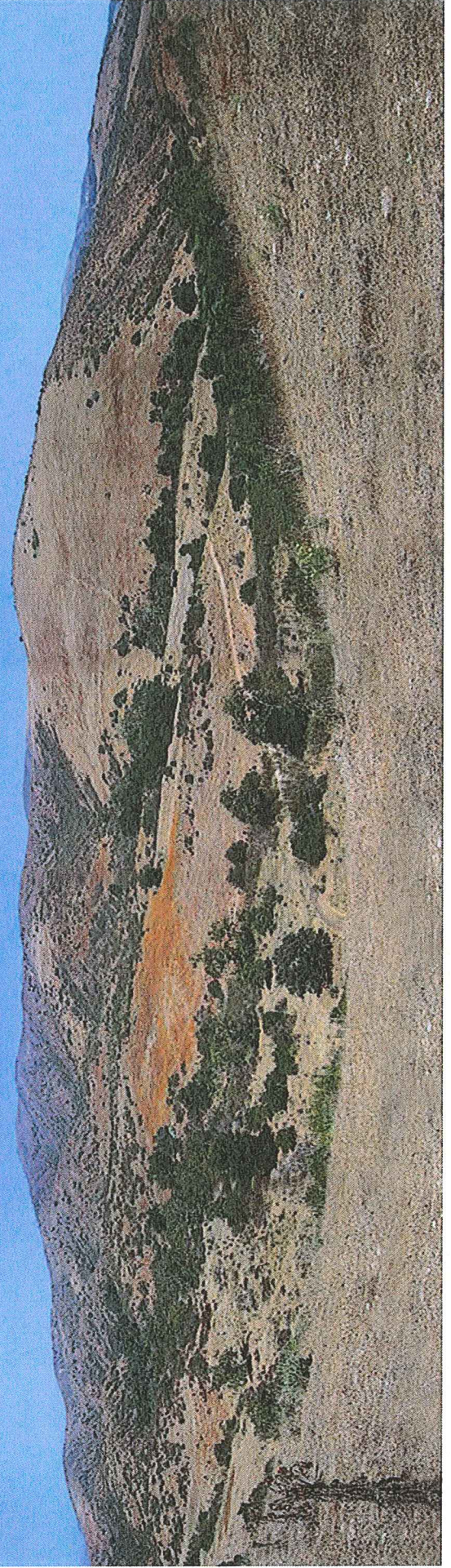
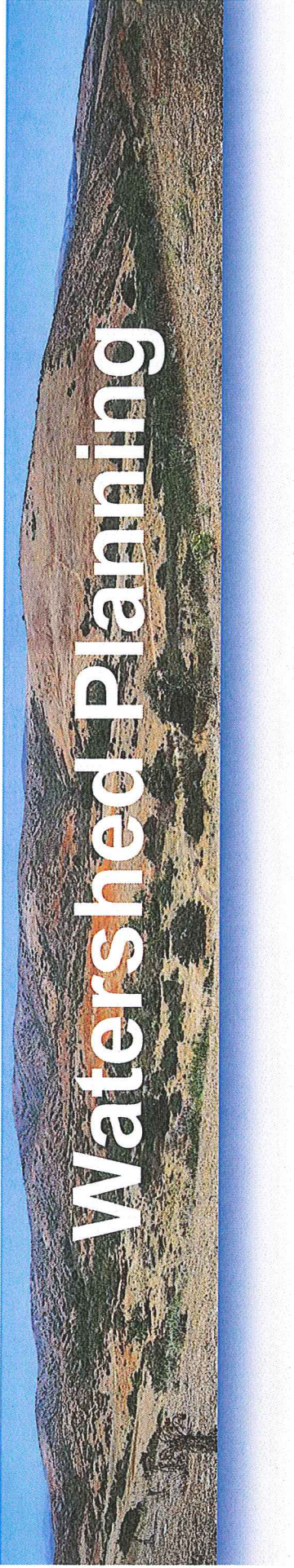


Comments on Tentative Order No. R9-2012-0011

Laura Coley Eisenberg, VP – Open Space & Resource Management, Rancho Mission Viejo

August 22, 2012

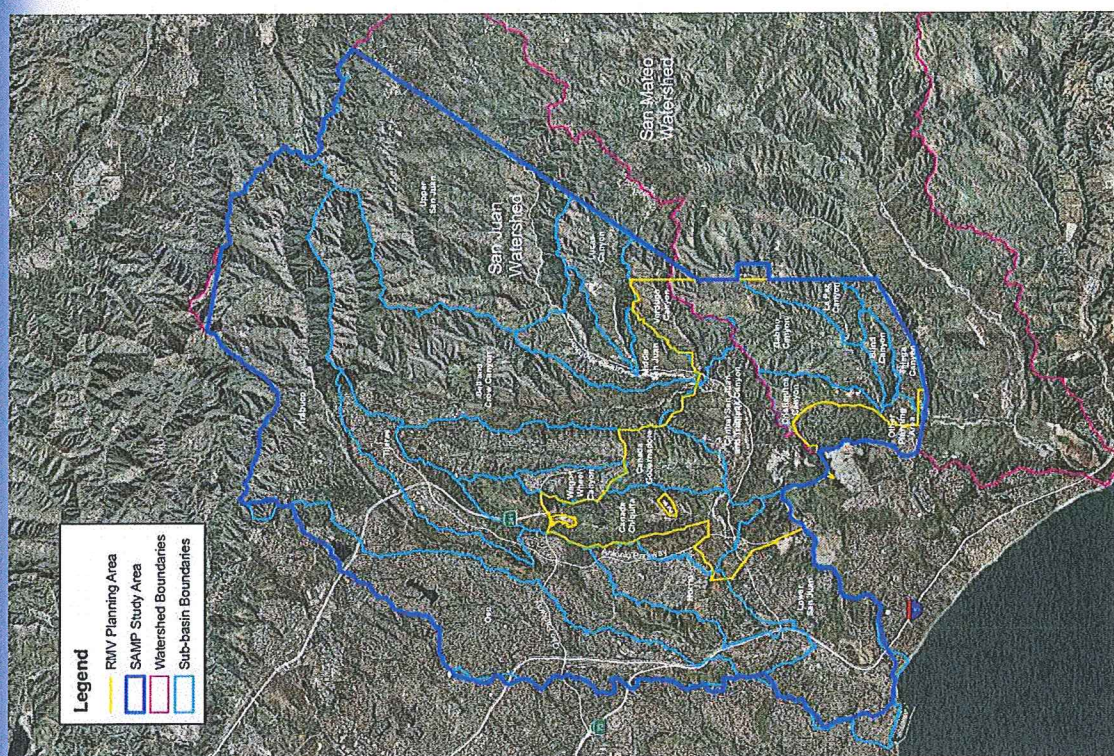




Watershed Planning

■ Contrary to the existing South Orange County Permit, the Tentative Order does not recognize the watershed planning that has occurred in Orange County to date:

- San Juan Creek and western San Mateo Watershed have been addressed in:
 - General Plan Amendment/Zone Change (GPA/ZC)
 - Special Area Management Plan (SAMP)
 - Habitat Conservation Plan (HCP)
 - Programmatic WQMP addressing specific conditions found in different sub-watersheds and coordinated with the Southern Subregion Habitat Reserve Management Program

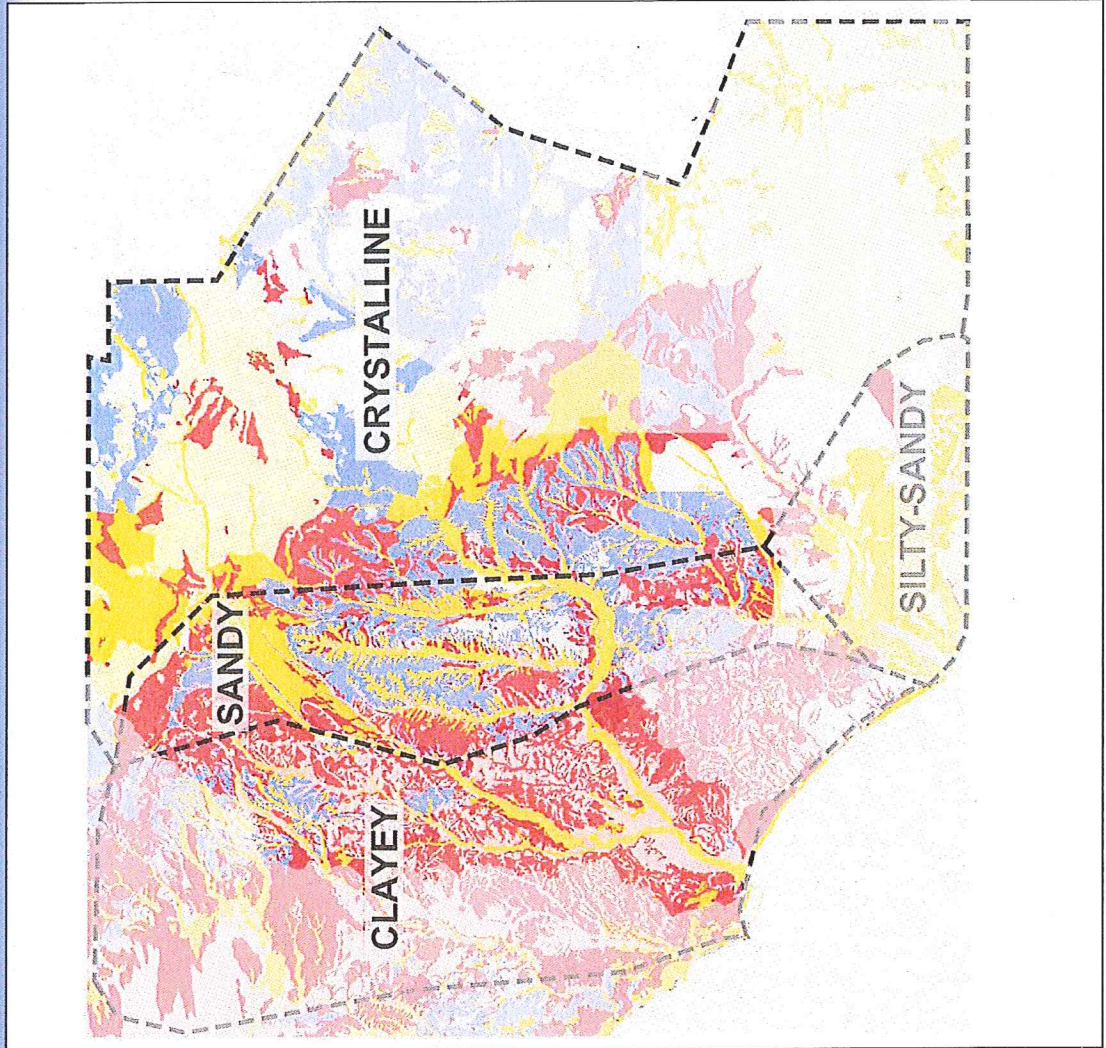


Site Design BMPs Applied at the Watershed Scale

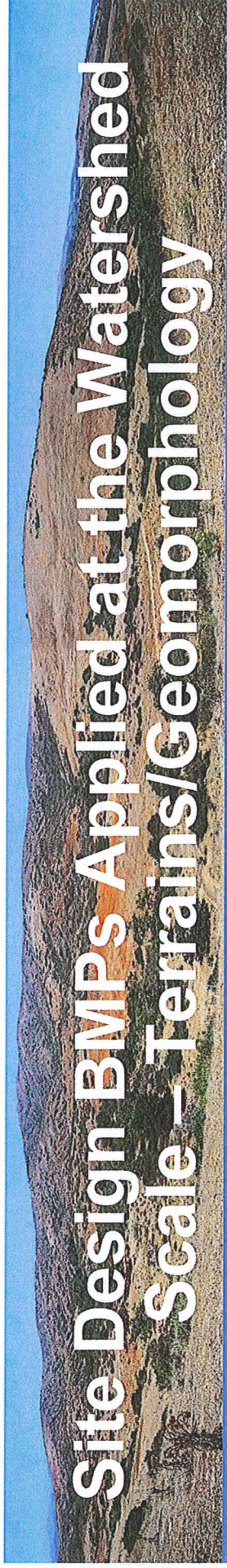
- The Tentative Order needs to recognize LID Site Design BMPs applied at the broader sub-watershed and watershed scale.
- For example;
 - Terrains/Geomorphology Principle
 - Buffer Tenet

SAMP Terrains/Geomorphology Principle

- **Principle: Recognize and account for the hydrologic response of different terrains at the sub-basin and watershed scale.**



	Rocky or Unclassified
	Erodable Sand
	Alluvial
	Less Erodable Upland Sand
	Erodable Clay
	Less Erodable Clay, Mid to Low Slope
	Less Erodable Clay, High Slope
	Erodable Silt, Low Slope
	Erodable Silt, High Slope



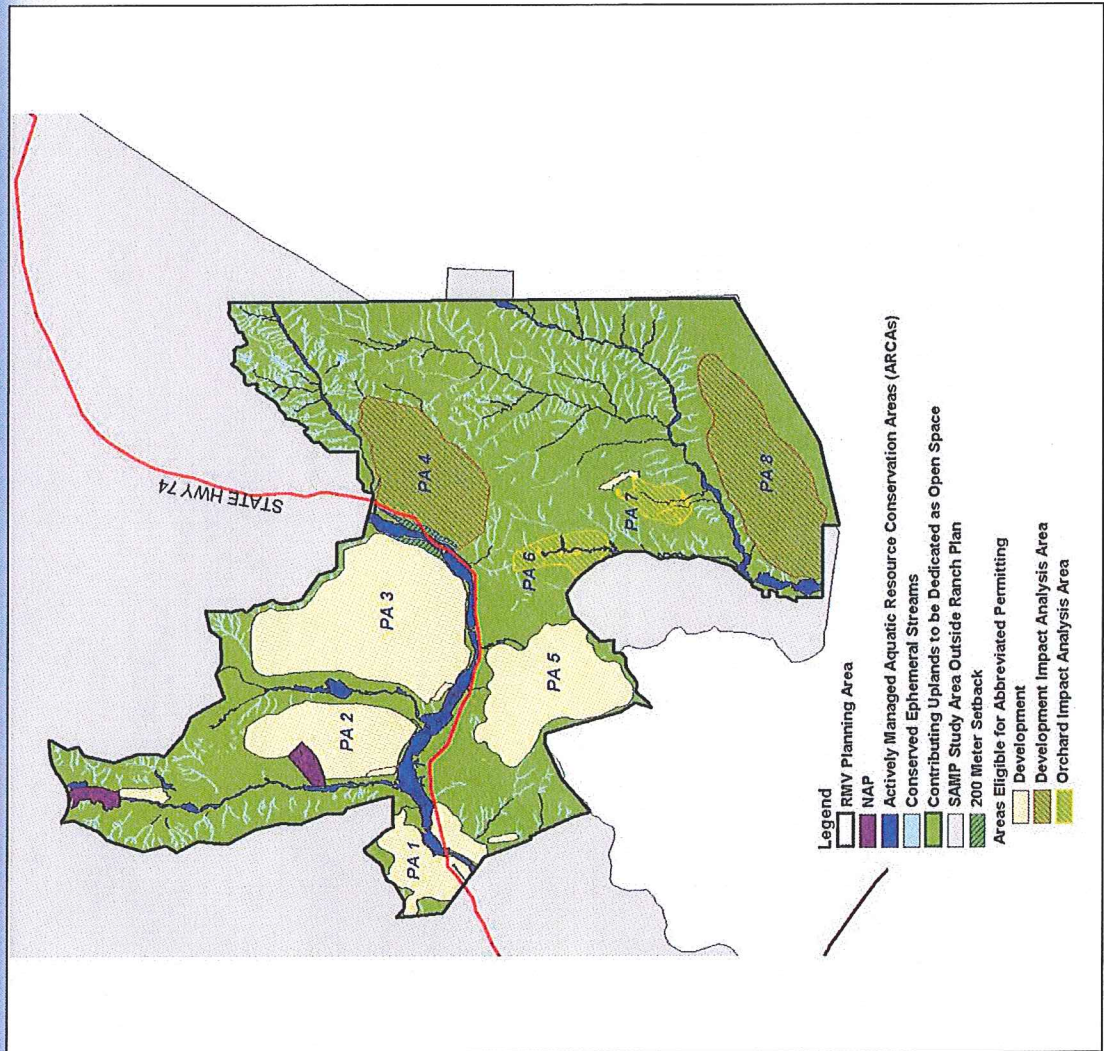
Site Design BMPs Applied at the Watershed Scale – Terrains/Geomorphology

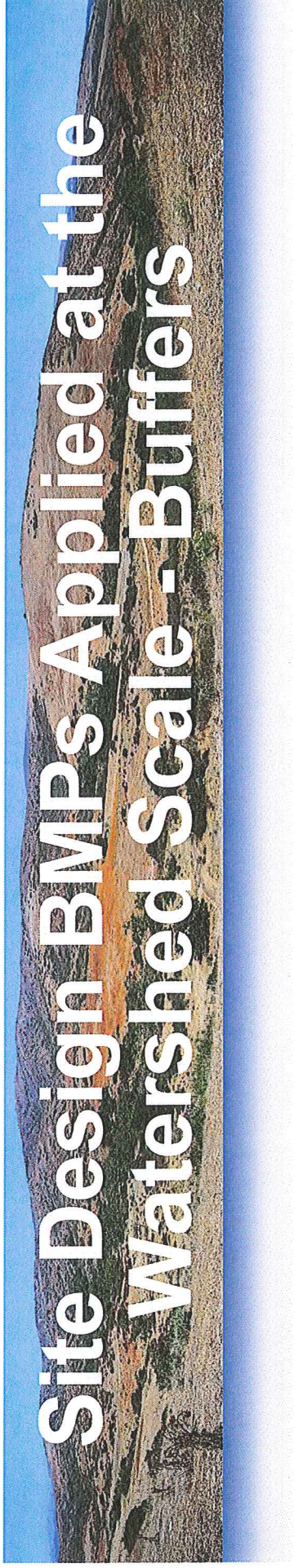
■ **Application of the Terrains/Geomorphology Principle at the watershed scale resulted in concentration of development in clay/silt terrains while protecting sandy, high infiltrating terrains. This resulted in the following water quality benefits:**

- maximizing infiltration over the watershed,
- minimizing the pre and post project change in runoff; and
- protecting sources of coarse sediment important for stream course functions, aquatic habitat and beach sand replenishment.

SAMP Buffer Tenet

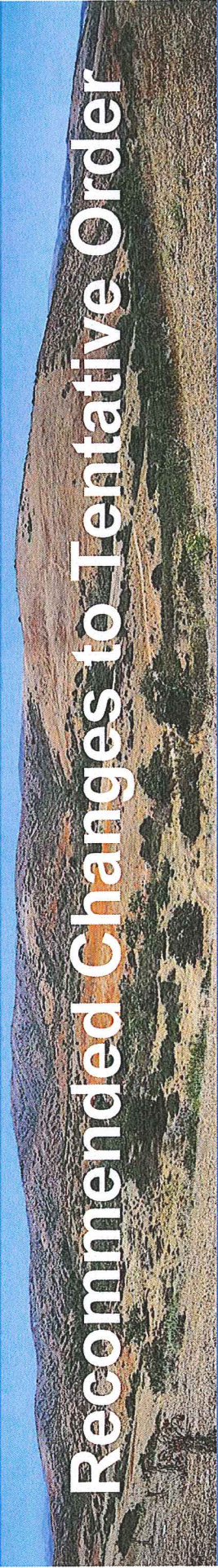
- **Tenet: Maintain adequate buffer for the protected riparian corridors**





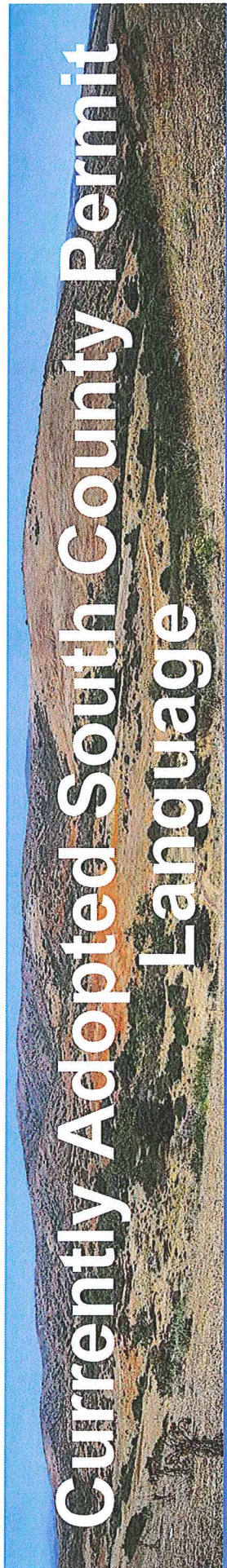
Site Design BMPs Applied at the Watershed Scale - Buffers

- Application of the Buffers Tenet at the watershed scale has resulted in protection of all mainstem creeks on RMV and protection of over 1,650 acres of riparian habitats within the RMV portion of the Southern Subregion Habitat Reserve.



Recommended Changes to Tentative Order

- The Tentative Order should provide for the ability of the co-permittee to incorporate the SAMP and/or HCP and its associated watershed and sub-watershed scale LID site design BMP's and hydromodification control BMP's into a JRMP and apply such standards to Priority Project review.
- The Tentative Order should incorporate the large development project language from the current South Orange County Permit.



Currently Adopted South County Permit Language

- Where a development project, greater than 100 acres in total project size or smaller than 100 acres in size yet part of larger common plan of development that is over 100 acres, has been prepared using watershed and/or sub-watershed based water quality, hydrologic, and fluvial geomorphic planning principles that implement regional LID BMPs in accordance with the sizing and location criteria of this Order and acceptable to the Regional Board, such standards shall govern review of projects with respect to Section F.1 of this Order and shall be deemed to satisfy this Order's requirements for LID site design, buffer zone, infiltration and hydromodification control standards.
- Regional BMPs must clearly exhibit that they will not result in net impact from pollutant loadings over and above the impact caused by capture and retention of the design storm. Regional BMPs may be used provided that the BMPs capture and retain the defined Section F.1.d(6)(a)(i) and that such controls are located upstream of receiving waters. Any volume that is not retained by the LID BMPs, up to the design capture volume, must be treated using LID bioinfiltration. Any volume up to and including the design capture volume, not retained by LID BMPs not treated by LID bioinfiltration must be treated using conventional treatment control BMPs in accordance with Section F.1.d.(6) and participation in the LID substitution program in Section F.1.d.(8).