

Table 1. Standards and Thresholds/Triggers by Permitting Organization

Table 1A. 2013 MS4 Phase II Permit Requirements

	New Development	Redevelopment
Threshold/Trigger	Land disturbance \geq 1 acre	
TP Standard	No net increase from pre-project conditions (on average annual basis)	Net reduction from pre-project conditions (on average annual basis)
TSS Standard		
Volume Standard		

Table 1B. 2013 NPDES General Construction Stormwater Permit Requirements

	New Development	Redevelopment
Threshold/Trigger	New cumulative impervious area \geq 1 acre	
TP Standard	None	
TSS Standard	None	
Volume Standard	Retain 1.0 inches of runoff from new impervious area on site (where infiltration is prohibited, treatment by wet basins, filtration, or other equivalent methods is required)	

Table 1C. Minimal Impact Design Standards (MIDS) Guidelines

	New Development	Redevelopment
Threshold/Trigger	New and/or fully redeveloped cumulative impervious area \geq 1 acre	
TP Standard	60% total annual removal (if volume control cannot be met)	
TSS Standard	None	
Volume Standard	Retain 1.1 inches of runoff from new or redeveloped impervious area (non-linear projects) Retain greater of 0.55 inches of runoff from new or redeveloped impervious area or 1.1 inches from net increase in impervious area (linear projects)	

Table 1D. Current BCWMC Requirements for Improvements and Development Proposals

	New Development	Redevelopment
Threshold/Trigger	\geq 0.5 acres (Commercial/Industrial) > 2 acres and 4 units (Residential)	Trigger varies for Comm./Ind. land use ¹ > 2 acres and 4 units (Residential) ³
TP Standard	Level 1 Standards	No increase in TP loading ^{2,3} Level 1 Standards ^{2,3}
TSS Standard	None	None
Volume Standard	None	None

¹ No increase in TP loading is triggered for commercial/industrial/institutional redevelopment satisfying the following criteria:

Parcel size (ac)	Increase in impervious area (ft ²)	Area of disturbance (ac)
\geq 0.5 – 1.0	\geq 1,000	any
> 1.0 – 5.0	\geq 2,000	any
> 5.0	\geq 10,000	any
any	any	\geq 5.0

² For commercial/industrial/institutional redevelopment with parcel or disturbance area >5 acres, redeveloping the entire site to Level 1 Standards provides acceptable treatment to non-degradation standards (i.e, no increase in TP loading).

³ Level 1 Standards are additionally applicable for residential redevelopment of >10 acres and including 4 or more living units. For all residential redevelopment, redeveloping the entire site to Level 1 Standards satisfies the non-degradation standard.

TP = Total phosphorus

TSS = Total suspended solids

MS4 = Municipal Separate Stormwater Sewer System

NPDES = National Pollutant Discharge Elimination System

Level 1 Standards = water quality performance goals based on NURP; design criteria for BMPs meeting

Level 1 Standards are defined in the *Requirements for Improvements and Redevelopment Proposals*

Table 2. Summary of Standards and Thresholds/Triggers (combined)

	Source	New Development	Redevelopment
Threshold/Trigger	MS4 Phase II Permit	Land disturbance \geq 1 acre	
	NPDES Construction Stormwater Permit	New cumulative impervious area \geq 1 acre	
	Minimal Impact Design Standards	New and/or fully redeveloped cumulative impervious area \geq 1 acre	
	BCWMC Requirements	\geq 0.5 acres (Commercial/Industrial) > 2 acres and 4 units (Residential)	Trigger for Comm./Ind. land use varies by parcel size ¹ > 2 acres and 4 units (Residential) ³
Total Phosphorus Standard	MS4 Phase II Permit	No net increase from pre-project conditions (average annual basis)	Net reduction from pre-project conditions (average annual basis)
	NPDES Construction Stormwater Permit	None	
	Minimal Impact Design Standards	60% total annual removal (if volume control cannot be met)	
	BCWMC Requirements	Level 1 Standards	No increase in TP loading ^{2,3} Level 1 Standards ^{2,3}
Total Suspended Solids Standard	MS4 Phase II Permit	No net increase from pre-project conditions (average annual basis)	Net reduction from pre-project conditions (average annual basis)
	NPDES Construction Stormwater Permit	None	
	Minimal Impact Design Standards	None	
	BCWMC Requirements	None	
Volume Standard	MS4 Phase II Permit	No net increase from pre-project conditions (average annual basis)	Net reduction from pre-project conditions (average annual basis)
	NPDES Construction Stormwater Permit	Retain 1.0" of runoff from new impervious area on site (where infiltration is prohibited, treatment by wet basins, filtration, or other equivalent methods is required)	
	Minimal Impact Design Standards	Retain 1.1" of runoff from new or redeveloped impervious area (non-linear projects); Retain greater of 0.55" of runoff from new or redeveloped impervious area or 1.1" from net increase in impervious area (linear projects)	
	BCWMC Requirements	None	

¹ No increase in TP loading is triggered for commercial/industrial/institutional redevelopment satisfying the following criteria:

Parcel size (ac)	Increase in impervious area (ft ²)	Area of disturbance (ac)
\geq 0.5 – 1.0	\geq 1,000	any
> 1.0 – 5.0	\geq 2,000	any
> 5.0	\geq 10,000	any
any	any	\geq 5.0

² For commercial/industrial/institutional redevelopment with parcel or disturbance area >5 acres, redeveloping the entire site to Level 1 Standards provides acceptable treatment to non-degradation standards (i.e, no increase in TP loading).

³ Level 1 Standards are additionally applicable for residential redevelopment of >10 acres and including 4 or more living units. For all residential redevelopment, redeveloping the entire site to Level 1 Standards satisfies the non-degradation standard.

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Revisions to BCWMC Standards and Thresholds/Triggers

Existing BCWMC standards and thresholds/ triggers are presented in the previous tables. Existing BCWMC standards are not directly comparable to MS4, NPDES, and MIDS performance goals. BCWMC thresholds/triggers vary by land use type. New commercial and industrial development has a smaller thresholds/trigger than the MS4 permit (i.e., BCWMC standards may apply when MS4 standards do not), while other land uses have thresholds/triggers greater than the MS4 permit (i.e., the MS4 standards may apply while BCMWC standards do not).

Questions to consider:

- Should the BCWMC standards stay the same?
 - If not, should the standards be more stringent than the MS4 permit, NPDES permit, or MIDS?
- Should the BCWMC thresholds/triggers stay the same?
 - If not, should the thresholds /triggers be higher or lower than the MS4 permit, NPDES permit, or MIDS?
 - If not, should the thresholds/triggers vary by land use and development/redevelopment (as they do now)?
- Should BCWMC thresholds/triggers for the application of standards be different than the triggers for project review (*current practices is that the thresholds/triggers are the same for standards and review*)?

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