



April 1, 2014

Bruce H. Wolfe, Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

**RE: Implementation of Hydromodification Management Requirements
in the Forthcoming Reissued Municipal Regional Permit**

Dear Mr. Wolfe and Ms. Creedon:

Attachment C in the San Francisco Bay Regional Board's 2009 Municipal Regional Stormwater NPDES Permit (MRP, Order R2-2009-0074) contains hydromodification management requirements specific to the Contra Costa Permittees.

Among the Attachment C requirements is a submittal due April 1, 2014. This letter is submitted in compliance with that requirement.

Attachment C states in part:

By April 1, 2014 the Contra Costa Clean Water Program shall submit a proposal containing one or a combination of the following three options (a.-c.) for implementation after the expiration and reissuance of this permit:

- a. Present model verification modeling results demonstrating that the IMPs are sufficiently oversized and perform to meet the 0.1Q2 low flow design criteria; or
- b. Present study results of Contra Costa County streams geology and other factors that support the low flow design criteria of 0.2Q2 as the limiting HMP design low flow; or

- c. Propose redesigns of the IMPs to meet the low flow design criteria of 0.1Q2 to be implemented during the next permit term.

The Contra Costa Clean Water Program previously submitted an IMP Monitoring Report, which was also required by Attachment C.

That report, dated September 15, 2013, states (on p. 6):

Local long-term rainfall records were then input to the calibrated model to analyze how IMPs would perform in comparison to current and potential future permit requirements. The simulation indicates that the IMPs fully control runoff flows between the thresholds specified in the current permit (two-tenths of the 2-year pre-project peak flow, or 0.2Q2, and the 10-year pre-project peak flow, or Q10). The Pittsburg bioretention IMPs also control runoff flows within a range extended to the potential future threshold of one-tenth of the 2-year pre-project peak flow, or 0.1Q2. The Walnut Creek bioretention + vault facilities could control flows within the extended range with minor modifications.

In next steps, CCCWP will work with other Bay Area Permittees, through the Bay Area Stormwater Management Agencies Association (BASMAA), to propose appropriate flow-control criteria and sizing factors to be used during the term of a reissued Regional Municipal Stormwater NPDES permit....

We are continuing our work with other BASMAA agencies and with Region 2 staff, through the MRP 2.0 Steering Committee and BASMAA's Development Committee, to develop and reach consensus on regionally consistent hydromodification criteria that are integrated with the Low Impact Development requirements in Provision C.3.c.

If you have any questions about this transmittal, please contact me at tdalz@pw.cccounty.us or (925) 313-2392.

Sincerely,

Thomas E. Dalziel
Program Manager
Contra Costa Clean Water Program

Attachments

TD: