

5.0 POST CONSTRUCTION

Introduction

Requirements of the Phase II General Permit pertaining to “post construction” measures (including Attachment 4) are implemented through the County’s process of regulating land use. Under state planning law and the California Environmental Quality Act, the County evaluates impacts from new development and redevelopment in Santa Barbara County and is authorized to regulate development to protect water quality through the County Comprehensive Plan and Zoning Ordinance. This regulatory process includes evaluation of impacts from development and is implemented through the review process to issue land use permits by the Planning and Development Department (P&D).

P&D implements this program through policy and California Environmental Quality Act review. Policy is implemented through:

- Interpretations and guidelines
- Land Use Development Code

California Environmental Quality Act review is implemented through:

- Initial study checklist
- Environmental Thresholds and Guidelines Manual
- Conditions of approval and mitigation measures to ensure that projects are consistent with key policies and address identified California Environmental Quality Act impacts.

P&D relies upon other County Departments and Divisions to review and enforce other laws and provisions, such as State Fire Code through Fire Department and local fire districts, Health & Safety Code through the Public Health Department, etc. In this way, the Public Works Department provides input to the County’s discretionary approval process through developed criteria for treatment of runoff from development. This input enables P&D to comply with Attachment 4(B(2(i))) of the General Permit for treatment control BMPs and Attachment 4(B(2(a))) for peak storm runoff discharge rates (see Appendix 5A).

Summary Table 5-1 Post Construction BMPs and Measurable Goals

(From Table 5-1 County of Santa Barbara Storm Water Management Program)

Year(s)	BMP	Current Status	Implementation Details	Measurable Goals	Implementing Entity
0	5.1 Update Land Use Policies	Updated policies adopted by Board of Supervisors in 2002.	Updated policies provide implementation framework for compliance with this MCM.	5.1.1. Completed	County Planning and Development Department

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Year(s)	BMP	Current Status	Implementation Details	Measurable Goals	Implementing Entity
1-5	5.2 Implement Design Per this MCM	Design standards to protect water quality are required on all new and redevelopment projects through policy, CEQA, and Zoning Ordinances.	Treatment control BMPs are conditioned by Public Works; all other design standards are conditioned by P&D.	5.2.1. Apply standards to 100% of all applicable projects.	County Planning and Development Department
1-5	5.3 Evaluate Program Efficacy	Design standards to protect water quality are required on all new and redevelopment projects through policy, CEQA, and Zoning Ordinances.	Existing policies, procedures, and standard conditions used to protect water quality will be evaluated through comparison to the General Permit requirements including Attachment(4).	5.3.1. Compare existing policies, procedures, and std conditions to the General Permit Attachment(4) requirements (year 1). 5.3.2. If it is determined that changes need to be made to better comply with those requirements, then the relevant policy, procedures, or standard conditions will be developed or modified so that they meet or exceed all of the requirements in the General Permit including Attachment 4(B) (year 2).	Planning and Development Department; Public Works Department
1-5	5.4 Discretionary Permit Review Process: Project Evaluations	Water quality measures are identified during pre-application review, application submittal and review, CEQA review. Project implementation verified through construction monitoring and applicant reporting.	Discretionary projects will be monitored for compliance with water quality measures, and non-compliance may include a correction notice, stop work order, collection of any bonds, and establishing a time frame for developer to take corrective steps to resume work.	5.4.1. Annually evaluate 100% of all discretionary projects for compliance with water quality measures. 5.4.2. Take enforcement actions on all non-compliant conditioned projects.	County Planning and Development Department
1-5, incrementally	5.5 Staff Training	Permitting and review staff. hold regular staff training on multiple subjects, including compliance with NPDES Permit conditions. Training materials including videotape of one training class are available.	Training can be used to initiate new staff, and to provide updates on innovative site design for existing staff. Training is critical to successful implementation of this MCM.	5.5.1. Existing staff attend annual training, 75% of all planners in year 1. 5.5.2. Train 100% of all planners annually by year 2. 5.5.3. New staff: 100% attendance in annual training.	County Planning and Development Department & Project Clean Water

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Year(s)	BMP	Current Status	Implementation Details	Measurable Goals	Implementing Entity
4-5	5.6 Incentive Program for Innovative Site Design	Storm water issues are not covered by existing incentive programs.	The incentive program will encourage site design that minimizes runoff, while also educating the design/construction community.	5.6.1. Incentive program established by year 3. 5.6.2. Establish annual award program in following year 4.	County Planning and Development Department & Project Clean Water

BMP 5.1 Update Land Use Policies					
Year	BMP	Current Status	Implementation Details	Measurable Goal	Implementing Entity
0	5.1 Update Land Use Policies	Updated policies adopted by Board of Supervisors in 2002.	Updated policies provide implementation framework for compliance with this MCM.	5.1.1 Completed	County Planning and Development Department

5.1 Measurable Goal: *Completed.*

Status: Complete. This BMP was implemented prior to approval of the SWMP. Table 1 lists the practices and policies that were reviewed and revised under this BMP. Except for the Land Use Development Code revisions shown in Figure 1 below, copies of these are in the Storm Water Management Program Appendices F & G.

Table 1 Updated Land Use Policies / Practices

Document	Updated On	Reference
Interpretive guidelines developed	Sept 2002	SWMP App F1
CEQA initial study checklist revised	Sept 2002	SWMP App F2
CEQA Guidelines (Santa Barbara County Environmental Thresholds and Guidelines Manual) revised	Sept 2002	SWMP App F3
Planner's Guide to Conditions of Approval and Mitigation Measures (Planning & Development)	Sep 2002*	SWMP App F4
Planner's Guide to Conditions of Approval and Mitigation Measures (Planning & Development)	Nov 2006	See attached Appendix 5B to this MCM
Standard Conditions of Approval / Water Quality BMPs developed (Public Works)	June 2004	SWMP App G
Land Use Development Code revised (35.30.180)	Jan 2007	See Below

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SANTA BARBARA COUNTY CODE - CHAPTER 35 - COUNTY LAND USE & DEVELOPMENT CODE

Standards for All Development and Land Uses

35.30.180

- C. **Standards for storage areas.** All projects identified in Subsection B. (Applicability) above shall be required to provide solid waste areas specifically identified for the storage of both trash and recycling containers in compliance with the following.
1. **Functional use.** Solid waste enclosures shall be properly located, exterior of living space, for functional use by occupants and by the disposal and hauling companies providing collection services.
 2. **Size and location.** The exact size and location of the solid waste and recycling facilities storage areas shall be determined by the review authority on a case-by-case basis taking into account types and quantities of recyclable materials to be generated by the proposed land use and by the mode of collection.
 3. **Screening requirements.** Solid waste enclosures shall be constructed to be as inconspicuous as possible and, in accordance with Santa Barbara County Code Chapter 17; the contents of enclosures shall be screened from public view.
- D. **Solid Waste Management Plan.** A Solid Waste Management Plan shall be developed by the permittee as directed by the County Solid Waste Management Plan Guidelines, and may require review and approval by the Public Works Department prior to the issuance of building permits by the Department.

35.30.180 - Storm Water Runoff Requirements

- A. **Applicability.** The following development or redevelopment is subject to the requirement that project-appropriate controls are in place to prevent or minimize water quality impacts:
1. Residential subdivisions with 10 or more dwelling units.
 2. Commercial development of 0.5 acres or greater.
 3. Parking lots of 5,000 square feet or more or have 25 or more parking spaces and are potentially exposed to storm water runoff.
 4. Automobile repair shops.
 5. Retail gasoline outlets.
 6. Restaurants.
 7. One-family residences located on slopes of 20 percent or greater.
 8. Any new development or redevelopment exceeding one acre.
- B. **Processing.** No permit for any development listed in Subsection A. (Applicability) above, shall be approved except in compliance with the Comprehensive Plan, and the California Environmental Quality Act if applicable.

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Effectiveness: This BMP was implemented in accordance with the Storm Water Management Program.

Proposed Modifications: This BMP was completed in Year 1; no changes are recommended.

Planned Year 2 Activities: See BMP 5.3

BMP 5.2 Implement Design Standards					
Year	BMP	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1-5	5.2 Implement Design Per this MCM	Design standards to protect water quality are required on all new and redevelopment projects through policy, CEQA, and Zoning Ordinances.	Treatment control BMPs are conditioned by Public Works; all other design standards are conditioned by P&D.	5.2.1 Apply standards to 100% of all applicable projects.	County Planning and Development Department

5.2.1 Measurable Goal: *Apply design standards to 100% of all applicable projects.*

Status: Complete. In Year 1, 464 Discretionary case applications were filed with P&D. During the same period, 233 Discretionary cases received final approval.

No. of Permits Reviewed / Permits Issued

Total discretionary case applications filed with P&D	1,464
Project Applications reviewed for treatment control BMPs	137
Applications with treatment control BMP Conditions	20
Projects approved with treatment control BMPs & recorded maintenance agreements	3
Applications reviewed by Flood Control*	228
Applications with Flood Control Conditions *	63
Projects approved with peak runoff detention BMPs & recorded maintenance agreements	10

* In addition to peak runoff, includes projects reviewed and conditioned for approval under Floodplain Management Ordinance (Chapter 15A) and Development Along Watercourses (Chapter 15B).

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Planning & Development. As described in the Storm Water Management Program, it is the practice of P&D to review all discretionary projects and condition as appropriate for water quality measures. Applications for discretionary projects and some complex ministerial projects including those within designated Special Problems areas are also reviewed by other departments with land use authority such as Public Works. In particular, the County Public Works Department / Water Resources Division reviews projects applicable to the Attachment 4(b) Design Standards for Peak Storm Water Runoff Discharge Rates (Flood Control District) and for Structural or Treatment Control BMPs (Project Clean Water). See Appendices A and B for a copy of these conditions.

Discretionary projects that trigger the peak runoff requirements or the treatment control BMP requirements, including tract maps, lot line adjustments, tentative parcel maps, conditional use permits, development permits, are reviewed by the Subdivision Review Committee. Both Flood Control and Project Clean Water staff attend the Subdivision Review Committee meetings. This is a standing committee with meetings generally held twice per month. In Year 1, there were twenty-two Committee meetings.

Treatment Control BMPs. The following projects were conditioned for treatment control BMPs during Year 1:

**Table 2 Development Review Summary Report Year 1
(Jul 1, 2006 – Jun 30, 2007)**

Project Number	Project Name	Type
04CUP-00000-00056	Live Oak Shale	CUP
04CUP-00000-00058	Johnson Detached Residential Unit	CUP
06AMD-00000-00005	Cate School Facility Residences	AMD
06GPA-00000-00012	OSR Enterprises Inc.	RZN
06CUP-00000-00045	Estancia La Serena Equestrian Center	CUP
06DVP-00000-00012	Hope Community Church	DVP
06TRM-00000-00003	Centex Homes (No File Rec'd)	TRM
06DVP-00000-00016	Orcutt Union Plaza	DVP
06DVP-00000-00018	Stagestop Plaza	DVP
07DVP-00000-00001	Tropicana Gardens Parking Lot Annex	DVP
07TRM-00000-00001	SRI Two LLC (Mobile Home Park Low Density)	
07DVP-00000-00009	Evergreen Shopping Center	DVP
07DVP-00000-00010	Dore Winery	DVP
07DVP-00000-00016	Mike Stoker	DVP
07CUP-00000-00044	Richards Holding Mining	CUP
07DVP-00000-00017	Miramar Hotel	DVP
03DVP-00000-00001	Lucas & Lewellyn Winery	DVP
07DVP-00000-00014	American Ethanol	DVP
06CDH—00000-00029	Padaro Lane SFR	CDH
06DVP-00000-00008	Orcutt Marketplace	DVP

The treatment control BMP requirements took effect on June 30, 2004. From June 30, 2004, until the beginning of Year 1 (Jul 1, 2006), an additional thirteen projects were conditioned. These include:

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Development Review Summary Report – PRIOR TO YEAR 1 (Jul 1, 2004 – Jun 30, 2006)

Project Number	Project Name	Type
05CUP-00000-00004	Verne Thacker	CUP
05DVP-00000-00007	Better Cooling Development Plan	DVP
05SPP-00000-00001	Rancho Maria Estates	SPP
05SPP-00000-00002	English-Joseph Property Inv.	SPP
05SPP-00000-00003	Logue/Los Alamos Commons	SPP
00DVP-00000-06009	Orcutt Aquacenter Inc.	DVP
02DVP-00000-00037	Villas Affordable Housing	DVP
05DVP-00000-00010	Morhart Land Company	DVP
05TRM-00000-00002	Enchantment Homes	TRM
05DVP-0000000019	Saint Joseph Place	DVP
05DVP-00000-00023	Turnpike Shopping Center	DVP
TM 14484	Park Hill Estates	TM
99-DP-043	Botanic Garden	DVP

To date, only three projects have been approved by decision makers and submitted for Plan Check review by Clean Water staff. During Plan Check review, the conditioned requirements are verified so that construction may begin and a maintenance agreement is recorded. The projects that proceeded through Plan Check include: Better Cooling in Santa Maria, Thacker Veterinary Clinic (Lompoc) and Clubhouse Estates residential subdivision (Vandenburg Village). An example maintenance agreement is shown in Appendix 5C.

Better Cooling has been constructed. Project Clean Water staff made a site investigation to confirm installation of the water quality filters. This project uses commercial media filters in the drop inlets of a parking area. Also, a detention basin is located downstream of the filters which provides for storage of the 100-year storm event.

Thacker Veterinary Clinic has been constructed. Project Clean Water staff made a site visit to confirm installation of the water quality facilities. This project includes a bioswale and a commercial media filter. The maintenance agreement is pending.

Clubhouse Estates has not been constructed.

Flood Control. All discretionary projects reviewed by Flood Control for impacts due to peak runoff and mitigation required to offset impacts from increased runoff. The Flood Control District administers the following requirements: Floodplain Management Ordinance (SBCC Chapter 15(A)), development along watercourses (SBCC Chapter 15(B) Chapter 24-7), and the standard conditions of project plan approval shown in Appendix 5A. Any discretionary application that has a creek or in a flood area overlay is sent over by the application coordinator and the flood fee in the fee schedule is collected.

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In Year 1, 228 cases were received and reviewed by Flood Control. Of these, 63 cases were approved through Plan Check.

Effectiveness: This BMP was implemented in accordance with the Storm Water Management Program.

Proposed Modifications: Ongoing requirements will continue; no changes to this BMP are recommended.

Planned Year 2 Activities: During Year 2, the standard conditions for treatment control BMPs will be updated to reflect recommendations discussed in BMP 5.3.1.

5.3 Evaluate Program Efficacy					
Year	BMP	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1-5	5.3 Evaluate Program Efficacy	Design standards to protect water quality are required on all new and redevelopment projects through policy, CEQA, and Zoning Ordinances.	Existing policies, procedures, and standard conditions used to protect water quality will be evaluated through comparison to the General Permit requirements including Attachment (4).	<p>5.3.1. Compare existing policies, procedures, and std conditions to the General Permit Attachment (4) requirements (year 1).</p> <p>5.3.2. If it is determined that changes need to be made to better comply with those requirements, then the relevant policy, procedures, or standard conditions will be developed or modified so that they meet or exceed all of the requirements in the General Permit including Attachment 4(B) (year 2).</p>	Planning and Development Department; Public Works Department

5.3.1 Measurable Goal: *Compare existing policies, procedures, and std conditions to the General Permit Attachment (4) requirements (year 1)*

Status: Complete. In Aug 2006, the County retained a consultant team consisting of Wallace Group and Larry Walker & Associates to evaluate existing policies, procedures, and standard conditions required by the General Permit including Attachment (4). Appendix 5D includes a copy of that evaluation and associated documentation.

In addition to comparison to the General Permit requirements, the consultant team was asked to compare the County's programs to other representative municipal programs that have a good track record on their post-construction program. Also, the consultant team analyzed ways in which the County could encourage or incorporate Low Impact Development strategies into the development review process.

A number of workshops and presentations were provided in order to obtain input from interested stakeholders. Information on these workshops including presentation material and records of attendance are shown in Appendix E. A list of the meetings and their locations are summarized below.

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Post-Construction Program Workshops and Presentation

Project Clean Water Stakeholders	Sept 19, 26, 2006	Santa Barbara, Santa Maria
Public Works Managers Meeting	Feb 8, 2007	Santa Barbara
Consulting Engineers and Land Surveyors (CELSOC) South Coast Committee.	March 1, 2007	Santa Barbara
Home Builders Association of the Central Coast	April 16, May 7, 2007	Santa Maria, Santa Barbara
Project Clean Water Stakeholders	April 19, 26, 2007	Santa Barbara, Santa Maria
American Public Works Association Luncheon	April 18, 2007	Buellton
Montecito Planning Commission	May 16, 2007	Santa Barbara
Board Architectural Review, South County	July 6, 2007	Santa Barbara
Planning Commission	July 25, 2007	Santa Barbara

Two additional workshops were hosted the County. These included a Low Impact Development Workshop 6/20/07 hosted by Project Clean Water and Filterra, presented by Larry Coffman. Also a workshop was held July 18 on Pervious Concrete. The workshop was sponsored by California Construction and Industrial Materials Association (Cal CIMA) and hosted by Project Clean Water at the Museum of Natural History. This workshop included an exam to certify attendees as a Certified Pervious Concrete Technician (CPCT). Additional workshops were held at various locations in southern California, including San Luis Obispo. County advertising for the event included an insert in the Santa Barbara Contractors Association newsletter (Jul 2007), an announcement in the Santa Maria Valley Contractors Association electronic newsletter.

Effectiveness: This BMP was implemented in accordance with the Storm Water Management Program. Through a series of workshops and presentations on the topic, implementation results in knowledge and awareness of the design/development community and decision makers.

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The effectiveness of this BMP was evaluated by the consultant team; their report lists a wide range of opportunities for improvement.

Below are the revisions recommended as necessary in order to comply with the General Permit.

Compliance with General Permit Requirements

<u>Recommendation</u>	<u>Status (see Appendix 5B)</u>
Require stormwater diversion and roofing for outdoor material areas	Done. See WAT-24
Require stormwater diversion for trash storage areas	Done. See WAT-25
Clarify water quality and disposal requirements applicable to large commercial development maintenance bays, vehicle/equipment wash areas and loading docks,	Done. See WAT-26, WAT-27, WAT-28, WAT-29.
Clarify water quality and disposal requirements applicable to automotive repair shop maintenance bays, vehicle/equipment wash areas and loading docks,	Done. See WAT-26, WAT-27, WAT-29.
Document a process by which an applicant can obtain a waiver,	To be implemented Year 2.
Implement an alternative certification process	To be implemented Year 2.

The following tables list additional recommendations and opportunities for improvement. These tables summarize the report recommendations which can also be found in Appendix 5D.

The recommendations are grouped by the various stages of the review.

Opportunities to Improve – Staff Level, Short Term

<u>Recommendation</u>	<u>Status</u>
Address stormwater BMPs at all pre-application meetings for categorical projects listed in Attachment 4.	Ongoing. Identify improvements to assure pre-app meeting success during Years 2-5.
The preliminary site plan reviewed by all departments' must identify approximate areas reserved for post construction management BMPs and approximate ROW lines. Public and private facilities need to be clearly identified.	Complete. Site plans must include post-construction treatment control BMPs as appropriate prior to application completeness. See Nov 27, 2006 Memo from T. Fayram to P&D.
Ensure P&D counter staff consistently identifies and routes projects subject to additional storm water	Complete. Identify improvements to assure proper routing / fee collection for

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Recommendation	Status
review to the Project Clean Water staff.	Project Clean Water review of treatment control BMPs.
<p>Redlines from one department can be in conflict with redlines received from another department (i.e. one department can request a BMP at a location that another department might object to). Inter- or intra-departmental comments should be compiled into a single set of redlines or otherwise coordinated (i.e., designated permit coordinator staff) and redistributed to appropriate staff when conflicts are identified. When conflicts occur and the applicant has been unable to resolve the issues independently, the Subdivision Review Committee (SDRC), a designated permit coordinate, and/or Planning and Development staff should meet to reconcile the discrepancy.</p>	<p>Complete. During FY 0607, Public Works developed a new position to provide coordination of permits through the development review process both internally, between Public Works Department Divisions (Flood Control, Clean Water, Roads, Traffic) and externally between the Public Works Department and the Planning & Development Department.</p> <p>The new dedicated permit coordinator improves the permit review process so that the applicant experiences a streamlined and consolidated set of requirements from the County as a whole. The coordinator assists in the expedition of permit processing, and looks for areas of process improvement. Extra attention is focused on permits that have become hindered by obstacles in the process. This position is held by Brett Stewart.</p>
<p>Sample operation and maintenance agreements should be available to the applicant for long term water quality BMPs and flow control facilities (swales and basins).</p>	<p>Done. See Appendix 5C for examples provided to applicants.</p>
<p>Ensuring maintenance for the life of the project is addressed in the CC&Rs, a special stormwater utility district, or other mechanism.</p>	<p>Done. All treatment control BMPs must have a Maintenance Agreement recorded between the property owner/manager and the County.</p>
<p>Definition of an inspection process to describe criteria and outcome of enforcement actions. Inspections include P&D permit compliance staff, building inspectors, and as appropriate, staff from other divisions (Public Works, Fire, Public Health, etc.).</p>	<p>To be described in Year 2.</p>
<p>A formal inspection and review process should be documented and include standardized inspection forms, inspector “certification” requirements and examples of citation letters.</p>	<p>To be developed Year 2.</p>
<p>Creation of Stormwater Special Maintenance District which could be retained to perform stormwater</p>	<p>To be addressed Year 2.</p>

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Recommendation	Status
maintenance for HOAs, businesses, etc	

Opportunities to Improve – Staff

Recommendation	Status
Replace all “If feasible”, “to maximum extent practicable” and “should” terminology in the Planner’s Guide to Conditions of Approval and Mitigation Measures with “must apply per our NPDES permit	To be addressed Year 2.
Identify mandatory standard water quality conditions of approval (i.e., Attachment 4(B)) vs. other conditions that protect water quality but are not mandatory (i.e., direct roof downspouts to landscaped area) to assure compliance with General Permit.	To be addressed Year 2.
Continue training P&D permit counter staff to identify and route projects subject to treatment control measures to the Project Clean Water office. Include a “post-class test for learning” at all mandatory stormwater training for staff	See Attachment G To be implemented through permit term.
Require inspection of BMPs during construction by qualified inspectors who have the authority to inspect and enforce proper installation of BMPs	P&D has authority to inspect installation of BMPs during construction and does so with permit compliance staff. See PW Standard Condition 7(f)
Allow signed certification from a licensed Civil Engineer or Architect that the Structural or Treatment Control BMP plans meets the criteria established	
Have all relevant documents (Planners Guide to Conditions of Approval and Mitigation Measures, Public Works Standard Specifications and Plans, etc) available electronically from a single site on the County’s web site	To be addressed Year 2.
Require pre-development meetings to be mandatory for all County reviewers with water quality being an item of discussion	To be addressed Year 2.
Provide applicants examples of specific maintenance requirements in sample maintenance agreements based upon the BMPs implemented (i.e. require percolation rates be verified for infiltration basins every 10 years)	To be developed Year 2.
Document and publish current County written or unwritten policies (i.e. no private water quality features to be located within Public ROW) as related to post construction water quality BMPs	To be developed Year 2; part of Technical Guidance Manual.
Periodically educate land use decision makers of the relationship between land use and water resource protection (model program after NEMO approach)	Schedule to be developed Year 2.
Evaluate unincorporated urban areas under the NDPES permit and determine watershed conditions best suited for various LID measures, similar to City of Arroyo Grande (i.e., identify areas where increased detention is recommended vs. areas where less detention and improved conveyance is recommended, etc.)	To be addressed Year 2.

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Opportunities to Improve – Long Term

Recommendation	Status
Develop a standardized worksheet to determine the project's requirements under the post-construction program and use the worksheet for pre-application meetings.	To be addressed Year 2.
Develop requirements for a project-specific Storm Water Management Plan as part of initial application submittal.	To be addressed Year 2.
Provide regular training to the development community and on the post-construction program.	Schedule to be developed Year 2.
Provide regular training to County staff involved in development review; use this training as opportunity to address potential conflicts between divisions/departments. Include a "post-class test for learning" at all mandatory stormwater training for staff.	See BMP 5.5.1.
Establish a tracking system to compile information regarding post construction BMP implementation including location, type of control, ownership, and other special conditions.	Already implemented.
Evaluate opportunities for establishing service districts for long term maintenance of the post construction BMPs in major new development.	To be addressed Year 2.
Develop a comprehensive operation and maintenance strategy that includes regular inspections by the County and an enforceable course of action to address deficiencies in project maintenance.	Already addressed for treatment control BMPs.
Coordinate with MS4-Permit cities for consistency in post-construction program	Existing committee meets quarterly.

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Opportunities to Improve - Decision Maker Recommendations

Recommendation	Status
<p>The regulatory authority to administer requirements placed on developers, whether through ordinance and/or building codes, must be clearly identified and explained. Consistent and specific legal authority provides for the foundation for implementing post construction BMPs. While the General Permit does not require one consolidated stormwater ordinance, some jurisdictions have developed an ordinance and accompanying guidance material, i.e., Ventura County. Since the County is not lacking the legal authority to implement the post-construction program, an alternative to a new ordinance would be a Technical Guidance Manual. A Technical Guidance Manual would clarify the legal authority and consolidate regulations pertaining to development. It would also include guidance on site design, source control, and treatment control BMPs. A Technical Guidance manual can be updated and revised by staff without Board action. Overall direction from the Board to develop a manual may be helpful since multiple departments would be involved.</p>	To be addressed Year 2.
<p>Clearly delineate each department’s responsibilities with regard to project review, provide funding to support those responsibilities, and assure regular training.</p>	To be addressed Year 2.
<p>Develop incentive program to implement source and site design BMPs. Examples of incentives that were suggested by the public during initial workshops for this evaluation included: density bonuses, in-lieu fees, awards and flood-control storage credits.</p>	To be addressed Year 2-5
<p>To promote LID concepts, consider defining a minimum ground water recharge rate, or percent vegetative cover/landscaping necessary for categories of development similar to City of Portland.</p>	To be addressed Year 2.
<p>Consider requiring large building projects to achieve Leadership in Energy and Environmental Design (LEED) ‘Certified’ standards.</p>	To be addressed Year 2.
<p>Evaluate opportunities for community-wide special stormwater utility districts, especially for new, very large subdivision developments.</p>	To be addressed Year 2.
<p>Develop, through a stake-holder effort, a stand alone technical guidance manual that provides clear guidance on post construction BMP requirements (for the Attachment 4(B) category projects) including 1) the type of control measures required based on the project type and 2) how to design, build, and maintain each control measures. The Manual should include low impact development concepts (site design BMPs) and identify incentives for encouraging the use of LID concepts. The technical guidance manual must have supporting legal authority, either through direct inclusion in an ordinance, or by reference in a stormwater or building ordinance that</p>	To be addressed Year 2.

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Recommendation	Status
a project proponent will use the latest version of a manual. The Technical Guidance Manual must integrate and support the County’s overall design review process, including other technical requirements and objectives implemented through Public Works, Fire, and other departments.	

Proposed Modifications: This measurable goal was completed; no changes are recommended.

Planned Year 2 Activities: Each recommendation from the report will be evaluated separately. See discussion above.

5.3.2 Measurable Goal: *If it is determined that changes need to be made to better comply with those requirements, then the relevant policy, procedures, or standard conditions will be developed or modified so that they meet or exceed all of the requirements in the General Permit including Attachment 4(B) (year 2).*

Status: To be implemented in year 2.

Effectiveness: NA.

Proposed Modifications: None.

Planned Year 2 Activities: See discussion 5.3.1 above.

5.4 Project Evaluations					
Year	BMP	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1-5	5.4 Discretionary Permit Review Process: Project Evaluations	Water quality measures are identified during pre-application review, application submittal and review, CEQA review. Project implementation verified through construction monitoring and applicant reporting.	Discretionary projects will be monitored for compliance with water quality measures, and non-compliance may include a correction notice, stop work order, collection of any bonds, and establishing a time frame for developer to take corrective steps to resume work.	5.4.1. Annually evaluate 100% of all discretionary projects for compliance with water quality measures. 5.4.2. Take enforcement actions on all non-compliant conditioned projects.	County Planning and Development Department

5.4.1. Measurable Goal: *Annually evaluate 100% of all discretionary projects for compliance with water quality measures*

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Status: Complete. Projects with treatment control BMPs that proceeded to construction were inspected during the construction and determined to have installed the measures correctly as per plan. These include the Thacker Veterinary Clinic in Lompoc, and Better Cooling in Orcutt. See 5.3.1 above.

Effectiveness: This BMP was implemented in accordance with the Storm Water Management Program.

Proposed Modifications: Ongoing inspection of treatment control measures will continue; no changes are recommended.

Planned Year 2 Activities: Continued inspections to verify compliance with measures as projects are constructed.

5.4.2 Measurable Goal: *Take enforcement actions on all non-compliant conditioned projects.*

Status: To be implemented in year 2. (No enforcement actions were taken in Year 1.)

Effectiveness: NA.

Proposed Modifications: None.

Planned Year 2 Activities: No change in activities proposed.

5.5 Staff Training					
Year	BMP	Current Status	Implementation Details	Measurable Goal	Implementing Entity
1-5, incrementally	5.5 Staff Training	Permitting and review staff. Hold regular staff training on multiple subjects, including compliance with NPDES Permit conditions. Training materials including videotape of one training class are available.	Training can be used to initiate new staff, and to provide updates on innovative site design for existing staff. Training is critical to successful implementation of this MCM.	5.5.1 Existing staff attend annual training, 75% of all planners in year 1. 5.5.2 Train 100% of all planners annually by year 2. 5.5.3 New staff: 100% attendance in annual training.	County Planning and Development Department & Project Clean Water

5.5.1 Measurable Goal: *Existing staff attend annual training, 75% of all planners in year 1.*

Status: Complete. All P&D development review staff received training during Year 1, including all new P&D development review staff. Trainings were developed by Project Clean Water staff and were held on the following dates:

- P&D staff training (Santa Maria) 5-14-07
- Make-up training (Santa Barbara) 6-15-07

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- P&D staff training (Santa Barbara) 6-11-07
- P&D Staff meeting re: completeness (Santa Barbara) 3-26-07
- P&D Staff training (Santa Maria) 8-22-06 (no sign-in sheet)

Effectiveness: This BMP was implemented in accordance with the Storm Water Management Program and increased the target audience knowledge and awareness. Material used during the trainings is shown in Appendix 5F, including the powerpoint presentation used, staff sign-in sheets, handouts, and a “pop quiz”. At the end of the training, staff participated in a fun but competitive “pop quiz” to review certain items and to make sure the highlights were understood. This was not an actual graded quiz, but rather an opportunity to vary the training format and reinforce the presentation. After the quiz, each question was discussed by the group which improved interaction and dialogue. This technique helps increase the knowledge and awareness in the target audience.

Proposed Modifications: This is a Year 1 BMP and is complete; therefore no changes are recommended.

Planned Year 2 Activities: Continue to provide training to all existing and new P&D staff under BMP 5.5.2.

5.5.2 Measurable Goal: *Train 100% of all planners annually by year 2*

Status: Measurable goal will be reached in year 2.

Effectiveness: NA.

Proposed Modifications: Ongoing commitment will continue; no modifications are recommended.

Planned Year 2 Activities: Continue to provide training to all existing and new P&D staff using similar format and materials as Year 1.

5.5.3 Measurable Goal: *New staff: 100% attendance in annual training(Years 1-5)*

Status: Complete.

Effectiveness: See 5.5.1 above

Proposed Modifications: Ongoing commitment will continue; no modifications are recommended.

Planned Year 2 Activities: Continue to provide training to all existing and new P&D staff using similar format and materials as Year 1.

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5.6 Incentive Program					
Years	BMP	Current Status	Implementation Details	Measurable Goal	Implementing Entity
4-5	5.6 Incentive Program for Innovative Site Design	Storm water issues are not covered by existing incentive programs.	The incentive program will encourage site design that minimizes runoff, while also educating the design/construction community.	5.6.1. Incentive program established by year 3. 5.6.2. Establish annual award program in following year 4.	County Planning and Development Department & Project Clean Water

5.6.1 Measurable Goal: *Incentive program established by year 3.*

Status: Not implemented in year 1.

Effectiveness: NA

Proposed Modifications: None.

Planned Year 2 Activities: Several of the Wallace Group report recommendations address incentives for innovative site design and will be addressed during Year 2+. These include:

Recommendation	Status
Develop incentive program to implement source and site design BMPs. Examples of incentives that were suggested by the public during initial workshops for this evaluation included: density bonuses, in-lieu fees, awards and flood-control storage credits.	To be addressed Year 2-5
To promote LID concepts, consider defining a minimum ground water recharge rate, or percent vegetative cover/landscaping necessary for categories of development similar to City of Portland.	To be addressed Year 2.
Consider requiring large building projects to achieve Leadership in Energy and Environmental Design (LEED) ‘Certified’ standards.	To be addressed Year 2.
Evaluate opportunities for community-wide special stormwater utility districts, especially for new, very large subdivision developments.	To be addressed Year 2.
Develop, through a stake-holder effort, a stand alone technical guidance manual that provides clear guidance on post construction BMP requirements (for the Attachment 4(B) category projects) including 1) the type of control measures required based on the project type and 2) how to design, build, and maintain each control measures. The Manual should include low impact development concepts (site design BMPs) and identify incentives for encouraging the use of LID concepts. The technical guidance manual must have supporting legal authority, either through direct inclusion in an ordinance, or by reference in a stormwater or building ordinance that a project proponent will use the latest version of a manual. The Technical Guidance Manual must integrate and support the County’s overall design review process, including other technical requirements and objectives implemented through Public Works, Fire, and other departments.	To be addressed Year 2.

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5.6.2 Measurable Goal: *Establish annual award program in following year 4.*

Status: Not implemented in year 1.

Effectiveness: NA.

Proposed Modifications: NA

Planned Year 2 Activities: NA.