

Ventura County Watershed Planning Project
Watershed-based Planning Solutions for Ventura County

MEMO: Alternative Compliance - Developing Redevelopment Project Area Master Plans

The Local Government Commission (LGC) is working with local and regional agencies and other stakeholders to align local land use planning and stormwater management Ventura County. This project, which is funded by the California Water Boards with Prop 40 funds is developing watershed-based planning strategies and policy recommendations to minimize the water quality impacts of development.

The draft NPDES stormwater permit for Ventura County, which was released shortly before the project began, has become a focal point of the project. LGC has provided comment on past drafts of the permit to shed light on challenges and opportunities within land development program of the permit. Particular emphasis has been placed on recognizing the importance of the form and location of development to water quality and watershed health. These brief comments call for taking additional steps needed to develop the Redevelopment Project Area Master Plan component of the permit's Alternative Compliance program.

Many questions remain regarding the impact of the permit's site level requirements on the form and location of development, which are also critical to water quality. The RPAMP program is a response to concerns that the draft permit's emphasis on site level requirements may be at odds with other environmental planning goals such as redevelopment, infill and compact community design. The Regional Board should be commended for providing a program that recognizes importance of development patterns and community design in managing stormwater. The program offers a cutting edge approach that has the potential to connect planning and design strategies across multiple scales and development contexts, but it needs further development.

The RPAMP program introduced in the draft permit is quite innovative but poses challenges and questions. At a basic level, there is uncertainty regarding what an RPAMP is and how the program would work. *How will an RPAMP be developed? What are the performance criteria? What are the conditions of approval? How much will it cost? How long will it take to develop and what happens in the interim? How are areas designated? What rules still apply within the RPAMP?* These are among the key questions that have surfaced through the meetings during the course of the project and must be met to reduce complexity and ensure that an RPAMP-type program is workable and effective.

LGC has led initial discussions with staff from local agencies, the LA Regional Board, and other stakeholders to begin answering these questions. However, to advance the program a broader dialogue and further vetting are needed. LGC has initiated discussions with other relevant constituencies and is developing concepts for one or more workshops to outline the details of the program and how it can be developed and implemented. The content of the workshop(s) will attend to the ultimate objectives of the program, methods for determining RPAMP areas, conditions of approval, performance criteria for projects within an RPAMP, and finally the development of a pilot RPAMP. LGC staff are compiling input from interested parties and exploring options for carrying out these next steps. We will provide additional comments and a proposed plan of action in coming weeks.

