

ACRONYMS

BMP	Best Management Practice
CASQA	California Storm Water Quality Association
CCRWQCB	Central Coast Regional Water Quality Control Board
CEC	Community Environmental Council (a community-based organization)
CEQA	California Environmental Quality Act
CK	Channelkeeper (a community-based organization)
CURE	Clean Up Rincon Effluent (a community-based organization)
EHS	County Environmental Health Services Division
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
GGCP	Green Gardener Certification Program
GIS	Geographic Information System
GSD	Goleta Sanitary District
HTO	Heal the Ocean (a community-based organization)
IPM	Integrated Pest Management
LUDP	Land Use Development Policy
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
ND	Negative Declaration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
P&D	County Planning and Development Department
PCA	Pest Control Advisors
PCW	Project Clean Water
POC	Pollutants of Concern
POTW	Publicly Owned Treatment Works
PW	County Public Works Department
RFQ	Request for Qualifications
RWQCB	Regional Water Quality Control Board
SCWRC	South Coast Watershed Resource Center
SOPs	Standard Operating Procedures
SUSMP	Standard Urban Storm Water Mitigation Plans
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USEPA	United States Environmental Protection Agency
WRC	South Coast Watershed Resource Center

INTRODUCTION

This Storm Water Management Program (SWMP) has been prepared by the County of Santa Barbara (County) pursuant to State Water Resources Control Board Water Quality Order No. 2003-005-DWQ National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS0000004 Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit). The General Permit establishes certain unincorporated areas on the South Coast, in the Santa Ynez Valley, and in the Orcutt area of the Santa Maria Valley (see Figure 1 and Appendix A) in which the County is responsible for water quality in storm-drains and surface drainages. Figure 1 shows the geographic area identified by the U.S. Environmental Protection Agency and the California State Water Resources Control Board subject to the NPDES Phase II regulations. This SWMP describes the County's program to protect water quality in those areas.

Table 1 lists the major streams throughout the entire County, identifies those which are within the County's permit area or within another jurisdiction's permit area, and shows which are listed as "impaired" by the State of California. The listing of impaired streams was considered in development of this SWMP. Streams listed as impaired may be subject to further, more focused, regulatory action by the State such as implementation of "total maximum daily load" limitations.

The goals of this SWMP are to (1) protect the health of the public and the environment, (2) meet Clean Water Act mandates through compliance with the General Permit requirements and applicable regulations (including Attachment 4 of the General Permit), and (3) to increase public involvement and awareness. Storm drains typically flow into creeks that have already passed through a variety of land uses, including natural, agricultural, urban and industrial, and often through more than one permit jurisdiction. Water quality monitoring has identified bacteria, nutrients, pesticides, heavy metals and other pollutants in certain creeks (see Appendix B for a discussion of monitoring results). According to the EPA (40 CFR Parts 9, 122, 123, and 124 Preamble, page 68746) a pollutant of concern is defined as any "...pollutant that has been identified as a cause of impairment". The SWMP describes those Best Management Practices (BMPs) that will reduce, control or eliminate identified pollutants of concern including those listed in Table 1 and those identified through local monitoring.

This SWMP outlines activities for a five-year implementation period of July through June, corresponding to the County's fiscal year that is the basis for County-wide performance measure reporting, with the first year starting after approval by the Central Coast Regional Water Quality Control Board (Year 1).

The County's storm water quality program, known as Project Clean Water, was initiated in 1998 in response to community requests to improve water quality in local creeks and the ocean. Project Clean Water is managed and staffed by members of the Santa Barbara County Water Agency (Public Works Department) and staff from the Environmental Health Services Division of the Public Health Department. In addition, Project Clean Water staff work closely with other County departments to ensure appropriate implementation of BMPs.

Because many of the elements of the original Project Clean Water work plan are also stormwater BMPs, the strategy outlined here generally describes an existing but evolving program. During the implementation period, the County will maintain existing efforts and augment them as necessary in permit areas that were not the focus of the original Project Clean Water work plan. The communities included in the original Project Clean Water program were parts of Carpinteria Valley, Montecito, the Goleta Valley and Orcutt. The community of Vandenberg Village is now included in permit area, and is thus part of this SWMP. More information on Project Clean Water and other water quality programs may be obtained at the Project Clean Water website: http://www.countyofsb.org/project_cleanwater/default.htm

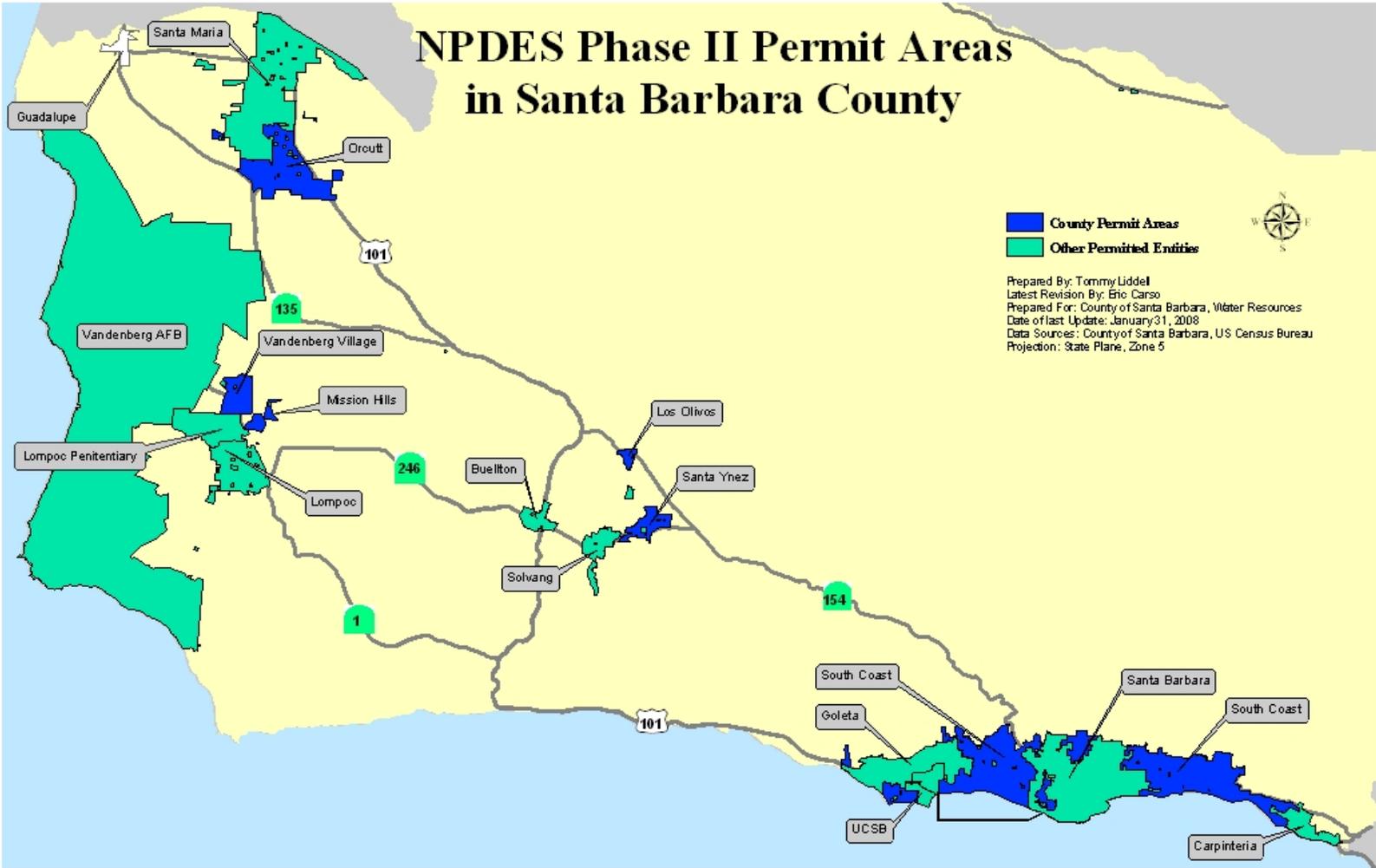


Table 1 – Santa Barbara County Receiving Waters Including Impaired Waterbodies, County NPDES Permitted Areas, and Adjacent Land-Use Jurisdictions

Stream / Waterbody	County Permit Area	Impairment* (CWA §303(d))	Adjacent Land-use Jurisdiction(s)
Alamo Pintado	Los Olivos	No listing	City of Solvang
Arroyo Burro Creek	South Coast	Pathogens	City of Santa Barbara
Arroyo Paredon Creek	South Coast	No listing	
Atascadero Creek	South Coast	No listing	
Barger Canyon Creek	South Coast	No listing	City of Santa Barbara
Bell Creek	South Coast	No listing	City of Goleta
Blosser Channel	Not in permitted area	Fecal coliform	City of Santa Maria
Bradley Canyon Creek	Not in permitted area	Fecal coliform	City of Santa Maria
Bradley Channel	Not in permitted area	Fecal coliform	City of Santa Maria
Buena Vista Creek	South Coast	No listing	
Carneros Creek	South Coast	No listing	City Goleta, City Santa Barbara (at airport)
Carpinteria Creek	South Coast	Pathogens	City of Carpinteria
Carpinteria Marsh	South Coast	Nutrients, Organic Enrichment/Low Dissolved Oxygen, Priority Organics, Sedimentation/Siltation	City of Carpinteria
Cieneguitas Creek	South Coast	No listing	City of Santa Barbara
Devereux Creek	South Coast	No listing	City of Goleta
Ellwood Creek	South Coast	No listing	City of Goleta
Franklin Creek	South Coast	No listing	City of Carpinteria
Fremont Creek	South Coast	No listing	
Garrapata Creek	South Coast	No listing	
Glen Annie Creek	South Coast	No listing	City of Goleta, City of Santa Barbara (at airport)
Goleta Slough	South Coast	Metals, pathogens, priority organics, sedimentation/siltation	City of Goleta, City of Santa Barbara (airport), UCSB
Greenwell Creek	South Coast	No listing	
Hospital Creek	South Coast	No listing	
Las Palmas Creek	South Coast	No listing	
Las Vegas Creek	South Coast	No listing	City of Goleta
Maria Ygnacio Creek	South Coast	No listing	City of Goleta

Stream / Waterbody	County Permit Area	Impairment* (CWA §303(d))	Adjacent Land-use Jurisdiction(s)
Mission Creek	South Coast	Pathogens, unknown toxicity	City of Santa Barbara
Montecito Creek	South Coast	No listing	
Oak Creek	South Coast	No listing	
Orcutt Creek	Orcutt	No listing	
Orcutt Solomon Creek	Orcutt	Boron, fecal coliform, nitrate	
Pacific Ocean at Arroyo Burro	South Coast	Total coliform	City of Santa Barbara
Pacific Ocean at Carpinteria State Beach	South Coast	Fecal coliform, total coliform	City of Carpinteria
Pacific Ocean at East Beach, mouth of Mission Creek	South Coast	Fecal coliform, fecal coliform	City of Santa Barbara
Pacific Ocean at East Beach, mouth of Sycamore Creek	South Coast	Total coliform	City of Santa Barbara
Pacific Ocean at Gaviota Beach	Not in permit area	Total coliform	State of California
Pacific Ocean at Hammonds Beach	South Coast	Fecal coliform	
Pacific Ocean at Hope Ranch Beach	South Coast	Fecal coliform	
Pacific Ocean at Jalama Beach	Not in permit area	Total coliform, fecal coliform	
Pacific Ocean at Ocean Beach	Not in permit area	Total coliform, Fecal coliform	
Pacific Ocean at Refugio Beach	Not in permit area	Total coliform	State of California
Pacific Ocean at Rincon Point	South Coast	Total coliform, fecal coliform	County of Ventura
Picay Creek	South Coast	No listing	
Rattlesnake Creek	South Coast	No listing	
Rincon Creek	South Coast	No listing	
Romero Creek	South Coast	No listing	
San Antonio Creek	Not in permit area	Sedimentation / siltation, Boron	
San Jose Creek	South Coast	No listing	City of Goleta
San Miguelito Creek	Not in permit area	No listing	City of Lompoc
San Pedro Creek	South Coast	No listing	City of Goleta
San Roque Creek	South Coast	No listing	City of Santa Barbara
San Ysidro Creek	South Coast	No listing	
Santa Maria River	Not in permit area	Fecal coliform, nitrate	City of Santa Maria
Santa Monica Creek	South Coast	No listing	City of Carpinteria
Santa Ynez River	Not in permit area	Nutrients,	City of Solvang, City

Stream / Waterbody	County Permit Area	Impairment* (CWA §303(d))	Adjacent Land-use Jurisdiction(s)
		Salinity/TDS/chlorides, Sedimentation / siltation	of Buellton, City of Lompoc
Sycamore Creek	South Coast	No listing	City of Santa Barbara
Toro Creek	South Coast	No listing	
Vandenberg Village Creek	Vandenberg Village	No listing	
Zaca Creek	Not in permit area	No listing	City of Buellton
Zanja de Cota Creek	Santa Ynez	No listing	

*From: California State Water Resources Control Board 2002 Clean Water Act Section 303(d) List Of Water Quality Limited Segments (Approved by USEPA July 2003)

Regulatory Requirements and Applicable Standards

The General Permit applies to the operator of a regulated small municipal separate storm sewer system (MS4) because discharges of storm water from such systems are considered “point sources” of potential pollution. MS4s are considered point sources because they collect storm water and direct it into discrete conveyances.

According to 40 CFR 122.26(b)(8), “municipal separate storm sewer means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

- Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law)...including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act that discharges into waters of the United States;
- Designed or used for collecting or conveying storm water;
- Which is not a combined sewer; and
- Which is not part of a Publicly Owned Treatment Works as defined at 40 CFR 122.2.”

EPA categorizes MS4s as either “small,” “medium,” or “large.” Regulated small MS4s are automatically designated if they are located in “urbanized areas” (as defined by the Bureau of the Census). The unincorporated areas of the South Coast area east of Bell Canyon as well as the Communities of Vandenberg Village and Orcutt fall into this category. Other small MS4s located outside urbanized areas may be designated on a case-by-case basis by the NPDES permitting authority. Both the areas automatically designated and those designated on a case-by-case basis (the communities of Santa Ynez and Los Olivos) are covered in this SWMP (see Figure 1).

The EPA delegated to the State Water Resources Control Board the authority to administer and enforce the municipal Phase II NPDES Program within the State of California. The final implementing regulations were published in the Federal Register

(Vol. 64 No. 235) on December 8, 1999 and are referenced herein as the Phase II rules. On April 30, 2003 the SWRCB adopted the General Permit for storm water discharges.

County Responsibilities

The County is responsible for implementing the SWMP in state designated unincorporated urbanized areas pursuant to the General Permit (see Figure 1). The Cities of Carpinteria, Santa Barbara, Goleta, Buellton, Solvang, Lompoc, and Santa Maria are responsible for implementing independent SWMPs within their municipal boundaries, but have a close working relationship with the County on topics of overlapping interest, such as public education (see Section 1.0).

In addition to the activities described in the SWMP, the County's Project Clean Water program includes watershed planning and restoration, pilot treatment control BMPs and monitoring, and additional projects that are not required elements of the SWMP pursuant to the General Permit. These additional measures are described in Appendix B Additional Water Quality Measures. To the extent that funding is available in the future, either through the County budget, or a grant funding source, these efforts may be continued at the discretion of the Board of Supervisors. Furthermore, in the case of land use regulation policies, BMPs incorporated to protect water quality in construction site and post-construction activities have been adopted and are applicable in the unincorporated areas countywide, regardless of whether they are included in the NPDES permit area.

Requirements for Regulated Small MS4s

Pursuant to State and Federal regulation, the owner or operator of a Phase II regulated small MS4, is required to submit a Notice of Intent (NOI) and Storm Water Management Program (SWMP) to obtain coverage under an NPDES storm water permit. The plan needs to describe how the regulated entity will identify and implement a range of BMPs into an effective storm water management program that includes the six "Minimum Control Measures", evaluation/assessment and reporting efforts, and record-keeping. Under these regulations the program must be developed and implemented. The storm water management program is intended to:

- Reduce the discharge of pollutants to the "maximum extent practicable";
- Protect water quality; and
- Satisfy the appropriate water quality requirements of the Clean Water Act.

"Maximum extent practicable" (MEP) is a standard introduced by the EPA that establishes the level of pollutant reductions that MS4 operators must achieve through implementation of a SWMP. Permittees such as the County will determine what the MEP is on a location-by-location basis and consider such factors as conditions and uses of receiving waters, specific local concerns, and other aspects of a comprehensive watershed plan, geography of the watershed and ability to implement BMPs. A more detailed discussion of MEP and the methodology employed by the County for selection of BMPs is provided in the following section.

Consistent with the Phase II rules, the General Permit defines a SWMP for a small MS4 as a program composed of six elements that, when implemented together, are expected to

reduce pollutants discharged into receiving water-bodies to the MEP. As stated in the Federal Register (Vol. 64, No. 235, p. 68753):

Because the six measures represent a significant level of control if properly implemented, EPA anticipates that a permit for a regulated small MS4 operator implementing BMPs to satisfy the six minimum control measures will be sufficiently stringent to protect water quality, including water quality standards, so that additional, more stringent and/or more prescriptive water quality based effluent limitations will be unnecessary.

These six program elements, or minimum control measures, are:

1. Public Education and Outreach on Storm Water Impacts
2. Public Involvement/Participation
3. Illicit Discharge Detection and Elimination
4. Construction Site Runoff Control
5. Post-Construction Storm Water Management in New Development and Redevelopment
6. Pollution Prevention/Good Housekeeping for Municipal Operations

The implementation and evaluation of these 6 minimum control measures comprise the heart of the County's SWMP. Because so many diverse factors can dictate the specifics of a storm water management program, the County has evaluated which BMPs will best satisfy each of the minimum control measures based on listed "impairments" (see Table 1), water quality data (see www.countyofsb.org/project_cleanwater/storm.htm for data), observations made during regular "creekwalks" and knowledge of local land uses. Through the annual reporting process, the County will evaluate both current conditions and BMP effectiveness, and, as appropriate, update the SWMP to achieve the objective of meeting water quality standards consistent with Receiving Water Limitations stipulations in Attachment 4 of the General Permit. It is recognized that, pursuant to the Phase II rule, this will be an iterative process as described in Attachment 4 of the General Permit.

In order to meet water quality objectives and standards in the Basin Plan, the County may expand or better tailor existing BMPs after implementing the minimum control measures described in this SWMP. Such changes would be based on the results of monitoring documented in the annual reports and developed in consultation with stakeholders and the Central Coast Regional Water Quality Control Board staff.

Achieving Maximum Extent Practicable

Through implementation of this SWMP, the County will achieve compliance with the Maximum Extent Practicable (MEP) standard through the identification, selection and implementation of BMPs described in this SWMP. The County has applied the following regulatory framework in order to meet its MEP obligations.

Flexibility in selecting appropriate BMPs is given to the County, or "permittee", as stated in the General Permit:

Permittees must implement Best Management Practices (BMPs) that reduce pollutants in storm water runoff to the technology-based standard of Maximum Extent Practicable

(MEP) to protect water quality. In accordance with 40 CFR section 122.44(k)(2), the inclusion of BMPs in lieu of numeric effluent limitations is appropriate in storm water permits.

And

If a Permittee employs all applicable BMPs except those that are not technically feasible in the locality, or whose cost exceeds any benefit to be derived, it would meet the MEP standard. MEP requires Permittees to choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs are not technically feasible, or the cost is prohibitive.

And

It is understood that storm water quality programs and regulations are new to the entities that will be regulated under this General Permit. Therefore, it is anticipated that this General Permit term will serve as a "ramping-up" period and that programs implemented by Phase II communities will not necessarily conform to programs implemented by Phase I communities.

The State Water Resources Control Board provides guidance for achieving the MEP standard in their Phase II Small MS4 General Permit Questions and Answer document (posted 08/05/04):

The MEP standard involves applying best management practices (BMPs) that are effective in reducing the discharge of pollutants in storm water runoff. In discussing the MEP standard, the State Board has said the following: "There must be a serious attempt to comply, and practical solutions may not be lightly rejected. If, from the list of BMPs, a permittee chooses only a few of the least expensive methods, it is likely that MEP has not been met. On the other hand, if a permittee employs all applicable BMPs except those where it can show that they are not technically feasible in the locality, or whose cost would exceed any benefit to be derived, it would have met the standard. MEP requires permittees to choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs would not be technically feasible, or the cost would be prohibitive." (Order No. WQ 2000-11, at p.20.) MEP is the result of the cumulative effect of implementing, continuously evaluating, and making corresponding changes to a variety of technically and economically feasible BMPs that ensures the most appropriate controls are implemented in the most effective manner. This process of implementing, evaluating, revising, or adding new BMPs is commonly referred to as the iterative approach (see question 4). For Small MS4s, EPA has stated that pollutant reductions to the MEP will be realized by implementing BMPs through the six minimum measures described in the permit. (64 Federal Register 68753.)

It is recognized that "pollutant reductions that represent MEP may be different for each small MS4, given the unique local hydrologic and geologic concerns that may exist and the differing possible pollutant control strategies. Therefore, each permittee will determine appropriate BMPs to satisfy each of the six minimum control measures through an evaluative process" (Federal Register, Volume 64, No. 235, page 68754, December 8, 1999.).

The preamble to the Federal Register states [sic]: "EPA has intentionally not provided a precise definition of MEP to allow maximum flexibility in MS4 permitting. MS4s need the flexibility to optimize reductions in storm water pollutants on a location-by-location basis. EPA envisions that this evaluative process will consider such factors as conditions of receiving waters, specific local concerns, and other aspects included in a comprehensive watershed plan. Other factors may include MS4 size, climate, implementation schedules, current ability to finance the program, beneficial use of receiving water, hydrology, geology, and capacity to perform operation and maintenance." (Id.)

The flexibility and “ramping-up” period for implementation of the SWMP is based upon the changing state of the art of storm water BMPs, as reflected in the Central Coast Regional Water Quality Control Board Basin Plan:

Several important points about Best Management Practices must be emphasized;

- *Best Management Practices are not officially considered "best" practices for use in California unless they have been certified by the State Board.*
- *The use of Best Management Practices does not necessarily ensure compliance with effluent limitations or with receiving water objectives. Because nonpoint source control has been a priority only since the 1970's, the long-term effectiveness of some Best Management Practices has not yet been documented.*

The "state-of-the-art" for Best Management Practices design and implementation is expected to change over time. The State planning process will include periodic review and update of Best Management Practices certifications.

BMPs are defined in the implementing federal regulations (40 CFR §122.2) as follows:

***Best Management Practices (BMPs)** – Best management practices means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States (40 CFR §122.2)*

Furthermore, BMPs must address “reasonably controlled” water quality conditions as defined in the Central Coast Regional Water Quality Control Board Basin Plan:

Controllable water quality conditions are those actions or circumstances resulting from man's activities that may influence the quality of the waters of the State and that may be reasonably controlled.

Similar to the General Permit, the federal definition of MEP includes explicit language about timing and economic feasibility to clarify further that BMPs are practicable. The County interprets the State and EPA definitions as establishing the same level of requirement so as to avoid the State regulations inadvertently establishing an unfunded mandate... “EPA has intentionally not provided a precise definition of MEP to allow maximum flexibility in MS4 permitting... Other factors may include MS4 size, climate, implementation

schedules, current ability to finance the program, beneficial uses of receiving water”... (USEPA Phase II Final Rule, Section II.H.3.a.iii in Federal Register, Volume 64, No. 235, page 68754, December 8, 1999). Given this guidance from the State of California and EPA for achieving MEP through the selection and implementation of BMPs, the County has relied on three basic sources for identification of appropriate BMPs for the SWMP: (1) input from the community, (2) review of other nonpoint source programs, and (3) review of various published BMP manuals and lists, (including the EPA “Fact Sheets” and “Management Measures” contained in the State of California Nonpoint Source Pollution Control Program). Factors considered in the selection of BMPs for this SWMP include (1) existing ambient water quality of local streams and beaches, including “impairments” listed in the Basin Plan (Table 1), (2) BMP applicability to known pollutants, (3) local geographic and hydrologic factors, (4) land use, (5) likely effectiveness and (6) technical and economic feasibility.

Notice of Intent

The County has filed a Notice of Intent to apply for coverage under the State of California General Permit (Appendix A Notice of Intent). As required, the Notice of Intent and this SWMP together contain the following information:

- The area covered by the SWMP;
- Best management practices (BMPs) for each of the six minimum control measures;
- Measurable goals for each of the BMPs (i.e., narrative or numeric standards used to gauge program effectiveness);
- A timeline for implementation of each measure (estimated months and years to implement each measure, including interim milestones and frequency of measurement); and
- Individual(s) or group(s) responsible for implementing or coordinating the storm water program.

How to Use This Document

This document describes the measures the County will develop and/or carry out during the 5-year term of the SWMP. BMPs and their implementation for each minimum control measure are discussed in Sections 1.0 through 6.0. Because significant overlap exists between minimum control measure efforts, some sections contain cross-references to other sections in order to avoid redundancy. Sections 1.0 through 6.0 use the following format for describing implementation of the six minimum control measures. Each section lists BMPs that are currently being implemented, future BMPs, a timeline for implementation, measurable goals for each BMP, and reporting requirements. The SWMP also contains a discussion of the annual report required to be submitted to the Regional Water Quality Control Board. Appendices to this report provide (1) specific examples of BMPs the County has already implemented and will continue to implement as well as (2) information regarding other local programs which relate to the success of this SWMP. In the case of municipal operations, examples are provided of BMPs that the County has identified and will implement during the term of this permit.

Additional information regarding this SWMP or other elements of Project Clean Water may be obtained at www.countyofsb.org/project_cleanwater or by contacting the County Public Works Department, Water Resources Division, at 805.568.3440.

MINIMUM CONTROL MEASURES

The Phase II Rule defines a storm water management program for a small MS4 as a program composed of six elements that, when implemented together, are expected to reduce pollutants discharged into receiving water-bodies to the MEP. These six program elements, or minimum control measures are:

1. Public Education and Outreach on Storm Water Impacts;
2. Public Involvement/Participation;
3. Illicit Discharge Detection and Elimination;
4. Construction Site Runoff Control;
5. Post-Construction Storm Water Management in New Development and Redevelopment; and
6. Pollution Prevention/Good Housekeeping for Municipal Operations.

The implementation and evaluation of these six minimum control measures comprise the heart of the County’s SWMP. Within each minimum control measure category, specific BMPs were identified from (1) input from the community (Table 2), (2) review of other programs, and (3) review of various published BMP manuals and lists, including the EPA “Fact Sheets” and “Management Measures” contained in the State of California Nonpoint Source Pollution Control Program.

A number of factors were used to select BMPs for this SWMP including (1) water quality of local streams and beaches, including “impairments” listed in the Basin Plan, (2) BMP applicability to known water quality, (3) likely effectiveness, and (4) technical and economic feasibility. This information has been summarized in annual reports and other studies posted on the County website at www.countyofsb.org/project_cleanwater.

Table 2 – Public Participation in SWMP development

	Stakeholder meetings	Workshops	Planning commission hearings/briefings	Board of Supervisor hearings
Initial program scope (1998-99)	15 (monthly)	2	1	4
Construction site controls	3	5	1	3
Post construction design guidelines	3	2	1	3
Storm Water Management Program	1	5		1

Commitment to Implement SWMP and Continue Existing County BMPs:

The County will implement the measures in this SWMP to protect water quality from the impacts of storm water runoff to the maximum extent practicable. In particular the County will continue to implement those BMPs described as previously developed and ongoing and will implement new/expanded BMPs as described. The County would also continue to seek outside sources of funding that are relevant to the storm water program, consistent with the types of funding obtained by Project Clean Water to date (see Appendix B). To the extent that similar opportunities for funding measures are available, the County will actively seek outside sources of funds to supplement the existing SWMP efforts.