Santa Clara Valley
Urban Runoff
Pollution Prevention Program

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DATE: **November 2011**

SUBJECT: Information on Co-permittee HM Applicability Maps

The Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2009-0074 adopted October 14, 2009, contains a county-wide map of the SCVURPPP subwatershed and catchment areas classified to show hydromodification management (HM) control areas. The MRP Attachment F.4 (cited in Provision C.3.g) described the areas of HM applicability as:

> **a. Purple areas**: These areas represent catchments that drain to hardened channels that extend continuously to the Bay or to tidally influenced sections of creeks. The HM Standard and associated requirements do not apply to projects in the areas designated in purple on the map.
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> Plans to restore a creek reach may reintroduce the applicability of HM requirements, unless the creek restoration project is designed to accommodate the potential hydromodification impacts of future development; if this is not the case, in these instances, Permittees may add, but shall not delete, areas of applicability accordingly.
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> **b. Red areas**: These areas represent catchments and subwatersheds that are greater than or equal to 65% impervious, based on existing imperviousness data sources. The HM Standard and associated requirements do not apply to projects in the areas designated in red on the map.
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> **c. Pink areas**: These are areas that are under review by the Permittees for accuracy of the imperviousness data. The HM Standard and associated requirements apply to projects in areas designated as pink on the map until such time as a Permittee presents new data that indicate that the actual level of imperviousness of a particular area is greater than or equal to 65% impervious. Any new data will be submitted to the Water Board in one coordinated submittal within one year of permit adoption.
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> **d. Green area**: These areas represent catchments and subwatersheds that are less than 65% impervious and are not under review by the Permittees. The HM Standard and associated requirements apply to projects in areas designated as green on the map.

During 2010, several Co-permittees conducted detailed analyses of the imperviousness of the "pink" areas which resulted in changes to the status of several catchments. A revised HM applicability map incorporating these changes was submitted to the Water Board on October 14, 2010, in compliance with the permit. In response to Water Board staff comments and to address some minor errors, a second revised map (dated November 2010) was submitted to the Water Board on March 21, 2011. Note that there are no longer any "pink areas" on the map. These areas were either determined to be greater than or equal to 65% impervious and changed to "red" (HM requirements do not apply), or were changed to "green" (HM requirements apply).

To assist Co-permittees in identifying HM requirements for local projects, Program staff created jurisdictional-level HM applicability maps with the same identification scheme as the county-wide map. At this scale, some of the maps appear to have small anomalies, which are explained below.

Anomalies in Map Data

The HM applicability maps were created by placing several GIS (geographical information system) data layers over top of one another. The nature, sources and resolution of these GIS data layers have created some anomalies in the maps.

Jurisdictional Boundaries

Jurisdictional boundaries are shown on the maps by thick black lines. The jurisdictional boundaries were obtained from public domain data from the Census 2000 TIGER line data developed by ESRI. Cities can sometimes have small areas within their municipal borders that are unincorporated. Due to the resolution and data source, these small interior areas sometimes appear as a jumble of thick black lines and shapes. Local agency GIS departments may be able to provide a better GIS data file to eliminate these anomalies.

Subwatersheds and Catchment areas

HM applicability areas are defined using two different spatially defined layers -- subwatershed and catchment layers. The subwatershed layer, used to estimate percent impervious, was developed in the 1980's by the Santa Clara Valley Water District. The catchment layer, used to identify areas draining to exempt channels and percent impervious in some areas, was developed by the District in 2003 and updated in 2008. Because these layers were developed at different times, the boundaries of these layers do not always match up exactly. It is not anticipated that these small differences will greatly influence the applicability of the HM requirements to a particular project.