

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.

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:

$$C = (0.009) / + 0.05$$

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.ufe.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 groundwater 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.

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

<u>Pervious Area Available for Infiltration</u>	<u>Catchment Served acres</u>	<u>Infiltration Capacity</u>
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 $\approx 2.8 \times$ 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.

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).

⁸ Center for Watershed Protection (CWP), (2003) *Impacts of Impervious Cover on Aquatic Systems*. Ellicott City, MD.

⁹ Coleman, D., C. MacRae, and E.D. Stein, (2005) *Effect of Increases in Peak Flows and Imperviousness on the Morphology of Southern California Streams*. Southern California Coastal Water Research Project Technical Report #450, Westminster, CA.

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 and 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.

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 Bay¹³ 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

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/steelhead2005.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.

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
<i>Representative Landscaping Values</i>				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
<i>Representative Lawn Values</i>				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.

INITIAL INVESTIGATION OF THE FEASIBILITY AND BENEFITS OF LOW-IMPACT SITE DESIGN PRACTICES (“LID”) FOR THE SAN FRANCISCO BAY AREA

Richard R. Horner[†]

ABSTRACT

The Clean Water Act NPDES permit that regulates municipal separate storm sewer systems (MS4s) in the San Francisco Bay Area, California will be reissued in 2007. The draft permit includes general provisions related to low impact development practices (LID) for certain kinds of development and redevelopment projects. Using six representative development project case studies, based on California building records, the author investigated the practicability and relative benefits of LID options for the majority of the region having soils potentially suitable for infiltration either in their natural state or after amendment using well recognized LID techniques. 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; and (2) in each of the 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 proposed Municipal Regional Urban Runoff Phase I NPDES Stormwater Permit (MRP).

This report covers locations in the Bay Area most amenable to soil infiltration of stormwater runoff, those areas having soils in Natural Resources Conservation Service (NRCS) Hydrologic Soil Groups A, B, or C as classified by the Natural Resources Conservation Service (<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>). Depending on site-specific conditions, A and B soils would generally effectively infiltrate water without modification, whereas C soils could require organic amendments according to now standard LID methods. This report does not cover locations with group D soils, which are generally not amenable to infiltration, again depending on the specific conditions on-site. A subsequent report will examine options in these locations, which include other LID techniques (e.g., roof runoff harvesting for irrigation or gray water supply) and state-of-the-art conventional stormwater

management practices. A minority but still substantial fraction of the Bay Area has group D soils (39.3, 68.0, 18.3, and 50.1 percent of the mapped areas of Alameda, Contra Costa, San Mateo, and Santa Clara Counties, respectively). Regarding any mapped soil type, it is important to keep in mind that soils vary considerably within small distances. Characteristics at specific locations can deviate greatly from those of the major mapped unit, making infiltration potential either more or less than may be expected from the mapping.

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. The study encompassed vegetated swales (channels for conveyance at some depth and velocity), 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). Application of these practices in a low impact site design mode requires 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 investigation also considered whether typical development patterns and local conditions in the Bay Area would enable LID implementation as required by a new standard proposed for the 2007 Ventura County Municipal Storm Water Permit. This standard requires management of effective impervious area (EIA), limiting it to 5%, as well as other impervious area (what might be termed Not-Connected Impervious Area, NCIA), and pervious areas.

Where treatment control BMPs are required to manage runoff from a site, Volume or Flow Hydraulic Design Bases commonly used in California 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 or the volume of annual runoff to achieve 80 percent or more volume treatment. The calculations in this analysis used the 85th percentile 24-hour rainfall event basis. The Flow 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 stormwater management controls; a second scenario employing conventional BMPs; and a third development scenario employing LID stormwater management strategies.

To establish a baseline for each case study, annual stormwater 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 stormwater 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 in the context of the EIA concept employed in the draft Ventura County MS4 permit, it was presumed that EIA would be limited to three percent. It was also assumed that pervious surfaces on a site receiving runoff from other areas on the site would be sized and prepared to manage (through infiltration or storage) the volume directed there in addition to precipitation falling directly on those areas. 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 the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) criteria for copper and zinc.

The results of this analysis show that:

- A full-range of typical development categories common in the Bay Area, from single family residential to restaurants, housing developments, and commercial uses like office buildings, can feasibly implement standard LID techniques to achieve no stormwater discharge during rain events equal to, and in some cases greater than, design storm conditions. This conclusion is based on an analysis that used actual building records in California and annual rainfall records in two rainfall zones in the Bay Area to show that site conditions support this level of performance. In addition, site conditions typical at a wide range of development projects are more than sufficient to attain compliance with a three percent EIA limit, as is being contemplated in other MS4 re-issuance proceedings in California presently.
- 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 stormwater 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.

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 Bay Area developments.

CASE STUDIES

Six case studies were selected to represent a range of urban development types considered to be representative of the Bay Area. 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 single home (SINGLE).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. For each case study 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).

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 and redevelopment were not represented in the sampling of building permits from the San Marcos database. To take these types of projects into account in the subsequent analysis, the Lg-SFR scenario scaled up all land use estimates from the Sm-SFR case in the ratio of 1000:23. The single home case (SINGLE) was derived from Bay Area records obtained at http://www.ppic.org/content/other/706EHEP_web_only_appendix.pdf, which showed 8000 ft² as a rough average for a single home lot in the region. As with the other 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 summarizes the characteristics of the six case studies. The table also provides the recorded or estimated areas in each land use and cover type.

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

	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
No. buildings	11	23	1	1	1000	1
Total area (ft ²)	476,982	132,227	33,669	92,612	5,749,000	8,000
Roof area (ft ²)	184,338	34,949	3,220	7,500	1,519,522	2114
No. parking spaces	438	-	33	37	-	-
Parking area (ft ²)	77,088	-	5808	6512	-	-
Access road area (ft ²)	22,212	-	6097	6456	-	-
Walkway area (ft ²)	33,960	10,656	1362	2078	463,289	518
Driveway area (ft ²)	-	13,800	-	-	600,000	835
Landscape area (ft ²)	159,384	72,822	17,182	70,066	3,166,190	4533

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single-family home

METHODS OF ANALYSIS

Annual Stormwater 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. The 85th percentile, 24-hour 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.

A memorandum titled Rainfall Data Analysis and Guidance for Sizing Treatment BMPs (http://www.cccleanwater.org/construction/Publications/CCCWPBasinSizingMemoFINAL_4-20-05.pdf) prepared for the Contra Costa Clean Water Program demonstrated a linear relationship between unit basin storage volume for 80 percent capture (which is related to the 85th

percentile event) and mean annual precipitation. Rainfall for Bay Area 85th percentile, 24-hour events could thus be determined from locations where events have been established in direct proportion to mean annual rainfall.

In order to obtain appropriate regional estimates of annual precipitation, rainfall records were obtained from a number of sites in the four counties, plus the city of Vallejo, covered by the permit.³ The mean annual range is from 13.73 to 24.30 inches, with quantities close to either 14 or 20 inches predominating. The study was performed for both of these rainfall totals. These figures were used in conjunction with 85th percentile, 24-hour event amounts of 0.75 for Los Angeles and 0.92 for Santa Rosa (<http://ci.santa-rosa.ca.us/pworks/other/SW/SRSWManualFinalDraft.pdf>), respectively, and mean annual totals of 12 and 31 inches for the respective cities to estimate 85 percentile, 24-hour event quantities of 0.77 and 0.82 inch for the 14 and 20-inch Bay Area rainfall zones, respectively.

Pre- and post-development runoff quantities were computed with selected CN values and the 0.77- and 0.82-inch rainfalls. The CN choices based on tabulated data in NRCS (1986) and professional judgment were 83 before development and 86 after land modification. Estimate runoff amounts were then divided by the rainfall totals to obtain runoff coefficients. The results were about the same for the two rainfall zones at 0.07 and 0.12 before and after development, respectively. Finally, total annual runoff volumes were estimated based on the two average annual precipitation figures.

Stormwater 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. Stormwater 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 A (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 Bay Area developments under the permit now in force? These county permits provide regulated entities with a large number of choices and few fixed requirements regarding the selection of stormwater BMPs. (See Contra Costa County NPDES Municipal Stormwater Permit, Order No. 99-058; see also Santa Clara County NPDES Municipal Stormwater Permit, Order No. 01-024, at C.3.a.). Clean Water Program Available options presumably include manufactured BMPs, such as drain inlet inserts (DIIs) and continuous deflative separation (CDS) units. Developments may also select such non-

³ <http://www.census.gov/stab/ccdb/cit7140a.txt>,
http://www.acwd.org/dms_docs/76d0b026b60d97830492079a48b1cb88.pdf,
<http://www.ci.berkeley.ca.us/aboutberkeley/weather.html>, <http://www.usbr.gov/dataweb/dams/ca10168.htm>,
<http://www.redwoodcity.org/about/weather.html>.

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 the Bay Area 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. DIIIs 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 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 groundwater 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. Loams are also common formations in the portion of the Bay Area covered by this report, those areas with Hydrologic

Soil Groups A, B, and C,⁴ thus making the conclusions of the San Fernando Valley study applicable for these purposes. 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.

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.⁵ Many successful systems of this type are in operation, such as the Natural Resources Defense Council office (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 stormwater management for case study sites where infiltration capacity, available space, or both appeared to be limited.

⁴ <http://gis.ca.gov/catalog/BrowseCatalog.epl?id=108>,
<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

⁵ New Buildings Institute, Inc., *Advanced Buildings* (2005)
(<http://www.poweryourdesign.com/LEEDGuide.pdf>).

RESULTS OF THE ANALYSIS

1. "Base Case" Analysis: Development without Stormwater Controls

Comparison of Pre- and Post-Development Runoff Volumes

Table 2 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 stormwater 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 40 percent of the site's pre-development recharge.

Table 2. Pre- and Post-Development without BMPs: Distribution of Surface Runoff Versus Recharge to Groundwater (annual volume in acre-ft)

Distribution	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
14 Inches/Year Rainfall:						
Precipitation ^b	12.8	3.54	0.90	2.47	154	0.21
Pre-development runoff ^c	0.89	0.25	0.07	0.17	10	0.02
Pre-development recharge ^d	11.9	3.29	0.83	2.30	144	0.19
Post-development impervious runoff ^c	8.07	1.51	0.42	0.57	66	0.09
Post-development pervious runoff ^c	0.51	0.24	0.06	0.23	10	0.01
Post-development total runoff ^c	8.58	1.75	0.48	0.80	76	0.10
Post-development recharge ^d	4.22	1.79	0.42	1.67	78	0.11
Post-development recharge loss (% of pre-development)	7.68 (65%)	1.50 (46%)	0.41 (49%)	0.65 (27%)	66 (45%)	0.08 (41%)
20 Inches/Year Rainfall:						
Precipitation ^b	18.2	5.06	1.29	3.54	220	0.30
Pre-development runoff ^c	1.28	0.35	0.10	0.24	15	0.03
Pre-development recharge ^d	16.9	4.71	1.19	3.30	205	0.27
Post-development impervious runoff ^c	11.5	2.16	0.60	0.82	94	0.13
Post-development pervious runoff ^c	0.73	0.34	0.08	0.33	15	0.01
Post-development total runoff ^c	12.2	2.50	0.68	1.15	109	0.14
Post-development recharge ^d	6.0	2.56	0.61	2.39	111	0.16
Post-development recharge loss (% of pre-development)	10.9 (65%)	2.15 (46%)	0.58 (49%)	0.91 (27%)	94 (45%)	0.11 (41%)

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single family home

^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. With expected concentrations being equal in the two rainfall zones, mass loadings in the 20 inches/year zone would be higher than those in the 14 inches/year zone in the same proportion as the ratio of rainfall quantities.

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
14 Inches/Year Rainfall:								
Residential roof	25	0.013	0.159	0.11	75	0.039	0.477	0.330
Commercial roof	18	0.014	0.281	0.14	54	0.042	0.844	0.420
Access road/driveway	120	0.022	0.118	0.66	360	0.066	0.354	1.981
Parking	75	0.036	0.097	0.14	225	0.108	0.291	0.420
Walkway	25	0.013	0.059	0.11	75	0.039	0.177	0.330
Landscaping	213	0.013	0.059	2.04	81	0.005	0.022	0.774
20 Inches/Year Rainfall:								
Residential roof	25	0.013	0.159	0.11	107	0.056	0.683	0.472
Commercial roof	18	0.014	0.281	0.14	77	0.060	1.207	0.601
Access road/driveway	120	0.022	0.118	0.66	515	0.094	0.507	2.834
Parking	75	0.036	0.097	0.14	322	0.155	0.417	0.601
Walkway	25	0.013	0.059	0.11	107	0.056	0.253	0.472
Landscaping	213	0.013	0.059	2.04	135	0.008	0.037	1.291

The Basin Plan freshwater acute criteria for copper and zinc are 0.013 mg/L and 0.120 mg/L, respectively (http://www.swrcb.ca.gov/rwqcb2/basinplan/web/BP_CH3.html). All developed land uses are expected to discharge copper at or above the criterion, based on the mass balance calculations using concentrations from Table 3. Any surface release from the case study sites would just meet or 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 equal or exceed the criterion initially, but it would be easier to dilute below that level. In contrast, runoff from land covers other than roofs 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 0.120 mg/L acute zinc criterion. 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	SINGLE ^a
14 Inches/ Year Rainfall:						
TZn (mg/L)	0.127	0.123	0.128	0.133	0.123	0.121
Lbs. TSS/year	1254	328	119	230	14249	20
Lbs. TCu/year	0.44	0.070	0.030	0.043	3.04	0.004
Lbs. TZn/year	2.94	0.576	0.165	0.286	25.04	0.034
Lbs. TP/year	6.24	2.27	0.68	1.69	98.55	0.14
20 Inches/ Year Rainfall:						
TZn (mg/L)	0.127	0.123	0.128	0.133	0.123	0.121
Lbs. TSS/year	1864	501	180	360	21781	30
Lbs. TCu/year	0.63	0.102	0.043	0.063	4.44	0.006
Lbs. TZn/year	4.22	0.833	0.238	0.417	36.2	0.050
Lbs. TP/year	9.60	3.55	1.05	2.71	154	0.22

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single-family home

2. “Conventional BMP” Analysis: Effect of Basic Treatment BMPs

Effect of Basic Treatment BMPs on Post-Development Runoff Volumes

The current set of regional permits allows regulated parties to select from a range of BMPs in order to treat or infiltrate a given quantity of annual rainfall. The administrative draft of the proposed MRP is also non-specific regarding the role of LID in satisfying permit conditions. The range of BMPs 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 stormwater 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 permits or the Municipal Regional Permit (MRP), if issued as now proposed. 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. 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 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 in acre-ft)

Distribution	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
14 Inches/Year Rainfall:						
Precipitation ^b	12.8	3.54	0.90	2.47	154	0.21
Pre-development runoff ^c	0.89	0.25	0.07	0.17	10	0.02
Pre-development recharge ^d	11.9	3.29	0.83	2.30	144	0.19
Post-development impervious runoff ^e	4.84-8.07	0.90-1.51	0.25-0.42	0.34-0.57	39-66	0.05-0.09
Post-development pervious runoff ^e	0.30-0.51	0.14-0.24	0.04-0.06	0.13-0.23	6.3-10	0.006-0.01
Post-development total runoff ^e	5.15-8.58	1.05-1.75	0.29-0.48	0.48-0.80	46-76	0.06-0.10
Post-development recharge ^{d, e}	4.22-7.60	1.79-2.49	0.42-0.62	1.67-2.00	78-108	0.11-0.15
Post-development recharge loss (% of pre-development) ^e	4.29-7.68 (36-65%)	0.80-1.50 (24-46%)	0.80-0.41 (26-49%)	0.30-0.65 (13-27%)	34-66 (24-45%)	0.05-0.08 (24-41%)
20 Inches/Year Rainfall:						
Precipitation ^b	18.2	5.06	1.29	3.54	220	0.30
Pre-development runoff ^c	1.28	0.35	0.10	0.24	15	0.03
Pre-development recharge ^d	16.9	4.71	1.19	3.30	205	0.27
Post-development impervious runoff ^e	6.92-11.5	1.29-2.16	0.35-0.60	0.49-0.82	56-94	0.08-0.13
Post-development pervious runoff ^e	0.44-0.73	0.20-0.34	0.05-0.08	0.19-0.33	9.0-15	0.006-0.01
Post-development total runoff ^e	7.36-12.2	1.50-2.50	0.41-0.68	0.68-1.15	65-109	0.08-0.14
Post-development recharge ^{d, e}	6.0-10.8	2.56-3.56	0.61-0.88	2.39-2.86	111-155	0.16-0.22
Post-development recharge loss (% of pre-development) ^e	6.1-10.9 (36-65%)	1.14-2.15 (24-46%)	0.31-0.58 (26-49%)	0.44-0.91 (13-27%)	49-94 (24-45%)	0.07-0.11 (24-41%)

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single-family home. 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 Quantity of water infiltrating the soil; the difference between precipitation and runoff ^e Ranging from the quantity with hardened bed BMPs to the quantity with soil-based BMPs

Effect of Basic Treatment BMPs on Pollutant Discharges

Table 6 presents estimates of zinc effluent concentrations and mass loadings of the various pollutants discharged from four types of conventional treatment BMPs. 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.

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

	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
Effluent Concentrations:						
CDS TZn (mg/L) ^a	0.095	0.095	0.098	0.102	0.095	0.094
EDB TZn (mg/L) ^a	0.085	0.086	0.084	0.084	0.086	0.084
Swale TZn (mg/L)	0.055	0.054	0.055	0.056	0.054	0.053
Filter strip TZn (mg/L)	0.039	0.039	0.039	0.041	0.039	0.038
Mass Loading Reductions—14 Inches/Year Rainfall:						
CDS TSS reduction	15.7%	19.9%	22.0%	24.0%	19.9%	20.2%
CDS TCu reduction	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
CDS TZn reduction	22.7%	22.4%	22.9%	23.1%	22.4%	22.5%
CDS TP reduction	30.6%	41.5%	40.7%	45.9%	41.5%	42.0%
EDB TSS reduction	68.1%	73.7%	79.0%	81.1%	73.7%	74.3%
EDB TCu reduction	61.9%	55.7%	66.2%	63.0%	55.7%	55.8%
EDB TZn reduction	59.7%	59.6%	60.4%	61.9%	59.6%	59.8%
EDB TP reduction	61.9%	69.7%	69.1%	72.9%	69.7%	70.1%
Swale TSS reduction	68.8%	71.1%	73.1%	73.9%	71.1%	71.3%
Swale TCu reduction	72.5%	68.5%	78.2%	73.3%	68.5%	68.5%
Swale TZn reduction	78.4%	78.1%	84.3%	78.8%	78.1%	78.2%
Swale TP reduction	66.3%	70.7%	67.2%	76.2%	70.7%	71.1%
Filter strip TSS reduction	69.9%	75.4%	80.6%	82.6%	75.4%	76.0%
Filter strip TCu reduction	74.4%	69.1%	78.2%	75.4%	69.1%	69.1%
Filter strip TZn reduction	78.3%	77.9%	78.4%	78.7%	77.9%	78.1%
Filter strip TP reduction	48.4%	53.1%	63.7%	59.8%	53.1%	53.5%

Table 6 continued

	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
Mass Loading Reductions—20 Inches/Year Rainfall:						
CDS TSS reduction	18.8%	25.0%	26.3%	30.5%	25.0%	25.4%
CDS TCu reduction	0.7%	1.9%	1.1%	3.0%	1.9%	2.0%
CDS TZn reduction	23.1%	23.3%	23.6%	24.7%	23.3%	23.4%
CDS TP reduction	35.4%	46.6%	44.8%	51.8%	46.6%	47.1%
EDB TSS reduction	68.8%	74.6%	79.6%	81.6%	74.6%	75.1%
EDB TCu reduction	61.8%	55.6%	66.0%	62.7%	55.6%	55.7%
EDB TZn reduction	59.6%	59.3%	60.2%	61.5%	59.3%	59.6%
EDB TP reduction	63.0%	70.4%	69.7%	73.4%	70.4%	70.7%
Swale TSS reduction	69.1%	71.4%	73.6%	74.1%	71.4%	71.6%
Swale TCu reduction	72.5%	68.4%	77.9%	73.1%	68.4%	68.5%
Swale TZn reduction	78.3%	78.0%	84.1%	78.6%	78.0%	78.1%
Swale TP reduction	67.6%	71.9%	68.2%	77.1%	71.9%	72.3%
Filter strip TSS reduction	70.6%	76.3%	81.2%	83.1%	76.3%	76.8%
Filter strip TCu reduction	74.4%	69.0%	78.0%	75.1%	69.0%	69.1%
Filter strip TZn reduction	78.2%	77.8%	78.3%	78.5%	77.8%	77.9%
Filter strip TP reduction	49.9%	54.6%	66.3%	61.0%	54.6%	55.0%

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single family home; CDS—continuous deflective separation unit; EDB—extended-detention basin

When treated with extended-detention basins, swales, or filter strips, effluents from each development case study site are expected to fall below the Basin Plan acute zinc criterion. These natural-surface BMPs, if fully implemented and well maintained, are predicted to prevent the pollutant masses generated on the six case study development sites from reaching a receiving water in both rainfall zones, which do not differ appreciably. Only total phosphorus reduction falls below 50 percent for three case studies. Otherwise, mass loading reductions range from about 60 to above 80 percent for the EDB, swale, and filter strip. These data indicate 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.

3. LID Analysis

(a) Hydrologic Analysis

The LID analysis repeats the analysis above, focusing here on the performance of LID techniques in reducing or eliminating runoff from the six development case studies. In addition to assessing the total runoff that would be expected, the analysis also considered whether LID techniques would be sufficient to attain compliance with a performance standard being

considered by the Los Angeles Regional Water Quality Control Board for Ventura County, California. This standard limits EIA (Effective Impervious Area) to five percent (but our analysis further assumed EIA would be ultimately reduced to three percent). All runoff from NCIA (Not-Connected Impervious Area) was assumed to drain to vegetated surfaces.

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, or all, 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. 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 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 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, since infiltration is a basic (although not exclusive) LID technique. 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:

<u>Pervious Area Available for Infiltration</u>	<u>Catchment Served acres</u>	<u>Infiltration Capacity</u>
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 $\approx 2.8 \times$ 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, in both rainfall zones all six of the sites have adequate or greater capacity to infiltrate the full annual runoff volume expected from NCIA and pervious areas where EIA is limited to three percent of the total site area. Indeed, five of the six development types have sufficient pervious area to infiltrate *all* runoff, including runoff from EIA areas. 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 five 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	SINGLE ^a
14 Inches/Year Rainfall:						
EIA runoff (acre-ft/year)	0.36	0.10	0.03	0.07	4.4	0.01
NCIA + pervious area runoff (acre-ft/year)	8.20	1.64	0.45	0.73	71.3	0.08
Total runoff (acre-ft/year)	8.56	1.74	0.48	0.80	75.7	0.09
Pervious area available for infiltration (acres)	3.66	1.67	0.39	1.61	72.7	0.10
Estimated infiltration capacity (acre-ft/year) ^b	9.8	4.2	1.4	4.2	203	0.28
Infiltration potential ^c	>100%	>100%	>100%	>100%	>100%	>100%
20 Inches/Year Rainfall:						
EIA runoff (acre-ft/year)	0.52	0.14	0.04	0.10	6.2	0.01
NCIA + pervious area runoff (acre-ft/year)	11.7	2.34	0.64	1.04	101.7	0.14
Total runoff (acre-ft/year)	12.2	2.48	0.68	1.14	108.0	0.15
Pervious area available for infiltration (acres)	3.66	1.67	0.39	1.61	72.7	0.10
Estimated infiltration capacity (acre-ft/year) ^b	9.8	4.2	1.4	4.2	203	0.28
Infiltration potential ^c	84%	>100%	>100%	>100%	>100%	>100%

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant;

OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single family home;

^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)

As Table 7 shows, each of the six case study sites have the capacity to infiltrate *all* or substantially all of the runoff produced onsite annually by draining impervious surfaces to pervious areas on native soils or, in some soil regimes, soils amended with organic matter. If these sites were designed as envisioned in this analysis, no runoff discharge is expected in storms as large as, and probably larger than, the design storm event—using infiltration only. Discharge would be anticipated only with exceptionally intense, large, or prolonged rainfall that saturates the ground at a faster rate than water can infiltrate or evaporate. 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. Therefore, this analysis shows that the EIA performance standard being considered for Ventura County, California, or one more stringent, can be met readily in development projects occurring on A, B, and C soils in the San Francisco Bay Area.

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

As noted, 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 LID 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 and robust performance of LID options for reducing or eliminating runoff in most expected conditions. Specifically, all development types studied could readily infiltrate and/or retain all expected annual precipitation.

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	SINGLE ^a
14 Inches/Year Rainfall:						
EIA runoff (acre-ft/year)	0.36	0.10	0.03	0.07	4.4	0.01
Roof runoff (acre-ft/year)	4.68	0.89	0.08	0.19	38.5	0.05
Other NCIA + pervious area runoff (acre-ft/year)	3.52	0.75	0.37	0.54	32.7	0.04
Total runoff (acre-ft/year)	8.56	1.74	0.48	0.80	75.6	0.10
Pervious area available for infiltration (acres)	3.66	1.67	0.39	1.61	72.7	0.10
Estimated infiltration capacity (acre-ft/year) ^b	9.8	4.2	1.4	4.2	203	0.28
Infiltration capacity ^c	>100%	>100%	>100%	>100%	>100%	>100%
20 Inches/Year Rainfall:						
EIA runoff (acre-ft/year)	0.52	0.14	0.04	0.10	6.2	0.01
Roof runoff (acre-ft/year)	6.67	1.27	0.12	0.28	55.1	0.08
Other NCIA + pervious area runoff (acre-ft/year)	5.03	1.07	0.52	0.76	46.7	0.06
Total runoff (acre-ft/year)	12.2	2.48	0.68	1.14	108.0	0.15
Pervious area available for infiltration (acres)	3.66	1.67	0.39	1.61	72.7	0.10

Table 8 continued

	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
Estimated infiltration capacity (acre-ft/year) ^b	9.8	4.2	1.4	4.2	203	0.28
Infiltration capacity ^c	>100%	>100%	>100%	>100%	>100%	>100%

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant;

OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—single family home;

^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)

Effect of Full LID Approach on Recharge

Table 9 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 stormwater controls) in all cases. These benefits are particularly impressive in developments with relatively high site imperviousness, such as in the MFR case.

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	SINGLE ^a
14 Inches/Year Rainfall:						
Pre-development recharge ^b (acre-ft)	11.9	3.29	0.83	2.30	144	0.19
No BMPs—						
Post-development recharge ^b (acre-ft)	4.22	1.79	0.42	1.67	78	0.11
Post-development recharge lost (acre-ft)	7.68	1.50	0.41	0.65	66	0.08
Post-development % recharge lost	65%	46%	49%	27%	45%	41%
Full LID approach—						
Post-development runoff capture (acre-ft) ^c	11.9	3.29	0.83	2.30	144	0.19
Post-development recharge lost (acre-ft)	0	0	0	0	0	0
Post-development % recharge lost	0%	0%	0%	0%	0%	0%

Table 9 continued

	MFR ^a	Sm-SFR ^a	REST ^a	OFF ^a	Lg-SFR ^a	SINGLE ^a
20 Inches/Year Rainfall:						
Pre-development recharge ^b (acre-ft)	16.9	4.71	1.19	3.30	205	0.27
No BMPs—						
Post-development recharge ^b (acre-ft)	6.0	2.56	0.61	2.39	111	0.16
Post-development recharge lost (acre-ft)	10.9	2.15	0.58	0.91	94	0.11
Post-development % recharge lost	65%	46%	49%	27%	45%	41%
Full LID approach—						
Post-development runoff capture (acre-ft) ^c	16.9	4.71	1.19	3.30	205	0.27
Post-development recharge lost (acre-ft)	0	0	0	0	0	0
Post-development % recharge lost	0%	0%	0%	0%	0%	0%

^a MFR—multi-family residential; Sm-SFR—small-scale single-family residential; REST—restaurant; OFF—office building; Lg-SFR—large-scale single-family residential; SINGLE—Single family home

^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. EIA was not distinguished from the remainder of the development, because these sites have the potential to capture all runoff.

(b) Water Quality Analysis

It was assumed that any site discharges would be 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. 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 in each of the six case studies, *all* stormwater 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.

SUMMARY AND CONCLUSIONS

This paper demonstrated that common Bay Area residential and commercial development types subject to the Municipal NPDES Permit are likely, without stormwater management, to reduce groundwater recharge from the pre-development 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 Basin Plan 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 stormwater management in Bay Area locations having NRCS Hydrologic Soil Groups A, B, and C. 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 or just barely meet 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 by draining all site runoff to pervious areas with A, B, or C soil types, runoff can be eliminated entirely in most development categories. It follows that a three percent Effective Impervious Area standard can be met in typical developments, as well. This result was reached assuming the use of native soils or well recognized soil enhancement techniques (typically, with compost). Draining impervious surfaces onto these soils, 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) provides an additional tool, increasing flexibility and confidence that no discharge in most meteorological conditions is a feasible performance expectation. Even in the development scenarios involving the highest relative proportion of impervious surface, losses of rainfall capture for beneficial uses could be reduced from the untreated scenario when draining to pervious areas was supplemented with water harvesting. These results demonstrate the basic soundness of the concept of using LID techniques to reduce stormwater pollution in the Bay Area, and further show that limiting directly connected impervious area and draining the remainder over pervious surfaces, as contemplated by some Regional Water Boards in California, is also feasible.

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ATTACHMENT A

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									
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									
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.

SUPPLEMENTARY INVESTIGATION OF THE FEASIBILITY AND BENEFITS OF LOW-IMPACT SITE DESIGN PRACTICES (“LID”) FOR THE SAN FRANCISCO BAY AREA

Richard R. Horner[†]

ABSTRACT

The Clean Water Act NPDES permit that regulates municipal separate storm sewer systems (MS4s) in the San Francisco Bay Area, California will be reissued in 2007. The draft permit includes general provisions related to low impact development practices (LID) for certain kinds of development and redevelopment projects. Using eight representative development project case studies, based on California building records, the author investigated the practicability and relative benefits of LID options for the portion of the region having soils potentially limiting to infiltration. The principal LID option applicable in this situation is roof runoff harvesting, supplement by dispersion of the roof water in single-home sites. Other site runoff would be treated by conventional stormwater best management practices (BMPs), as specified in the permit. The results showed that effectively managing roof runoff and treating the remainder with conventional BMPs can: (1) reduce annual runoff volumes by almost half to more than 3/4, depending on land use characteristics, with much of the water saved available for a beneficial use; and (2) decrease mass loadings of pollutants to receiving waters by 63 to over 90 percent, depending on pollutant and land use.

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INTRODUCTION

Background

A report titled Initial Investigation of the Feasibility and Benefits of Low-Impact Development Practices (“LID”) for the San Francisco Bay Area used six representative development project case studies, based on California building records, to investigate the practicability and relative benefits of LID options for the majority of the region having soils potentially suitable for infiltration either in their natural state or after amendment using well recognized LID techniques. The results demonstrated that: (1) LID site design and source control techniques are more effective than conventional best management practices (BMPs) in reducing runoff rates; and (2) in each of the case studies, LID methods would reduce site runoff volume and pollutant loading to zero in typical rainfall scenarios.

For a broad regional assessment of relatively large scale use of soil-based, infiltrative LID practices, the initial report covered areas having soils in Natural Resources Conservation Service (NRCS) Hydrologic Soil Groups A, B, or C as classified by the Natural Resources Conservation Service (<http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>). Depending on site-specific conditions, A and B soils would generally effectively infiltrate water without modification, whereas C soils could require organic amendments according to now standard LID methods. This supplementary report covers locations with group D soils, which are generally not amenable to infiltration, again depending on the specific conditions on-site. A minority but still substantial fraction of the Bay Area has group D soils (39.3, 68.0, 18.3, and 50.1 percent of the mapped areas of Alameda, Contra Costa, San Mateo, and Santa Clara Counties, respectively). Regarding any mapped soil type, it is important to keep in mind that soils vary considerably within small distances. Characteristics at specific locations can deviate greatly from

those of the major mapped unit, making infiltration potential either more or less than may be expected from the mapping. The soil survey data are regarded as appropriate for use in broad-scale assessments such as underlie this and the initial report, but once site-specific implementation begins, it is important to verify site conditions.

General Assessment Methods

The assessment for group D soils reported herein emphasizes the use of LID practices appropriate in areas with relatively restrictive soils to the greatest possible extent, supplemented by conventional stormwater management practices implemented at fully practicable, high levels of effectiveness. The assessment was performed in a manner analogous to the analysis for the other soil groups and as described in the initial report. To recap briefly, with respect to each of several development case studies, three assessments were undertaken: a baseline scenario incorporating no stormwater management controls; a second scenario employing conventional BMPs; and a third development scenario employing LID stormwater management strategies. In each assessment, annual stormwater runoff volumes were estimated, as well as concentrations and mass loadings (the products of concentrations times flow volumes) of four pollutants: (1) total suspended solids (TSS), (2) total recoverable copper (TCu), (3) total recoverable zinc (TZn), and (4) total phosphorus (TP). The results of the second and third assessments were expressed in terms of the extent to which the management practices would reduce pollutant concentrations and loadings and runoff volumes, converting stormwater discharge a potential beneficial use (direct consumption or, in the case of group A, B, C soil areas, groundwater recharge).

Six case studies were selected to represent a range of urban development types considered to be representative of the Bay Area. 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 single home (SINGLE). The land cover types for these various land uses were derived from building permit and other public records from the Bay Area or elsewhere in California.

Adaptation of Methods for Areas with Group D Soils

A key LID technique in a setting with soils relatively restrictive to infiltration is water harvesting, which can be applied at larger scales in commercial and light industrial developments and at smaller residential scales using cisterns or rain barrels. Harvesting has been successful in reducing runoff discharged to the storm drain system and conserving water in applications at all scales. For example, in downtown Seattle the King County Government Center collects enough roof runoff to supply over 60 percent of the toilet flushing and plant irrigation water requirements, saving approximately 1.4 million gallons of potable water per year (http://www.psat.wa.gov/Publications/LID_studies/rooftop_rainwater.htm, http://dnr.metrokc.gov/dnrp/ksc_tour/features/features.htm). A much smaller public building in Seattle, the Carkeek Environmental Learning Center, drains roof runoff into a 3500-gallon cistern to supply toilets (<http://www.harvesth2o.com/seattle.shtml>). Collecting drainage from individual dwellings for household use is a standard technique around the world, particularly in areas deficient in rainfall and without affordable alternative sources.

An additional general category of LID practices for poorly infiltrating locations, applicable especially at single homes and other relatively small-scale developments, is runoff dispersion for storage in vegetation and soil until evapotranspiration and some infiltration occurs. Section C.3.c of the California Regional Water Quality Control Board San Francisco Bay Region "Administrative Draft" NPDES Municipal Regional Stormwater Permit ("the Permit") requires all single-family home projects that create and/or replace 5,000 square feet or more of impervious surface to implement one or more stormwater lot-scale BMPs from a selection of: (1) diverting roof runoff to vegetated areas; (2) directing paved surface runoff flow to vegetated areas; and/or (3) installing driveways, patios, and walkways with pervious material such as pervious concrete or pavers. Another way of distributing and dissipating roof runoff used successfully in varied soils in the state of Washington is the downspout dispersion system, consisting of a splash block or gravel-filled trench serving to spread roof runoff over a vegetated area (Washington Department of Ecology 2005 [Volume III, Section 3.1.2]).

The basis of the group D soils assessment was harvesting roof runoff to the maximum possible degree, supplemented in smaller-scale developments by runoff dispersion methods. The report asserts that, through these LID BMPs, it is practicable to prevent the entrance of any roof runoff into the municipal storm drain system in any soils setting in the Bay Area. In group D soils, infiltration likely cannot be relied upon to reduce runoff from other portions of developments, such as walkways, driveways, parking lots, access roads, and landscaping. Some water loss would undoubtedly occur, especially through evapotranspiration and at least some infiltration of runoff generated on or directed to landscaping. The analysis presented in this report does not take account of these losses and hence is somewhat conservative in estimating benefits.

As required by the Permit, any runoff not attenuated by harvest, evapotranspiration, or infiltration would be subject to quantity and quality controls. The analysis assumes that extended-detention basins (EDBs) with water residence times up to 72 hours would provide this control. EDBs are one of several general-purpose, conventional stormwater BMPs available for this service, others being wet ponds, constructed wetlands, sand or other media filters, and biofiltration swales and filter strips. The California Department of Transportation (Caltrans, 2004) tested the performance of all of these practices in its BMP Retrofit Pilot Program, conducted in San Diego and Los Angeles Counties. The initial report investigating LID for A, B, and C soils presented estimates of benefits for EDBs, swales, and filter strips, along with continuous deflective separation (CDS) units, a practice that effectively captures only large particulate pollutants. For brevity, this follow-up report focuses on just EDBs as the supplement to LID. In performance, EDBs tend to fall between swales and filter strips for total suspended solids, slightly lower than the other two BMP types for metals, and either between the two or comparable to swales for total phosphorus.

These practices were applied to the same six case studies used in the initial analysis and described in Table 1 of the first report. Two additional case studies were defined for the assessment reported here: a sizeable commercial retail installation (COMM) and an urban redevelopment (REDEV). The hypothetical COMM scenario consists of a building with a 2-acre footprint and 500 parking spaces. Parking spaces were estimated to be 176 sq ft in area, which corresponds to 8 ft width by 22 ft length dimensions. A simple, square parking lot with roadways around the four sides and a square building with walkways also around the four sides were assumed. Roadways and walkways were taken to be 20 ft and 6 ft wide, respectively. The REDEV case was taken from an actual project in Berkeley involving a remodel of an existing structure, built originally as a corner grocery store with apartments above and a large side yard, and the addition of a new building on the same site to create a nine-unit, mixed-use, urban infill project. Table 1 summarizes the characteristics of these two case studies. The table also provides the recorded or estimated areas in each land use and cover type.

Table 1. Characteristics and Land Use and Land Cover Areas of Added Case Studies

	COMM ^a	REDEV ^a
No. buildings	1	1
Total area (ft ²)	226,529	5,451
Roof area (ft ²)	87,120	3,435
No. parking spaces	500	2 uncovered
Parking area (ft ²)	88,000	316 uncovered
Access road area (ft ²)	23,732	-
Walkway area (ft ²)	7,084	350
Driveway area (ft ²)	-	650
Landscape area (ft ²)	20,594	700

^a COMM—retail commercial; REDEV—commercial/residential infill

The assessment for group D soils employed the same methods as the earlier analysis to estimate annual stormwater runoff volumes and pollutant discharges. Please refer to the initial report for details on those

methods. The Natural Resource Conservation Service (NRCS, 1986) methodology cited in that report was applied to estimate that infiltration in group D soils would be roughly 60 percent of the amount through landscaping or the bed of a conventional BMP in C soils, which were the basis for establishing runoff coefficients in the first analysis. While that initial analysis was performed for both 14- and 20-inch average annual runoff zones, typical of different Bay Area locations, this supplementary work covered only the former condition. This simplification was made in the interest of brevity in this report, given that the first analysis showed almost no difference in conclusions between the two situations.

RESULTS OF THE ANALYSIS

Table 2 provides a comprehensive summary of the results. Rows shaded in gray compare runoff and pollutant discharges with and without treatment by CDS units, which can capture relatively large solids but have no mechanisms for dissolved substances and the finer particles. Having no soil contact and very limited residence time for evaporation, this BMP cannot reduce runoff volume at all. It can achieve some substantial reductions in TSS and TP for land uses relatively high in landscaped area but little removal of metals, especially copper.

The blue-shaded rows show the performance of conventional EDBs. In the group D soils considered in this analysis, they were estimated to reduce annual runoff volumes by 13-23 percent, the higher values for land uses with relatively small impervious footprints (OFF and REST). These BMPs can capture the majority of the long-term mass loading of most pollutants from most land uses in these soils, falling below 50 percent in reducing metals in stormwater flowing from residential developments.

Rows shaded in green present the results of applying LID BMPs appropriate for group D soils, roof runoff harvesting supplemented by dispersion in single-home land uses, plus treating the remaining runoff with EDBs. Comparing annual runoff volumes with and without LID, it can be seen that removing roof runoff from the storm drain system affords very significant benefits in reducing surface discharge and putting much of that water to productive use. Compared to directing all site runoff to EDBs, LID is expected to reduce volume by almost 10 times in the REDEV case, by about five times for the various residential land uses, 3.6 times for the large commercial development, and around twice for the OFF and REST cases. This management strategy can recover over 3/4 of the stormwater that would otherwise go down the drain in the intense redevelopment case, approximately 2/3 for the multi- and single-family residential cases, over half in the COMM development, and almost half in the office and restaurant cases with relatively small roof footprints.

Reduction of volume translates to decreases in pollutant loadings also. The combination of LID and EDB treatment is estimated to raise copper and zinc reductions to about 70 to over 90 percent in all except the developments with relatively low roof proportions (60-65 percent in these cases). TSS predictions come in at a quite consistent 75-82 percent across land uses. Total phosphorus estimates are a similarly consistent 63-71 percent, a bit higher in the highly impervious REDEV case.

Effectively managing roof runoff gives a way out of the dilemma posed by group D soils in the Bay Area. The analysis has demonstrated that harvesting this runoff stream, supplemented by ground dispersion techniques with sufficient space, shows strong promise to reduce the majority of flow inputs to municipal storm drain systems while conserving water. Moreover, this strategy can also stem the majority of solids, copper, zinc, and phosphorus transport to receiving waters.

Table 2. Runoff Volume and Pollutant Loading Reductions with Conventional and Low-Impact Development (LID) Best Management Practices (BMPs) for Eight Land Use Case Studies in Hydrologic Group D Soils

	COMM ^a	OFF ^a	REST ^a	REDEV ^a	MFR ^a	Lg-SFR ^a	Sm-SFR ^a	SINGLE
Total annual runoff with no BMPs (ac-ft)	5.29	0.80	0.47	0.12	8.57	75.66	1.74	0.10
Total annual runoff with CDS units ^b (reduction)	5.29 (0.0%)	0.80 (0.0%)	0.47 (0.0%)	0.12 (0.0%)	8.57 (0.0%)	75.66 (0.0%)	1.74 (0.0%)	0.10 (0.0%)
Total annual runoff with EDBs ^b (reduction)	4.43 (16.3%)	0.63 (21.3%)	0.36 (23.2%)	0.11 (8.1%)	7.48 (12.7%)	65.27 (13.7%)	1.50 (13.7%)	0.09 (13.3%)
Total annual runoff with LID ^b (reduction)	2.22 (58.0%)	0.44 (45.0%)	0.28 (40.4%)	0.03 (78.9%)	2.80 (67.3%)	26.72 (64.8%)	0.61 (64.8%)	0.04 (65.7%)
CDS TSS reduction ^{b, c}	19.4%	44.8%	33.9%	22.1%	27.1%	37.1%	37.1%	37.7%
CDS TCu reduction ^{b, c}	0.4%	11.0%	4.2%	0.9%	2.7%	7.3%	7.3%	7.6%
CDS TZn reduction ^{b, c}	25.3%	29.1%	25.5%	25.5%	24.1%	25.6%	25.6%	25.9%
CDS TP reduction ^{b, c}	25.9%	63.7%	54.3%	35.7%	46.7%	57.6%	57.6%	58.2%
EDB TSS reduction ^{b, c}	64.7%	78.1%	74.9%	66.5%	62.8%	70.3%	70.3%	70.9%
EDB TCu reduction ^{b, c}	57.9%	51.6%	56.4%	53.2%	51.4%	43.5%	43.5%	43.6%
EDB TZn reduction ^{b, c}	57.6%	49.6%	48.9%	58.1%	48.5%	47.7%	47.7%	48.0%
EDB TP reduction ^{b, c}	44.4%	67.6%	63.3%	52.8%	56.3%	64.4%	64.4%	64.7%
LID + EDB TSS reduction ^{b, c, d}	74.6%	80.3%	77.0%	81.5%	79.4%	81.3%	81.3%	81.8%
LID + EDB TCu reduction ^{b, c, d}	71.9%	60.3%	62.2%	82.3%	73.8%	68.9%	68.9%	69.5%
LID + EDB TZn reduction ^{b, c, d}	79.7%	65.1%	60.9%	92.3%	78.9%	76.4%	76.4%	77.0%
LID + EDB TP reduction ^{b, c, d}	63.1%	69.8%	66.0%	75.2%	69.4%	70.8%	70.8%	71.1%

^a COMM—retail commercial; OFF—office building; REST—restaurant; REDEV—commercial/residential redevelopment; MFR—multi-family residential; Lg-SFR—large-scale single-family residential; Sm-SFR—small-scale single-family residential; SINGLE—single family home

^b CDS—continuous deflective separation; EDBs—extended-detention basins; reduction—comparison with no BMPs

^c TSS—total suspended solids; TCu—total recoverable copper; TZn—total recoverable zinc; TP—total phosphorus

^d LID + EDB—roof runoff harvesting for COMM, OFF, REST, REDEV, AND MFR; harvesting supplemented by dispersion of roof runoff for Lg-SFR, Sm-SFR, and SINGLE; treatment of remaining runoff by EDBs

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