



City of Woodland

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May 28, 2019

Ms. Elizabeth Lee  
Central Valley Regional Water Quality Control Board  
Municipal Storm Water Permitting Unit  
11020 Sun Center Drive, Suite #200  
Rancho Cordova, CA 95670-6114

**SUBJECT: CITY OF WOODLAND'S HYDROMODIFICATION MANAGEMENT PLAN AND CONCLUSION REGARDING THE ALTERNATIVE HYDROMODIFICATION STANDARD REQUEST  
PHASE II SMALL MS4 GENERAL PERMIT 2013-001-DWQ, SECTION E.12.F.ii**

Dear Ms. Lee (by e-mail and U.S. Mail),

The City of Woodland (City) is a Phase II MS4 Permittee that has corresponded with the Central Valley Regional Water Quality Control Board (Board) for the past 3 years in regards to the City's Proposed Hydromodification Management Plan (HMP) to be in compliance with the requirements of Section E.12.F.ii of the Phase II Small MS4 General Permit (GP), 2013-00010-DWQ. The following is a summary of the past correspondence:

- In my role with the City as the stormwater system engineer, along with City's consultant, Mark Cocke, with Nexgen Utility Management, met with Chris Day and yourself on January 6, 2016 to discuss the subject.
- City issued a letter to the Board, dated January 22, 2016 which formally asked for direction to proceed with the ability to not submit a HMP to remain in compliance with the GP. Attached to the letter was a support information sheet developed by NEXGEN to back up our HMP exemption request.
- Board issued a letter to the City, dated March 10, 2016, indicating that within the third year of the effective date of the permit, July 1, 2016, the City must either develop and implement HMP or propose an alternative Hydromodification Standard.
- City issued a letter to the Board, dated May 23, 2016 which formally requested that an alternative Hydromodification Standard be approved. Attached to the letter was the City's proposed alternative Hydromodification Standard that was prepared for the City by our consultant engineer, NEXGEN, dated May 10, 2016.

- Due to lack of Board staffing, the City's formal request languished. Of note, during the entire time, all regulated development projects in the City met the HMP requirements as outlined in the GP.
- A teleconference to get the City's request jump started was held on February 13, 2016. Teleconference participants were the City Engineer, myself, Bryan Smith of the Board and yourself. The teleconference resulted in a letter by the Board to the City, dated February 15, 2018. The letter laid out how the City can demonstrate compliance with the HMP requirements of the GP by the use of regional retention basins.
- On May 2, 2019, the City submitted a proposed HMP report, dated April 18, 2019, which was prepared by another City consultant, RICK Engineering. The RICK HMP report demonstrates how the HMP requirements of the GP can be met in the City by the use of a regional retention basin, specifically the SE area of the City which drains into the East Regional Pond (ERP).
- A meeting between the Board and City (including the City's consultant, RICK Engineering) was held in the Board's Rancho Cordova office on May 24, 2019 to discuss the City's proposed HMP.

The City agreed to write this letter that summarizes the ultimate outcome of the City's HMP request as discussed in our meeting on May 24, 2019. The Board staff found the City's proposed HMP by RICK Engineering to be in compliance with the HMP requirements of the GP. Therefore, moving forward the outcome of the meeting were as follows:

- As long as the proposed developments in the areas that drain into the ERP matches or gets less dense development than what was studied, the developments will not need to provide hydromodification on-site. Should the land uses get more intensive (higher density), then additional studies will be required to ensure that the ERP can handle the HMP requirements of the development.
- As the RICK Study shows the developments within the ERP drainage area meets the HMP requirements of the 2 year, 24 hour event storm, an alternative hydromodification standard is no longer being requested. It was clarified in the meeting that the 2 year, 24 hour event storm is the hydromodification standard.
- Going forward, for areas not covered by the RICK study, the City can repeat a similar analysis in other areas of the City without going to the Board again for concurrence.
- The City currently has a Post-Construction Standards Plan (PCSP), dated 2015, which outlines how developments in the City of Woodland can meet all the stormwater requirements of the GP. Section 5.5 of the PCSP outlines how developments in the City can meet the HMP requirements. The City will modify Section 5.5 of the PCSP to indicate that the HMP standard can be met by either a project level or area level analysis. Previously, and per the narrow guidelines of the GP, HMP had to be met within the footprints of a development's project area.
- Section 7 of the PCSP includes municipal specific information regarding implementation of the GP. This letter will be added to Section 7 of the PCSP to meet the Board's requirement for an auditable method to keep track of the documents demonstrating compliance with the HMP requirements of the GP.

Thank you for your time invested in this endeavor and we appreciate working with the Board to minimize the impairments that developments can have to the waters of the United States.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Fong".

Chris Fong,  
Senior Associate Civil Engineer

cc: Brent Meyer, City Engineer (e-mail only)