

**Appendix 5C – Year 2 Annual Report
County of Santa Barbara Storm Water Management Program**

Opportunities to Improve – Staff Level, Short Term

Recommendation	Status
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.).	Complete. See Appendix 5.D Maintenance requirements
A formal inspection and review process should be documented and include standardized inspection forms, inspector “certification” requirements and examples of citation letters.	Complete. See Appendix 5.D. Maintenance requirements
Creation of Stormwater Special Maintenance District which could be retained to perform stormwater maintenance for HOAs, businesses, etc	Ongoing. There have been no new developments in Santa Barbara County for which a maintenance district would be appropriate. This would require a fairly large, multi-use development, i.e a new community with residential areas, commercial areas, schools, shopping, 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	Complete. See Appendix 5.XX Planner’s Guide
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.	Complete. See Appendix 5.XX Planner’s Guide
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	Complete. See BMP 5.5
Require inspection of BMPs during construction by qualified inspectors who	Complete and ongoing. P&D has authority to inspect installation of BMPs during construction and does so

Recommendation	Status
<p>have the authority to inspect and enforce proper installation of BMPs</p>	<p>with permit compliance staff. Enforcement authority is outlined in Zoning Code and includes Stop Work until correction is complete and BMPs are installed properly. In addition to P&D's compliance staff, Public Works staff will inspect installation and requires the engineer to provide written certification that BMPs were installed as per plan (see PW Standard Condition 7(f)).</p>
<p>Allow signed certification from a licensed Civil Engineer or Architect that the Structural or Treatment Control BMP plans meets the criteria established</p>	<p>At this time, the County does not wish to limit County review role in any way by providing alternative certification. County does require engineer to certify proprietary filters, if specified for a development. See PW Standard Condition 7(f) Complete and ongoing. See Clean Water Website. http://www.sbprojectcleanwater.org/post_construction.html</p>
<p>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 Require pre-development meetings to be mandatory for all County reviewers with water quality being an item of discussion</p>	<p>One way communications were improved during Year 2 was to establish an audio/video link to all SDRC members, located at their personal computers. This way, an applicant at any P&D office with questions for other County staff could link up to 6 parties simultaneously to discuss their issues concurrently. However, pre-development meetings have continued to be optional for applicants. Reasons why an applicant may choose not to have a pre-development meeting include: they are already familiar with development requirements, it adds time to the overall permit process, increases their costs, and design details are not well-developed at such an early point in the process and they prefer to wait until submittal to get feedback from County staff (pre-app materials are typically conceptual). Complete. See Clean Water Website. http://www.sbprojectcleanwater.org/post_construction.html</p>
<p>Provide applicants examples of specific maintenance requirements in sample maintenance agreements based upon the BMPs implemented. 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 Periodically educate land use decision makers of the relationship between land use and water resource protection (model program after NEMO approach)</p>	<p>In progress, partially complete. See Clean Water Website. http://www.sbprojectcleanwater.org/post_construction.html Complete and Ongoing. During Year 2, PCW staff made presentations to South County Board of Architectural Review on July 6, 2007, and to the Planning Commission on July 25, 2007. Also, County staff made a presentation to the Goleta Design Review Board, upon request. That</p>

Recommendation	Status
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.)	presentation included the same material that was presented to the Planning Commission (and the Montecito Planning Commission in May of 2007). In progress. This recommendation is under ongoing internal review and analysis. The topic of where / when / how to limit hydromod impacts has been topic of numerous meetings with Flood Control's development engineering staff, the Deputy Director of Water Resources, and the Deputy Director and senior staff of comprehensive planning (P&D). It is recognized that future requirements under the revised NDPEs General will dictate some of that direction. Those cities in the County that must implement current RWQB requirements for LID and hydromod have coordinated closely with the County's Flood Control District to determine their best course of action. County staff will continue to pursue approaches internally and in conjunction with cities in the County as we establish the best approach to continue protecting water resources from impacts due to development in unincorporated areas.

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.	Complete. A project's requirements are outlined shown on Clean Water Website http://www.sbprojectcleanwater.org/post_construction.html and this worksheet is used during pre-application meetings.
Develop requirements for a project-specific Storm Water Management Plan as part of initial application submittal.	Complete and Ongoing. Item (N) of the permit application states, "Describe measures that will be incorporated into the project design to address storm water quality (e.g. protect riparian corridors, reduce runoff, reduce directly connected impervious areas, eliminate pollutant sources, etc.). Refer to Best Management Practices handbooks such as Start at the Source by BASMAA and on the internet at www.epa.gov/npdes/menuofbmps.htm . Also handouts at the county developed by Project Clean Water." An application cannot be accepted by P&D as complete until the applicant identifies the treatment control measures on the project Grading & Drainage Plans or other appropriate submittal. To do this, the applicant must calculate runoff from the design storm and define how the project will treat that runoff. For example, if the proposal includes use of bioswales, bioretention, or detention, then the location of those areas would have to be identified and

Recommendation	Status
	<p>sized accordingly. Similarly, if the proposal includes a manufacturer's control device, the location and type of the filter must be identified.</p> <p>Submittal requirements for a Storm Water Quality Mitigation Plan submittal(s) must:</p> <ul style="list-style-type: none"> a. show the locations of all treatment facilities and their drainage (treatment) areas, b. demonstrate how the treatment facilities comply with the conditions by treating runoff from the design storm, and c. include a long-term maintenance plan appropriate for the proposed facilities. <p>Submittals must be approved prior to issuance of any zoning, building, or land use clearances if the project meets the design standard categories shown in Attachment 4(B). However, it would not be appropriate to require this level of detail in a submittal as part of an initial application.</p>
<p>Provide regular training to the development community and on the post-construction program.</p>	<p>During Year 2, there were no trainings offered to development community by the County of Santa Barbara. The development community however was highly involved with those cities who must implement the new hydromod / LID requirements are directed by the RWQCB. Several workshops and trainings were offered in Santa Barbara and in Santa Maria, for example. The City of Lompoc provided written notification to local development community.</p>
<p>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.</p>	<p>See BMP 5.5.</p>
<p>Establish a tracking system to compile information regarding post construction BMP implementation including location, type of control, ownership, and other special conditions.</p>	<p>Complete. Staff uses a simple spreadsheet for tracking location, type, ownership, etc.</p>
<p>Evaluate opportunities for establishing service districts for long term maintenance of the post</p>	<p>Ongoing. There have been no new developments in Santa Barbara County on this scale for which a maintenance district would be appropriate. This would require a fairly</p>

Recommendation	Status
construction BMPs in major new development.	large, multi-use development, i.e a new community with residential areas, commercial areas, schools, shopping, etc.
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.	Ongoing. P&D has authority to inspect installation of BMPs during construction and does so with permit compliance staff. Enforcement authority is outlined in Zoning Code and includes Stop Work until correction is complete and BMPs are installed properly. In addition to P&D's compliance staff, Public Works staff will inspect installation and requires the engineer to provide written certification that BMPs were installed as per plan (see PW Standard Condition 7(f)).
Coordinate with MS4-Permit cities for consistency in post-construction program	Existing committee meets quarterly.

Opportunities to Improve - Decision Maker Recommendations

Recommendation	Status
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.	Ongoing. A technical guidance manual or handbook was not developed during Year 2. This is due to several reasons. 1) The County's website was dramatically updated to provide a summary or outline, complete with links to authority, examples, and design guidance to assist developers. 2) The General Permit was continued after March 2008 with expectations for renewed permit to be released including greater specificity regarding post-construction MCM. 3) Revisions to the Public Works Engineering Design Standards that would reflect recommendations for improvement. See Year 3 planned activities.
Clearly delineate each department's	Complete and ongoing.

Recommendation	Status
responsibilities with regard to project review, provide funding to support those responsibilities, and assure regular training.	See Clean Water Website. http://www.sbprojectcleanwater.org/post_construction.html
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 3-5. See MG 5.6.1
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.	Pending implementation of revised General Permit.
Consider requiring large building projects to achieve Leadership in Energy and Environmental Design (LEED) ‘Certified’ standards.	Ongoing.
Evaluate opportunities for community-wide special stormwater utility districts, especially for new, very large subdivision developments.	Ongoing. There have been no new developments in Santa Barbara County of this scale for which a maintenance district would be appropriate. This would require a fairly large, multi-use development, i.e a new community with residential areas, commercial areas, schools, shopping, etc. Ongoing. A technical guidance manual or guidance handbook was not developed during Year 2. This is due to several reasons. 1) The County’s website was dramatically updated to provide a summary or outline, complete with links to authority, examples, and design guidance to assist developers. 2) The General Permit was continued after March 2008 with expectations for renewed permit to be released including greater specificity regarding post-construction MCM. See Year 3 planned activities.
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	

Recommendation

Status

requirements and objectives implemented through Public Works, Fire, and other departments.