefits

- GI projects can achieve multiple benefits:
  - Flow reduction
  - Pollutant reduction
  - Urban greening
  - Traffic calming
  - Improved bike and pedestrian safety
  - Climate benefits
  - Flood resiliency
- Promoting benefits helps get public support





# Overview of GI Requirements (MRP 2.0)

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- Develop a GI Plan (completed by September 2019)
  - Prioritize and map planned and potential projects
  - Update related municipal plans
  - Evaluate funding options
  - Track progress
- Conduct education and outreach
- Conduct “early implementation”
  - Construct planned and funded projects
  - Review public project lists and assess opportunity for incorporating GI elements

# For More Information:

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- **SMCWPPP C.3 Regulated Projects Guide**  
<https://www.flowstobay.org/preventing-stormwater-pollution/with-new-redevelopment/c-3-regulated-projects/>
- **SMCWPPP GI Design Guide**  
<https://www.flowstobay.org/data-resources/resources/green-infrastructure-design-guide/>
- **Municipal Regional Stormwater Permit**  
[http://www.waterboards.ca.gov/sanfranciscobay/water\\_issues/programs/stormwater/Municipal/R2-2015-0049.pdf](http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/Municipal/R2-2015-0049.pdf)



# Questions?

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