INVESTIGATION OF THE FEASIBILITY AND BENEFITS OF LOW-IMPACT SITE DESIGN PRACTICES ("LID") FOR VENTURA COUNTY

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ABSTRACT

The Clean Water Act NPDES permit that regulates municipal separate storm sewer systems (MS4s) in Ventura County, California will be reissued in 2007. The draft permit includes provisions for requiring the use of low impact development practices (LID) for certain kinds of development and redevelopment projects. Using six representative development project case studies, the author investigated the practicability and relative benefits of the permit's LID requirements. The results showed that (1) LID site design and source control techniques are more effective than conventional best management practices (BMPs) in reducing runoff rates; (2) Effective Impervious Area (EIA) can practicably be capped at three percent, a standard more protective than that proposed in the draft permit; and (3) in five out of six case studies, LID methods would reduce site runoff volume and pollutant loading to zero in typical rainfall scenarios.

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INTRODUCTION

The Assessment in Relation to Municipal Permit Conditions

This purpose of this study is to investigate the relative water quality and water reuse benefits of three levels of storm water treatment best management practices (BMPs): (1) basic "treat-and-release" BMPs (e.g., drain inlet filters, CDS units), (2) commonly used BMPs that expose runoff to soils and vegetation (extended-detention basins and biofiltration swales and filter strips), and (3) low-impact development (LID) practices. The factors considered in the investigation are runoff volume, pollutant loading, and the availability of water for infiltration or other reuse. In order to assess the differential impact of storm water reduction approaches on these factors, this study examines six case studies typical of development covered by the Ventura County Municipal Separate Storm Sewer System Permit.

Low-impact development methods reduce storm runoff and its contaminants by decreasing their generation at sources, infiltrating into the soil or evaporating storm flows before they can enter surface receiving waters, and treating flow remaining on the surface through contact with vegetation and soil, or a combination of these strategies. Soil-based LID practices often use soil enhancements such as compost, and thus improve upon the performance of more traditional basins and biofilters. For the study's purposes, verification of the practicability and utility of LID practices was based on a modified version of the Planning and Land Development Program (Part 4, section E) in the Draft Ventura County Municipal Separate Storm Sewer System Permit ("Draft Permit"). The Draft Permit requires that Effective Impervious Area (EIA) of certain types of new development and redevelopment projects be limited to five percent of

total development project area. EIA is defined as hardened surface hydrologically connected via sheet flow or a discrete hardened conveyance to a drainage system or receiving water body. (Draft Permit p. 50) The study modified this requirement to three percent, as a way to test both the feasibility of meeting the higher, five percent standard in the draft permit and because as the lower, three percent EIA is essential to protect the Ventura County aquatic environment (see Attachment A).

The Draft Permit further requires minimizing the overall percentage of impervious surfaces in new development and redevelopment projects to support storm water infiltration. The Draft Permit also directs an integrated approach to minimizing and mitigating storm water pollution, using a suite of strategies including source control, LID, and treatment control BMPs. (Draft Permit p. 50) It is noted in this section of the document that impervious surfaces can be rendered "ineffective" if runoff is dispersed through properly designed vegetated swales. In testing the practicability of the draft permit's requirements and a three percent EIA standard, this study broadened this approach to encompass not only vegetated swales (channels for conveyance at some depth and velocity) but also vegetated filter strips (surfaces for conveyance in thin sheet flow) and bioretention areas (shallow basins with a range of vegetation types in which runoff infiltrates through soil either to groundwater or a subdrain for eventual surface discharge). The Draft Permit's stipulation of "properly designed" facilities was interpreted to entail, among other requirements, either determination that existing site soils can support runoff reduction through infiltration or that soils will be amended using accepted LID techniques to attain this objective. Finally, the study further broadened implementation options to include water harvesting (collection and storage for use in, for example, irrigation or gray water systems), roof downspout infiltration trenches, and porous pavements.

The Draft permit was interpreted to require management of EIA, other impervious area (what might be termed Not-Connected Impervious Area, NCIA), and pervious areas as follows:

- Runoff from EIA is subject to treatment control and the Draft Permit's Hydromodification Mitigation Control requirements before discharge.

- NCIA must be drained onto a properly designed vegetated surface or its runoff managed by one of the other options discussed in the preceding paragraph. To the extent NCIA runoff is not eliminated prior to discharge from the site in one of these ways, it is subject to treatment control and the Draft Permit's Hydromodification Mitigation Control requirements before discharge.

- Runoff from pervious areas is subject to treatment control and the Draft Permit's Hydromodification Mitigation Control requirements before discharge. This provision applies to pervious areas that both do and do not receive drainage from NCIA.

Where treatment control BMPs are required to manage runoff from the site, the Draft Permit's Volumetric or Hydrodynamic (Flow Based) Treatment Control design bases were assumed to apply. The former basis applies to storage-type BMPs, like ponds, and requires capturing and treating either the runoff volume from the 85th percentile 24-hour rainfall event for the location, the volume of annual runoff to achieve 80 percent or more volume treatment, or the volume of runoff produced from a 0.75 inch storm event. The calculations in this analysis used the 0.75-inch quantity. The Hydrodynamic basis applies to flow-through BMPs, like swales, and requires treating the runoff flow rate produced from a rain event equal to at least 0.2 inches per hour intensity (or one of two other approximately equivalent options).

Scope of the Assessment

With respect to each of the six development case studies, three assessments were undertaken: a baseline scenario incorporating no storm water management controls; a second scenario employing conventional BMPs; and a third development scenario employing LID storm water management strategies.

To establish a baseline for each case study, annual storm water runoff volumes were estimated, as well as concentrations and mass loadings of four pollutants: (1) total suspended solids (TSS), (2) total recoverable copper (TCu), (3) total recoverable zinc (TZn), and (4) total phosphorus (TP). These baseline estimates were based on the anticipated land use and cover with no storm water management efforts.

Two sets of calculations were then conducted using the parameters defined for the six case studies.

The first group of calculations estimated the extent to which basic BMPs reduce runoff volumes and pollutant concentrations and loadings, and what impact, if any, such BMPs have on recharge rates or water retention on-site.

The second group of calculations estimated the extent to which commonly used soil-based BMPs and LID site design strategies ameliorate runoff volumes and pollutant concentrations and loadings, and the effect such techniques have on recharge rates. When evaluating LID strategies, it was presumed that EIA would be limited to three percent and runoff from EIA, NCIA, and pervious areas would be managed as indicated above. The assessment of basins, biofiltration, and low-impact design practices analyzed the expected infiltration capacity of the case study sites. It also considered related LID techniques and practices, such as source reduction strategies, that could work in concert with infiltration to serve the goals of: (1) preventing increase in annual runoff volume from the pre- to the post-developed state, (2) preventing increase in annual pollutant mass loadings between the two development states, and (3) avoiding exceedances of California Toxics Rule (CTR) acute saltwater criteria for copper and zinc.

The results of this analysis show that:

- Developments implementing no post-construction BMPs result in storm water runoff volume and pollutant loading that are substantially increased, and recharge rates that are substantially decreased, compared to pre-development conditions.

- Developments implementing basic post-construction treatment BMPs achieve reduced pollutant loading compared to developments with no BMPs, but storm water runoff volume and recharge rates are similar to developments with no BMPs.

- Developments implementing traditional basins and biofilters, and even more so low-impact post-construction BMPs, achieve significant reduction of pollutant loading and runoff volume as well as greatly enhanced recharge rates compared to both developments with no BMPs and developments with basic treatment BMPs.

- Typical development categories, ranging from single family residential to large commercial, can feasibly implement low-impact post-construction BMPs designed in compliance with the draft permit's requirements, as modified to include a lower, three percent EIA requirement.

This report covers the methods employed in the investigation, data sources, and references for both. It then presents the results, discusses their consequences, draws conclusions, and makes recommendations relative to the feasibility of utilizing low-impact development practices in Ventura County developments.

CASE STUDIES

Six case studies were selected to represent a range of urban development types considered to be representative of coastal Southern California, including Ventura County. These case studies involved: a multi-family residential complex (MFR), a relatively small-scale (23 homes) single-family residential development (Sm-SFR), a restaurant (REST), an office building (OFF), a relatively large (1000 homes) single-family residential development (Lg-SFR) and a sizeable commercial retail installation (COMM).[1]

Parking spaces were estimated to be 176 sq ft in area, which corresponds to 8 ft width by 22 ft length dimensions. Code requirements vary by jurisdiction, with the tendency now to drop below the traditional 200 sq ft average. About 180 sq ft is common, but various standards for full- and compact-car spaces, and for the mix of the two, can raise or lower the average.[2] The 176 sq ft size is considered to be a reasonable value for conventional practice.

Roadways and walkways assume a wide variety of patterns. Exclusive of the two SFR cases, simple, square parking lots with roadways around the four sides and square buildings with walkways also around the four sides were assumed. Roadways and walkways were taken to be 20 ft and 6 ft wide, respectively.

Single-family residences were assumed each to have a driveway 20 ft wide and 30 ft long. It was further assumed that each would have a sidewalk along the front of the lot, which was calculated to be 5749 sq ft in area. Assuming a square lot, the front dimension would be 76 ft. A 40-ft walkway was included within the property. Sidewalks and walkways were taken to be 4 ft wide.

Exclusive of the COMM case, the total area for all of these impervious features was subtracted from the total site area to estimate the pervious area, which was assumed to have conventional landscaping cover (grass, small herbaceous decorative plants, bushes, and a few trees). For the COMM scenario, the hypothetical total impervious cover was enlarged by 10 percent to represent the landscaping, on the belief that a typical retail commercial establishment would typically be mostly impervious.

Table 1 (page 5) summarizes the characteristics of the six case studies. The table also provides the recorded or estimated areas in each land use and cover type.

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[1] Building permit records from the City of San Marcos in San Diego County provided data on total site areas for the first four case studies, including numbers of buildings, building footprint areas (including porch and garage for Sm-SFR), and numbers of parking spaces associated with the development projects. While the building permit records made no reference to features such as roadways, walkways, and landscaping normally associated with development projects, these features were taken into account in the case studies using assumptions described herein. Larger developments were not represented in the sampling of building permits from the San Marcos database. To take larger development projects into account in the subsequent analysis, the two larger scale case studies were hypothesized. The Lg-SFR scenario scaled up all land use estimates from the Sm-SFR case in the ratio of 1000:23. The hypothetical COMM scenario consisted of a building with a 2-acre footprint and 500 parking spaces. As with the smaller-scale cases, these hypothetical developments were assumed to have roadways, walkways, and landscaping, as described herein.

[2] J. Gibbons, *Parking Lots*, NONPOINT EDUCATION FOR MUNICIPAL OFFICERS, Technical Paper No. 5 (1999) (http://nemo.uconn.edu/tools/publications/tech_papers/tech_paper_5.pdf).

Table 1. Case Study Characteristics and Land Use and Land Cover Areas

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
No. buildings	11	23	1	1	1000	1
Total area (ft^2)	476,982	132,227	33,669	92,612	5,749,000	226,529
Roof area (ft^2)	184,338	34,949	3,220	7,500	1,519,522	87,120
No. parking spaces	438	-	33	37	-	500
Parking area (ft^2)	77,088	-	5808	6512	-	88,000
Access road area (ft^2)	22,212	-	6097	6456	-	23,732
Walkway area (ft^2)	33,960	10,656	1362	2078	463,289	7,084
Driveway area (ft^2)	-	13,800	-	-	600,000	-
Landscape area (ft^2)	159,384	72,822	17,182	70,066	3,166,190	20,594

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential;
REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial

METHODS OF ANALYSIS

Annual Storm Water Runoff Volumes

Annual surface runoff volumes produced were estimated for both pre- and post-development conditions for each case study site. Runoff volume was computed as the product of annual precipitation, contributing drainage area, and a runoff coefficient (ratio of runoff produced to rainfall received). For impervious areas the following equation was used:

$$C = (0.009)\, I + 0.05$$

where I is the impervious percentage. This equation was derived by Schueler (1987) from Nationwide Urban Runoff Program data (U.S. Environmental Protection Agency 1983). With I = 100 percent for fully impervious surfaces, C is 0.95.

The basis for pervious area runoff coefficients was the Natural Resource Conservation Service's (NRCS) Urban Hydrology for Small Watersheds (NRCS 1986, as revised from the original 1975 edition). This model estimates storm event runoff as a function of precipitation and a variable representing land cover and soil, termed the curve number (CN). Larger events are forecast to produce a greater amount of runoff in relation to amount of rainfall because they more fully saturate the soil. Therefore, use of the model to estimate annual runoff requires selecting some event or group of events to represent the year. A 0.75-inch rainfall event was used in the analysis here for the relative comparison between pre- and post-development and applied to deriving a runoff coefficient for annual estimates, recognizing that smaller storms would produce less and larger storms more runoff.

To select CN for the pre-development case, an analysis performed in the area of the Cedar Fire in San Diego County was used in which CN was determined before and after the 2003 fire.[3] In the San Diego analysis, CN = 83 was estimated for the pre-existing land cover, which was generally chaparral, a vegetative cover also typical of Ventura County. As indicated below, soils are also similar in Ventura and San Diego Counties, making the parameter selection reasonable for use in both locations. For post-development landscaping, CN = 86 was selected based on tabulated data in NRCS (1986) and professional judgment.

Pre- and post-development runoff quantities were computed with these CN values and the 0.75-inch rainfall, and then divided by the rainfall to obtain runoff coefficients. The results were 0.07

[3] American Forests, *San Diego Urban Ecosystem Analysis After the Cedar Fire* (Feb. 3, 2006) (http://www.ufei.org/files/pubs/SanDiegoUrbanEcosystemAnalysis-PostCedarFire.pdf).

and 0.12, respectively. Finally, total annual runoff volumes were estimated based on an average annual precipitation in the City of Ventura of 14.71 inches.[4]

Storm Water Runoff Pollutant Discharges

Annual pollutant mass discharges were estimated as the product of annual runoff volumes produced by the various land use and cover types and pollutant concentrations typical of those areas. Again, the 0.75-inch precipitation event was used as a basis for volumes. Storm water pollutant data have typically been measured and reported for general land use types (e.g., single-family residential, commercial). However, an investigation of low-impact development practices of the type this study sought to conduct demands data on specific land coverages. The literature offers few data on this basis. Those available and used herein were assembled by a consultant to the City of Seattle for a project in which the author participated. They appear in Attachment B (Herrera Environmental Consultants, Inc. undated).

Pollutant concentrations expected to occur typically in the mixed runoff from the several land use and cover types making up a development were estimated by mass balance; i.e., the concentrations from the different areas of the sites were combined in proportion to their contribution to the total runoff.

The Effect of Conventional Treatment BMPs on Runoff Volume, Pollutant Discharges, and Recharge Rates

The first question in analyzing how BMPs reduce runoff volumes and pollutant discharges was, What BMPs are being employed in Ventura County developments under the permit now in force? This permit is open-ended and provides regulated entities with a large number of choices and few fixed requirements. These options presumably include manufactured BMPs, such as drain inlet inserts (DIIs) and continuous deflective separation (CDS) units. Developments may also select such non-proprietary devices as extended-detention basins (EDBs) and biofiltration swales and filter strips. EDBs hold water for two to three days for solids settlement before releasing whatever does not infiltrate or evaporate. Biofiltration treats runoff through various processes mediated by vegetation and soil. In a swale, runoff flows at some depth in a channel, whereas a filter strip is a broad surface over which water sheet flows. Each of these BMP types was applied to each case study, although it is not clear that these BMPs, in actuality, have been implemented consistently within Ventura County to date.

The principal basis for the analysis of BMP performance was the California Department of Transportation's (CalTrans, 2004) BMP Retrofit Pilot Program, performed in San Diego and Los Angeles Counties. One important result of the program was that BMPs with a natural surface infiltrate and evaporate (probably, mostly infiltrate) a substantial amount of runoff, even if conditions do not appear to be favorable for an infiltration basin. On average, the EDBs, swales, and filter strips lost 40, 50 and 30 percent, respectively, of the entering flow before the discharge point. DIIs and CDS units do not contact runoff with a natural surface, and therefore do not reduce runoff volume.

The CalTrans program further determined that BMP effluent concentrations were usually a function of the influent concentrations, and equations were developed for the functional

[4] Ventura County Watershed Protection District (http://www.vcwatershed.org/fws/specialmedia.htm). The City of Ventura is considered to be representative of most of the developed and developing areas in Ventura County. However, there is some variation around the county, with the maximum precipitation registered at Ojai (annual average 21.32 inches). Ojai is about 15 miles inland and lies at elevation 745 ft at the foot of the Topatopa Mountains, the orographic effect of which influences its meteorology. Ojai's higher rainfall was taken into account in the calculations, and the report notes the few instances where it affected the conclusions.

relationships in these cases. BMPs generally reduced influent concentrations proportionately more when they were high. In relatively few situations influent concentrations were constant at an "irreducible minimum" level regardless of inflow concentrations.

In analyzing the effects of BMPs on the case study runoff, the first step was to reduce the runoff volumes estimated with no BMPs by the fractions observed to be lost in the pilot study. The next task was estimating the effluent concentrations from the relationships in the CalTrans report. The final step was calculating discharge pollutant loadings as the product of the reduced volumes and predicted effluent concentrations. As before, typical pollutant concentrations in the mixed runoff were established by mass balance.

Estimating Infiltration Capacity of the Case Study Sites

Infiltrating sufficient runoff to maintain pre-development hydrologic characteristics and prevent pollutant transport is the most effective way to protect surface receiving waters. Successfully applying infiltration requires soils and hydrogeological conditions that will pass water sufficiently rapidly to avoid overly-lengthy ponding, while not allowing percolating water to reach ground-water before the soil column captures pollutants.

The study assumed that infiltration would occur in surface facilities and not in below-ground trenches. The use of trenches is certainly possible, and was judged to be an approved BMP by CalTrans after the pilot study. However, the intent of this investigation was to determine the ability of pervious areas to manage the site runoff. This was accomplished by determining the infiltration capability of the pervious areas in their original condition for each development case study, and further assessing the pervious areas' infiltration capabilities if soils were modified according to low impact development practices.

The chief basis for this aspect of the work was an assessment of infiltration capacity and benefits for Los Angeles' San Fernando Valley (Chralowicz et al. 2001). The Chralowicz study posited providing 0.1-0.5 acre for infiltration basins to serve each 5 acres of contributing drainage area. At 2-3 ft deep, it was estimated that such basins could infiltrate 0.90-1.87 acre-ft/year of runoff in San Fernando Valley conditions. Soils there are generally various loam textures with infiltration rates of approximately 0.5-2.0 inches/hour. The most prominent soils in Ventura County, at least relatively near the coast, are loams, sandy loams, loamy sands, and silty clay loams, thus making the conclusions of the San Fernando Valley study applicable for these purposes.[5] This information was used to estimate how much of each case study site's annual runoff would be infiltratable, and if the pervious portion would provide sufficient area for infiltration. For instance, if sufficient area were available, the infiltration configuration would not have to be in basin form but could be shallower and larger in surface area. This study's analyses assumed the use of bioretention areas rather than traditional infiltration basins.

Volume and Pollutant Source Reduction Strategies

As mentioned above, the essence of low-impact development is reducing runoff problems before they can develop, at their sources, or exploiting the infiltration and treatment abilities of soils and vegetation. If a site's existing infiltration and treatment capabilities are inadequate to preserve pre-development hydrology and prevent runoff from causing or contributing to violations of water quality standards, then LID-based source reduction strategies can be implemented, infiltration and treatment capabilities can be upgraded, or both.

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[5] Cabrillo Port Liquefied Natural Gas Deepwater Port Draft EIS/EIR (Oct. 2004) (http://www.cabrilloport.ene.com/files/eiseir/4.05%20%20-Agriculture%20and%20Soils.pdf).

Source reduction can be accomplished through various LID techniques. Soil can be upgraded to store runoff until it can infiltrate, evaporate, or transpire from plants through compost addition. Soil amendment, as this practice is known, is a standard LID technique.

Upgraded soils are used in bioretention cells that hold runoff and effect its transfer to the subsurface zone. This standard LID tool can be used where sufficient space is available. This study analyzed whether the six development case study sites would have sufficient space to effectively reduce runoff using bioretention cells, assuming the soils and vegetation could be amended and enhanced where necessary.

Conventional pavements can be converted to porous asphalt or concrete or replaced with concrete or plastic unit pavers or grid systems. For such approaches to be most effective, the soils must be capable of infiltrating the runoff passing through, and may require renovation.

Source reduction can be enhanced by the LID practice of water harvesting, in which water from impervious surfaces is captured and stored for reuse in irrigation or gray water systems. For example, runoff from roofs and parking lots can be harvested, with the former being somewhat easier because of the possibility of avoiding pumping to use the water and fewer pollutants. Harvesting is a standard technique for Leadership in Energy and Environmental Design (LEED) buildings.[6] Many successful systems of this type are in operation, such as the Natural Resources Defense Council offices (Santa Monica, CA), the King County Administration Building (Seattle, WA), and two buildings on the Portland State University campus (Portland, OR). This investigation examined how water harvesting could contribute to storm water management for case study sites where infiltration capacity, available space, or both appeared to be limited.

RESULTS OF THE ANALYSIS

1. "Base Case" Analysis: Development without Storm Water Controls

Comparison of Pre- and Post-Development Runoff Volumes

Table 2 (page 9) presents a comparison between the estimated runoff volumes generated by the respective case study sites in the pre- and post-development conditions, assuming implementation of no storm water controls on the developed sites. On sites dominated by impervious land cover, most of the infiltration that would recharge groundwater in the undeveloped state is expected to be lost to surface runoff after development. This greatly increased surface flow would raise peak flow rates and volumes in receiving water courses, raise flooding risk, and transport pollutants. Only the office building, the plan for which retained substantial pervious area, would lose less than half of the site's pre-development recharge.

[6] New Buildings Institute, Inc., *Advanced Buildings* (2005) (http://www.poweryourdesign.com/LEEDGuide.pdf).

Table 2. Pre- and Post-Development without BMPs: Distribution of Surface Runoff Versus Recharge to Groundwater

Annual Volume (acre-ft)	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
Precipitation[b]	13.4	3.72	0.95	2.60	162	6.37
Pre-development runoff[c]	0.94	0.26	0.07	0.18	11	0.45
Pre-development recharge[d]	12.5	3.46	0.88	2.42	150	5.92
Post-development impervious runoff[c]	8.48	1.59	0.44	0.60	69	5.50
Post-development pervious runoff[c]	0.54	0.25	0.06	0.24	11	0.07
Post-development total runoff[c]	9.02	1.83	0.50	0.84	80	5.57
Post-development recharge[d]	4.39	1.88	0.45	1.76	82	0.80
Post-development recharge loss (% of pre-development recharge)	8.08 (65%)	1.57 (46%)	0.43 (49%)	0.66 (27%)	68 (45%)	5.12 (86%)

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential;
COMM—retail commercial
[b] Volume of precipitation on total project area
[c] Quantity of water discharged from the site on the surface
[d] Quantity of water infiltrating the soil; the difference between precipitation and runoff

Pollutant Concentrations and Loadings

Table 3 presents the pollutant concentrations from the literature and loadings calculated as described for the various land use and cover types represented by the case studies. Landscaped areas are expected to release the highest TSS concentration, although relatively low TSS mass loading because of the low runoff coefficient. The highest copper concentrations and loadings are expected from parking lots. Roofs, especially commercial roofs, top the list for both zinc concentrations and loadings. Landscaping would issue by far the highest phosphorus, although access roads and driveways would contribute the highest mass loadings.

Table 3. Pollutant Concentrations and Loadings for Case Study Land Use and Cover Types

Land Use	Concentrations				Loadings			
	TSS (mg/L)	TCu (mg/L)	TZn (mg/L)	TP (mg/L)	Lbs. TSS/ acre-year	Lbs. TCu/ acre-year	Lbs. TZn/ acre-year	Lbs. TP/ acre-year
Residential roof	25	0.013	0.159	0.11	79	0.041	0.503	0.348
Commercial roof	18	0.014	0.281	0.14	57	0.044	0.889	0.443
Access road/driveway	120	0.022	0.118	0.66	380	0.070	0.373	2.088
Parking	75	0.036	0.097	0.14	237	0.114	0.307	0.443
Walkway	25	0.013	0.059	0.11	79	0.041	0.187	0.348
Landscaping	213	0.013	0.059	2.04	85	0.005	0.024	0.815

The CTR acute criteria for copper and zinc are 0.0048 mg/L and 0.090 mg/L, respectively. Table 3 shows that all developed land uses are expected to discharge copper above the criterion, based on the mass balance calculations using concentrations from Table 3. Any surface release from the case study sites would violate the criterion at the point of discharge, although dilution by the receiving water would lower the concentration below the criterion at some point. Even if copper mass loadings are reduced by BMPs, any surface discharge would exceed the criterion initially, but it would be easier to dilute below that level. In contrast, runoff from some land covers would not violate the acute zinc criterion. Because of this difference, the evaluation considered whether or not the zinc criterion would be exceeded in each analysis, whereas there was no point in this analysis for copper. There are no equivalent water quality

criteria for TSS and TP; hence, their concentrations were not further analyzed in the different scenarios.

Table 4 shows the overall loadings, as well as zinc concentrations, expected to be delivered from the case study developments should they not be fitted with any BMPs. As Table 4 shows, all cases are forecast to exceed the 0.090 mg/L acute zinc criterion, and the retail commercial development does so by a wide margin. Because of its size, the large residential development dominates the mass loading emissions.

Table 4. Case Study Pollutant Concentration and Loading Estimates without BMPs

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
TZn (mg/L)	0.127	0.123	0.128	0.133	0.123	0.175
Lbs. TSS/year	1321	345	125	242	15016	853
Lbs. TCu/year	0.46	0.074	0.032	0.045	3.21	0.37
Lbs. TZn/year	3.09	0.607	0.174	0.301	26.4	2.64
Lbs. TP/year	6.58	2.39	0.72	1.78	104	3.36

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial

2. "Conventional BMP" Analysis: Effect of Basic Treatment BMPs

Effect of Basic Treatment BMPs on Post-Development Runoff Volumes

The current permit allows regulated parties to select from a range of BMPs in order to treat or infiltrate a given quantity of annual rainfall. The range includes drain inlet inserts, CDS units, and other manufactured BMPs, detention vaults, and sand filters, all of which isolate runoff from the soil; as well as basins and biofiltration BMPs built in soil and generally having vegetation. Treatment BMPs that do not permit any runoff contact with soils discharge as much storm water runoff as equivalent sites with no BMPs, and hence yield zero savings in recharge. As mentioned above, the CalTrans (2004) study found that BMPs with a natural surface can reduce runoff by substantial margins (30-50 percent for extended-detention basins and biofiltration).

With such a wide range of BMPs in use, runoff reduction ranging from 0 to 50 percent, and a lack of clearly ascertainable requirements, it is not possible to make a single estimate of how much recharge savings are afforded by maximal implementation of the current permit. We made the following assumptions regarding implementation of BMPs. Assuming natural-surface BMPs perform at the average of the three types tested by CalTrans (2004), i.e., 40 percent runoff reduction, the estimate can be bounded as shown in Table 5 (page 11). The table demonstrates that allowing free choice of BMPs without regard to their ability to direct water into the ground forfeits substantial groundwater recharge benefits when hardened-surface BMPs are selected. Use of soil-based conventional BMPs could cut recharge losses from half or e more of the full potential to about one-quarter to one-third or less, except with the highly impervious commercial development. This analysis shows the wisdom of draining impervious to pervious surfaces, even if those surfaces are not prepared in any special way. But as subsequent analyses showed, soil amendment can gain considerably greater benefits.

Table 5. Pre- and Post-Development with Conventional BMPs: Distribution of Surface Runoff Versus Recharge to Groundwater

Annual Volume (acre-ft)	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
Precipitation[b]	13.4	3.72	0.95	2.60	162	6.37
Pre-development runoff[c]	0.94	0.26	0.07	0.18	11	0.45
Pre-development recharge	12.5	3.46	0.88	2.42	150	5.92
Post-development impervious runoff[c, d]	5.09-8.48	0.95-1.59	0.26-0.44	0.36-0.60	41-69	3.30-5.50
Post-development pervious runoff[c, d]	0.32-0.54	0.15-0.25	0.04-0.06	0.14-0.24	6.6-11	0.04-0.07
Post-development total runoff[c, d]	5.41-9.02	1.10-1.83	0.30-0.50	0.50-0.84	48-80	3.34-5.57
Post-development recharge[d, e]	4.39-7.99	1.88-2.62	0.45-0.65	1.76-2.10	82-114	0.80-3.03
Post-development recharge loss (% of pre-development recharge)[d, e]	4.51-8.08 (36-65%)	0.84-1.57 (24-46%)	0.23-0.43 (26-49%)	0.32-0.66 (13-27%)	36-68 (24-45%)	2.89-5.12 (49-86%)

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial. Ranges represent 40 percent runoff volume reduction, with full site coverage by BMPs having a natural surface, to no reduction, with BMPs isolating runoff from soil.
[b] Volume of precipitation on total project area
[c] Quantity of water discharged from the site on the surface
[d] Ranging from the quantity with hardened bed BMPs to the quantity with soil-based BMPs
[e] Quantity of water infiltrating the soil; the difference between precipitation and runoff

Effect of Basic Treatment BMPs on Pollutant Discharges

Table 6 (page 12) presents estimates of zinc effluent concentrations and mass loadings of the various pollutants discharged from four types of conventional treatment BMPs. The manufactured CDS BMPs in this table, which do not expose runoff to soil or vegetation, are not expected to drop any of the concentrations sufficiently to meet the acute zinc criterion at the discharge point. The loading reduction results show the CDS units always performing below 50 percent reduction for all pollutants analyzed, and most often in the vicinity of 20 percent, with zero copper reduction.

When treated with swales or filter strips, effluents from each development case study site are expected to fall below the CTR acute zinc criterion. All but the large commercial site would meet the criterion with EDB treatment. These natural-surface BMPs, if fully implemented and well maintained, are predicted to prevent the majority of the pollutant masses generated on most of the development sites from reaching a receiving water. Only total phosphorus reduction falls below 50 percent for two case studies. Otherwise, mass loading reductions range from about 60 to above 80 percent for the EDB, swale, and filter strip. This data indicates that draining impervious to pervious surfaces, even if those surfaces are not prepared in any special way, pays water quality as well as hydrologic dividends.

Table 6. Pollutant Concentration and Loading Reduction Estimates with Conventional BMPs

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
Effluent Concentrations:						
CDS TZn (mg/L)[a]	0.095	0.095	0.098	0.102	0.095	0.131
EDB TZn (mg/L)[a]	0.085	0.086	0.084	0.084	0.086	0.098
Swale TZn (mg/L)	0.055	0.054	0.055	0.056	0.054	0.068
Filter strip TZn (mg/L)	0.039	0.039	0.039	0.041	0.039	0.048
Loading Reductions:						
CDS TSS loading reduction	15.7%	19.9%	22.0%	24.0%	19.9%	16.9%
CDS TCu loading reduction	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
CDS TZn loading reduction	22.7%	22.4%	22.9%	23.1%	22.4%	25.1%
CDS TP loading reduction	30.6%	41.5%	40.7%	45.9%	41.5%	20.3%
EDB TSS loading reduction	68.1%	73.7%	79.0%	81.1%	73.7%	71.7%
EDB TCu loading reduction	61.9%	55.7%	66.2%	63.0%	55.7%	66.8%
EDB TZn loading reduction	59.7%	59.6%	60.4%	61.9%	59.6%	66.6%
EDB TP loading reduction	61.9%	69.7%	69.1%	72.9%	69.7%	54.5%
Swale TSS loading reduction	68.8%	71.1%	73.1%	73.9%	71.1%	69.4%
Swale TCu loading reduction	72.5%	68.5%	78.2%	73.3%	68.5%	75.8%
Swale TZn loading reduction	78.4%	78.1%	84.3%	78.8%	78.1%	80.7%
Swale TP loading reduction	66.3%	70.7%	67.2%	76.2%	70.7%	55.0%
Filter strip TSS loading reduction	69.9%	75.4%	80.6%	82.6%	75.4%	72.3%
Filter strip TCu loading reduction	74.4%	69.1%	78.2%	75.4%	69.1%	78.7%
Filter strip TZn loading reduction	78.3%	77.9%	78.4%	78.7%	77.9%	80.9%
Filter strip TP loading reduction	48.4%	53.1%	63.7%	59.8%	53.1%	34.6%

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial; CDS— continuous deflective separation unit; EDB—extended-detention basin

3. LID Analysis: Development According to Modified Draft Permit Provisions

(a) Hydrologic Analysis

The LID analysis was first performed according to the Draft Permit provisions under the Planning and Land Development Program (Part 4, section E). In this analysis, however, EIA was limited to three instead of five percent, under the reasoning presented in Attachment A. All runoff from NCIA was assumed to drain to vegetated surfaces, as provided in the Draft Permit.

One goal of this exercise was to identify methods that reduce runoff production in the first place. It was hypothesized that implementation of source reduction techniques could allow all of the case study sites to infiltrate substantial proportions of the developed site runoff, advancing the hydromodification mitigation objective of the Draft Permit. When runoff is dispersed into the soil instead of being rapidly collected and conveyed away, it recharges groundwater, supplementing a resource that maintains dry season stream flow and wetlands. An increased water balance can be tapped by humans for potable, irrigation, and process water supply. Additionally, runoff volume reduction would commensurately decrease pollutant mass loadings.

Accordingly, the analysis considered the practicability of more than one scenario by which the draft permit's terms could be met, as modified to reflect three percent EIA. In one option, all roof runoff is harvested and stored for some beneficial use. A second option disperses runoff into the soil via roof downspout infiltration trenches. The former option is probably best suited to cases like the large commercial and office buildings, while distribution in the soil would fit best with residences and relatively small commercial developments. The analysis was repeated with the assumptions of harvesting OFF and COMM roof runoff for some beneficial use and dispersing roof runoff from the remaining four cases in roof downspout infiltration systems.

Expected Infiltration Capacities of the Case Study Sites

The first inquiry on this subject sought to determine how much of the total annual runoff each property is expected to infiltrate. This assessment tested the feasibility of draining all but three percent of impervious area to pervious land on the sites. Based on the findings of Chralowicz et al. (2001), it was assumed that an infiltration zone of 0.1-0.5 acres in area and 2-3 ft deep would serve a drainage catchment area in the size range 0-5 acres and infiltrate 0.9-1.9 acre-ft/year. The conclusions of Chralowicz et al. (2001) were extrapolated to conservatively assume that 0.5 acre would be required to serve each additional five acres of catchment, and would infiltrate an incremental 1.4 acre-ft/year (the midpoint of the 0.9-1.9 acre-ft/year range). According to these assumptions, the following schedule of estimates applies:

Pervious Area Available for Infiltration	Catchment Served acres	Infiltration Capacity
0.5 acres	0-5 acres	1.4 acre-ft/year
1.0 acres	5-10 acres	2.8 acre-ft/year
1.5 acres	10-15 acres	4.2 acre-ft/year
(Etc.)	...	...

As a formula, infiltration capacity ≈ 2.8 x available pervious area. To apply the formula conservatively, the available area was reduced to the next lower 0.5-acre increment before multiplying by 2.8.

As shown in Table 7, five of the six sites have adequate or greater capacity to infiltrate the full annual runoff volume from NCIA and pervious areas where EIA is limited to three percent of the total site area (four at the higher Ojai rainfall). Indeed, five of the six development types have sufficient pervious area to infiltrate *all* runoff, including runoff from EIA areas. With the most representative rainfall, only the large commercial development, with little available pervious area, falls short of the needed capacity to infiltrate all rainfall, but it still has the capacity to meet the terms of the draft permit, as modified for this analysis. These results are based on infiltrating in the native soils with no soil amendment. For any development project at which infiltration-oriented BMPs are considered, it is important that infiltration potential be carefully assessed using site-specific soils and hydrogeologic data. In the event such an investigation reveals a marginal condition (e.g., hydraulic conductivity, spacing to groundwater) for infiltration basins, soils could be enhanced to produce bioretention zones to assist infiltration. Notably, the four case studies with far greater than necessary infiltration capacity would offer substantial flexibility in designing infiltration, allowing ponding at less than 2-3 ft depth.

Table 7. Infiltration and Runoff Volume With 3 Percent EIA and All NCIA Draining to Pervious Areas

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
EIA runoff (acre-ft/year)	0.38	0.11	0.03	0.07	4.6	0.18
NCIA + pervious area runoff (acre-ft/year)	**8.63**	**1.73**	**0.47**	**0.76**	**75.0**	**5.39**
Total runoff (acre-ft/year)	9.01	1.84	0.50	0.83	79.6	5.57
Pervious area available for infiltration (acres)	3.66	1.67	0.39	1.61	72.7	0.47
Estimated infiltration capacity (acre-ft/year)[b]	**9.8**	**4.2**	**1.4**	**4.2**	**203**	**1.4**
Infiltration capacity [c]	> 100%[d]	> 100%	> 100%	> 100%	> 100%	~26% [d]

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial;
[b] Based on Chralowicz et al. (2001) according to the schedule described above
[c] Compare runoff production from NCIA + pervious area (**row 3**) with estimated infiltration capacity (**row 6**)
[d] At Ojai rainfall levels, capacity would be ~78 percent at the MFR site and ~18 percent at the COMM site.

As Table 7 shows, five of the six case study sites have the capacity to infiltrate *all* runoff produced onsite by draining impervious surfaces to pervious areas. Even runoff from the area assumed to be EIA could be infiltrated in most cases based on the amount of pervious area available in typical development projects. By showing that it is possible under normal site conditions and using native soils to retain *all* runoff in typical developments, these results demonstrate that a three percent EIA requirement, which would not demand that all runoff be retained, is feasible and practicable.

Additional Source Reduction Capabilities of the Case Study Sites: Water Harvesting Example

Infiltration is one of a wide variety of LID-based source reduction techniques. Where site conditions such as soil quality or available area limit a site's infiltration capacity, other source LID measures can enhance a site's runoff retention capability. For example, soil amendment, which improves infiltration, is a standard LID technique. Water harvesting is another. Such practices can also be used where infiltration capacity is adequate, but the developer desires greater flexibility for land use on-site. Table 8 shows the added implementation flexibility created by subtracting roof runoff by harvesting it or efficiently directing it into the soil through downspout dispersion systems, further demonstrating the feasibility of meeting the draft permit's proposed requirements, as modified to include a three percent EIA standard.

Table 8. Infiltration and Runoff Volume Reduction Analysis Including Roof Runoff Harvesting or Disposal in Infiltration Trenches (Assuming 3 Percent EIA and All NCIA Draining to Pervious Areas)

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
EIA runoff (acre-ft/year)	0.38	0.11	0.03	0.07	4.6	0.18
Roof runoff (acre-ft/year)	4.92	0.93	0.09	0.20	41	2.33
Other NCIA + pervious area runoff (acre-ft/year)	**3.71**	**0.79**	**0.39**	**0.56**	**35**	**3.06**
Total runoff (acre-ft/year)	9.01	1.84	0.50	0.83	79.6	5.57
Pervious area available for infiltration (acres)	3.66	1.67	0.39	1.61	72.7	0.47
Estimated infiltration capacity (acre-ft/year)[b]	**9.8**	**4.2**	**1.4**	**4.2**	**203**	**1.4**
Infiltration capacity [c]	> 100%	> 100%	> 100%	> 100%	> 100%	~45% [d]

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial;
[b] Based on Chralowicz et al. (2001) according to the schedule described above
[c] Comparison of runoff production from NCIA + pervious area (**row 3**) with estimated infiltration capacity (**row 6**)
[d] If the higher rainfall at Ojai is assumed, capacity would be ~32 percent of the amount needed for the COMM case.

Effect of Full LID Approach on Recharge

Table 9 (page 15) shows the recharge benefits of preventing roofs from generating runoff and infiltrating as much as possible of the runoff from the remainder of the case study sites. The data show that LID methods offer significant benefits relative to the baseline (no storm water controls) in all cases. These benefits are particularly impressive in developments with relatively high site imperviousness, such as in the MFR and COMM cases. In the latter case the full LID approach (excluding the common and effective practice of soil amendment) would cut loss of the potential water resource represented by recharge and harvesting from 86 to 37 percent.

Table 9. Comparison of Water Captured Annually (in acre-ft) from Development Sites for Beneficial Use With a Full LID Approach Compared to Development With No BMPs

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
Pre-development recharge[b] (acre-ft)	12.5	3.46	0.88	2.42	150	5.92
No BMPs:						
post-development recharge [b] (acre-ft)	4.39	1.88	0.45	1.76	82	0.80
post-development runoff (acre-ft)	8.08	1.57	0.43	0.66	68	5.12
post-development % recharge lost	65%	46%	49%	27%	45%	86%
Full LID approach:						
post-development runoff capture (acre-ft)[c]	12.5	3.46	0.88	2.42	150	3.73
post-development runoff (acre-ft)	0	0	0	0	0	2.19
post-development % recharge lost	0%	0%	0%	0%	0%	37%

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial
[b] Quantity of water infiltrating the soil; the difference between precipitation and runoff
[c] Water either entirely infiltrated in BMPs and recharged to groundwater or partially harvested from roofs and partially infiltrated in BMPs. For the first five case studies, EIA was not distinguished from the remainder of the development, because these sites have the potential to capture all runoff.

(b) Water Quality Analysis

As outlined above, it was assumed that EIA discharges, as well as runoff from all pervious surfaces, are subject to treatment control. For purposes of the analysis, treatment control was assumed to be provided by conventional sand filtration. This choice is appropriate for study purposes for two reasons. First, sand filters can be installed below grade, and land above can be put to other uses. Under the Draft Permit's approach, pervious area should be reserved for receiving NCIA drainage, and using sand filters would not draw land away from that service or other site uses. A second reason for the choice is that sand filter performance data equivalent to the data used in analyzing other conventional BMPs are available from the CalTrans (2004) work. Sand filters may or may not expose water to soil, depending on whether or not they have a hard bed. This analysis assumed a hard bed, meaning that no infiltration would occur and thus there would be no additional recharge in sand filters. Performance would be even better than shown in the analytical results if sand filters were built in earth.

Pollutant Discharge Reduction Through LID Techniques

The preceding analyses demonstrated that each of the six case studies could feasibly comply with the draft permit's requirements, as modified to include a more protective three percent EIA standard. Moreover, for five of the six case studies, *all* storm water discharges could be eliminated at least under most meteorological conditions by dispersing runoff from impervious surfaces to pervious areas. Therefore, pollutant additions to receiving waters would also be eliminated. This demonstrates not only that a lower EIA (three percent) is a feasible and practicable approach to maintaining the natural hydrology of land being developed, as discussed above, but that a lower EIA is a feasible and practicable way to eliminate the discharge of pollutants that could cause or contribute to violations of water quality standards.

While the high proportion of impervious area present on the large commercial site relative to pervious area would not allow eliminating all discharge, harvesting roof water and draining NCIA to properly-prepared pervious area would substantially decrease the volume discharged. Deployment of treatment control BMPs (e.g. sand filter treatment) could cut contaminant discharges from pollutants in the remaining volume of runoff to low levels.

Table 10 presents the pollutant reductions from the untreated case achievable through the complete LID approach described above in comparison to conventional treatments (from Table 6). Assuming EIA still discharges through sand filters, pollutant loadings from the untreated condition are expected to decrease by more than 96 percent for all but the COMM case. In that challenging case loadings would still fall by at least 89 percent for TSS and the metals and by 83 percent for total phosphorus, assuming City of Ventura rainfall levels, and slightly less assuming the higher Ojai rainfall levels. Thus, the Draft Permit's basic premise of disconnecting most impervious area, supplemented by specially managing roof water, is shown by both water quality and hydrologic results to be feasible and to afford broad and significant environmental benefits.

Table 10. Pollutant Loading Reduction Estimates With a Full LID Approach Relative to Conventional BMPs

	MFR[a]	Sm-SFR[a]	REST[a]	OFF[a]	Lg-SFR[a]	COMM[a]
Conventional TSS loading reduction[b]	15.7-69.9%	19.9-75.4%	22.0-80.6%	24.0-82.6%	19.9-75.4%	16.9-72.3%
Conventional TCu loading reduction[b]	0.0-74.4%	0.0-69.1%	0.0-78.2%	0.0-75.4%	0.0-69.1%	0.0-78.7%
Conventional TZn loading reduction[b]	22.7-78.4%	22.4-78.1%	22.9-84.3%	23.1-78.8%	22.4-78.1%	25.1-80.9%
Conventional TP loading reduction[b]	30.6-66.3%	41.5-70.7%	40.7-69.1%	45.9-76.2%	41.5-70.7%	20.3-55.0%
LID TSS loading reduction[c]	99.4%	99.3%	99.5%	99.4%	99.3%	89.0% [d]
LID TCu loading reduction[c]	98.1%	96.7%	98.0%	96.2%	96.7%	90.6% [d]
LID TZn loading reduction[c]	99.1%	98.8%	98.9%	98.3%	98.8%	94.8% [d]
LID TP loading reduction[c]	98.1%	98.6%	98.8%	98.7%	98.6%	83.1%[d]

[a] MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; COMM—retail commercial; CDS— continuous deflective separation unit; EDB—extended-detention basin; NCIA—not connected impervious area; EIA—effective (connected) impervious area

[b] Range from Table 6 represented by treatment by CDS unit, EDB, biofiltration swale, or biofiltration strip

[c] Based on directing roof runoff to downspout infiltration trenches (MFR, Sm-SFR, REST, and Lg-SFR) or harvesting it (OFF and COMM), draining other NCIA to pervious areas, and treating EIA with sand filters

[d] If the higher rainfall at Ojai is assumed, reduction estimates for TSS, TCu, TZn, and TP would be 84.0, 86.3, 92.5, and 75.5 percent, respectively.

SUMMARY AND CONCLUSIONS

This paper demonstrated that common Ventura County area residential and commercial development types subject to the Municipal NPDES Permit are likely, without storm water management, to reduce groundwater recharge from the predevelopment state by approximately half in most cases to a much higher fraction with a large ratio of impervious to pervious area. With no treatment, runoff from these developments is expected to exceed CTR acute copper and zinc criteria at the point of discharge and to deliver large pollutant mass loadings to receiving waters.

Conventional soil-based BMP solutions that promote and are component parts of low-impact development approaches, by contrast, regain about 30-50 percent of the recharge lost in development without storm water management, although commercially-manufactured filtration and hydrodynamic BMPs for storm water management give no benefits in this area. It is expected the soil-based BMPs generally would release effluent that meets the acute zinc criterion at the point of discharge, although it would still exceed the copper limit. Excepting phosphorus, it was found that these BMPs would capture and prevent the movement to receiving waters of the majority of the pollutant loadings considered in the analysis.

It was found that a three percent Effective Impervious Area standard can be met in typical developments, and that by draining all site runoff to pervious areas, runoff can be eliminated entirely in most development types. This result was reached assuming the use of native soils. Soil enhancement (typically, with compost) can further advance infiltration. Draining impervious surfaces onto the loam soils typical of Ventura County, in connection with limiting directly connected impervious area to three percent of the site total area, should eliminate storm runoff from some development types and greatly reduce it from more highly impervious types. Adding roof runoff elimination to the LID approach (by harvesting or directing it to downspout infiltration trenches) should eliminate runoff from all but mostly impervious developments. Even in the development scenario involving the highest relative proportion of impervious surface, losses of rainfall capture for beneficial uses could be reduced from more than 85 to less than 40 percent, and pollutant mass loadings would fall by 83-95 percent from the untreated scenario when draining to pervious areas was supplemented with water harvesting. These results demonstrate the basic soundness of the Draft Permit's concept to limit directly connected impervious area and drain the remainder over pervious surfaces.

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ATTACHMENT A

JUSTIFICATION OF PROPOSED EFFECTIVE IMPERVIOUS AREA LIMITATION

Summary

The literature shows that adverse impacts to the physical habitat and biological integrity of receiving waters occur as a result of the conversion of natural areas to impervious cover. These effects are observed at the lowest levels of impervious cover in associated catchments (two to three percent) and are pronounced by the point that impervious cover reaches five percent. To protect biological productivity, physical habitat, and other beneficial uses, effective impervious area should be capped at no more than three percent.

I. Impacts to physical habitat of California receiving waters observed at three percent impervious cover

Stein *et al*.[7] note that while studies from parts of the country with climates more humid than California's indicate that physical degradation of stream channels can initially be detected when watershed impervious cover approaches 10%, biological effects, which may be more difficult to detect, may occur at lower levels (CWP 2003).[8] Recent studies from both northern and southern California indicate that intermittent and ephemeral streams in California are more susceptible to the effects of hydromodification than streams from other regions of the US, with stream degradation being recognized when the associated catchment's impervious cover is as little as 3-5% (Coleman *et al*. 2005).[9] Furthermore, supplemental landscape irrigation in semi-arid regions, like California, can substantially increase the frequency of erosive flows (AQUA TERRA Consultants 2004).[10]

Coleman, *et al*.[3] report that the ephemeral/intermittent streams in southern California (northwestern Los Angeles County through southern Ventura County to central Orange County) appear to be more sensitive to changes in percent impervious cover than streams in other areas. Stream channel response can be represented using an *enlargement curve*, which relates the percent of impervious cover to a change in cross-sectional area. The data for southern California streams forms a relationship very similar in shape to the enlargement curves developed for other North American streams. However, the curve for southern California streams is above the general curve for streams in other climates. This suggests that a specific enlargement ratio is produced at a lower value of impervious surface area in southern California than in other parts of North America. Specifically, the estimated threshold of response is approximately 2-3% impervious cover, as compared to 7-10% for other portions of the U.S. It is important to note that this conclusion applies specifically to streams with a catchment drainage area less than 5 square miles.

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[7] Stein, E.D., S. Zaleski, (2005) *Managing Runoff to Protect Natural Streams: The Latest Developments on Investigation and Management of Hydromodification in California*. (Proceedings of a Special Technical Workshop Co-sponsored by California Stormwater Quality Association (CASQA), Stormwater Monitoring Coalition (SMC), University of Southern California Sea Grant (USC Sea Grant), Technical Report #475).

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[10] AQUA TERRA Consultants, (2004) *Urbanization and Channel Stability Assessment in the Arroyo Simi Watershed of Ventura County CA*. FINAL REPORT. Prepared for Ventura County Watershed Protection Division, Ventura CA.

This study concludes that disconnecting impervious areas from the drainage network and adjacent impervious areas is a key approach to protecting channel stability. Utilizing this strategy can make it practical to keep the effective impervious cover (*i.e.* the amount hydrologically connected to the stream) equal to or less than the identified threshold of 2-3%.

II. Impacts to biological integrity of receiving waters observed with any conversion from natural to impervious surface

Two separate studies conducted by Horner *et al*.[11,12] in the Puget Sound region (Washington State), Montgomery County, Maryland, and Austin, Texas built a database totaling more than 650 reaches on low-order streams in watersheds ranging from no urbanization and relatively little human influence (the reference state, representing "best attainable" conditions) to highly urban (>60 percent total impervious area, "TIA"). Biological health was assessed according to the benthic index of biotic integrity (B-IBI) and, in Puget Sound, the ratio of young-of-the-year coho salmon (*Oncorhynchus kisutch*), a relatively stress-intolerant fish, to cutthroat trout (*Oncorhynchus clarki*), a more stress-tolerant species. The following discussion summarizes the results and conclusions of these two studies.

There is no single cause for the decline of water resource conditions in urbanizing watersheds. Instead, it is the cumulative effects of multiple stressors that are responsible for degraded aquatic habitat and water quality. Imperviousness, while not a perfect yardstick, appears to be a useful predictor of ecological condition. However, a range of stream conditions can be associated with any given level of imperviousness. In general, only streams that retain a significant proportion of their natural vegetative land-cover <u>and</u> have very low levels of watershed imperviousness appear to retain their natural ecological integrity. It is this change in watershed land-cover that is largely responsible for the shift in hydrologic regime from a sub-surface flow dominated system to one dominated by surface runoff.

While the decline in ecological integrity is relatively continuous and is consistent for all parameters, the impact on physical conditions appears to be more pronounced earlier in the urbanization process than chemical degradation. It is generally acknowledged, based on field research and hydrologic modeling, that it is the shift in hydrologic conditions that is the driving force behind physical changes in urban stream-wetland ecosystems.

Multiple scales of impact operate within urbanizing watersheds: landscape-level impacts, including the loss of natural forest cover and the increase in impervious surface area throughout the watershed; riparian corridor-specific impacts such as encroachment, fragmentation, and loss of native vegetation; and local impacts such as water diversions, exotic vegetation, stream channelization, streambank hardening, culvert installation, and pollution from the widespread use of pesticides and herbicides. All of these stressors contribute to the overall cumulative impact.

The researchers found that there is no clear threshold of urbanization below which there exists a "no-effect" condition. Instead, there appears to be a relatively continuous decline in almost all measures of water quality or ecological integrity. Losses of integrity occur from the lowest levels of TIA and are already pronounced by the point that TIA reaches 5 percent.

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[11] Horner, R. R., C. W. May, (2002) *The Limitations of Mitigation-Based Stormwater Management in the Pacific Northwest and the Potential of a Conservation Strategy based on Low-Impact Development Principles*. (Proceedings of the American Society of Engineers Stormwater Conference, Portland, OR).

[12] Horner, R.R., E. H. Livingston, C. W. May, J. Maxted, (2006) *BMPs, Impervious Cover, and Biological Integrity of Small Streams*. (Proceedings of the Eighth Biennial Stormwater Research and Watershed Management Conference, Tampa, FL).

Similarly, the Alliance for the Chesapeake Bay[13] reports that small-watershed studies by the Maryland Department of Natural Resources Biological Stream Survey have shown that some sensitive species are affected by even low amounts of impervious cover. In one study, no brook trout were observed in any stream whose watershed had more than 2 percent impervious cover, and brook trout were rare in any watershed with more than 0.5 percent impervious cover.

III. Ventura County's watersheds include biologically-significant water bodies

The literature discussed above is relevant to the watersheds of Ventura County, which contain rivers and streams that currently or historically support a variety of beneficial uses that may be impaired by water quality degradation and stream hydromodification as a result of storm water runoff from impervious land cover. Unlike some Southern California watersheds, Ventura County still has many natural stream systems with a high degree of natural functionality.

For instance, the Ventura River watershed in northwestern Ventura County "supports a large number of sensitive aquatic species,"[14] including steelhead trout, a federally-listed endangered species. Although "local populations of steelhead and rainbow trout have nearly been eliminated along the Ventura River" itself, the California Department of Fish and Game has "recognized the potential for the restoration of the estuary and enhancement of steelhead populations in the Ventura River."[15] Steelhead may also be present in tributaries such as San Antonio Creek.[16] Thriving rainbow trout populations exist in tributaries of the Ventura River including Matilija Creek and Coyote Creek.[17] The Ventura River either does or is projected to support the following beneficial uses: warm freshwater habitat; cold freshwater habitat; wildlife habitat; rare, threatened, or endangered species; migration of aquatic organisms; and spawning and reproduction.[18] Furthermore, the Ventura River Estuary also supports commercial fishing, shellfish harvesting, and wetland habitat.[19] The Ventura River receives municipal storm drain discharges from Ojai, San Buenaventura, and unincorporated areas of Ventura County.[20]

The Santa Clara River watershed in northern Ventura County "is the largest river system in southern California that remains in a relatively natural state."[21] Sespe Creek is one of the Santa Clara's largest tributaries, and "supports significant steelhead spawning and rearing habitat."[22] Other creeks in the Santa Clara River watershed that support steelhead are Piru Creek and Santa Paula Creek. Sespe Creek and the Santa Clara River also provide spawning habitat for the Pacific lamprey. Rainbow trout populations exist in tributaries of the Santa Clara River including Sespe Creek.[23] The creeks and the Santa Clara river do or are projected to support the following beneficial uses: warm freshwater habitat; cold freshwater habitat; wildlife habitat; preservation of biological habitats rare, threatened, or endangered species; migration of aquatic organisms; and spawning and reproduction.[24] Los Padres National Forest covers much of the Santa Clara River watershed, but increasing development in floodplain areas has been

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[13] Karl Blankenship, BAY JOURNAL,"It's a hard road ahead for meeting new sprawl goal: States will try to control growth of impervious" (July/August 2004), at http://www.bayjournal.com/article.cfm?article=66.
[14] Los Angeles Region Water Quality Control Plan (1994) p. 1-18 ("Basin Plan").
[15] Basin Plan, p. 1-16; Ventura County Environmental & Energy Resources Division, "Endangered Steelhead Trout in Ventura County: Past, Present, and Future," available at http://www.wasteless.org/Eye_articles/steelhead.htm.
[16] Ventura County Environmental & Energy Resources Division, "Steelhead Spawning in Ventura County," (2005), available at http://www.wasteless.org/Eye_articles/steehead2005.html.
[17] Ventura County Environmental & Energy Resources Division, "Endangered Steelhead Trout in Ventura County: Past, Present, and Future," available at http://www.wasteless.org/Eye_articles/steelhead.htm.
[18] Basin Plan, Table 2-1.
[19] Basin Plan, Table 2-4.
[20] Ventura County Watershed Protection District, *Report of Waste Discharge* (January 2005) at p. 3.
[21] Basin Plan, p. 1-16.
[22] Basin Plan, p. 1-16.
[23] Ventura County Environmental & Energy Resources Division, "Endangered Steelhead Trout in Ventura County: Past, Present, and Future," available at http://www.wasteless.org/Eye_articles/steelhead.htm.
[24] Basin Plan, Table 2-1.

identified as a threat to the river system's water quality.[25] Furthermore, the Santa Clara estuary supports the additional beneficial uses of shellfish harvesting and wetlands habitat.[26] The Santa Clara River receives municipal storm drain discharges from Fillmore, Oxnard, San Buenaventura, Santa Paula, and unincorporated areas of Ventura County.[27]

The Calleguas Creek watershed "empties into Mugu Lagoon, one of southern California's few remaining large wetlands."[28] It supports or is projected to support the following beneficial uses: estuarine habitat; marine habitat; wildlife habitat; preservation of biological habitats; rare, threatened, or endangered species; migration of aquatic organisms; spawning and reproduction; shellfish harvesting; and wetlands habitat.[29] Historically, Calleguas Creek drained largely agricultural areas. But this watershed has been under increasing pressure from sedimentation due to increased surface flow from municipal discharges and urban wastewaters, among other sources.[30] Increasing residential developments on steep slopes has been identified as a substantial contributing factor to the problem of accelerated erosion in the watershed (and sedimentation in the Lagoon). Calleguas Creek receives municipal storm drain discharges from Camarillo, Moorpark, Simi Valley, Thousand Oaks, and unincorporated areas of Ventura County.[31]

Ventura County's coastal streams also support a variety of beneficial uses:[32]

- Little Sycamore Canyon Creek in southern Ventura County (warm freshwater habitat; wildlife habitat; rare, threatened or endangered species; and spawning and reproduction);
- Lake Casitas tributaries (warm freshwater habitat; cold freshwater habitat; wildlife habitat; rare, threatened or endangered species; spawning and reproduction; and wetland habitat);
- Javon Canyon and Padre Juan Canyon (warm freshwater habitat; cold freshwater habitat; wildlife habitat; and spawning and reproduction); and
- Los Sauces Creek in northern Ventura County (warm freshwater habitat; cold freshwater habitat; wildlife habitat; migration of aquatic species; and spawning and reproduction).

IV. Conclusion

In order to protect the biological habitat, physical integrity, and other beneficial uses of the water bodies in Ventura County, effective impervious area should be capped at no more than three percent.

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[25] Basin Plan, pp. 1-16, 1-18.
[26] Basin Plan, Table 2-4.
[27] Ventura County Watershed Protection District, *Report of Waste Discharge* (January 2005) at p. 3.
[28] Basin Plan, p. 1-18.
[29] Basin Plan, Table 2-1.
[30] Basin Plan, pp. 1-16, 1-18.
[31] Ventura County Watershed Protection District, *Report of Waste Discharge* (January 2005) at p. 3.
[32] Basin Plan, Table 2-1.

ATTACHMENT B

POLLUTANT CONCENTRATIONS FOR URBAN SOURCE AREAS (HERRERA ENVIRONMENTAL CONSULTANTS, INC. UNDATED)

Source Area	Study	Location	Sample Size (n)	TSS (mg/L)	TCu (ug/L)	TPb (ug/L)	TZn (ug/L)	TP (mg/L)	Notes
Roofs									
Residential	Steuer, et al. 1997	MI	12	36	7	25	201	0.06	2
Residential	Bannerman, et al. 1993	WI	~48	27	15	21	149	0.15	3
Residential	Waschbusch, et al. 2000	WI	25	15	n.a.	n.a.	n.a.	0.07	3
Residential	FAR 2003	NY		*19*	*20*	*21*	*312*	*0.11*	4
Residential	Gromaire, et al. 2001	France		*29*	*37*	*493*	*3422*	*n.a.*	5
Representative Residential Roof Values				**25**	**13**	**22**	**159**	**0.11**	
Commercial	Steuer, et al. 1997	MI	12	24	20	48	215	0.09	2
Commercial	Bannerman, et al. 1993	WI	~16	15	9	9	330	0.20	3
Commercial	Waschbusch, et al. 2000	WI	25	18	n.a.	n.a.	n.a.	0.13	3
Representative Commercial Roof Values				**18**	**14**	**26**	**281**	**0.14**	
Parking Areas									
Res. Driveways	Steuer, et al. 1997	MI	12	157	34	52	148	0.35	2
Res. Driveways	Bannerman, et al. 1993	WI	~32	173	17	17	107	1.16	3
Res. Driveways	Waschbusch, et al. 2000	WI	25	34	n.a.	n.a.	n.a.	0.18	3
Driveway	FAR 2003	NY		*173*	*17*		*107*	*0.56*	4
Representative Residential Driveway Values				**120**	**22**	**27**	**118**	**0.66**	
Comm./ Inst. Park. Areas	Pitt, et al. 1995	AL	16	110	116	46	110	n.a.	1
Comm. Park. Areas	Steuer, et al. 1997	MI	12	110	22	40	178	0.2	2
Com. Park. Lot	Bannerman, et al. 1993	WI	5	58	15	22	178	0.19	3
Parking Lot	Waschbusch, et al. 2000	WI	25	51	n.a.	n.a.	n.a.	0.1	3
Parking Lot	Tiefenthaler, et al. 2001	CA	5	36	28	45	293	n.a.	6
Loading Docks	Pitt, et al. 1995	AL	3	40	22	55	55	n.a.	1
Highway Rest Areas	CalTrans 2003	CA	53	*63*	*16*	*8*	*142*	*0.47*	7
Park and Ride Facilities	CalTrans 2003	CA	179	*69*	*17*	*10*	*154*	*0.33*	7
Comm./ Res. Parking	FAR 2003	NY		*27*	*51*	*28*	*139*	*0.15*	4
Representative Parking Area/Lot Values				**75**	**36**	**26**	**97**	**0.14**	

Landscaping/Lawns									
Landscaped Areas	Pitt, et al. 1995	AL	6	33	81	24	230	n.a.	1
Landscaping	FAR 2003	NY		*37*	*94*	*29*	*263*	n.a.	4
Representative Landscaping Values				**33**	**81**	**24**	**230**	**n.a.**	
Lawns - Residential	Steuer, et al. 1997	MI	12	262	n.a.	n.a.	n.a.	2.33	2
Lawns - Residential	Bannerman, et al. 1993	WI	~30	397	13	n.a.	59	2.67	3
Lawns	Waschbusch, et al. 2000	WI	25	59	n.a.	n.a.	n.a.	0.79	3
Lawns	Waschbusch, et al. 2000	WI	25	122	n.a.	n.a.	n.a.	1.61	3
Lawns - Fertilized	USGS 2002	WI	58	n.a.	n.a.	n.a.	n.a.	2.57	3
Lawns - Non-P Fertilized	USGS 2002	WI	38	n.a.	n.a.	n.a.	n.a.	1.89	3
Lawns - Unfertilized	USGS 2002	WI	19	n.a.	n.a.	n.a.	n.a.	1.73	3
Lawns	FAR 2003	NY	3	*602*	*17*	*17*	*50*	*2.1*	4
Representative Lawn Values				**213**	**13**	**n.a.**	**59**	**2.04**	

Notes:

Representative values are weighted means of collected data. Italicized values were omitted from these calculations.

1 - Grab samples from residential, commercial/institutional, and industrial rooftops. Values represent mean of DETECTED concentrations

2 - Flow-weighted composite samples, geometric mean concentrations

3 - Geometric mean concentrations

4 - Citation appears to be erroneous - original source of data is unknown. Not used to calculate representative value

5 - Median concentrations. Not used to calculate representative values due to site location and variation from other values.

6 - Mean concentrations from simulated rainfall study

7 - Mean concentrations. Not used to calculate representative values due to transportation nature of land use.