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RE: CASTLEROCK PROJECT PRELIMINARY CONSTRUCTION RISK LEVEL ASSESSMENT

This memo serves to provide a preliminary analysis of the construction risk level determination for the Castlerock development project in regards to the current Construction General Permit adopted by the California State Water Resources Control Board on September 02, 2009. The preliminary risk level for this project is determined to be **RISK LEVEL TWO.** The risk level determination is calculated based on Appendix 1 of Order No. 2009-009-DWQ. The sediment risk factor is established and compared with the receiving water risk factor to determine the overall Combined Risk Level.

The sediment risk factor is based on the product of 3 variables; the R factor, K factor and LS factor. The R factor is based on EPA fact sheet 3-1 for Construction Rainfall Erosivity. Because the preliminary project duration will be greater than 1 year, the Erosivity Index (EI) value will be 100%. Based on the Isorodent map in the fact sheet (Figure 1), the project is located near the 40 contour, a R value of 40.0 (see figure 1) will be used. The K factor is 0.32 and is established with an overlay from Google Earth based on the GIS map method (Figure 2 attached). The LS factor (Figure 3) is calculated from the LS Factor table in the General Permit, Appendix 1, based on the existing site topography. The LS factor is 20.57 with the sheet flow lengths of approximately 1000 LF and an average slope of approximately 20%. The annual watershed erosion estimate is the product of R x K x LS; 40.0 x 0.32 x 20.57 = 263 tons/acre/year. This amount is greater than the 75 tons/acre threshold, therefore the site has a **HIGH** risk for erosion (Figure 4).

The San Diego River is the receiving water for the site. The San Diego River is not impaired for sediment (Figure 5) nor is it designated for beneficial uses of SPAWN, COLD or MIGRATORY. Therefore, the receiving water risk factor is **low**. Figure 5 shows the receiving water decision matrix.

(continued)

Based on the Combined Risk Level Matrix (Figure 6), a project with a **high sediment risk** and a **low receiving water risk** is considered a **Level 2** project under the current General Permit. The project would be required to comply with all aspects of the Level 2 requirements as outlined in Attachment D of the General Permit, Order No. 2009-009-DWQ, which runs through September 02, 2014. This risk level will be subject to revision if changes to the construction duration occur, if construction does not begin prior to that date or if there are any changes adopted by the State Water Resources Control Board before grading begins.

Sincerely,

John Eardensohn, RCE 34584

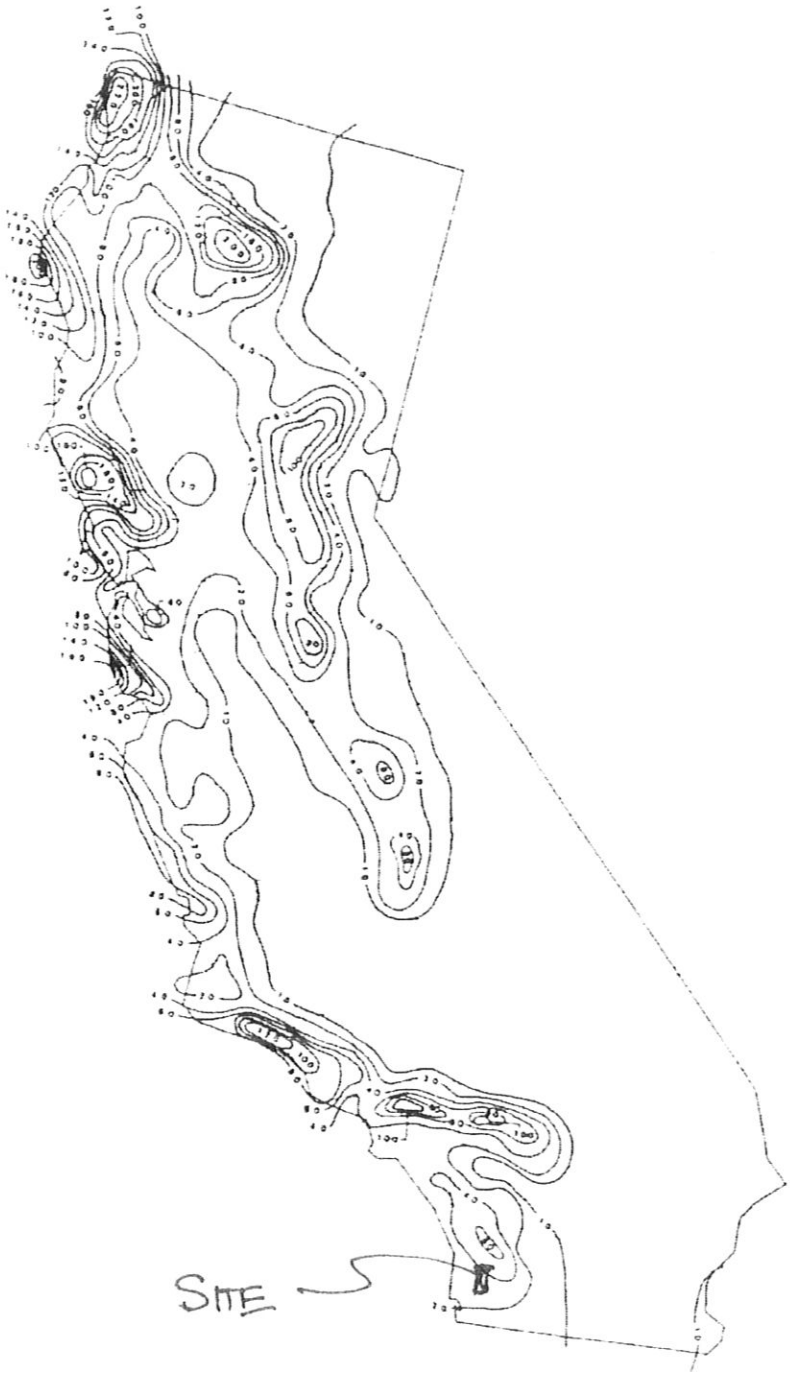
Attachments: Figures 1-6

FIGURE 1

Rainfall Erosivity Waiver

R VALUE

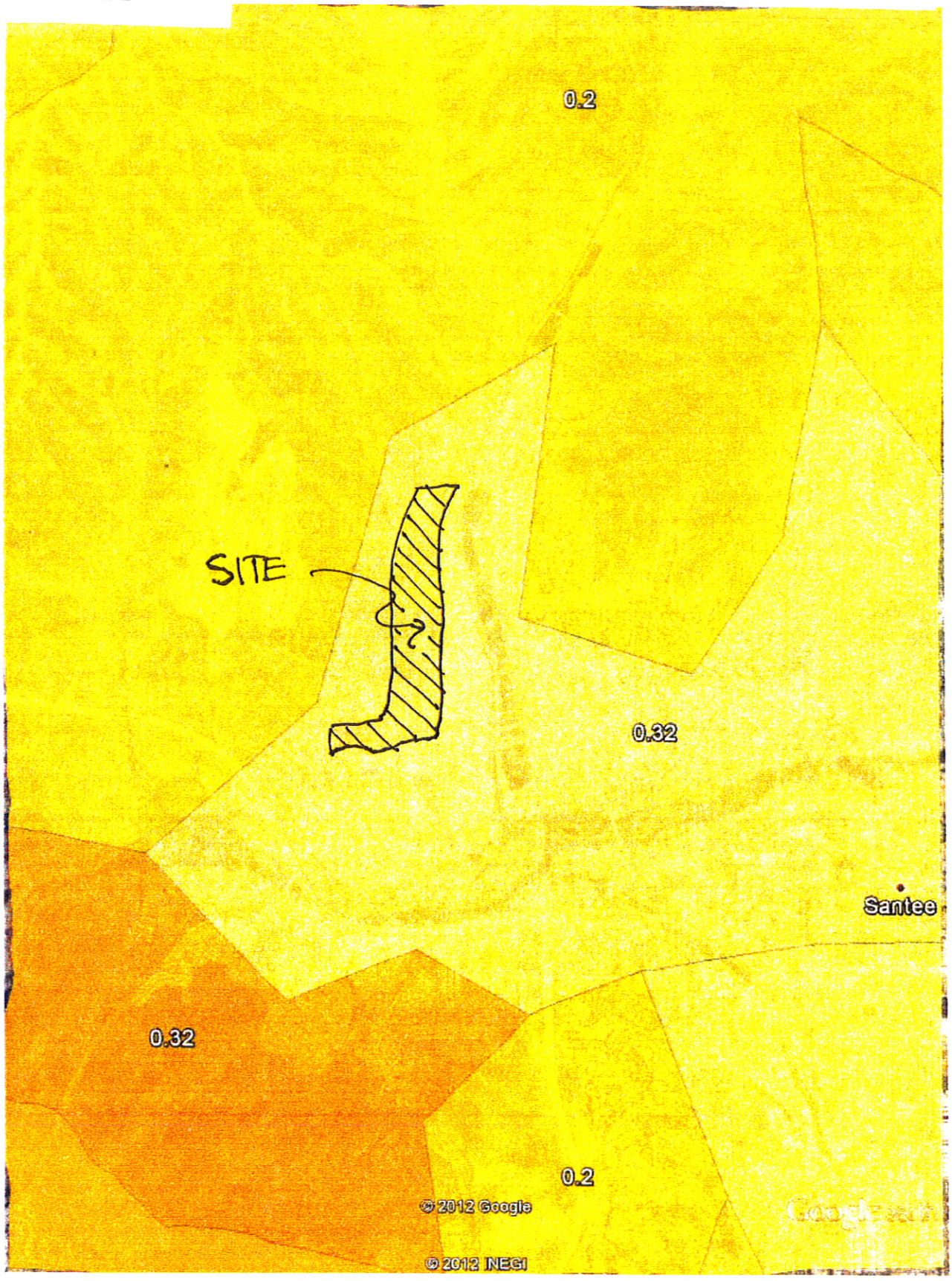
. Isoerodent Map of California



Note: Units for all maps on this page are hundreds ft•tonf•in(ac•h•yr)$^{-1}$

FIGURE 2

K FACTOR



Google earth

miles 2
km 3

FIGURE 3

LS FACTOR

Sheet Flow Length (ft)	Average Watershed Slope (%)																	
	0.2	0.5	1.0	2.0	3.0	4.0	5.0	6.0	8.0	10.0	12.0	14.0	16.0	20.0	25.0	30.0	40.0	50.0	60.0
<3	0.05	0.07	0.09	0.13	0.17	0.20	0.23	0.26	0.32	0.35	0.36	0.38	0.39	0.41	0.45	0.48	0.53	0.58	0.63
6	0.05	0.07	0.09	0.13	0.17	0.20	0.23	0.26	0.32	0.37	0.41	0.45	0.49	0.56	0.64	0.72	0.85	0.97	1.07
9	0.05	0.07	0.09	0.13	0.17	0.20	0.23	0.26	0.32	0.38	0.45	0.51	0.56	0.67	0.80	0.91	1.13	1.31	1.47
12	0.05	0.07	0.09	0.13	0.17	0.20	0.23	0.26	0.32	0.39	0.47	0.55	0.62	0.76	0.93	1.08	1.37	1.62	1.84
15	0.05	0.07	0.09	0.13	0.17	0.20	0.23	0.26	0.32	0.40	0.49	0.58	0.67	0.84	1.04	1.24	1.59	1.91	2.19
25	0.05	0.07	0.10	0.16	0.21	0.26	0.31	0.36	0.45	0.57	0.71	0.85	0.98	1.24	1.56	1.86	2.41	2.91	3.36
50	0.05	0.08	0.13	0.21	0.30	0.38	0.46	0.54	0.70	0.91	1.15	1.40	1.64	2.10	2.67	3.22	4.24	5.16	5.97
75	0.05	0.08	0.14	0.25	0.36	0.47	0.58	0.69	0.91	1.20	1.54	1.87	2.21	2.86	3.67	4.44	5.89	7.20	8.37
100	0.05	0.09	0.15	0.28	0.41	0.55	0.68	0.82	1.10	1.46	1.88	2.31	2.73	3.57	4.59	5.58	7.44	9.13	10.63
150	0.05	0.09	0.17	0.33	0.50	0.68	0.86	1.05	1.43	1.92	2.51	3.09	3.68	4.85	6.30	7.70	10.35	12.75	14.89
200	0.06	0.10	0.18	0.37	0.57	0.79	1.02	1.25	1.72	2.34	3.07	3.81	4.56	6.04	7.88	9.67	13.07	16.16	18.92
250	0.06	0.10	0.19	0.40	0.64	0.89	1.16	1.43	1.99	2.72	3.60	4.48	5.37	7.16	9.38	11.55	15.67	19.42	22.78
300	0.06	0.10	0.20	0.43	0.69	0.98	1.28	1.60	2.24	3.09	4.09	5.11	6.15	8.23	10.81	13.35	18.17	22.57	26.51
400	0.06	0.11	0.22	0.48	0.80	1.14	1.51	1.90	2.70	3.75	5.01	6.30	7.60	10.24	13.53	16.77	22.95	28.60	33.67
600	0.06	0.12	0.24	0.56	0.96	1.42	1.91	2.43	3.52	4.95	6.67	8.45	10.26	13.94	18.57	23.14	31.89	39.95	47.18
800	0.06	0.12	0.26	0.63	1.10	1.65	2.25	2.89	4.24	6.03	8.17	10.40	12.69	17.06	23.24	29.07	40.29	50.63	59.93
1000	0.06	0.13	0.27	0.69	1.23	1.86	2.55	3.30	4.91	7.02	9.57	12.23	14.96	20.57	27.66	34.71	48.29	60.84	72.15

LS Factors for Construction Sites. *Table from Renard et. al., 1997.*

APPROXIMATE FLOW LENGTH OF 1000' @ 20%

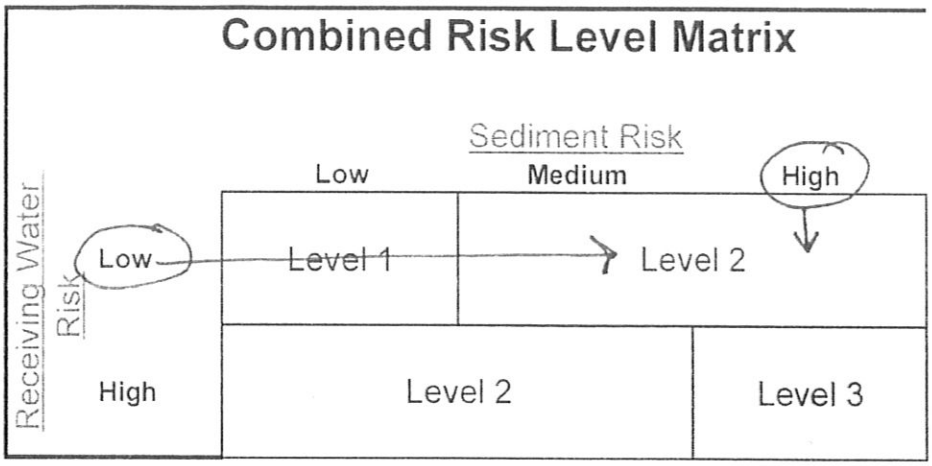
FIGURE 4

	A	B	C
1	**Sediment Risk Factor Worksheet**		**Entry**
2	**A) R Factor**		
3	Analyses of data indicated that when factors other than rainfall are held constant, soil loss is directly proportional to a rainfall factor composed of total storm kinetic energy (E) times the maximum 30-min intensity (I30) (Wischmeier and Smith, 1958). The numerical value of R is the average annual sum of EI30 for storm events during a rainfall record of at least 22 years. "Isoerodent" maps were developed based on R values calculated for more than 1000 locations in the Western U.S. Refer to the link below to determine the R factor for the project site.		
4	http://cfpub.epa.gov/npdes/stormwater/LEW/lewCalculator.cfm		
5		**R Factor Value**	40
6	**B) K Factor (weighted average, by area, for all site soils)**		
7	The soil-erodibility factor K represents: (1) susceptibility of soil or surface material to erosion, (2) transportability of the sediment, and (3) the amount and rate of runoff given a particular rainfall input, as measured under a standard condition. Fine-textured soils that are high in clay have low K values (about 0.05 to 0.15) because the particles are resistant to detachment. Coarse-textured soils, such as sandy soils, also have low K values (about 0.05 to 0.2) because of high infiltration resulting in low runoff even though these particles are easily detached. Medium-textured soils, such as a silt loam, have moderate K values (about 0.25 to 0.45) because they are moderately susceptible to particle detachment and they produce runoff at moderate rates. Soils having a high silt content are especially susceptible to erosion and have high K values, which can exceed 0.45 and can be as large as 0.65. Silt-size particles are easily detached and tend to crust, producing high rates and large volumes of runoff. Use Site-specific data must be submitted.		
8	Site-specific K factor guidance		
9		**K Factor Value**	0.32
10	**C) LS Factor (weighted average, by area, for all slopes)**		
11	The effect of topography on erosion is accounted for by the LS factor, which combines the effects of a hillslope-length factor, L, and a hillslope-gradient factor, S. Generally speaking, as hillslope length and/or hillslope gradient increase, soil loss increases. As hillslope length increases, total soil loss and soil loss per unit area increase due to the progressive accumulation of runoff in the downslope direction. As the hillslope gradient increases, the velocity and erosivity of runoff increases. Use the LS table located in separate tab of this spreadsheet to determine LS factors. Estimate the weighted LS for the site prior to construction.		
12	LS Table		
13		**LS Factor Value**	20.57
14			
15	**Watershed Erosion Estimate (=RxKxLS) in tons/acre**		263.296
16	**Site Sediment Risk Factor**		**High**
17	Low Sediment Risk: < 15 tons/acre		
18	Medium Sediment Risk: >=15 and <75 tons/acre		
19	High Sediment Risk: >= 75 tons/acre		
20			

FIGURE 5

Receiving Water (RW) Risk Factor Worksheet	Entry	Score
A. Watershed Characteristics	yes/no	
A.1. Does the disturbed area discharge (either directly or indirectly) to a **303(d)-listed waterbody impaired by sediment** (For help with impaired waterbodies please visit the link below) or has a **USEPA approved TMDL implementation** http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml **OR**	no	Low
A.2. Does the disturbed area discharge to a waterbody with designated beneficial uses of SPAWN & COLD & MIGRATORY? (For help please review the appropriate Regional Board Basin Plan) http://www.waterboards.ca.gov/waterboards_map.shtml		
Region 1 Basin Plan Region 2 Basin Plan Region 3 Basin Plan Region 4 Basin Plan Region 5 Basin Plan Region 6 Basin Plan Region 7 Basin Plan Region 8 Basin Plan Region 9 Basin Plan		

FIGURE 6



Project Sediment Risk: High

Project RW Risk: Low

Project Combined Risk: Level 2