SMCWPPP Guidance for Project Applicants in **Addressing Stormwater Quality Concerns During CEQA Review**

June 2023

The following table provides supplemental guidance to project applicants in completing the initial study checklist to address urban runoff water considerations during project environmental review.

CEQA Guidelines ¹ Question	Additional Issues to Address Stormwater Quality Concerns within the CEQA Initial Study Checklist
CHECKLIST CHAPTER IV: BIOLOGICAL RESOURCES	
IV.b) Will the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	The evaluation of a project's effect on sensitive natural communities should encompass aquatic and wetland habitats. Consider "aquatic and wetland habitat" as examples of sensitive habitat.
CHECKLIST CHAPTER VII: GEOLOGY AND SOILS	
VII.b) Will the project result in substantial soil erosion or the loss of topsoil?	See response to Item $X.c$) below.
CHECKLIST CHAPTER X: HYDROLOGY AND WATER QUALITY	
X.a) Will the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	The evaluation of a project's compliance with water quality standards should consider the project's potential effect on water bodies on the Section 303(d) list ² , as well as the potential for conflict with applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses.
	The evaluation of a project's potential to degrade water quality should consider whether a project has the potential to result in a significant impact to surface water quality, marine, fresh, or wetland waters, or to groundwater quality. As with every category of environmental impact, effects must be considered both during and after construction. The evaluation of water quality impacts should include a description of how the project will comply with the requirements of the MRP and the State's Construction General Permit. The description should also include a statement that the project should avoid creation of mosquito larval sources that would subsequently require chemical treatment to protect human and animal health.

¹ CEQA Guidelines:

https://resources.ca.gov/CNRALegacyFiles/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf

² 2020-22 California Integrated Report: 2020-2022 California Integrated Report | California State Water Resources **Control Board**

CEQA Guidelines¹ Question

- X.c) Will the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would::
 - i) result in substantial erosion or siltation on- or off-site;
 - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
 - iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - iv) impede or redirect flood flows?

Additional Issues to Address Stormwater Quality Concerns within the CEQA Initial Study Checklist

The evaluation of a project's effect on drainage patterns should refer to Chapter 7 and Appendix H of the SMCWPPP Regulated Projects Guide, where applicable, to assess the significance of altering existing drainage patterns and to develop any mitigation measures. The evaluation of hydromodification effects should also consider any potential for streambed or bank erosion downstream from the project.

The evaluation of a project's potential to create or contribute runoff should consider whether the project meets or exceeds the size thresholds for regulation under Provision C.3 (i.e., projects that create and/or replace 5,000 square feet of impervious surface). The response to this question will indicate how Provision C.3 requirements will be met. Applicants must address Provision C.3 requirements in environmental documents for projects that meet or exceed the impervious surface thresholds.