

City of Santa Barbara

Meeting or Exceeding General Permit/Attachment 4/Interim Requirements (Feb. 15th Letter)

GENERAL PERMIT REQUIREMENTS				
Requirement	SWMP or TGM ¹ Section(s)	Meet	Exceed	Explanation of Exceedence
Public Education/Outreach				
Implement public education program	SWMP 4.1	X		
Public Involvement/Participation				
Comply with State and local public notice requirements when implementing a public participation/involvement program	SWMP 4.2	X		
Illicit Discharge Detection/Elimination				
Develop, implement and enforce a program to detect and eliminate illicit discharges	SWMP 4.3	X		
Develop a storm sewer system map	SWMP 4.3.1, #1, and Appendix B	X		
Effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges and implement appropriate enforcement procedures and actions	SWMP 4.3.1, #2, 3	X		
Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping	SWMP 4.3.1, #4, 5, 6	X		
Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste	SWMP 4.3.1, #7	X		

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Construction Site Runoff Control				
Requirement	SWMP or TGM ¹ Section(s)	Meet	Exceed	Explanation of Exceedence
Implement and enforce a program to reduce pollutants in any storm water runoff from construction activities that result in a land disturbance of greater than or equal to one acre	SWMP 4.4.1		X	City policy requires erosion control plans on all construction projects, including those under 1 acre. <i>Standard</i> erosion control measures are required on projects that result in a land disturbance of <i>less than</i> one acre, or on a slope less than 15 percent, or not immediately adjacent to a creek. <i>Detailed</i> erosion control plans are required on larger projects that have slopes greater than 15 percent, are adjacent to a creek, and/or the disturbed soil area is greater than 1 acre.
The program must include the development and implementation of an ordinance or other regulatory mechanism	SWMP 4.4.1, #1	X		
Requirements for construction site operators to implement appropriate erosion and sediment control best management practices	SWMP 4.4.1, #2	X		
Requirements for construction site operators to control waste at the construction site	SWMP 4.4.1, #2	X		
Procedures for site plan review	SWMP 4.4.1, #3	X		
Procedures for receipt and consideration of information submitted by the public	SWMP 4.4.1, #4	X		
Procedures for site inspection and enforcement	SWMP 4.4.1, #5	X		
Post-Construction Runoff Control				
Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre	SWMP 4.5, 4.5.1, #1, 2, 3, and Santa Barbara Municipal Code, Title 22 (Environmental Policy and Construction)		X	All discretionary review projects, regardless of size or type of land use, receive extensive development review, may require preparation of an environmental document pursuant to the California Environmental Quality Act (CEQA), and receive detailed conditions of approval for storm water management as applicable. The City goes beyond the General Permit minimum standards by addressing peak storm water discharge rates on all discretionary development and redevelopment projects that go to PC, including projects smaller than 1 acre. Furthermore, the City requires all discretionary projects to meet storm water treatment requirements.

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Requirement	SWMP or TGM ¹ Section(s)	Meet	Exceed	Explanation of Exceedence
Develop and implement strategies, which include a combination of structural and/or non-structural BMPs	SWMP 4.5.1, #4, and Draft TGM	X		
Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects (the requirements must include the design standards contained in Attachment 4)	SWMP 4.5 and 4.5.1, #1 (codes and policies), #2 and 3 (process), #4 (implementation of Attachment 4 standards)	X		
Ensure adequate long-term operation and maintenance of BMPs	SWMP 4.5.1, #6	X		
Pollution Prevention/Good Housekeeping				
Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations	SWMP 4.6.1, #1 (Operations and Maintenance Programs)	X		
Employee training	SWMP 4.6.1, #2	X		
ATTACHMENT 4				
Permittees shall comply with Receiving Water Limitations A.1 through timely implementation of control measures and other actions to reduce pollutants in the discharges in accordance with the SWMP	See SWMP and associated Tables 4.1 – 4.6	X		
Adopt an ordinance or other document to ensure implementation of the Design Standards included herein <i>or a functionally equivalent program that is acceptable to the appropriate RWQCB</i>	SWMP 4.5.1, and Table 4.5: BMPs #5.4 and 5.5	X		

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All discretionary development and redevelopment projects that fall into one of the following categories are subject to these Design Standards:	SWMP 4.5.1, #4		X	The Attachment 4 development categories are all captured in the City's discretionary review process for development and redevelopment, and are therefore subject to storm water design standards. Several of the established Attachment 4 categories have higher thresholds than the City's smaller, more protective project thresholds. All hillside residential projects in the Hillside Design District or on slopes of 20% or greater are discretionary, as are all commercial developments, auto repair shops, gasoline outlets, restaurants, etc., and all are subject to the storm water treatment standards.
Single-Family Hillside Residences	SWMP 4.5.1, #4	X		
100,000 Square Foot Commercial Developments	SWMP 4.5.1, #4		X	The City goes beyond the General Permit minimum standards by applying this general rule for peak storm water discharge rates to all discretionary development and redevelopment projects undergoing Planning Commission permit approval regardless of project size or type, as feasible given site circumstances.
Automotive Repair Shops	SWMP 4.5.1, #4	X		
Retail Gasoline Outlets	SWMP 4.5.1, #4	X		
Restaurants	SWMP 4.5.1, #4	X		
Home Subdivisions with 10 or more housing units	SWMP 4.5.1, #4		X	The Santa Barbara Municipal Code, Title 27 (subdivision ordinance) establishes that any project proposing 5 or more units on a lot has to be approved by the Planning Commission (PC) and <i>any number of units</i> proposed adjacent to a creek or on a slope of 20% or greater has to be approved by PC, and is therefore discretionary; subject to the Design Standards. Moreover, smaller discretionary subdivision projects are subject to storm water treatment standards.
Parking lots 5,000 square feet or more or with 25 or more parking spaces and potentially exposed to storm water runoff	SWMP 4.5.1, #4		X	All parking lots greater than 5,000 sq. ft. or 25 spaces are subject to PC review and Design Standards apply. The City goes beyond the minimum standards by applying post-construction BMPs for proper design to protect water quality to all parking lots with 10 or more spaces.

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Requirement	SWMP or TGM ¹ Section(s)	Meet	Exceed	Explanation of Exceedence
Conflicts With Local Practices	SWMP Table 4.5, BMP #5.4.c		X	The City plans to conduct an ordinance audit in Year 2 of the 5-year permit, to identify and remedy areas in the municipal code and other ordinances or policies that conflict with enforcing design standards
Peak Storm Water Runoff Discharge Rates: Post-development peak storm water runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increased peak storm water discharge rate will result in increased potential for downstream erosion	SWMP 4.5.1, #4, and Santa Barbara Municipal Code, Title 22 (Environmental Policy and Construction)		X	This standard applies to all discretionary projects that go to PC and Title 22 prohibits increase in runoff discharge rates from projects within the 100-year flood zone.
Conserve Natural Areas: Concentrate or cluster Development on portions of a site while leaving the remaining land in a natural undisturbed condition	SWMP 4.5.1, #4		X	The City goes beyond the State minimum design standards by applying the criteria of limiting grading, and preserving open space and native vegetation, as feasible, to all discretionary development and redevelopment projects requiring Planning Commission permit approval, and/or design review board approval, as applicable, regardless of project size or type.
Limit clearing and grading of native vegetation at a site to the minimum amount needed to build lots, allow access, and provide fire protection	SWMP 4.5.1, #1 and #4	X		
Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants	SWMP 4.5.1, #1 (ABR Guidelines and Landscape Design Guidelines), and #4	X		
Promote natural vegetation by using parking lot islands and other landscaped areas	SWMP 4.5.1, #1, 4	X		
Preserve riparian areas and wetlands	SWMP 4.5.1, #1, 4	X		

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Minimize Storm Water Pollutants of Concern: "Minimization of the pollutants of concern" will require the incorporation of a BMP or combination of BMPs best suited to maximize the reduction of pollutant loadings in that runoff to the Maximum Extent Practicable	SWMP 4.5.1, #1, 4	X		
Protect Slopes and Channels: Convey runoff safely from the tops of slopes and stabilize disturbed slopes	SWMP 4.5.1, #1, 4	X		
Utilize natural drainage systems to the maximum extent practicable	SWMP 4.5.1, #1, 4	X		
Stabilize permanent channel crossings	SWMP 4.5.1, #1, 4	X		
Vegetate slopes with native or drought tolerant vegetation, as appropriate	SWMP 4.5.1, #1, 4	X		
Install energy dissipaters, such as riprap, at the outlets of new storm drains, culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion	SWMP 4.5.1, #1, 4	X		
Provide Storm Drain System Stenciling and Signage	SWMP 4.5.1, #4	X		
Properly Design Outdoor Material Storage Areas	SWMP 4.5.1, #4	X		
Properly Design Trash Storage Areas	SWMP 4.5.1, #4	X		
Provide Proof of Ongoing BMP Maintenance	SWMP 4.5.1, #6	X		

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Design Standards for Structural or Treatment Control BMPs: Require that post-construction treatment control BMPs incorporate, at a minimum, either a volumetric or flow based treatment control design standard, or both <i>(Limited Exclusion: Restaurants and Retail Gasoline Outlets, where the land area for development or redevelopment is less than 5,000 square feet, are excluded from the numerical Structural or Treatment Control BMP design standard requirement only)</i>	SWMP 4.5.1		X	All discretionary projects in the City are subject to the design standards for structural or treatment control BMPs. The City does not practice or implement the Limited Exclusion; restaurants and retail gasoline outlets of all sizes are required to implement post-construction treatment control BMPs and/or treatment control design standards.
Provisions Applicable to Individual Priority Project Categories	SWMP 4.5.1, #4		X	The City goes beyond the minimum standards by applying post-construction BMPs for proper design to protect water quality to all industrial, commercial, restaurant, gasoline retail, automotive, and parking lots with 10 or more spaces, as well as residential projects over 4,000 sq. ft.
INTERIM REQUIREMENTS (FEB 15, 2008 LETTER)				
Maximize infiltration of clean storm water and minimize runoff volume and rate:	SWMP 4.5.1, #1, #4 (Minimization of Storm Water Pollutants of Concern), and TGM, Chap. 1, pg. 1-6, Chap. 4, Sections 4.4, 4.5, 4.8, Chap. 5, Section 5.10, 5.11,	X		

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Requirement	SWMP or TGM ¹ Section(s)	Meet	Exceed	Explanation of Exceedence
- EIA shall be maintained at less than five percent (5%) of total project area	TGM, Sections 1.2.1, 4.1.1, 4.3, 4.4, 4.6, 4.7, 5.3-5.11, 6.5, and 6.6	X		(FYI: These specific design examples and guidelines not only encourage disconnecting impervious areas, but also provide specific numeric sizing criteria for LID designs, like filter strips and sand filters that reduce the EIA and assist applicants in meeting volumetric and treatment criteria. Requirements apply to all discretionary projects and the TGM is moving towards inclusion of more ministerial projects.)
- New and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent the pre-construction runoff hydrographs	TGM and Title 22 (SBMC)		X	The TGM requires the implementation of LID designs when a project creates new or redeveloped impervious surfaces greater than 500 square feet. This significantly smaller threshold (versus 5,000 square feet) will result in many more projects approaching the pre-construction runoff hydrographs. Larger projects (4,000 square feet and above) are required to implement more intensive, specific LID designs, which will result in further attaining this goal. Furthermore, volumetric retention requirements apply to all discretionary projects that go to PC (including those smaller than 5,000 sq. ft.).
- Projects whose disturbed project area exceeds two acres, preserve the pre-construction drainage density for all drainage areas serving a first order stream or larger and ensure that post-project time of concentration is equal or greater than pre-project time of concentration	TGM		X	All discretionary projects that go to PC (including projects less than 2 acres) must meet volumetric, rate, and treatment standards, which together work to preserve the pre-construction drainage density.
Schedule for development and adoption of control standards for hydromodification must include: numeric criteria for controlling storm water runoff volume and rates from new and redevelopment	SWMP 4.5 and TGM Chap. 1		X	The SWMP requires compliance with volume and rate standards for all discretionary projects going to PC. The SWMP also requires production of the TGM in Year 1 (currently a Draft), a draft ordinance in Year 2, and a final ordinance in Year 3. The TGM provides the foundation for future ordinance provisions for numeric criteria for all discretionary projects and ministerial projects with over 500 sq. ft. of new or redeveloped impervious surfaces.
- Numeric criteria for stream stability	Title 22 (SBMC), SWMP 4.5, #4, TGM Chap. 1	X		

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- Specific applicability criteria, land disturbance acreage thresholds, and exemptions	SWMP 4.5, #1, #4, TGM Chap. 1	X		
- Performance criteria for control BMPs and an inspection program	SWMP 4.3, #3, #4, 4.4.1, #1, #5, 4.6.1, #1, throughout 5.0, throughout 6.0, and TGM, Section 4.8.1 and Chap. 6 – all “Operations and Maintenance” sections	X		
- Education requirements for municipal staff on hydromodification and LID	SWMP 4.3.1, #7, 4.5, 4.6.1, #2, 5.3.3, #3, 5.3.6, #2, 6.3.3, #1, 6.3.6, #1, 7.0	X		(FYI: \$\$ in FY09 budget for TGM training for City staff and applicable public stakeholders)
Protect riparian areas, wetlands, and their buffer zones – 30-foot buffer zone	SWMP 4.5.1, TGM Chap. 4	X		
Effective strategy to adopt and implement protection of riparian areas, wetlands, and their buffer zones	SWMP 4.5.1, #1, #4, and TGM Chap. 4	X		
Minimize pollutant loading – BMPs and/or control measures, including volume and/or flow-based treatment criteria	SWMP 3.2, 3.3, 4.1-4.6 (throughout), especially 4.5.1, #4, and TGM Chaps. 4,5,6	X		
Effective strategy to reduce pollutant loading	Same as above	X		

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Long-term watershed protection – have a strategy to develop watershed based hydromodification management plans	SWMP 3.2, TGM Chap. 4, and Watershed Action Plan	X		(FYI: The City Creeks Division will produce a Watershed Action Plan, following the current/pending General Plan Update.)
Incorporate LID strategies with the goal to achieve an EIA of no more than three to ten percent (3-10%) of watershed area, depending on local conditions	TGM	X		(By applying LID strategies with required design and capacity criteria to discretionary and ministerial projects – see Tiers 2 and 3 in Table 1-1, Chap. 1, TGM – the City is effectively reducing the EIA; addressing a cumulative, non-point source pollution problem with a cumulative approach.)
Detailed plan for evaluating effectiveness and progress toward complying with the General Permit	SWMP – Measurable Goals (see tables 4.1-4.6) and Reporting Requirements	X		
- Explain how effectiveness/progress results will be communicated to stakeholders	SWMP – posted annual reports and public meetings re: SWMP status to City Council, Planning Commission, Creeks Advisory Committee	X		
- Evaluation plan should include quantifiable measures based on: assessing compliance with General Permit requirements	SWMP compliance = General Permit compliance (Reporting on Measurable Goals)	X		
- Verify that BMPs are being implemented	SWMP 4.3.1 #6, 4.4 #1, 5, 4.5.1 #3, 4.6.1 #1	X		

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- Assess the chemical, physical, and biological impacts on beneficial uses caused by POCs in storm water discharges	SWMP 3.2, 3.3			
- Characterize watersheds and storm water discharges	Completed: Creek Inventory and Assessment (2000), and Existing Conditions Study of Santa Barbara Watersheds (2005), both posted on website – www.sbcreeks.org	X		
- Identify sources of pollutants	SWMP 3.2, 3.3	X		
- Evaluate long-term trends in receiving water quality	SWMP 3.2 and Annual Reporting	X		

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