

**San Luis Obispo County Storm Water Management Program
Response to Comments from Sierra Club October 5, 2006 Letter**

1. At 4.5 Best Management Practices and Measurable Goals for Post-Construction Stormwater Management for New Development and Redevelopment, listed BMP #1 refers to the adoption of ordinance revisions and notes that these must include the requirements in Attachment 4 of the MS4 General Permit. These requirements should be specified. (p 1, paragraph 4.)

Response: The General Permit Attachment 4 requirements are included along with the General Permit in SWMP Appendix D.

2. At Minimum Control Measure #5: Post-Construction Stormwater Management for New Development and Redevelopment. BMP PC5 states that the Los Angeles County Standard Urban Stormwater Mitigation Plans (SUSMP) “can be used as a model” to develop and implement a Low Impact Development (LID) Design Standards Manual. We would like to see this changed to an assurance that the L.A. County SUSMPs will, not “can,” be used as model for San Luis Obispo LID standards, as no other specific design standards are cited. (p 1, paragraph 5.)

Response: The County of San Luis Obispo co-sponsored, with the Water Board, an LID workshop in November 2005, which brought together LID experts from across the nation. Whether the County uses the information suggested by the commenter or uses more up to date information is up to the County itself. The goal is develop and implement an effective program. Water Board staff expects the County to use all available information to develop and maintain their LID manual.

3. Structural BMPs are notable largely by their absence from the SWMP. Aside from noting their presence in the MEP standard the EPA’s requirement for their inclusion, specific non-structural and structural or treatment control BMPs appear to be left up to the individual project plans. The program must state, not merely indicated, the post construction non-structural and structural BMPs it will mandate in order to fulfill the purpose of the program. (p 2, first full paragraph.)

Response: Non-structural BMPs include ordinance adoption with General Permit Attachment 4 Design Standards (PC1), CEQA initial study checklist revision (PC2), making post-construction storm water management review a part of the development review process (PC3), post-construction BMP site inspections (PC4), provide Low Impact Development (LID) education and outreach materials to project applicants, contractors, and developers, and an LID incentive program. Post construction structural BMPs will be included in the County LID design manual (PC5) that will be published in permit year two.