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Memorandum

To : Regional Water Board
Executive Officers

Regional Water Board Attorneys

Date: JAN - 4 1994

From : William R. Attwater
Chief Counsel
OFFICE OF THE CHIEF COUNSEL
STATE WATER RESOURCES CONTROL BOARD
901 P Street, Sacramento, CA 95814
Mail Code: G-8

Subject: GUIDANCE ON CONSIDERATION OF ECONOMICS IN THE ADOPTION OF WATER QUALITY OBJECTIVES

ISSUE

What is required of a Regional Water Quality Control Board (Regional Water Board) in order to fulfill its statutory duty to consider economics when adopting water quality objectives in water quality control plans or in waste discharge requirements?

CONCLUSION

A Regional Water Board is under an affirmative duty to consider economics when adopting water quality objectives in water quality control plans or, in the absence of applicable objectives in a water quality control plan, when adopting objectives on a case-by-case basis in waste discharge requirements. To fulfill this duty, the Regional Water Board should assess the costs of the proposed adoption of a water quality objective. This assessment will generally require the Regional Water Board to review available information to determine the following: (1) whether the objective is currently being attained; (2) what methods are available to achieve compliance with the objective, if it is not currently being attained; and (3) the costs of those methods. The Regional Water Board should also consider any information on economic impacts provided by the regulated community and other interested parties.

If the potential economic impacts of the proposed adoption of a water quality objective appear to be significant, the Regional Water Board must articulate why adoption of the objective is necessary to assure the reasonable protection of beneficial uses of state waters, despite the potential adverse economic consequences. For water quality control plan amendments, this

discussion could be included in the staff report or resolution for the proposed amendment. For waste discharge requirements, the rationale must be reflected in the findings.

DISCUSSION

A. Legal Analysis

1. Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act, Water Code Section 13000 et seq. (Porter-Cologne Act or Act), the State Water Resources Control Board (State Water Board) and the Regional Water Boards are the principal state agencies charged with responsibility for water quality protection. The State and Regional Water Boards (Boards) exercise this responsibility primarily through the adoption of water quality control plans and the regulation of waste discharges which could affect water quality. See Water Code Secs. 13170, 13170.2, 13240, 13263, 13377, 13391.

Water quality control plans contain water quality objectives, as well as beneficial uses for the waters designated for protection and a program of implementation to achieve the objectives. Id. Sec. 13050(j). In the absence of applicable water quality objectives in a water quality control plan, the Regional Water Board may also develop objectives on a case-by-case basis in waste discharge requirements. See id. Sec. 13263(a).[1]

When adopting objectives either in a water quality control plan or in waste discharge requirements, the Boards are required to exercise their judgment to "ensure the reasonable protection of beneficial uses and the prevention of nuisance". Id. Secs. 13241, 13263; see id. Sec. 13170. The Porter-Cologne Act recognizes that water quality may change to some degree without

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1 The focus of this memorandum is limited to an analysis of the Boards' obligation to consider economics when adopting water quality objectives either in water quality control plans or, on a case-by-case basis, in waste discharge requirements. This memorandum does not discuss the extent to which the Boards' are required to consider the factors specified in Water Code Section 13241 in other situations. Specifically, this memorandum does not discuss the applicability of Section 13241 to the development of numeric effluent limitations, implementing narrative objectives contained in a water quality control plan. Further guidance on the latter topic will be developed at a later date.

causing an unreasonable effect on beneficial uses. Id. The Act, therefore, identifies factors which the Boards must consider in determining what level of protection is reasonable. Id.[2] These factors include economic considerations. Id.[3]

The legislative history of the Porter-Cologne Act indicates that "[c]onservatism in the direction of high quality should guide the establishment of objectives both in water quality control plans and in waste discharge requirements". Recommended Changes in Water Quality Control, Final Report of the Study Panel to the [State Water Board], Study Project--Water Quality Control Program, p. 15 (1969) (Final Report). Objectives should "be tailored on the high quality side of needs of the present and future beneficial uses" Id. at 12. Nevertheless, objectives must be reasonable. and economic considerations are a necessary part of the determination of reasonableness. "The regional boards must balance environmental characteristics, past, present and future beneficial uses, and economic considerations (both the cost of providing treatment facilities and the economic value of development) in establishing plans to achieve the highest water quality which is reasonable." Id. at 13.

2. Senate Bill 919

The Boards are under an additional mandate to consider economics when adopting objectives as a result of the recent enactment of Senate Bill 919. 1993 Cal. Stats., Chap. 1131, Sec. 8, to be codified at Pub. Res. Code, Div. 13, Ch. 4.5, Art. 4. The legislation, which is

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2 *Other factors which must be considered include:*

(a) Past, present, and probable future beneficial uses of water;
(b) Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto;
(c) Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area;
(d) The need for developing housing within the region;
(e) The need to develop and use recycled water.

3 *See also Water Code Section 13000 which mandates that activities and factors which may affect water quality "shall be regulated to attain the highest water quality which is reasonable, considering all demands being made and to be made on those waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible" (emphasis added).*

effective January 1. 1994, amended the California Environmental Quality Control Act, Public Resources Code Section 21000 et seq. (CEQA), to require that, whenever the Boards adopt rules requiring the installation of pollution control equipment or establishing a performance standard or treatment requirement, the Boards must conduct an environmental analysis of the reasonably foreseeable methods of compliance. This analysis must take into account a reasonable range of factors, including economics. For the reasons explained above, the latter requirement is duplicative of existing requirements under the Porter-Cologne Act regarding consideration of economics.

B. Recommendation

The meaning of the mandate to "consider economics" in the Porter-Cologne Act is not entirely clear. It is clear that the Porter-Cologne Act does not specify the weight which must be given to economic considerations. Consequently, the Boards may adopt water quality objectives even though adoption may result in significant economic consequences to the regulated community. The Porter-Cologne Act also does not require the Boards to do a formal cost-benefit analysis.

The Porter-Cologne Act does impose an affirmative duty on the Boards to consider economics when adopting water quality objectives. The Boards probably cannot fulfill this duty simply by responding to economic information supplied by the regulated community. Rather, the Boards should assess the costs of adoption of a proposed water quality objective. This assessment will normally entail three steps. First, the Boards should review any available information on receiving water and effluent quality to determine whether the proposed objective is currently being attained or can be attained. If the proposed objective is not currently attainable, the Boards should identify the methods which are presently available for complying with the objective. Finally, the Boards should consider any available information on the costs associated with the treatment technologies or other methods which they have identified for complying with a proposed objective.[4]

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[4] *See, for example, Managing Wastewater In Coastal Urban Areas, National Research Council (1993). This text provides data on ten technically feasible wastewater treatment technologies, which can be used to make comparative judgments about performance and to estimate the approximate costs of meeting various effluent discharge standards, including standards for toxic organics and metals.*

In making their assessment of the cost impacts of a proposed objective, the Boards are not required to engage in speculation. Rather, the Boards should review currently available information. In addition, the Boards should consider, and respond on the record, to any information provided by dischargers or other interested persons regarding the potential cost implications of adoption of a proposed objective.

If the economic consequences of adoption of a proposed water quality objective are potentially significant, the Boards must articulate why adoption of the objective is necessary to ensure reasonable protection of beneficial uses. If the objective is later subjected to a legal challenge, the courts will consider whether the Boards adequately considered all relevant factors and demonstrated a rational connection between those factors, the choice made, and the purposes of the Porter-Cologne Act. See California Hotel & Motel Assn. v. Industrial Welfare Com., 25 Cal.3d 200, 212, 157 Cal.Rptr. 840, 599 P.2d 31 (1979).

Reasons for adopting a water quality objective, despite adverse economic consequences, could include the sensitivity of the receiving waterbody and its beneficial uses, the toxicity of the regulated substance, the reliability of economic or attainability data provided by the regulated community, public health implications of adopting a less stringent objective, or other appropriate factors. These factors may also include the legislative directive that a "margin of safety [ ] be maintained to assure the protection of all beneficial uses." Final Report, p. 15 and App. A, p. 59.

If objectives are proposed for surface waters and adverse economic consequences stemming from adoption of the objectives could be avoided only if beneficial uses were downgraded, the Boards should address whether dedesignation would be feasible under the applicable requirements of the Clean Water Act and implementing regulations. See 40 C.F.R. Sec. 131.10. Dedesignation is feasible only for potential, rather than existing, uses. See id. Sec. 131.10(g). If dedesignation of potential beneficial uses is infeasible, the Boards should explain why, e.g., that there is a lack of data supporting dedesignation.[5]

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5 It should also be noted that, even if dedesignation of potential beneficial uses is feasible, in the great majority of cases it will not have any significant effect on the selection of a proposed objective. This is so because the proposed objective will be necessary to protect existing beneficial uses, which cannot be dedesignated.

The State or Regional Water Board's rationale for determining that adoption of a proposed objective is necessary to protect water quality, despite adverse economic consequences, must be discernible from the record. This reasoning could be included in the staff report or in the resolution adopting a proposed water quality control plan amendment. When objectives are established on a case-by-case basis in waste discharge requirements, the rationale must be included in the findings.

EXHIBIT D

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State of California

Memorandum

To: Archie Matthews
Division of Water Quality

Date: FEB 11 1993

Elizabeth M. Jennings

Elizabeth Miller Jennings
Senior Staff Counsel
OFFICE OF THE CHIEF COUNSEL
From: STATE WATER RESOURCES CONTROL BOARD
901 P Street, Sacramento, CA 95814
Mail Code: G-8

Subject: DEFINITION OF "MAXIMUM EXTENT PRACTICABLE"

ISSUE

What is the meaning of the standard "maximum extent practicable" (MEP) as used in the Clean Water Act's storm water provisions, and how can this standard be communicated to the regulated community? How can this concept be included in the draft BMP manual?

CONCLUSION

The standard "maximum extent practicable" is not specifically defined for use in the storm water program. It has been defined in other rules, however, to require taking all actions which are technically feasible. I have included draft language for the manual.

DISCUSSION

Section 402(p) of the Clean Water Act (33 U.S.C. § 1342(p)) provides that permits issued for discharges from municipal separate storm sewers must require controls to reduce the discharge of pollutants "to the maximum extent practicable". The statutory language provides that municipal permits:

> "Shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques and system, design and engineering methods, and such other

> provisions as the [EPA] Administrator or the State determines appropriate for the control of such pollutants." Clean Water Act Section 402(p)(3)(B)(iii); 33 U.S.C. § 1342(p)(3)(B)(iii).

Neither Congress nor the U.S. Environmental Protection Agency (EPA) has defined the term "maximum extent practicable", and yet this is the critical standard which municipal dischargers must attain in order to comply with their permits. (The State could have spelled out the specific controls which the municipalities were required to undertake. However, such an approach would have relinquished the municipal dischargers of any flexibility in implementing their storm water programs.)

On its face, it is possible to discern some outline of the intent of Congress in establishing the MEP standard. First, the requirement is to reduce the discharge of pollutants, rather than totally prohibit such discharge. Presumably, the reason for this standard (and the difference from the more stringent standard applied to industrial dischargers in Section 402(p)(3)(A)), is the knowledge that it is not possible for municipal dischargers to prevent the discharge of all pollutants in storm water. The second point which is clearly encompassed in the standard is that it is the permitting agency, and not the discharger, which is the ultimate arbiter on whether there has been sufficient reduction of pollutants.

The most difficult issue is determining how much pollutants must be reduced, or, in other words, which best management practices (BMPs) must be employed in order to comply with the MEP standard. While the term is not defined in the Clean Water Act or the EPA regulations, the same term does appear in other federal laws and regulations, and there are some definitions or interpretations which may be useful to the storm water program.

In the Uranium Mill Tailings Radiation Control Act of 1978 (42 U.S.C. § 7901, et seq.), the Department of Energy was required to designate within one year of the Act's adoption "to the maximum extent practicable" contaminated areas within the vicinity of uranium processing sites. In addressing a lawsuit brought after the Department designated very few of the "vicinity properties", the federal court declared that MEP means "a substantial majority of the locations" should have been designated within the year. Sierra Club v. Edwards (D.C.D.C. 1983) 19 ERC 1357. Where a NEPA regulation required that "to the maximum extent practicable" environmental clearance was required for uncompleted projects which had never undergone NEPA review, a court held that the regulation "mandates a meaningful

environmental review" rather than a "perfunctory evaluation". Save the Courthouse Committee v. Lynn (S.D.N.Y. 1975) 408 F.Supp. 1323.

In an interim final regulation recently promulgated by the Department of Transportation, MEP is defined, where operators of onshore oil pipelines must have resources "to the maximum extent practicable" to remove and to mitigate or prevent worst case discharges. 49 CFR Part 194. MEP is defined to mean:

> "The limits of available technology and the practical and technical limits on an individual pipeline operator in planning the response resources required to provide the on-water recovery capability and the shoreline protection and cleanup capability to conduct response activities ...."

Finally, the term MEP is used in the Superfund legislation, wherein permanent solutions and alternative treatment technologies must be selected "to the maximum extent practicable". CERCLA, Section 121(b). The legislative history of the language indicates that the relevant factors in determining whether MEP is met include technical feasibility, cost, and state and public acceptance. 132 Cong. Rec. H 9561 (Oct. 8, 1986).

While each of the above interpretations and definitions varies, they do follow a pattern. The pattern that emerges is that there must be a serious attempt to comply, and that practical solutions may not be lightly rejected. If a municipality reviews a lengthy menu of BMPs, and chooses to select only a few of the least expensive, it is likely that MEP has not been met. On the other hand, if a municipal discharger 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. In any case, the burden would be on the municipal discharger to show compliance.

The definitions contained in the pipeline regulation and the Superfund legislative history are most analogous to storm water regulation. The major emphasis in both of these rules are technical feasibility. Similarly, the municipal dischargers should be required to employ whatever BMPs are feasible, i.e., are likely to be effective and are not cost prohibitive. Thus, where a choice may be made between two BMPs which should provide generally comparative effectiveness, the discharger may choose the least expensive alternative and exclude the more expensive BMP. However, it would not be acceptable either to reject all BMPs which would address a pollutant source or to pick a BMP based solely on cost, which would be clearly less effective.

As you know, the BMP Guidance manual is being published by the Task Force, which is made up of dischargers, rather than by the State Water Board. As far as I know, there is no intention for the State Water Board to adopt the manual as its own guidance document. Therefore, it is important to stress in the manual, both in the section on MEP and in the front of the manual, that this manual is not a publication of the State or the Regional Water Boards, and that these Boards have not specifically endorsed the contents. Rather, the manual was assembled by a group of dischargers in the interest of assisting themselves and others to comply with the storm water permits. In the section on MEP, it should be stated that the final determination regarding whether a discharger was reduced pollutants to the maximum extent practicable can only be made by the Regional or State Water Boards, but that selection and implementation of BMPs through consideration of the listed factors should assist dischargers in achieving compliance.

The following language is suggested in order to clarify that the manual is not the product of the State Water Board:

> "This Manual was produced and published by the Storm Water Task Force, an advisory body of municipal agencies regulated by the storm water program. This Manual is not a publication of the State Water Resources Control Board or any Regional Water Quality Control Board, and none of these Boards has specifically endorsed the contents thereof. The purpose of this manual is to assist the members of the Task Force and other dischargers subject to storm water permits, in attaining compliance with such permits."

The following language is recommended in place of Insert A in the manual for municipal dischargers:

> "Although MEP is not defined by the federal regulations, use of this manual in selecting BMPs should assist municipalities in achieving MEP. In selecting BMPs which will achieve MEP, it is important to remember that municipalities will be responsible to reduce the discharge of pollutants in storm water to the maximum extent practicable. This means choosing effective BMPs, and rejecting 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. The following factors may be useful to consider:
>
> "1. Effectiveness: Will the BMP address a pollutant of concern?

"2. Regulatory Compliance: Is the BMP in compliance with storm water regulations as well as other environmental regulations?

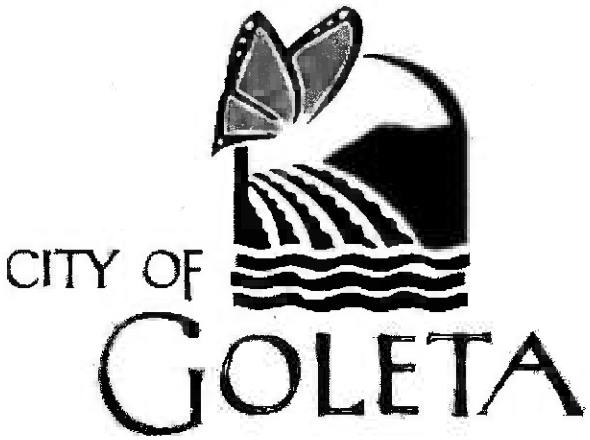
"3. Public acceptance: Does the BMP have public support?

"4. Cost: Will the cost of implementing the BMP have a reasonable relationship to the pollution control benefits to be achieved?

"5. Technical Feasibility: Is the BMP technically feasible considering soils, geography, water resources, etc.?

"After selecting a menu of BMPs, it is of course the responsibility of the discharger to insure that all BMPs are implemented."

EXHIBIT E



Storm Water Management Plan

City of Goleta
Department of Community Services
February 2010

Table of Contents

ACRONYMS

BMP	Best Management Practice
CASQA	California Storm Water Quality Association
CCAMP	Central Coast Ambient Monitoring Program
CCR	California Code of Regulations
CEC	Community Environmental Council (a community-based organization)
CEQA	California Environmental Quality Act
CIG	Community Interest Group
CWA	Clean Water Act
CURE	Clean up Rincon Effluent (a community-based organization)
EHS	County Environmental Health Services Division
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESHA	Environmentally Sensitive Habitat Area
GIS	Geographic Information System
HHW	Household Hazardous Waste
HMP	Hydromodification Management Plan
HTO	Heal the Ocean (a community-based organization)
IDDE	Illicit Discharge Detection and Elimination
LCP	Local Coastal Plan
LID	Low Impact Development
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
PAH	Polycyclic Aromatic Hydrocarbon
PCW	Project Clean Water
POC	Pollutants of Concern
POTW	Publicly Owned Treatment Works
RWQCB	Regional Water Quality Control Board
SCWRC	South Coast Watershed Resource Center
SOPs	Standard Operating Procedures
SWMP	Storm Water Management Plan/Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDL	Total Maximum Daily Load

1.0 INTRODUCTION

The City of Goleta (City) is required to comply with various federal and state regulations related to environmental protection. One of the primary environmental laws the City must comply with is the Clean Water Act (CWA) and associated implementing regulations. The purpose of the CWA is to protect and restore the physical, chemical, and biological integrity of our nation's waterways by controlling and limiting discharges of pollutants into these waterways.

In California, the State Water Resources Control Board (SWRCB) has determined that urban runoff is a leading cause of pollution throughout the state and that it contributes pollutants of concern such as sediments, non-sediment solids, nutrients, pathogens, oxygen-demanding substances, petroleum hydrocarbons, heavy metals, floatables, polycyclic aromatic hydrocarbons (PAHs), trash, and pesticides to our waterways. In addition, the impervious nature (i.e., pavement and hardscape) of most urban communities has resulted in storm water discharges that have greater volumes, velocity, and pollutant loads than predevelopment runoff. The impacts of these changes can include damaging effects on both human health and aquatic ecosystems if left unmitigated. However, when water quality impacts are considered during the planning stages of a project, new development, or many redevelopment projects, a municipality can more efficiently incorporate measures to protect water quality.

The SWRCB identified the City of Goleta as a small municipal separate storm sewer system (MS4) requiring coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems, Water Quality Order No. 2003-0005-DWQ and CAS000004 (General Permit).

A requirement of the General Permit is development of a Storm Water Management Plan designed to reduce the discharge of pollutants to the maximum extent practicable and to protect water quality. The General Permit also requires the development and implementation of Best Management Practices (BMPs) to address the following Minimum Control Measures (MCM):

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

1.1 Purpose

This Storm Water Management Plan (SWMP) has been prepared by the City of Goleta pursuant to the requirements of the General Permit and serves as a framework for identifying, assigning, and implementing the Minimum Control Measures and BMPs intended to reduce the discharge of pollutants from the MS4 and protect downstream water quality to the maximum extent practicable. In addition to these primary objectives, this SWMP is intended to:

- Serve as a planning and guidance document to be used by the City's regulatory body, all City departments, contractors, and the general public;
- Be dynamic and adaptively managed to address changes in General Permit requirements, organizational structure, responsibilities, and goals;
- Define techniques and measurable goals for measuring BMP effectiveness; and
- Define a five-year schedule for the Storm Water Management Program implementation to comply with the requirements of the General Permit.

During the development process of the Storm Water Management Plan, the City reviewed historical and existing water quality data, and rainfall data while considering the existing and future land uses within the City limits. Through this process, the City held public meetings to review the various drafts of the reports and considered public input on the SWMP. This input was also considered when choosing the BMPs to be implemented.

1.2 Regulatory Background

In 1972 the Federal Water Pollution Control Act, also known as the Clean Water Act, was enacted. The CWA established the baseline goal of attaining fishable, swimmable waters throughout the United States. In 1987, the CWA was amended to add Section 402, which established a framework for regulating discharges from MS4s as a special category of point source discharges under the NPDES Program. In 1990, the United States Environmental Protection Agency (U.S. EPA) promulgated regulations for permitting MS4s serving a population of 100,000 or more. These regulations, known as the Phase I regulations, require operators of Medium and Large MS4s to obtain storm water permits.

The U.S. EPA adopted the Phase II Final Rule in December 1999. The Phase II regulations address storm water discharges from MS4s with a population of less than 100,000 (Large, Medium and Small MS4s). The City of Goleta, with a population of less than 50,000, is in the Small MS4 category.

The SWRCB administers both the Phase I and Phase II programs in California, as established by the Porter-Cologne Water Quality Control Act of 1962 and regulated under Title 23 of the California Code of Regulations (CCR). The Phase II Final Rule

promulgated by the U.S. EPA prompted the SWRCB to adopt the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems, Water Quality Order No. 2003-0005-DWQ on April 30, 2003.

The Central Coast Regional Water Quality Control Board (RWQCB or Regional Board) is one of nine RWQCBs in California and has jurisdiction over a 300-mile-long by 40-mile-wide section of California's Central Coast. Its geographic area includes the City of Goleta and, therefore, the RWQCB is responsible for the coordination and control of water quality locally, including compliance oversight associated with the General Permit.

In a letter to the City of Goleta dated February 15, 2008, titled *Notification to Traditional, Small MS4s on Process for Enrolling Under the State's General Permit for Storm Water Discharge* the RWQCB identified a new process and schedule for enrollment into the NPDES Phase II program. This letter also sets forth the RWQCB's expectations for SWMP content in order to be found in compliance with the General Permit
In particular, the February 15 letter from the RWQCB states that the City's SWMP is required to include an array of BMPs to achieve four additional water quality protection conditions not specifically defined within the General Permit. These conditions and their associated implementation requirements are as follows:

1. Maximize Infiltration of Clean Storm Water, and Minimize Runoff Volume and Rate: This condition requires the City to present a schedule for developing and adopting control standards for hydromodification. The schedule for adopting hydromodification control standards is required to include:

- Numeric criteria for controlling storm water runoff volume and rates from new development and redevelopment;
- Numeric criteria for stream stability required to protect downstream beneficial uses and prevent physical changes to downstream channels that would adversely affect the physical structure, biologic condition, and water quality of streams;
- Specific applicability criteria, land disturbance acreage thresholds, and exemptions;
- Performance criteria for control BMPs and an inspection program to ensure proper long-term functioning; and
- Education requirements for appropriate municipal staff on hydromodification and low-impact development.

2. Protect Riparian Areas, Wetlands, and Their Buffer Zones: This condition requires the City to present a strategy to adopt and implement BMPs and/or other control measures to establish and maintain a minimum 30-foot buffer zone for riparian areas and wetlands.

3. Minimize Pollutant Loading: This condition requires the City to develop a strategy to reduce pollutant loading through the use of BMPs and/or other control measures including volume and/or flow-based treatment criteria.

4. Provide Long-Term Watershed Protection: This condition requires the City to present a strategy to develop a watershed-based Hydromodification Management Plan (HMP). The Central Coast RWQCB recommends the HMP incorporate Low Impact Development (LID) strategies with the goal of post-construction storm water management that achieves an effective impervious area of no more than 3 to 10 percent of watershed area within the City's jurisdiction, depending on local conditions.

1.3 City Responsibilities

The City is responsible for developing, submitting and implementing its SWMP within its legally defined City Limits. In the case of land use regulation policies, some BMPs that protect water quality from construction site and post-construction activities exist and are applicable City-wide.

In addition, the City is served by two sanitary districts that implement BMPs cooperatively with the City. The City may implement certain BMPs in topics of overlapping interest, such as public education, with the County, Special Districts and other agencies, (See Section 1.0).

The City is also responsible for allocation of funds for the capital, operation, maintenance, and enforcement expenditures necessary to implement and enforce such BMPs and control measures within its jurisdiction. The City is committed to making water quality a high priority and will dedicate resources required to meet Maximum Extent Practicable (MEP) standards.

1.4 Requirements for Regulated Small MS4s

The owner or operator of a Phase II regulated small MS4, is required to submit a Notice of Intent (NOI) and SWMP to obtain coverage under an NPDES storm water permit. The SWMP is developed to describe how the regulated entity will identify and implement a range of Best Management Practices into an effective storm water management program that includes the six Minimum Control Measures (MCM) as described above, evaluation/assessment, 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 is a standard set by the Congress in §402(p)(3)(B)(iii) of the Clean Water Act, 33 U.S.C. §1311(p)(3)(B)(iii). These sections establish the level of effort required in reducing pollutants in MS4 communities and define goals that MS4 operators must achieve through the implementation of a storm water management

program. MEP requires the City 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 WQ2000-11). 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 ensure the most appropriate controls are implemented in the most effective manner.

It is the goal of the City of Goleta to comply with the Small Cities Permit and fulfill the requirements of the six Minimum Control Measures enumerated by the General Permit.

The City has developed this SWMP in order to achieve the MEP standards. This process has included the thorough identification, selection and implementation of BMPs as described herein. The City has relied upon community input, review of various BMP manuals, and review of the EPA Fact Sheets.

At the present time, the Central Coast RWQCB (CCRWQCB) is evaluating the need for Total Maximum Daily Load (TMDL) criteria on the south coast beaches. If this program is required of the City, a modification to this SWMP may be required.

1.5 Prior City Actions

The City of Goleta's original SWMP was submitted to the RWQCB in 2003 in accordance with the timeline established by the Phase II Final Rule. The Phase II Final Rule required the City to submit a Notice of Intent and SWMP to the Central Coast RWQCB on or before March 10, 2003. This initial draft SWMP was developed in consultation with the County of Santa Barbara because the City of Goleta was newly incorporated and the County was providing storm water management services under contract with the City.

Public workshops and City Council meetings on the initial draft of the City SWMP were beginning in February 2003 through August 2003. At that time the first draft SWMP was submitted to the RWQCB.

In February 2005, the City received a comment letter from the RWQCB on the City's 2003 submittal. At that time the SWMP was revised and redesigned to more specifically address the City's storm water issues, while also considering regional programs and coordination.

In November 2005, the City Council approved the submittal of the September 2005 draft of the SWMP. In December 2005, the City received comments on the September 2005 draft from Santa Barbara Channelkeeper. The City's SWMP was revised to incorporate the comments received. Formal response/comments from the RWQCB on the City's September 2005 submittal were never received.

On March 10, 2008 the City received the letter dated February 15, 2008 from the RWCQB described in Section 1.2 of this report. Further revisions to the SWMP have been made in response to the RWQCB's February 15, 2008 letter.

1.6 City Storm Water Management Plan Coordination

Implementation of the City of Goleta SWMP involves several City departments and requires the City's total involvement and support. The program will be managed by the Director of Community Services and implemented by the Community Services Department staff from the Engineering, Capital Projects, Public Works Maintenance and the Parks and Open Space Divisions. Contact information for those directly involved in the implementation of the City's SWMP is provided below. The main City Hall telephone number is (805) 961-7500.

Department	Name/E-mail	Title	Phone Number
Community Services (CS)	Steve Wagner, P.E swagner@cityofgoleta.org	Community Services Director	(805) 961-7561
CS/Engineering	Marti Schultz, P.E. mschultz@cityofgoleta.org	Principal Engineer	(805) 961-7562
CS/Maintenance	Robert Morgenstern rmorgenstern@cityofgoleta.org	Manager Public Works Maintenance	(805) 961-7575
CS/Capital Projects	Rosemarie Gaglione rgaglione@cityofgoleta.org	Senior Project Manager	(805) 961-7569
CS/Parks & Open Space	Bill Millar bmillar@cityofgoleta.org	Manager Parks & Open Space	(805) 961-7575

Once the SWMP is approved by the RWQCB, a permit can be issued. The term of the permit is anticipated to be 5 years. This amount of time is necessary to allow the City to implement all the proposed BMPs identified in the approved plan. Some of the BMPs can be implemented quickly while others will take time to develop and implement. The City has considered this and has estimated when each BMP would be implemented over the first 5-year permit period. This information is included in the listing of each BMP for each MCM. The City's SWMP is intended to be part of an evolving storm water program. The proposed BMPs will be evaluated each year as part of an Annual Report submitted to the RWQCB. Ineffective BMPs may be discontinued and new BMPs may be added to the SWMP as conditions warrant or new technologies allow.

2.0 CITY OF GOLETA OVERVIEW

The City of Goleta is located on the south coast of Santa Barbara County approximately 90 miles north of Los Angeles, California. The City encompasses approximately 8 square miles and is situated on an alluvial plain at the base of the Santa Ynez Mountains. The climate can be described as semi-arid Mediterranean. Annual rainfall rates average approximately 18 inches per year.

The soils throughout a majority of the City range from sandy silt to silty clay. These soil types are generally not conducive to infiltration and/or groundwater recharge. This presents a feasibility issue relating to the implementation of volume-based BMPs. Long-term surface water storage due to poor-draining soils can raise public health concerns relating to vector issues.

The City of Goleta's existing land use type by area is shown in Table 2-1.

Table 2-1 Land Use by Area

Land Use Type	% Total	Acres
Residential	33%	1,675
Commercial/Industrial	23%	1,167
Open Space	22%	1,117
Agricultural	9%	457
Public-Quasi Public	13%	660
	100%	5,075

As shown above, approximately one third of the City comprises residential development, 23% comprises commercial/industrial land uses and another 22% comprises open space. The remaining 22% comprises agricultural (9%) and public (13%) uses.

In developing this SWMP, the City's existing and future land uses, hydrology, geography and soils conditions where taken into consideration. The selection of appropriate BMPs associated with each Minimum Control Measure was based on these factors along with existing storm water quality data identified in Section 3.0 of this plan.

2.1 Major Streams in or Adjacent to the City of Goleta

Many watersheds drain from the coastal mountains through the City of Goleta out to the Pacific Ocean. Many of the creeks in Goleta are ephemeral for the most part and do not run year-round. This ephemeral condition is dependent on the amount of rainfall in a given year. During storm events, high-intensity short-duration rainfall rates typically occur as storm fronts pass over the coastal mountain range. The orographic effect of

the south-facing mountains can create flash flood conditions during winter storms in several streams throughout the City.

The following table lists the major streams in or adjacent to the City of Goleta and shows which are listed as "impaired" by the State of California. The constituents of concerns identified as impairments below were considered in the development of this SWMP. The City of Goleta acknowledges that certain streams listed as impaired may be subject to further, more focused regulatory action by the State such as the implementation of TMDL limitations. Such regulatory action may necessitate revisions to this SWMP at a later date.

Table 2-2 Goleta Area Stream Size and Quality

Stream Name	Watershed Area (acres)	Impairment (CWA 303(d)
San Antonio Creek	3230	No Listing
Maria Ygnacio Creek	4,377	No Listing
San Jose Creek	5,503	No Listing
Las Vegas Creek	1,537	No Listing
San Pedro Creek	2,982	No Listing
Carneros Creek	2,439	Ammonia
Glen Annie/Tecolotito Creek	5,114	Nitrates
Devereaux Creek	2,042	No Listing
Bell Canyon Creek	325	Nitrates
Ellwood Canyon Creek	2,486	No Listing
Winchester Creek	1,125	No Listing
Tecolote Creek	3,637	No Listing
Goleta Slough	196	Pathogens, Priority Organics

In total there are over 31,700 acres of tributary watershed area in or adjacent to the City of Goleta. A vast majority of the tributary watershed area lies upstream of the City and outside of its jurisdiction. Most of these watersheds extend through unincorporated areas of the County and into the Los Padres National Forest. One of the challenges this presents to the City relates to the water quality entering the City from upstream properties. Previous water quality monitoring at the City's upstream limits on some of these streams indicates potential upstream water quality concerns. Although the City has no authority over upstream land use, the City will strive to improve receiving water quality through consultation and coordination with adjacent jurisdictions.

The map on the following page shows the location of various coastal streams in relation to the City limits.

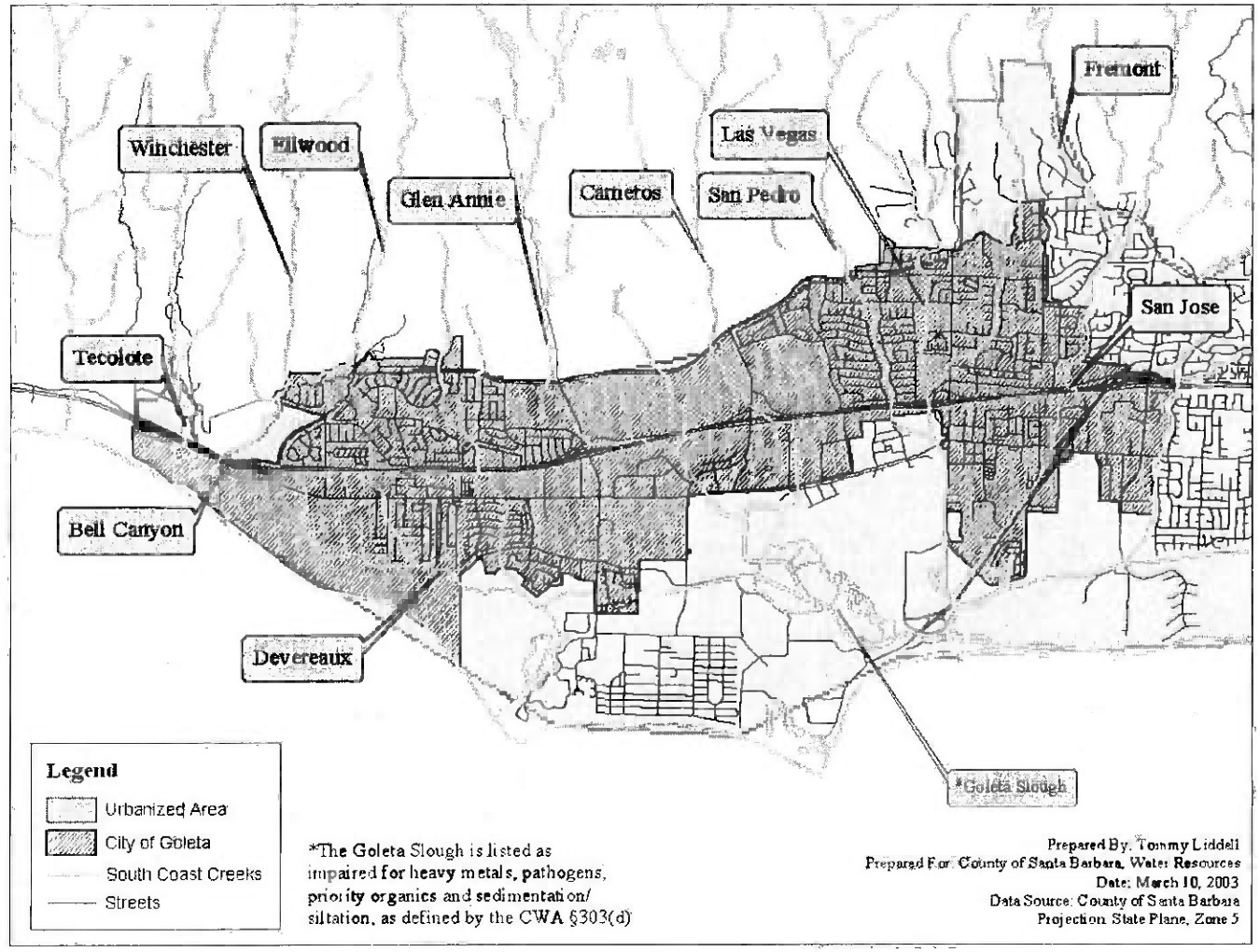


Figure 2-1. Goleta Area Streams

3.0 WATER QUALITY ASSESSMENT

An important step in developing an effective storm water management program is conducting a comprehensive assessment of water quality conditions and overall watershed concerns. To that end City staff has reviewed historical water quality data from several testing sites located in or adjacent to the City. These included the Central Coast Ambient Monitoring Program (CCAMP) and Goleta Stream Team water quality testing locations, as tested by Santa Barbara Channelkeeper, in and adjacent to the City. The CCAMP information may be found on the web at http://www.ccamp.org. The Goleta Stream Team and CCAMP water quality monitoring sites are listed in Tables 3-1 and 3-2.

Table 3-1 Stream Team Water Quality Test Sites

Goleta Stream Team Water Quality Test Site Location	Site Number
San Jose at Hollister	SJ1
San Jose at Patterson	SJ2
Maria Ygnacio	MY2
San Pedro at Hollister	SP1
San Pedro at Cathedral Oaks	SP2
Las Vegas Creek	LV1
Los Carneros at Hollister	LC1
Los Carneros at Calle Real	LC2
Tecolito at Hollister	GA1
Glen Annie at Golf Course	GA2
Phelps Ditch at Ocean Meadows	DV21
Phelps Ditch at Phelps	DV22
Phelps Ditch at Hollister	DV23
Phelps Ditch at Padova/Placer	DV24
Phelps Ditch at Frisbee course	DV25

Table 3-2 CCAMP Water Quality Test Sites

CCAMP Water Quality Test Site Location	Site Number
Tecolote Creek at Baccara Resort Entrance	3115TCI
Bell Creek at Baccara Resort Entrance	315BEL
Devereaux Slough Tributary at Golf Course	315DEV
Glenn Annie Creek at Hollister Road	315ANN
Los Carneros Creek at Hollister	315LCR
San Jose Creek at Hollister	315SJC
San Pedro Creek below Hollister	315SPC
Atascadero Creek at Ward Drive	315ATA
Atascadero Creek at Patterson	315ATU
Maria Ygnacio Creek at Patterson	315MTC

For overall watershed, concerns City staff reviewed previous illicit discharge files and reported complaints to determine possible problem areas and potential water quality issues.

Both the water quality data and previous discharge complaints referred to above were considered in selecting appropriate BMPs for each Minimum Control Measure of the SWMP.

Table 3-3 identifies the potential sources and pollutants of concern (POC) by land use type in the City. This table cross references the selected BMPs identified in the SWMP for each land use/pollutant type.

Table 3-3
City of Goleta Pollutant Activity/Sources

Land Use	Generating Site	Potential Pollutant Activities/Source	Pollutants of Concern/ Groups	BMP Cross Reference
Residential	• Apartments • Multi-Family • Single Family, detached	• Driveway and sidewalk cleaning • Dumping and spills • Vehicle and equipment maintenance and washing • Landscape maintenance and irrigation • Septic system maintenance • Swimming pool and spa discharges • Illicit connections • Sump dewatering • Painting	• Sediment • Nutrients (P, N, NO_3, NO_2) • Pathogens (indicator bacteria) • Hydrocarbons (O & G, lubricants) • Pesticides • Gross pollutants (litter, trash, debris) • Toxics (organics, hazardous waste, etc.)	• **PEO - 1, 5, 6, 7, 9** • **PP - 1, 2, 3** • **IDDE - 1, 2, 3, 4** • **PPGH - 1, 2, 6**
Commercial	• Golf Courses • Auto sales, dismantling, maintenance, and oil change shops • Gas stations • Commercial laundry and dry cleaning • Nurseries/garden centers • Restaurants • Agriculture	• Building maintenance (power washing) • Dumping and spills • Landscaping and grounds maintenance • Outdoor fluid storage • Parking lot maintenance (power washing) • Vehicle fueling, maintenance, repair, and washing • Wash down of greasy equipment and grease traps • Illicit connections • Sump dewatering • Carpeting	• Sediment • Nutrients (P, N, NO_3, NO_2) • Hydrocarbons (O & G, lubricants) • Pesticides • Metals • Gross pollutants (litter, trash, debris) • Detergents • Toxics (organics, hazardous waste, etc.)	• **PEO - 1, 5, 6, 7, 9** • **PP - 1, 2, 3** • **IDDE - 1, 2, 3, 4** • **PPGH - 1, 2,**
Industrial	• Auto recyclers • Distribution centers • Food processing • Garbage truck washouts • Metal plating operations • Petroleum storage/refining	• All commercial activities • Industrial process water or rinse water • Loading and unloading area wash downs • Parking lot maintenance (power washing) • Outdoor material storage (fluids) • Illicit connections • Sump dewatering	• Nutrients (P, N, NO_3, NO_2) • Pathogens (indicator bacteria) • Hydrocarbons (O & G, lubricants) • Pesticides • Metals • Gross pollutants (litter, trash, debris) • Toxics (organics, hazardous waste, etc.)	• **PEO - 2, 5, 6** • **PP - 1, 2, 3** • **IDDE - 1, 2, 4, 5** • **PPGH - 1, 2**

Table 3-3 (continued)
City of Goleta Pollutant Activity/Sources

Land Use	Generating Site	Potential Pollutant Activities/Source	Pollutants of Concern: Groups	BMP Cross Reference
Institutional	• Churches • Corporate campuses • Hospitals • Schools	• Building maintenance (power washing) • Dumping and spills • Landscaping and grounds care (irrigation) • Parking lot maintenance (power washing) • Vehicle washing • Wash down of greasy equipment and grease traps • Illicit connections • Sump dewatering	• Sediment • Pathogens (indicator bacteria) • Hydrocarbons (O & G, lubricants) • Pesticides • Gross pollutants (litter, trash, debris) • Detergents • Toxics (organics, hazardous waste, etc.)	• **PEO – 4, 5, 7, 9** • **PP – 1, 2, 3** • **IDDE – 1, 2, 3, 4** • **PPGH – 1, 2**
Municipal	• Airports • Landfills • Maintenance depots • Municipal fleet storage • Public works yards • Streets and highways	• Building maintenance (power washing) • Dumping and spills • Landscaping and grounds care (irrigation runoff) • Outdoor fluid storage • Parking lot maintenance (power washing) • Road maintenance • Spill prevention and response • Vehicle fueling, maintenance, repair, and washing • Illicit connections	• Sediment • Nutrients (P, N, NO_3, NO_2) • Hydrocarbons (O & G, lubricants) • Pesticides • Metals • Gross pollutants (litter, trash, debris) • Toxics (organics, hazardous waste, etc.) • Detergents	• **PEO – 5, 6** • **PP – 2, 3** • **IDDE -1 2, 3, 4, 5** • **PPGH – 1, 2, 4, 5**
Other	• Mobile • Parks • Multi-use detention basins and detention/recharge basins • Construction sites	• Vehicle accidents • Mobile car wash and auto detailers, painters, power washers, pet washers, and food vendors • New development and redevelopment • Operations and maintenance	• Sediment • Pathogens (indicator bacteria) • Hydrocarbons (O & G, lubricants) • Metals • Gross pollutants (litter, trash, debris) • Detergents • Toxics (organics, hazardous waste, etc.)	• **PEO – 5, 6, 7** • **PP – 1, 2, 3** • **IDDE -1 2, 3, 4, 5** • **CSRC – 1, 2** • **PCRS – 1, 2, 3, 4** • **PPGH – 1, 2, 4**

4.0 PUBLIC EDUCATION AND OUTREACH

This Minimum Control Measure is intended to ensure greater public support of and compliance with the storm water management program. The selected BMPs are intended to teach the public the importance of protecting storm water quality, both for the benefit of the environment and for human health. The role of each community member, both at home and work, is a particular emphasis.

4.1 Regulatory Requirements

EPA guidelines establish the following BMPs for Public Education and Outreach Minimum Control Measure (*Fact Sheet 2.3 – Public Education and Outreach Minimum Control Measure, 01/00*):

- Distribution of educational materials on the impact of storm water discharges and steps that can be taken to reduce storm water pollution
- Brochures or fact sheets for public distribution and posting
- Alternative information sources such as websites, bumper stickers, and refrigerator magnets
- A library of educational materials
- Event participation
- Education programs for school children
- Storm drain stenciling
- Storm water hotlines

4.2 Best Management Practices

The City will implement the BMPs listed above and additional ones, as detailed below. The City will continue to implement the existing public outreach and education programs and evaluate their effectiveness on an ongoing basis as part of future Annual Reports.

- **Brochures/Direct Mailings:** Each year the City will distribute a series of informational brochures on storm water quality targeting a variety of storm water issues. These issues can range from proper disposal of animal waste, pesticide-free gardening, riparian corridors, proper disposal of household hazardous waste, alternative household products, pollutants o concern, etc. These materials will be produced in both Spanish and English. These brochures/mailers will be distributed at special events, by mail, through enforcement activities, and by request.
- **Business Based Education Program and Green Business Program:** The City will develop an inventory of all businesses located within the City by the end of year 1. The list of businesses will be prioritized based on potential storm water quality impacts by business type and grouped into low, medium and high priority. The City will conduct site visits to all high and medium priority businesses in years 1 and 2. In years 3 to 5 of the permit, the City will conduct site visits at all low-priority businesses and will conduct follow-up site visits to all high priority

businesses. These visits will be used to educate the businesses on appropriate BMPs for their particular industry to minimize impacts to storm water quality. Any existing or potential storm water quality concerns identified during these visits will be documented and follow-up letters and visits will be conducted as necessary to insure that the issues are corrected.

- **Green Business Program:** The City participates in a regional Green Business Program that identifies businesses that can be certified as "Green Businesses". A Green Business must show environmental leadership through solid waste reduction/recyclables, proper hazardous waste management, waste reduction measures, environmental purchasing, energy conservation and management, water conservation-including landscaping, pollution prevention, and air emission reduction. The City will advertise the Green Business program on their website and through City newsletters. The local Chamber of Commerce will also be promoting the program. The City will report on the number of businesses that apply for the program, number of site visits made, and number of certifications issued. The City will conduct annual inspections to assess if the business continues to comply with the goals of the Green Business program.
- **Storm Water Quality Website:** The City will develop and launch a storm water management program website by the end of year 1. The website will feature general information on the City's SWMP, copies of water quality reports, studies, storm water quality educational materials and a calendar of events. The City's website currently receives over 2500 visitors/hits per month. The website will be updated to ensure that all information is current and readily available. The website shall include information on the proper disposal of household hazardous waste material (HHW), the sites for disposal, and any upcoming special collection events. The City will also distribute materials that list the storm water management website address and storm water hotline phone number as described below.
- **Event Participation:** The City will hold a minimum of two storm water events each year. The two core events will be held in conjunction with Earth Day in the spring and Creek Week in the fall. These events will feature activities such as guided walks, presentations, public forums, and other events that highlight watersheds and water quality issues.
- **Educational Programs for School Children:** The City will offer classroom presentations for grades K – 6, and distributes materials such as a coloring book on nonpoint source pollution, stickers, and storm drain marker decals. Curriculum training for teachers is offered annually, and the curriculum is distributed to teachers who request classroom presentations. Through a consulting contract, the City will provide additional classroom education using the Watershed Resource Center and additional classroom education. The schools will be offered various levels of storm water education ranging from classroom discussions through field visits to creek restoration sites. It is anticipated that, initially, the program will educate upwards of 425 students annually. The program facilitators will market the school teachers to ensure participation in the educational program.

- **Storm Drain Marking:** The City will continue to inspect and mark all storm drain inlets as required on an annual basis with markers that say "Don't Dump – Drains to Ocean". The City will document and report on the number of storm drains inlets inspected and marked.
- **Storm Water Hotlines:** A regional Water Quality Hotline provided by the County of Santa Barbara, is accessible at 1-877-OUR-OCEAN. Callers can report water quality issues or get information such as where to dispose of hazardous waste. The City will also provide a telephone hotline where water quality issues may be reported by the end of year 1. Both hotlines will be advertised on the City's website, City scroll and in the City's quarterly newsletter that is distributed to all residents. The hotline will be checked daily and a mechanism put in place for weekend calls to be directed either to '911' or the City messaging system that will be checked every Monday.
- **Media Campaigns:** The City will participate in a minimum of two bilingual storm water quality media campaigns each year. These may consist of regional movie trailers, bus advertisements, print ad campaigns, radio spots, for example, that are implemented to promote a variety of events and focused storm water quality topics. The City coordinates with the County of Santa Barbara and other agencies to maximize the effectiveness of the media campaigns. Campaigns may also include outreach for Earth Day (spring) and Creek Week/Watershed Month (October) events.
- **Publication of Annual Report:** The City will provide the Annual Report on the storm water programs as required by the RWQCB to the public for review and comment in advance of submittal to the Board.

4.3 Measurable Goals

The City educates the general public about storm water quality issues and their role in the solutions by outreach to the business and residential community, and to school children. Measurable goals for each BMP are listed below. In 2001, the County sponsored a regional public opinion survey that encompassed the Goleta area to determine the existing level of community awareness on storm water issues. The survey provided important information for future program development and specific target audiences. As a measurable goal for the entire Public Education and Outreach Program, the City will conduct another public opinion survey in year 5.

Table 4-1
BMP Implementation: Public Education and Outreach

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
PEO 1	Brochures / Direct Mailings	Brochures and posters are available in Spanish and English, and website is established. Brochures will continue to be distributed.	Brochures will provide info on how community members can prevent storm water pollution. Issues can range from animal waste, pesticide-free gardening, HHW disposal, primary pollutants of concern and alternative products. They will be provided though various events, city website and by direct mailing to all residents. The City website will have a designate location for all storm water handouts to aid in distribution to the public.	Compile number of brochures distributed and methods of distribution used, website hits, number of people attending public events, establishment of a storm water interest sign-in sheet at events. Target is to reach 25% of permit area annually. Refer to Table 3-1.	1-5
PEO 2	Business Based Education Program	Currently in development	City will prioritize businesses into Low, Medium and High priority education/inspection needs. A database and spreadsheet will be developed to track all data collected. City will use a variety of education andinspection materials depending on type of business. City will perform site visits to local businesses to educate on NPDES, the BMPs, POCs and the importance of this program to their community.	Years 1 – 2: City will visit all high and medium priority businesses. Years 3 – 5: City will visit all low priority and perform 2nd visits to original businesses. City will develop a log of all business, track the visits, and log any problem issues and subsequent letters or visits to ensure compliance with the law.	1-5
PEO 3	Green Business Program	Currently in Development	City will develop a Green Business Program to certify local environmental businesses.	City will also develop a list of potential Green Businesses to enlist, assist in annual site visits (as needed), and create a log of inspections to track all of our currently certified Green Businesses to ensure program compliance.	1-5

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
PEO 4	K – 6, Educational Programs for children	Ongoing	Classroom presentations are available on request. Presentations are available at creek restoration sites. City shall work with its contractor to ensure schools participate actively in the program.	Educate 25% of school children (K-6) every year, including topics on primary POCs. City will track number of children taught annually.	2 & 4
PEO 5	Storm Drain Marking	All City Storm drains are marked.	City will continue to mark all storm drains, new storm drains and re-mark any that have faded.	Check markers every six months and replace as needed.	1-5
PEO 6	Storm Water Hotline	County hotline is established.	County Hotline directs complaints and gives information. Promote use of City (once established) and County hotlines through printed materials and City website. Hotlines will be advertised on the City website and scroll and in the City newsletter.	City shall develop a Goleta hotline in year one. Document usage of all calls monthly. During the week, all hotline issues are logged, tracked, and responded to within 24 hours. Logs will include date, time, location, and nature of incident. Logs will also indicate completion of each item and if any additional action was required. Weekend calls will be directed to '911' or City messaging system and checked on Monday.	1-5
PEO 7	Media Campaign	Bilingual Media campaigns are run on an annual basis.	Media campaigns will be run during events such as Earth Day, Pollution Prevention Week, and Creek Week.	Co-sponsor at least two media campaigns each year. These campaigns may be done in cooperation with the County or City of Santa Barbara, Local Sanitary Districts, etc. City will track the various types of media used and the number of households that are reached by the media campaigns.	1-5
PEO 8	Public Opinion Survey	Original survey performed in 2001.	City will conduct survey to determine level of knowledge and demographics of audience.	City will conduct a survey in year 5, in coordination with the County, to determine effectiveness of programs and future program direction. City will track the number of citizens surveyed, number of people completing the survey, any changes in behavior reported by residents after seeing storm water media or activities. Survey results will be used to update the existing SWMP programs and increase awareness	5

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
PEO 9	Event Participation	City currently participates in local events, including Earth Day and Creek Week.	City will hold a minimum of 2 storm water quality events per year. These shall include Earth Day and Creek Week.	City will compile number of events organized/attended and number of people who attended each event. City will track the number of handouts distributed and develop a list of people that visit the booth.	1-5
PEO 10	Storm Water Quality Website	Currently in Development	City shall develop a storm water management website by the end of year 1. Website will include factsheet for prevention of storm water pollution, HHW disposal, City storm water reports, brochures, mailers, etc.	City shall document the information placed on the website and track the number of hits. The website will be advertised in the City newsletter, brochures, and mailings and on the City scroll.	1-5
PEO 11	Publication of Annual Report	Done at the end of each year of the permit period.	Each year the City will publish the Annual Report in advance of submittal to the RWQCB to obtain public comment.	Public comment will be received annually, considered and filed with the Annual Report to the RWQCB.	1-5
PEO 12	Community-Based Social Marketing	None.	City will evaluate projects as they are presented for Community-Based Social Marketing. As Social Marketing is a means to foster new sustainable behavior, each project would be evaluated for effectiveness and cost.	The City will perform an assessment of programs in Year 3, and implement, as appropriate, in Years 3 - 5.	3-5

4.4 Reporting

The data collected for each measure (such as number of brochures distributed) will be compiled, reviewed and summarized in Annual Reports. Significant variance from targets will be assessed and discussed. Progress in implementing goals that have multi-year timelines will be reported annually. Implementation of existing BMPs will be fine-tuned as needed. Measurable goals will be adjusted as appropriate, and the basis for any changes will be included in the subsequent Annual Report.

5.0 PUBLIC PARTICIPATION AND INVOLVEMENT

This Minimum Control Measure is intended to foster active community support for developing, reviewing and implementing the SWMP. Participation by the public ensures that the program reflects community values and priorities, and increases the potential for overall success of the program.

5.1 Regulatory Requirements

EPA guidelines establish the following BMPs for the Public Participation/Involvement Minimum Control Measure (*Fact Sheet 2.4 - Public Participation/Involvement Minimum Control Measure, 01/00; and "Measurable Goals Guidance for Phase II Small MS4s"*):

- Community interest groups or citizen panels
- Regular coordination among agencies
- Volunteer water quality monitoring
- Community cleanups/citizen watch groups
- Regular public meetings

These BMPs assure that the program will be supported by City residents and provide input to guide future development of the program.

5.2 Best Management Practices

The City will implement all the EPA-suggested BMPs listed above and others as described below.

5.2.1 Community Interest Group

The City will develop a storm water quality community interest group and hold quarterly meetings (or more frequently if needed) regarding the City's SWMP implementation and other current storm water issues. The community interest group meetings will feature updates on the City and regional storm water programs and guest speakers, and will provide the opportunity for community members to discuss any issues of concern. Attendance is expected to vary from approximately 10 to 50 people. The City will maintain an e-mail and mailing list. Those on the list are notified of regular meetings, announcements, and other events through the e-mail system. In addition, City staff will work with nonprofit groups and the Regional Water Quality Control Board to explore alternative public forums on water quality.

5.2.2 Establish Regular Coordination Among Agencies

Since its incorporation, the City has participated in the Intergovernmental Committee which is hosted by the County of Santa Barbara. Topics for discussion are suggested by participants and include development and interpretation of non-point source regulations, opportunities for cooperative efforts, emerging technology and sharing of

water quality information. The County has a regional membership that includes the City of Goleta of California Storm Water Quality Association (CASQA), which facilitates the exchange of information and joint research and efforts among Phase I and Phase II agencies statewide. CASQA meets on a bimonthly basis.

5.2.3 Community Cleanups

The City will advertise community cleanup program opportunities and work with local volunteer groups on cleanup activities. The media will be contacted and participants of community interest groups will be notified. City staff will implement a minimum of two cleanup events in creeks and/or beaches each year.

Each year in conjunction with Creek Week, a community cleanup effort is held in a variety of Goleta watersheds. The City of Goleta will continue this effort and attempt to increase participation in the event each year through advertising, school groups and public outreach.

Biweekly volunteer roadside trash pickup collections are also conducted in coordination with Goleta Valley Beautiful, a local non-profit organization. Volunteers pick up trash and debris from sidewalks, parkways and right-of-way areas where sweepers cannot reach.

5.2.4 Additional Programs

Water Quality Hotline
See Section 4.0 "Public Education & Outreach". The hotline, managed by the County of Santa Barbara and the telephone extension at the City of Goleta, encourages community members to report water quality problems that they observe. The hotline is promoted on all printed materials and through the City website.

Public Opinion Surveys
See Section 4.0. In 2001 the County completed a regional public opinion survey (which included the City) to provide the foundation for the public education campaign. The survey gauged awareness of the causes and consequences of storm water pollution and the willingness to reduce pollution-causing behavior.

5.3 Measurable Goals

Public involvement and participation has been essential to the development and ongoing activities of the City storm water program, ensuring that the program reflects community concerns and priorities while improving creek and ocean water quality. Measurable goals for each Public Participation BMP are listed in the following table.

Table 5-1
BMP Implementation: Public Participation

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
PP 1	Storm Water Quality Community Interest Group	No group formed yet.	Advertise and form City-based storm water quality community interest group (CIG). Publish notice of initial CIG meetings in the local newspaper, on City website and on the City scroll.	CIG formed and quarterly meetings scheduled y by end of year 1. City will document process used to form CIG, track interested parties and publically notice all meetings. City will track the number of meetings held, number of attendees and record action minutes of all meetings.	1-5
PP 2	Coordination among agencies	Ongoing	The Intergovernmental Committee meets quarterly, and the California Storm Water Quality Association meets bimonthly.	Continue to attend meetings, document attendance and actions. City will attend 100% of all inter-governmental meetings and attend CASQUA meetings as issues arise. Meetings are coordinated and documented by the County of Santa Barbara. All actions are also logged by all agencies.	1-5
PP 3	Community Cleanups	Ongoing	City will hold at least two cleanup activities annually, and continue Creek Week activities. City will advertise creek cleanup activities and use local volunteers to coordinate and organize the event. City will encourage participation from local special interest groups and junior high and high school students. City will continue the volunteer biweekly trash collections in conjunction with Goleta Valley Beautiful.	City will track and report on the number of streams and roadways cleaned and exact locations, number of events, number of participants (and students), the amount of waste collected, and length in miles of streams/creek cleaned.	1-5
PP 4	Volunteer Water Quality Monitoring	City currently supports the Goleta Stream Team water quality monitoring efforts under contract with Santa Barbara Channel Keeper.	City will conduct water quality monitoring at selected sites throughout the City via the services of the Goleta Stream Team personnel or other qualified water quality monitoring contractors.	City will document number of participants, test site locations, test dates and date. Test results will be posted on City website and included in the Annual Report. Data will be evaluated on an ongoing basis to determine trends and focus IDDE efforts.	1-5
PP 5	Water Quality Hotline	See Public Education and Outreach section			1-5
PP 6	Public Opinion Surveys	See Public Education and Outreach section			1 & 5

5.4 Reporting

The data collected for each measure (such as number of Community Cleanups in each area) will be compiled, reviewed and reported in Annual Reports. Significant variance from targets will be assessed and discussed. Measurable goals will be adjusted as appropriate; the basis for program changes will be included in each Annual Report. Feedback from the Community Interest Group and other sources will be used to improve implementation of all six Minimum Control Measures.

6.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

This Minimum Control Measure of the Storm Water Management Plan is designed to reduce pollutants in storm water runoff to receiving waters. It requires the development and implementation of a system to identify and eliminate sources of illicit discharge and illegal dumping. The City has developed a system to identify and eliminate illicit discharges throughout the permit area. This system depends on a number of partners including the public and other local agencies. The specific requirements for this system are described in detail below, including measurable goals for determining effectiveness. The City will continue to target all pollutants of concern (pathogens, nutrients, trash, metals, sediment, etc.). See Table 3-3 for specific BMP ties to pollutants of concern.

6.1 Regulatory Requirements

The regulations generally classify non-storm water discharges as illicit or exempted. An illicit discharge is defined by the EPA as "...any discharge to a MS4 that is not composed entirely of storm water and not authorized by an NPDES permit." Improperly disposed of materials, such as animal and human wastes, trash, and discharges from mobile carpet cleaning operations, can enter the storm water system and cause health and safety concerns, as well as other receiving water impacts. Pathogens are a particular pollutant of concern which results from illicit discharges.

Discharge sources must be controlled and illegal behavior prevented. Controlling and eliminating illicit discharges through a comprehensive detection and abatement program can protect the public health and safety. Prevention can be enhanced through education on hazards and consequences of illegal disposal, provision of alternative disposal options and incentives, and through legal enforcement procedures (*USEPA Fact Sheet 2.5 – Illicit Discharge Control, 01/00*). This program shall include:

- Storm Drain System Mapping
- Storm Water Ordinance
- Education and Outreach
- Identification and Elimination of Illicit Discharge Sources
- Storm Water Monitoring

The General Permit states that the following discharges may be exempted from being regulated discharges unless they are determined to be a significant source of pollution or a nuisance.

Table 6-1
Discharges Exempted from SWMP Regulation

• Irrigation water • Landscape irrigation • Diverted stream flows • Rising ground waters • Lawn watering • Foundation drains • Air conditioning condensation • Discharges from potable water sources • Street wash water	• Flows from riparian habitats and wetlands • Emergency fire fighting discharges • Springs • Water from crawl space pumps • Footing drains • Dechlorinated swimming pool discharges • Uncontaminated pumped ground water • Individual residential car washing • Waterline flushing

The City is aware of the September 25, 2003 letter regarding the proper disposal of Water Supply System Flushing and understands that the regulations of water system supply flushing to land may be waived. The remaining authorized non-storm water discharges identified by the General Permit will require further review, observation and evaluation. As such the City will develop practices for reviewing, testing and evaluating the remaining discharges to see whether or not they are deemed significant pollutants contributors. If any of the above discharges are determined to be significantly impacting the storm water quality through the City testing and evaluation practices, BMPs will be added to remediate the individual negative impacts of those discharges.

6.2 Best Management Practices

The City will implement the EPA suggested BMPs listed in this section and others described herein.

6.2.1 Storm Drain System Mapping

A map of the City storm drain system showing major pipes and outfalls has been completed. This map will be updated to include all catch basin locations so that detailed sub-watershed drainage areas can be determined. The storm drain system map will be revised as necessary as new drainage systems are constructed.

6.2.2 Storm Water Ordinance

Upon incorporation, the City adopted the existing codes of the County of Santa Barbara as identified in Table 6-2. These existing codes cover the ancillary benefits of proper storm water management of facilities, but are not specific to cover the topic of illicit discharge.

The ordinances and existing code sections referenced in Table 6-2 were initially created to address improper waste disposal, and though they have an ancillary benefit to improving water quality, they were not designed to specifically address non-storm water runoff. While each is helpful in its own way, no single ordinance addresses illicit discharges and enforcement for the express purpose of improving surface water quality. As a result of this, the City will develop and adopt a new storm water discharge ordinance that will address all forms of illicit discharges, including all animal waste, and/or waste disposal which effect water quality. Procedures for enforcement will be defined at the conclusion of the development of the ordinance and include appropriate enforcement measures during year one. Procedures may include, but are not limited to: 1st offense: warning notice with education materials including clean up and abatement order; 2nd offence: Notice of Violation (NOV) with penalties; 3rd offence: Administrative Civil Liability (ACL) fines; 4th offence: referral to the District Attorney's office for prosecution. The ordinance will be enforced throughout the term of the General Permit.

The process to develop and adopt the storm water ordinance will be included in the first Annual Report. Developing this ordinance will involve community outreach, including all stakeholder group coordination meetings held prior to the first public hearing. As is the standard practice for all public hearings, a notice will be published in the local newspaper. This ordinance will be brought before the City Council twice: once for the first reading, which will also include community comments, and secondly for a final reading and adoption.

Once the ordinance is enacted, enforcement activities will be recorded and monitored in terms of the number of violations reported and resolved.

Table 6-2
Legal References

City Codes	Purpose	Responsible Party	Enforcement Capability
Chapter 14 – Grading 14-29 Drainage, Erosion, and Sediment Control 14-31 Enforcement and Interpretation **California Building Code (2001) (Adopted by Reference by City)** **Chapter 33 – Excavation and Grading**	Address compliance with NPDS Phase II Storm Water Regulations regarding surface run-off from construction sites	City of Goleta — Building & Neighborhood Services Department & Community Services Department	Issuance of Stop Work Orders; Citation and/or prosecution of misdemeanor offense
Chapter 17 – Solid Waste Services 17-16 Right Of Person And Responsible Party To Dispose Of Solid Waste Article IV Enforcement and Penalties	Prevention of unauthorized solid waste disposal	City of Goleta — Community Services Department, Building & Neighborhood Services Department	Citation, Civil/Criminal Penalties and Fines
Chapter 18 – Health and Sanitation 18-1 Notice to Abate Nuisance to be Given 18-5 Burying Animals, etc.	Address pathogen-generating animal waste.	City of Goleta through a contract with County Animal Control	Issuance of Notice to Abate, Citation and/or Prosecution of Misdemeanor or Criminal Offense
Chapter 24 – Offenses Miscellaneous 24-8 Watercourse – Dumping garbage, debris, etc prohibited	Prevent contamination of watercourses by dumping of garbage, debris or wastes	City of Goleta — Community Services Department, County Flood Control District	Citation, Civil/Criminal Penalties and Fines
Chapter 25 – Oil and Petroleum Wells 25-10 Pollution Control Plan 25-15 Enforcement 25-38 Pollution	Prevent the contamination of surface waters by onshore petroleum facilities	County Energy Services Division, County Fire Dept.	Issuance of a Cessation of Operations Order, Civil/Criminal Penalties and Fines
Chapter 26 – Parks and Recreation 26-2 Enforcement 26-3 Citation 26-29 Littering Prohibited 26-30 Water Pollution Prohibited 26-33 No Wastewater, Oil or Sewage on ground 26-54 Removal of Animal Waste	Prevent the contamination of surface waters by the improper disposal of waste	City of Goleta — Community Services Department	Citation issuance

6.2.3 Education and Outreach

An effective BMP for the elimination and prevention of illicit discharges is the education and cooperation of a concerned public. Education is a primary tool of enforcement activities; the City distributes a number of brochures that address illicit discharges and appropriate actions for eliminating these sources of pollution. The efforts for educating the community about controlling illicit discharges, listed below, are discussed in greater detail in Section 4.0, Public Education and Outreach.

- City and County websites
- Regional Water Quality Hotline (877-OUR-OCEAN)
- Brochures
- Public events
- Media Campaigns
- South Coast Watershed Resource Center

Because many illicit discharges occur because of a lack of awareness on the part of the discharger, education is an important tool of enforcement activities. Often, simply pointing out the error and suggesting BMPs to be used in the future is enough to convince businesses and homeowners to cease discharging, dumping or using an illegal storm-drain connection. In most cases the individual responsible can be encouraged to do the right thing through proper education. Targeted information brochures have been developed for creek-side residents, owners of domesticated animals, and various businesses to educate them on the dangers of illicit discharges and the appropriate BMPs to reduce these types of violations. In addition the City will promote the proper use and disposal of household hazardous waste materials. Information will include locations for proper disposal and potential alternatives to the use of toxic materials.

6.2.4 Identification and Elimination of Illicit Discharge Sources

To maximize the limited resources available, potential sources of illegal dumping and illicit connections are identified and prioritized based in part on public access and contact to the area (or storm drain), characterization of nearby land uses as industrial, commercial and older residential areas.

Based on past experience, the City has identified areas adjacent to creeks and streams in industrial areas that have the potential for illicit discharges. These areas are monitored for illicit activities by the City's Community Services inspectors, building inspectors, and Code Enforcement officers (see Table 6-3).

Table 6-3
City/County Activities to Identify and Eliminate Illicit Discharges

Agency	Activity
City of Goleta	Monitoring of storm drain system, city streets, inlets and outfalls
Santa Barbara County Flood Control District	Monitoring of main channels, flood control facilities
Sanitary Districts	Sewer lines and sewer spills Annual smoke testing
Environmental Health/Fire Department	Hazardous material spills On-call response & investigation

The City's existing program for identification and elimination of illicit discharge sources comprises two parts and is based on the principal of complaint/response (1) Spill and Complaint Response, and (2) Field Investigation and Abatement.

The following describes procedures used to address the ongoing identification and abatement of illicit discharges.

Spill and Complaint Response

- City may receive complaint or notice of the spill, discharge or illegal connection. Complaints are often received from City staff or through the Project Clean Water Hotline at 1-877-OUR-OCEAN.
- Identify the potential source of the discharge to determine appropriate response agency.
- Document response and track the spill/discharge to source.
- Use education and enforcement to eliminate the discharge to the storm drain/sewer or ground surface.
- Perform site cleanup through City or contract staff.
- Apply BMPs, if applicable, to assure on-going compliance.
- Maintain records of response and identify re-occurrence patterns.

Enforcement of existing policies and ordinances is crucial to the effort of maintaining water quality in the creeks and oceans. These efforts include a water quality reporting hotline (877-OUR-OCEAN) and a future a City of Goleta Public Works telephone line, coordination between various enforcement agencies and personnel, and increased report follow-up.

The initial approach to prevention and elimination is education on the pollution source, what effects it has on our watershed, and how the problem may be eliminated through BMPs. When necessary, education can be used in combination with legal enforcement to eliminate the illicit discharge.

Field Investigation and Abatement

The City will initiate a proactive field investigation and abatement program that includes annual creek walks to inspect known storm drain outfalls and look for non permitted discharges and/or waste disposal activities. An abatement process will be initiated and followed through to conclusion whenever non-permitted discharges or water quality issues are found. The abatement process may consist of a range of activities ranging from additional site visits to contact the responsible party, issuance of letters and education brochures, etc. up to legal enforcement as appropriate.

Educating the general public, business owners, industries, school children, teachers, and regulatory personnel on the hazards associated with illegal discharges and improper disposal of waste is being accomplished in a number of ways. A detailed discussion on storm water educational outreach and participation is made in Section 4 of this document.

City staff responds to complaints regarding water quality throughout the year. Complaints range from illegal dumping of trash, horse manure and greenwaste in the creeks, to the illegal disposal of liquid waste. Complaint response may require the cooperation of many agencies. Callers are not always aware of the boundaries between incorporated and unincorporated areas, so a call referral system has been established so that calls can be efficiently redirected to the correct agency.

6.2.5 Storm Water Monitoring

To better understand the specific type of pollutants impacting storm water quality throughout the City, the City supports Santa Barbara Channel Keeper's Goleta Stream Team storm water monitoring program. Data collected by this program will be evaluated on an ongoing basis to focus the City's IDDE efforts. The City will track and document the test locations, dates and water quality data as part of the Annual Report.

The following map (Figure 6-1) shows the existing Goleta Stream Team storm water quality monitoring locations in and adjacent to the City of Goleta.

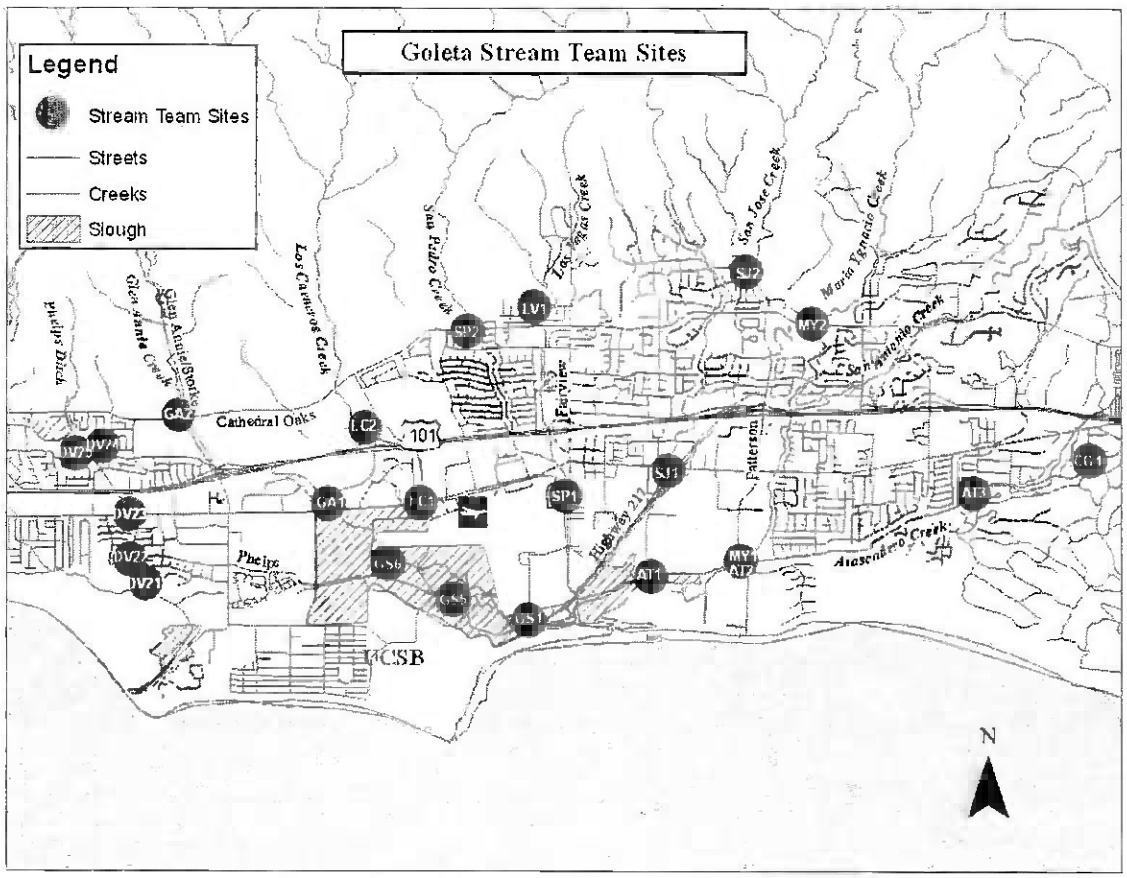


Figure 6-1 Water Quality Monitoring Locations

6.3 Measurable Goals

The following measurable goals for the selected BMPs have been identified to ensure that illicit discharges are detected, eliminated and prevented. The effectiveness of the BMPs for this Minimum Control Measure will be evaluated on an annual basis and documented in the subsequent Annual Report:

Table 6-4
BMP Implementation: Illicit Discharge Detection and Elimination

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
IDDE 1	Storm Drain System Mapping	A majority of the City's storm drain system has been mapped.	This storm drain system map will be updated to include all catch basin locations so detailed sub-watershed drainage areas can be determined. The storm drain system map will be revised as necessary as new drainage systems are constructed.	All catch basins included on map by end of year 2 and sub-watershed drainage areas included on map by end of year 3.	2-3
IDDE 2	Storm Water Ordinance	Staff is currently reviewing various storm water discharge ordinances	City to develop and adopt a new storm water discharge ordinance that will address all forms of illicit discharges. The development of this ordinance will include public meetings and comment period, public notices, being brought before City Council for at least two readings and finally adoption.	Ordinance will be developed and adopted by the end of year 1. Public participation will be tracked at the outreach meetings. Ordinance will be implemented and enforced throughout the term of the permit. Enforcement actions will be documented, recorded, and monitored for resolution of an outstanding issue and included in Annual Report. Effectiveness of this measurable goal will be measured by, but not limited to program evaluation surveys.	1-5
IDDE 3	Education & Outreach	Ongoing	Continue to use websites, hotline, brochures, public events, and media campaigns, business education to educate the community.	See Section 4.0 Public Education and Outreach measurable goals: PEO 1, 2, 6, 7, 9, and 10. Effectiveness of this measurable goal will be measured by, but not limited to program evaluation surveys.	1-5

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
IDDE 4	Identification & Elimination of Illicit Discharge Sources	Ongoing	Respond to spills or complaints received through City Hall and the water quality hotline, observations, and reports from field personnel. Through the Business Based Education Program the City will prioritize businesses and perform site visits. This BMP is detailed as PEO 2. City Community Services Field personnel will perform field investigations to identify and abate potential discharge sources. Once a year the City will perform creek walks to evaluate and inspect the existing condition of all culvert outfalls and creek conditions. Previously identified illicit discharge areas, will be monitored for illicit activities twice a year. Results from spills, complaints, creek observations, etc. will be kept and combined with storm water monitoring data to obtain a complete data set.	Respond to spills and/or complaints within 1 (one) business day of receiving complaint, referral or notice. The City will document number of complaint responses, the date and time, location, nature of the call, number of calls, and resolution of issue on 100% of calls. PEO 2 will target all high and medium priority businesses in years 1-2 and low priority business in years 3-5. Please refer to PEO 2. Field investigations will be performed once a year by the appropriate number of inspection staff and logged as to sites visited, observations made, and any actions required to remedy illegal discharges. The appropriate number of field staff will be determined depending on the size and magnitude of the investigation, at the discretion of the City's Community Service Director. Target areas for inspections will include previously identified illicit discharge areas, creeks, and industrial areas near water bodies. Field investigations will be performed either by vehicle observation, or by foot. Follow up inspections will be done to ensure discharges have been eliminated. The creeks will be logged for their existing conditions and all outfalls will be evaluated for debris conditions. A photo journal will be developed. Effectiveness of this measurable goal will be measured by, but not limited to the following: public response cards to complainants that describe the resolution of their complaint, either mailed, or posted on the City website; and/or program evaluation surveys.	+1-5 2-5 1-5 1-5

BMP #	BMP	Current Status	Implementation Details	Measurable Goal	Year
IDDE 5	Storm Water Monitoring	City currently supports the Goleta Stream Team water quality monitoring efforts under contract with Santa Barbara Channel Keeper	City will conduct water quality monitoring at selected sites throughout the City via the services of the Goleta Stream Team personnel or other qualified water quality monitoring contractors.	City will document number of participants, test site locations, test dates and date. Test results will be posted on City website and included in the Annual Report. Data will be evaluated on an ongoing basis to determine trends and focus IDDE efforts. Effectiveness of this measurable goal will be measured by, but not limited to program evaluation surveys.	1-5
IDDE 6	Mutt Mitt Program	City of Goleta currently provides mutt mitts at their parks and open space facilities. This program is described in detail as PPGH 6 On Page 59.			1-5
IDDE 7	Training	None	Code Enforcement and other inspection personnel. (Also see CSRS 2.)	100% of City inspection staff will receive a minimum of 4 (four) hours of training each year. City will document and track the number of inspectors trained, and the hours of training received.	1-5
IDDE 8	Hazardous Materials Spillage Response and Training	None	City shall develop a hazardous spill response program and train all field and responsible personnel as to how to respond to various hazards.	100% of field personnel and their managers shall be trained. City shall log all employees trained, date and hours of training.	1-5
IDDE 9	Non-storm water discharges exempt under general permit	On-going	City will develop a schedule for reviewing, testing and evaluating discharges to determine if they are significant pollutant contributors.	City will submit a schedule in the Annual Report (Year 1).	1

6.4 Reporting

The data collected for each BMP will be compiled, reviewed and reported in Annual Reports. Significant variance from targets will be assessed and discussed. Measurable goals will be adjusted as appropriate; the basis for any changes will be included in the next Annual Report. Feedback from the Community Interest Group and other sources will be used to improve implementation of all six Minimum Control Measures.

7.0 CONSTRUCTION SITE RUNOFF CONTROL

The purpose of construction site runoff controls is to prevent soil and construction waste from entering storm water. Sediment is usually the main pollutant of concern, and over a short period of time, construction sites can contribute more sediment to creeks than can be deposited naturally over several decades. The resulting siltation and the contribution of other pollutants from construction sites can cause physical, biological, and chemical harm to local waterways.

7.1 Regulatory Requirements

EPA guidelines establish the following BMPs for Construction Site Runoff Control Minimum Control Measure (*Fact Sheet 2.6 - Construction Site Runoff Control Minimum Control Measure, 01/00*):

- Ordinance or other regulatory mechanism as well as sanctions to ensure compliance
- Procedures for site plan review which incorporate consideration of potential water quality impacts
- Requirements for construction site operators to implement appropriate erosion and sediment control BMPs
- Procedures for receipt and consideration of information submitted by the public
- Procedures for site inspection and enforcement of control measures

The State General Permit for NPDES Phase II requires local jurisdictions to establish construction site controls for sites of one or more acres. In addition, the State General Permit for Construction Activities requires filing of an NOI and development of a Storm Water Pollution Protection Plan (SWPPP) pursuant to RWQCB regulation.

7.1.1 Program Development

The State has direct jurisdiction over construction sites of 1 acre or more. In addition, under state planning law and the California Environmental Quality Act (CEQA), the City is responsible for evaluating new development and redevelopment projects, and therefore has a key role in implementing the NPDES Phase II construction runoff control measures. The City will review and update the existing Grading Ordinance as appropriate. Currently the Ordinance addresses construction site runoff control and associated inspection and enforcement procedures. The City shall determine whether the Grading Ordinance provides the necessary framework for fully implementing construction runoff control measures. The City will ensure compliance with all state and local regulations.

Potential revisions to the Grading Ordinance could be referenced to BMP manuals. The manuals referencing BMPs include:

- Storm Water Quality Task Force (1997 or current) Construction Activity Best Management Practice Guidebook
- Caltrans (2002 or current) Construction Site Best Management Practices Handbook
- San Francisco Regional Water Quality Control Board (1999 or current) Erosion and Sediment Control Field Manual

7.2 Best Management Practices

Currently the City Grading Ordinance requires development of a Grading plan and SWPPP for all projects disturbing 50 cubic yards of earth or more. Under current regulations, work conducted under a grading permit requires the owner or contractor to adhere to "Grading Notes". The Grading Notes are provided to each applicant as part of the grading permit and are intended to be placed verbatim on plans. The Grading Notes list 12 requirements, several of which pertain to protection of water quality by preventing erosion or sediment movement both during and after construction. These include:

- Grading Note #3: Contractor shall employ all labor, equipment and methods required to prevent his operations from producing dust in amounts damaging to adjacent property, cultivated vegetation, and domestic animals or causing a nuisance to persons occupying buildings in the vicinity of the job site. Contractor shall be responsible for damage caused by dust from his grading operation.
- Grading Note #4: Before beginning work requiring exporting or importing of materials, the Contractor shall obtain approval from the City Engineer for haul routes used and methods provided to minimize deposit of soils on roads.
- Grading Notes #5, #8, #9 and #10 guarantee that cut slopes and fill material will not erode or slump which could adversely affect water quality if material moves into a water conveyance system. They include requirements such as verification by a geotechnical engineer that work is properly completed, all slopes appropriately keyed and benched, all fill material properly moist and compacted, and excavation does not exceed 1 ½ horizontal to 1 vertical. Erosion and Sediment Control BMPs (i.e., blankets, fiber bonded matrix, fiber rolls, silt fence, etc.) shall be implemented on construction sites that obtain City grading permits.

7.2.1 Construction Site Enforcement, Inspections

Section 14-18 of the Grading Ordinance specifies several routine inspections shall occur. In addition the City Engineer may require such other inspections of any work to ascertain compliance with the provisions of this Chapter and other laws and regulations as may be required. In addition, if a member if the public reports a storm water violation, additional inspections will be required and documented. All non-compliance issues will be addressed according to standard City procedures. A licensed landscape architect, qualified biologist, archeologist, agricultural advisor, or other qualified professional may be required to be present during inspections. Non-compliance is subject to construction site activity suspension ("red-tagging"), fines, or both.

7.2.2 Staff Training

Construction inspection staff will be responsible for understanding and enforcing SWPPPs. City inspection staff will receive a minimum of 4 hours' training in current regulations, compliance standards and techniques.

The City, in cooperation with other local agencies, will co-sponsor a training workshop for construction site operators. This training will educate and train construction site operators on the proper implementation of stormwater runoff controls (e.g., City sponsored trainings, fact sheets), and include information on proper site planning, minimization of soil movement, capturing sediment, and good housekeeping.

7.2.3 General Permit Compliance

General Permit requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litters, etc., and sanitary waste at a construction site are to be observed.

7.2.4 Storm Water Pollution Prevention Guidelines

The City will develop and adopt storm water pollution prevention guidelines for all project one (1) acre or larger by the end of year one. These guidelines will be used as the framework by which SWPPPs will be developed, reviewed and approved on all projects.

7.2.5 Storm Water Pollution Prevention Plans

The City will require the submittal of SWPPPs on all projects 1 (one) acre or larger. The SWPPP shall be submitted stamped by a licensed civil engineer and include the installation and maintenance details of all proposed storm water pollution prevention BMPs to be implemented.

7.2.6 Pre-Construction Meetings

A pre-construction meeting will be held prior to the beginning of construction on all projects disturbing 1 acre or more. At the meeting the City will ensure all appropriate contractor personnel have reviewed the approved project SWPPP and understand the plan details and protocols. Meeting attendees and discussion topics will be documented.

7.2.7 Measurable Goals

The following goals will be used to check progress each year as well as demonstrate the efforts made to reduce pollutants to the maximum extent practicable. The intent is

to provide both an opportunity to assess and evaluate the program and a feedback mechanism to measure and update the program as appropriate.

Measurable goals for each BMP identified in this Minimum Control Measure are identified in Table 7-1.

Table 7-1
BMP Implementation: Construction Site Runoff Control

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year
CSRC 1	Construction Site Enforcement & Inspections	Existing Grading Ordinance provides for storm water pollution prevention measures.	Existing Grading Ordinance will be reviewed in year one. Inspections will be conducted according to adopted Grading Ordinance, and approved SWMP.	Minimum of two inspections per month during rainy season on 1+ acre sites and before each rain event. Minimum of four inspections during non-rainy season for long duration projects. Enforcement actions at 100% of sites where BMPs failed and a log of all inspections. City will document and track number of projects, number of site inspections conducted, the success and/or failure of approved BMPs and any enforcement actions taken. Additionally, the City will track owner, contractor, start and competition dates, inspection dates, inspection findings, complaints, responses to complaints and follow ups.	1-5
CSRC 2	Inspection Staff Training	None	Inspection staff will receive a minimum of 4 hrs of training in regulations, compliance standards and protocols. Training shall include new technologies, installation operations, maintenance of BMPs and enforcement strategies.	100% of City inspection staff will receive a minimum of four (4) hours of training each year. City will document and track the number inspectors trained, and hours of training received.	1-5
CSRC 3	Storm Water Pollution Prevention Guidelines	None	City will develop and adopt Storm Water Pollution Prevention Guidelines by the end of year 1.	Adoption of Storm Water Pollution Prevention Guideline by end of year 1. Guideline will be applied to 100% of projects disturbing 1 or more acres.	1-5

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year
CSRC 4	Storm Water Pollution Prevention Plans (SWPPP)	Ongoing	City will required the submittal of SWPPP's on all projects that disturb 1 acre or more.	Submittal of SWPPP's in accordance with approved guidelines on 100% of projects disturbing 1 acre or more. City will document and track the number of SWPPP's submitted on projects greater than or equal to one acre.	1-5
CSRC 5	Pre-Construction Meetings	Ongoing	Pre-construction meetings will be held on projects greater than or equal to 1 acre.	Pre-construction meetings will be held on 100% of all projects disturbing 1 acre or more. City will document and track the number of pre-construction meetings held. Meeting minutes will be included in the Annual Report.	1-5
CRSC 6	General Permit Compliance	In development	For sites greater than one (1) acre, and for sites less than one acre, which are part of a larger common plan of development, the City shall establish Construction Site Controls in compliance with General Permit. This includes (1) procedures for site plan review, (2) construction site operator requirements to control waste, building materials, concrete washout, chemicals, litter and sanitary waste generated on construction sites that may adversely impact water quality and (3) procedures for receipt and consideration of information submitted by the public.	City will coordinate with all site operators and through pre-construction meetings, the proper methods of disposal of on-site generated wastes. City will log all meeting held, dates, projects, attendees, special project conditions etc.	1-5
CRSC 7	Construction Site Operator Training	In Development	The City, in cooperation with other local agencies will co-sponsor an annual training workshop for Construction Site Operators. The City will assist to educate and train construction personnel on the proper implementation of stormwater runoff controls (e.g., City-sponsored trainings, fact sheets). The training will include information on proper site planning, minimization of soil movement, capturing sediment, and good housekeeping.	The City will document training workshops and attendance.	1-5

7.3 Reporting

Feedback from City inspectors, RWQCB staff, construction contractors, project owners and the public will be evaluated on an ongoing basis and the above list of BMPs may be revised. Any proposed changes to the selected BMPs will be discussed in the subsequent Annual Report.

8.0 POST-CONSTRUCTION RUNOFF CONTROL

One of the most effective ways to reduce the generation of non-point source pollution from urban runoff is through the incorporation of Low Impact Development (LID) design strategies in the planning phase of a project before it is built. Once a project is built, it is complex and expensive to correct runoff problems. This Minimum Control Measure focuses on site planning and design considerations, which are most effective when addressed in the early stages of project development. Effective long-term management and maintenance are critical, therefore the best design opportunities are those with the least maintenance needs. The goal of the program is to integrate basic and practical storm water management techniques into new development and redevelopment projects to protect water quality.

8.1 Regulatory Requirements

EPA regulations for post-construction runoff control require that the City must, at a minimum, 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. The City shall implement the following (*EPA Fact Sheet 2.7 – Post-Construction Runoff Control, 01/00*):

- Develop and implement strategies that include a combination of structural and/or non-structural best management practices
- Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment to the extent allowable under local law
- Ensure adequate long-term operation and maintenance of BMPs

Additionally, the State General Permit requires "for those Small MS4s described in supplemental provision E below, the requirements must at least include the design standards contained in Attachment 4 of the General Permit." These standards contain specific requirements relating to the maximization of infiltration and the minimization of storm water runoff volume and rate. These standards are commonly referred to as "Hydromodification Control" standards. The City has developed an interim set of hydromodification control standards to meet this requirement. These standards are modeled after the standards approved as part of the County of Santa Barbara's SWMP and will be applied to projects until a final set of Goleta specific control standards are developed as part of an approved hydromodification plan. Once approved, the Goleta specific hydromodification controls will be applied to development projects as appropriate.

8.1.1 Background

Under State planning law and CEQA, the City is responsible for evaluating new development and redevelopment projects for NPDES concerns. Therefore, the City has

a key role in implementing the NPDES Phase II post-construction runoff control measures. In general, the City's existing land use policies and development review process provide a strong framework for water quality protection and compliance. These include:

- General Plan policies for creek setbacks, environmentally sensitive habitat areas (ESHA) buffers, and protection of wetlands;
- CEQA initial study checklist that includes storm water quality as an issue area on new development and redevelopment,
- Application of CEQA thresholds to provide the basis for identifying storm water quality impacts and determining whether impacts are significant, and
- Standard conditions of approval and mitigation measures to implement key policies and address identified CEQA impacts.
- Rules for designing structural BMPs to provide water quality protection on new development and redevelopment as a part of their standards conditions of approval.

8.2 Best Management Practices

The City land use policies will consider inclusion of a number of measures that protect storm water quality. They include setback "buffers" from top of bank, limitations on grading steep slopes, and delineation and protection of wetlands and other ESHAs. General protection of surface water quality occurs during evaluation of potential impacts in CEQA review and/or in establishing conditions for project approval.

8.2.1 Watershed/Wetland Protection Policies

General Plan Watershed Protection Policies

The City has adopted water quality policies that will be applied to all new development and redevelopment projects proposed in the City that generate runoff that is directly or indirectly discharged to storm drains, creeks, streams, rivers, the ocean, or other receiving water bodies in the City. These policies provide City staff and the development community with a framework to identify appropriate water quality protection measures for proposed projects, including the development and application of reasonable and feasible storm water quality BMPs. These conditions will always be applied to projects adjacent to riparian area and wetland areas.

These policies will direct growth away from sensitive areas, encourage environmentally sensitive site design, protect wetland and riparian resources, and minimize degradation of water quality. These policies, as defined in the General Plan Conservation Element, are designed to preserve and protect Goleta's environmental resources including valuable habitat areas. Listed below are a few of the goals of the conservation element.

- Protect maintain and enhance the natural ecosystem processes.
- Preserve, restore and enhance the physical and biological integrity of the creeks and natural drainages and their associated riparian habitats,

- Identify and protect wetland, vernal pools as special habitats for flora and fauna as well as their role in cleansing surface waters and drainages.
- Protect water quality and biological diversity of the Goleta Slough and Devereaux Slough.
- Manage water resources to maintain high groundwater water and surface water quality and to protect marine aquatic habitats.

These goals are further defined through specific policies relating to buffer zones that are identified in the Conservation element of the General Plan. The most critical of those buffer zones are:

- CE 2.2 Stream Side Protection areas: In fully subdivided areas, buffer zone is greater than 50 feet; whereas all other instances the buffer zone is greater than 100 feet. Exemptions are made in accordance to section CE2.2C.
- CE 3.4 Protection of Wetland: Buffer shall be sufficient size to ensure biological integrity but not less than 100 feet.
- CE 5.2 Protection of Native Grasslands: Impacts shall be minimized by providing a 10-foot buffer that is restored with native species.
- CE 5.3 Coastal Sage Scrub and Chaparral: Habitats impact minimized by providing a 25-foot buffer restored with native species.
- CE 10 Watershed Management and Water Quality: Requires new development to comply with the SWMP.

CEQA Initial Study Checklist Revisions

The CEQA Initial Study Checklist provides a preliminary analysis of the potentially significant environmental impacts of a proposed project to identify appropriate measures to mitigate the impact, and ultimately, to determine whether a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report is required. The City's initial study checklist was adapted from the recommended checklist contained in the State CEQA Guidelines. Presently, the City checklist combines water resources and flooding into one category and includes direct reference regarding water quality impacts resulting from project-related discharges. The Initial Study checklist will be revised in Year 1 to better identify and address storm water quality issues.

CEQA Thresholds for Water Quality

The City Environmental Thresholds and Guidelines Manual include standards and thresholds used to determine the significance of program and project-related impacts under CEQA. The thresholds and standards are adopted by the City Council and are applied to all new private and public projects. Surface water quality impacts have historically been evaluated through the related effects on biological resources or in coordination with the RWQCB and its water quality regulations. New guidelines will be developed in Year 2 to determine when a project's water quality impacts may be considered significant. The new standards will summarize EPA studies demonstrating adverse water quality impacts from construction activities and new development, provide guidance as to when a project's surface and storm water quality impacts may

be considered significant, less than significant or cumulatively significant, and provide a mitigation hierarchy.

Standard Conditions of Approval/Mitigation Measures

The City will apply standard conditions of approval to address policy consistency and/or potentially significant impacts identified during the project review and CEQA processes. The City will develop and adopt a new list of standard conditions of approval by the end of Year 1 that address post-construction runoff control (with reference to LID guidelines), construction site runoff control (with reference to Storm Water Pollution Prevention Guidelines) and long-term maintenance of approved BMPs for new development and redevelopment.

Discretionary Permit Review Process

Application Submittal

To proceed with development, applicants must first apply for a planning permit from the City. Permit requirements and allowable uses are set forth in the City's Zoning Ordinances. The application package requires submittal of information and plans regarding proposed uses of the land and structures. The application material also requires the applicant to submit information regarding current and proposed storm water drainage, proximity to creeks, proposed impermeable area, and proposed measures to reduce impacts to water quality.

Application Review

Under the Permit Streamlining Act and CEQA, once submitted, the City has 30 days to determine application completeness. The application is subject to internal City review and where discretionary permits are required, and for more complex ministerial applications, other local agencies with interest in the City use regulatory authority such as Flood Control or sanitary districts, will review the application through the Development Review Committee. This provides another opportunity for the City and applicants to discuss project design and water quality protective measures that can be incorporated into the project. A water quality advisory is included in the complete/incomplete letter for projects with potential storm water quality impacts.

Development Review Committee (DRC)

To assure that water quality measures are addressed in the early design stages of project development, City staff convenes a DRC to review new project applications. During the DRC meetings, staff perform a preliminary storm water quality impact assessment where potential storm water impacts and proposed mitigation measures are evaluated. This information is provided to the applicant for consideration and/or incorporation into the project to address and mitigate potential storm water quality impacts.

CEQA Review

Non-exempt projects are reviewed under the State and City CEQA guidelines. This includes preparation of an initial study to determine the significance of project impacts, including impacts to water quality. The City's initial study checklist form will be updated

to more specifically address urban water quality impacts. The City will also develop new CEQA guidelines for surface and storm water quality to assist in the assessment of water quality impacts and new mitigation measures and standard conditions that include water quality BMPs to address any impacts identified. If water quality and other project impacts can be feasibly mitigated to a less-than-significant level, a negative declaration (ND) is prepared. If there is the potential for significant impacts an EIR is prepared. The EIR can include identification of additional mitigation measures or alternative project designs, which reduce water quality impacts. Both the ND and EIR are subject to public review and comment, which provides an additional opportunity for the public to comment on water quality issues.

Preliminary Grading Plan and Hydrology Report Review
Prior to approval by the governing board, staff review the preliminary grading plans and hydrology report to ensure the proposed storm water quality BMPs meet the requirements related to LID and hydromodification control criteria.

Staff Report Preparation and Decision-maker Hearings
Recommendations for approval or denial of the project are contained in a staff report or Council Agenda Report. Project approval can only be granted where the appropriate permit findings can be made including a finding that the project is conformance with the City's Comprehensive and/or Coastal Plan policies. Non-compliance with the City's water quality policies would be grounds for project denial.

If mitigation measures are required to address significant water quality impacts or to address policy consistency, the measures will be adopted as conditions of approval.

Land Use Clearance and Permit Compliance
To gain project approval, the applicant must receive land use clearance from the City and obtain applicable Building and Grading Permits. City staff ensures the project plans submitted for building and grading are consistent with the approved actions, and that any compliance items required to be completed prior to land use clearance are completed. This includes review of the final grading plan and hydrology reports to ensure that incorporation of the required BMPs meet the requirements associated with LID and hydromodification criteria. To obtain clearance to use or occupy the development, the applicant must implement any water quality measures adopted as a condition of approval and/or included in the approved plans.

Inspection Procedures
City staff provides regular inspection of all projects during construction to ensure compliance with permit conditions and mitigation measures under CEQA. Project conditions vary but often do include water quality protection. Measures to protect water quality may apply to construction activities (temporary) or long-term measures built into the project (structural features, bioswales, drainage design, revegetation and landscaping, etc.). All long-term storm water quality BMPs will be subject to a maintenance agreement approved by the City Council and administered by a homeowners association (residential subdivision) or business owner (commercial or

industrial subdivision). For sites that fail inspections, enforcement actions will include, but are not limited to: 1st offense: warning notice with education materials including clean up and abatement order; 2nd offence: Notice of Violation (NOV) with penalties; 3rd offence: Administrative Civil Liability (ACL) fines; 4th offence: referral to the District Attorney's office for prosecution. The City will continue to inspect all long-term measures to ensure that they remain functional.

8.2.2 Hydromodification Management Plan

The City of Goleta will develop a watershed-based hydromodification management plan in cooperation with the Water Board as part of a regional joint effort with other local agencies. The primary goal of the HMP is to determine an economically viable and effective set of Goleta-specific hydromodification control standards that will provide protection of water resources (e.g., water quality, beneficial uses, biological and physical integrity of watersheds and aquatic habitats) to the maximum extent practicable. The City will derive Goleta-specific criteria for controlling hydromodification in new and redevelopment projects using Water Board-approved methodology developed through the joint effort.

The City will also select thresholds the City will use to determine the applicability of hydromodification control criteria to new and redevelopment projects. These applicability criteria and thresholds will be consistent with long-term watershed protection. As appropriate, the City may consider and include exemptions for new development and redevelopment projects that are consistent with the Water Board-approved methodology, where assessments of downstream channel conditions and proposed discharge hydrology indicate that adverse hydromodification effects to present and probable future beneficial use of natural drainage systems are unlikely.

Examples of potential exemptions include, but are not limited to:

- All projects that disturb less than one acre;
- Projects that are replacement, maintenance or repair of a Permittee's existing flood control facility, storm drain, or transportation network;
- Redevelopment projects in the urban core that do not increase the effective impervious area or decrease the infiltration capacity of pervious areas compared to the pre-project conditions;
- Projects with any increased discharge go directly (or via a storm drain) to a sump, lake, area under tidal influence, or other receiving water that is not susceptible to hydromodification impacts; and,
- Projects that discharge directly (or via a storm drain) into concrete or improved (not natural) channels (e.g., rip rap, sackcrete, etc.) which, in turn discharge into a receiving water that is not susceptible to hydromodification impacts.

The City recognizes that storm water quality technologies are constantly being improved. Therefore, the hydromodification controls will be reviewed on an annual basis and revised if necessary to incorporate new storm water quality technology.

8.2.3 Staff Training

All City staff involved in the review and approval of discretionary projects will receive annual training on the City's SWMP appropriate for their position. The annual training will include but not be limited to the following topics:

- Overview of the City's SWMP
- How to identify and evaluate potential storm water impacts during early phase design review
- CEQA thresholds relating to storm water quality impacts
- LID strategies and overview of City's adopted LID guidelines
- SWPPP and overview of City's adopted Storm Water Pollution Prevention guidelines
- Review of SWPPPs
- Incorporation and implementation of storm water quality standard conditions of approval
- Overview of Hydromodification Plan and numeric control standards
- Long-term maintenance agreements for storm water quality BMPs

8.2.4 Early Project Review

The City holds Development Review Committee (DRC) meetings early in the development review process to identify and discuss potential project concerns and conditions associated with proposed development projects. As part of this process staff will conduct a preliminary storm water quality assessment to identify potential storm water quality impacts. Appropriate mitigation measures to be incorporated into the design and conditions of approval are considered and discussed. This process is intended to ensure that appropriate storm water quality measures are identified and incorporate into projects early in the design process.

8.2.5 Low Impact Development

The City supports the incorporation of the LID strategies into all new development and redevelopment projects as appropriate. This BMP provides for the development of a strategy for implementing LID for new and redevelopment projects. Once adopted, the LID guidelines will serve as a reference guide to designers and engineers in the early phases of project development.

8.3 Measurable Goals

Table 8-1 identifies measurable goals for each Post-Construction BMPs described herein. The list of the BMPs and associated goals will be evaluated on an ongoing basis and updated as necessary to meet the MEP standard. The BMPs and goals will be documented and included in the Annual Report.

Table 8-1
BMP Implementation: Post-Construction Runoff Control

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year*
PCRC 1A	CEQA Initial Study Checklist Revision	The City checklist combines water resources and flooding into one category.	The City will review the current checklist used and revise (as appropriate) to identify and address storm water quality issues	The City will review and revise/update the CEQA checklist on an annual basis. Revisions will be documented in the Annual Report.	1
PCRC 1B	CEQA Thresholds for Water Quality	The City Environmental Thresholds and Guidelines Manual include standards and thresholds used to determine the significance of program and project-related impacts under CEQA.	New threshold guidelines will be developed to determine how a project's surface and storm water quality impacts may be considered. The new standards will summarize EPA studies demonstrating adverse water quality impacts from construction activities and new development.	New threshold guidelines will be developed in Year 2 to determine when a project's water quality impacts may be considered significant, less than significant or cumulatively significant, and also provide a mitigation hierarchy.	2

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year*
PCRC 1C	Enforceable Mechanisms		The City will develop and/or modify enforceable mechanisms that will effectively implement hydromodification controls and LID. Enforceable mechanisms may include municipal codes, regulations, standards, and specifications.	The City will develop an analysis of all applicable codes, regulations, standards, and/or specifications that identifies modifications and/or additions necessary to effectively implement hydromodification controls and LID in Quarter 2. The City will approve new and/or modified enforceable mechanisms that effectively resolve regulatory conflicts and implement hydromodification controls and LID in new and redevelopment projects in Quarter 8. The City will apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects by Quarter 9	Q2 Q8 Q9
PCRC 2A	Hydromodification Control Criteria		The City will derive municipality-specific criteria for controlling hydromodification in new and redevelopment projects using Water Board-approved methodology developed through the Joint Effort.	Hydromodification Control Criteria	Q8
PCRC 2B	Applicability Thresholds		The City will select applicability thresholds for applying Hydromodification Control Criteria to new and redevelopment projects. Applicability thresholds will be consistent with long-term watershed protection.	Applicability Thresholds	Q8

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year*
PCRC 2C	Implementation Strategy for LID and Hydromodification Control		The City will develop and enact a strategy for implementing LID and hydromodification control for new and redevelopment projects. The strategy will provide appropriate education and outreach for all applicable target audiences, and will include specific guidance for LID BMP design and for complying with hydromodification control critera. The strategy will also apply LID principles and features to new and redevelopment projects during the two-year period preceding adoption of hydromodification control criteria.	The City will develop: *Guidance* 1. Develop, advertise and make available LID BMP Design Guidance suitable for all stakeholders. 2. Specific guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements made available to new and redevelopment project applicants *Education and Outreach* 1. Documentation of goals, schedules, and target audiences for education and outreach the municipality will conduct in support of the following stragetic objectives: enforceable mechanisms, hydromodification control criteria, applicability thresholds, LID BMP design, and compliance with LID and hydromodification control criteria. 2. Tracking Report indicating municipality's accomplishments in education and outreach supporting implementation of LID and hydromodification control for new and redevelopment projects. *Interim LID Implementation* 1. Apply LID principles and features to all applicable new and redevelopment projects.	Q4 Q8 Q2 Q8 Q2 – 8

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year*
				2. Tracking Report, for the period Q2 to Q8, identifying LID design principles and features incorporated into each applicable new and redevelopment project.	Q9
PCRC 3	Staff training	Approximately 10% of the existing staff has been trained in the protection of water quality.	Annual training provided for all City staff involved in the review and approval of discretionary projects	100% of all City staff will receive a minimum of 4 hours annual training on SWMP issues, each training session will include a test to evaluate material comprehension. The City will track the number of training sessions given, number of attendees and hours of training provided.	1-5
PCRC 4	Early Project Review	Ongoing	Internal DRC meetings held early in the project review process on all discretionary projects. Storm water quality impact assessment performed by staff to determine potential storm water quality impacts associated with proposed project. Appropriate storm water quality BMPs and LID strategies to be implemented as part of the project are identified.	Storm water quality assessment is performed on 100% of projects reviewed by DRC. City will track and document the number and type of projects reviewed by DRC and the results and recommendations of the storm water quality assessment.	1-5

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year
PCRC 6	Inspection Procedures & Enforcement	In development	Inspections will be conducted once at the end of construction activities to ensure correct BMP implementation. After construction, inspections will be conducted annually, to ensure the long-term maintenance and functionality of those installed BMPs.	Enforcement actions at 100% of sites where BMPs failed and a log of all inspections. The inspection log will be used to inform inspectors of any conditions, measures, and/or control BMPs for specific sites. Post-construction inspections may be ongoing depending on type of BMPs required and any long-term maintenance activities that must tracked.	Q2-Yr5
PCRC 7	Long-term Maintenance Agreements	City shall develop standard Long-term Maintenance Agreement.	Developers will sign the Long-term Maintenance Agreement indicating that all BMPs will remain in operable condition for the life of the project. On all long-term projects with storm water quality BMPs that are subject to maintenance to ensure functionality, City will execute an agreement with homeowner association (residential subdivision) or business owner (commercial/industrial) to ensure operability of all BMPs.	The City will execute agreement and inspections. Said agreement will automatically transfer with the sale, transfer or quick claim of the project's property. City shall log all projects that include BMPs requiring long-term maintenance.	Q9-Yr5
PCRC 8	Long-term Watershed Protection	Through development of the SWMP, the City is committed to long-term watershed protection	The City will 1) develop quantifiable measures that indicate how the City's watershed protection efforts achieve desired watershed conditions, 2) evaluate the existing watershed protection efforts, and 3) adapt or change the existing efforts if necessary.	The City will evaluate the watershed protection efforts. Upon review of programs, existing policies may be modified, updated, or adapted to include additional protection to the watershed. Quantifiable measures will be developed in Year 4.	Ongoing

* The implementation schedule for measurable goals related to the Joint Effort refers to the eight 3-month quarters (e.g., Q2, Q4, etc.) of the two-year Joint Effort, and the first quarter of the following year (Q9). For purposes of implementing and tracking Joint Effort BMPs, Quarter 1 will begin upon notification from the Central Coast Water Board. Water Board staff will notify the City by electronic mail of the date that will serve as the start date for Quarter 1.

8.4 Reporting

Data collected for each measurable goal will be compiled, reviewed, and summarized in Annual Reports. Significant variance from targets will be assessed and discussed in Annual Reports to RWQCB. Feedback from City staff, permittees, developers, community interest groups, and other stakeholders, will be used to modify BMPs or the measurable goals, as appropriate; the basis for any changes will be included in the subsequent Annual Report.

The City will achieve Joint Effort measurable goals by the end of Q2, Q4, Q8, and Q9. The City will report to the Water Board on completion of measurable goals within 30 days of the end of the quarter in which the measurable goal is scheduled for completion. Reporting will include evidence of adequate detail and substance for the Water Board to determine whether the measurable goal is complete.

9.0 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The purpose of this MCM for Municipal Operations/Good Housekeeping Practices is to review and modify, where necessary, the City's delivery of public services that may impact storm water management. In particular, the City needs to examine any actions that will reduce the amount and type of pollution that 1) collects on public streets, open spaces, storage areas and infrastructure that is discharged into local waterways; and, 2) results from actions that may environmentally damage land development and flood management practices or affect the maintenance of storm sewer systems. In this way the City may serve as a model to the community, in addition to altering its own actions which may result in a cost savings by performing proper and timely maintenance of the storm water systems and thus avoiding costly repairs from age and neglect.

9.1 Regulatory Requirements

The State's General Permit states that the City must develop and implement an operations and maintenance plan that will prevent or reduce pollutants in runoff from municipal or facility operations. Additionally, the City will determine if there are any changes to be made in order to protect or improve the water entering the storm water systems (*EPA Fact Sheet 2.8 – Pollution Prevention/Good Housekeeping, 01/00*). The minimum requirements for the Pollution Prevention/Good Housekeeping MCM are:

- Analyze and develop an operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from municipal facilities operations into the MS4 storm water drainage systems;
- Develop and implement an operation and maintenance program that assists in preventing or reducing storm water pollution from activity areas such as parks and open space maintenance, land disturbances, new construction and storm water system maintenance;
- Select and implement appropriate Best Management Practices (BMPs) that will reduce or eliminate pollutants in storm water runoff from these activities to the maximum extent practicable and will produce measurable goals; and
- Incorporate an employee training program outlining the potential impacts on the storm water system from municipal activities. Use of training materials available from the EPA, the State, or other organizations will be considered, as they will conserve resources.

9.1.1 Evaluation of City Facilities and Appropriate BMPs

To address the need for storm water protection, a multi-step process will be used to survey the nature of each City operation, identify appropriate BMPs and provide for their implementation. Any new or acquired facilities will be evaluated with respect to operations, activities and appropriate storm water management practices.

Facilities and Services Assessment
The City will develop a comprehensive list of all City facilities and services. Staff will then perform an assessment of all City facilities and services to determine the potential storm water quality impacts associated with each. Once potential impacts are determined appropriate, mitigation measures and BMPs will be identified and implemented as required.

Development of Citywide Best Management Practices (BMPs)/Distribution of Existing Fact Sheets
BMP Fact Sheets from the EPA will be distributed at City activities. Fact Sheets will be grouped by activity, such as Housekeeping and Pesticide-Free Maintenance. Each BMP Fact Sheet will list a variety of specific BMPs that can be selected by a facility manager as appropriate for the particular site and activity. Not all of the BMPs listed on a fact sheet may be employed; those that are appropriate would be determined on a site-by-site basis. This menu approach will allow facility managers to take credit for their existing efforts and select new options to augment their existing programs.

9.2 Best Management Practices (BMPs)

The City engages in numerous activities that range from road and building maintenance to hiring contractors to construct roads and buildings, from pesticide free parks and open spaces to overseeing land development impacts, and maintenance and repair of storm water systems. To cover such activities under the SWMP requires flexibility in implementing the BMPs. It is the objective of the BMPs 1) to keep pollutants from contact with rain water, and 2) to prevent pollutants from being dumped or poured into the storm drains. Listed below are BMPs that either exist or will be develop by the City over the next 5 years once the SWMP is approved.

9.2.1 Maintenance Plan: Facilities Survey

The City will develop a Facilities Survey of all existing and planned municipal facilities with their associated services. Each facility will be evaluated to determine what, if any, impact it or its services may have on possible storm water runoff. Such impacts may include improperly stored oils, solvents, or other toxic fluids; or, improper cleaning practices; or, neglect of regular maintenance. This survey should be converted into a tracking log so that each facility is noted with its potential impacts, dates evaluated and revaluated, dates when improper activities happened resulting in pollution runoff affecting the storm water systems. Included in this log should be future dates for completing long-term improvements or deficiencies that need to be rectified.

Included in the municipal facilities are City roadways, sidewalks, and medians. A separate survey will be created to identify the location of each and possible impact upon the storm water system each may have. A regular maintenance schedule is active for the sidewalks and pathways of Old Town. The cleaning practices include use of a pressurized washer with a waste water capture system. Occasionally, these sidewalks

needed repairs such as grinding the concrete to maintain a consistent elevation across all section of concrete. When these repairs are performed, the mechanical grinder used is equipped with a dust collection system to recapture any powdery or dusty debris. Additional practices are incorporated to prevent debris from entering the storm water systems.

9.2.2 Maintenance Plan: Storm Water Drainage System

Standard maintenance activities include scheduled cleaning, inspections, and repair of all City owned MS4 storm water drainage systems. A maintenance schedule will be developed to ensure that priority is given to drainage systems needing the most attention before the start of the rainy season and after any major storm system affecting the City. Appropriate downstream debris capture systems to prevent the accumulation of waste from entering adjacent waters or the ocean will be utilized. Any debris collected will be disposed of properly. It is the intent of the City to track each inspection, cleaning and repair performed on the catch basins and associated storm water systems.

The storm water drainage system includes catch basins, storm water drains, sewer collection systems, and water distribution system. The City has implemented a catch basin inspection and cleaning program. Each year before the onset of winter rains, every catch basin is inspected and cleaned out as necessary. Debris and trash are removed and properly disposed of.

Random inspections should be made to identify any illicit connections and discharges along the storm water system. Such connections and discharges should be logged and then recorded on a form that will be given to Code Enforcement which will assist with any applicable enforcement measures. City staff, when performing other duties throughout the City, will also make note of any areas where possible illicit or legal connections or discharges appear.

9.2.3 Street Sweeping

The City has instituted a Street Sweeping Program to enhance the efforts of the Goleta West Sanitary District that currently sweeps streets west of La Patera Road. The City program sweeps all City streets east of La Patera. The streets are divided into 3 zones and each zone will be swept twice a month. At this time the City does not see a need for installing 'No Parking' signs or issuing citations as the public is cooperating by voluntarily not parking on streets during street sweeping days.

It is the intent of the City's Street Sweeping Program to maintain clean roadways, streets, gutters, and curbs and to reduce the discharge of pollutants to the maximum extent practical. Staff will compile a study of past field observations, current water quality challenges, and typical City rainfall patterns, and use this study as a basis for updating and improving the program.

The sweeping portion of this program is conducted by a contractor. Occasional inspections of the contractor work will be made. Such inspections will be used to determine whether improvements are needed for the sweeping routes, the frequency, technology, and the disposal methods. Also, these inspections will ensure that the contractor is employing the BMPs to control pollutants resulting from their activities. This will be included in any agreements signed by the City and the contractor.

The inspections will also take into account the assessment of the City streets in need of resurfacing or replacement of roadways, streets and curbs. Including this step in the program combines staffs' efforts and reinforces the needs to streamline all practices employed.

9.2.4 Urban Forestry

Pursuant to the General Plan Conservation Element Section 5.2.4 CE14, Preservation and Enhancement of the Urban Forest is a requirement of all projects. The City recognizes its requirements to protect, preserve and enhance Goleta's Urban Forest for its aesthetic, visual and environmental benefits to the community. The Goleta Urban Forest consists of all public and private trees, including street trees, trees in parks and other public land trees on private property throughout the City.

Public Urban Forest Management Plan
As of 2005, the City had an estimated 7,500 trees within the street right-of-way. The Development of Public Urban Forest Management Plan will provide for a diverse tree population of mixed ages and species while maximizing planting space. This will in turn maximize the environmental benefit related to air quality, storm water runoff and shade.

Tree City USA
The City of Goleta has recently been designated the status of "Tree City USA". This designation from the National Arbor Day Foundation indicates the City's commitment to protection of the Urban Forest. It also ensures that there is proper funding allocated for the maintenance and protection of the Urban Forest. The City will have signs posted citywide to indicate the designation as a Tree City USA member.

9.2.5 Pesticide-Free Maintenance Program

Section 12753 of the California Food and Agricultural Code defines a pesticide as "Any spray adjuvant, or any substance, or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, as defined in Section 12754.5 (of the Food and Agricultural Code), which may infest or be detrimental to vegetation, man, animals, or households, or present in any agricultural or nonagricultural environmental whatsoever." Pesticides present a threat to water quality and may be found in numerous areas.

The City has implemented a pesticide-free maintenance program for its parks and open space areas. As such, no synthetic pesticides are used to maintain the parks and open

space areas within the City limits. To continue this program, occasional evaluation will be made that may include the following: 1) determine acceptable pest levels (usually some presence is tolerable); 2) utilize preventive practices, such as using clean tools and removing infected plants; 3) monitor the type and extent of any pest problem; 4) use mechanical controls, such as pulling weeds; and 5) use biological controls whenever possible (e.g., predator mites).

The City will respond to and document all incidents of illegal discharges related to pesticides or herbicide. Adequate control measures will be considered to prevent future illicit discharges.

9.2.6 Purchasing and Contracts

The City will review policy language requiring vendors and contractors who provide services for the City to implement storm water Best Management Practices. Contracts will be worded to include specific language requiring contractors to obtain approval from the City of project-oriented BMPs or activity-related Storm Water Plan. The contractor's BMPs or plan will describe how storm water conveyances will be protected from potential pollutants specific to the project undertaken. If they violate the plan, it will be sufficient reason for termination of the contract without harm to the City.

A review will be made of existing boilerplate contracts and purchasing specifications to determine if additional language is necessary. Such language would describe how to protect storm water quality and reduce any discharge of pollutants. Such services and contracts may include housekeeping, painting, landscaping, and construction as areas to practice BMPs. When necessary, contracts specifications will be updated to include specific language addressing storm water pollution prevention per the SWMP, and in some cases shall require specific BMPs related to the activities of a particular service.

Quality assurance audits may be conducted during the time services are being performed to ensure the applicable storm water requirements are being addressed and enforced as necessary.

9.2.7 Training by City Departments

Staff training and coordination is a necessary component of the City's Pollution Prevention/Good Housekeeping program. City employees will receive an appropriate level of training on storm water pollution prevention based on their department and work responsibilities. Most of the training programs will be integrated into existing training presented to staff, such as safety training.

Developing a training program will require evaluating a variety of storm water pollution prevention programs which already exist to determine which would best address the needs of the City. Such training programs will include 1) basic storm water pollution prevention BMPs; 2) BMPs that are specific to any MS4 Maintenance Program activities; 3) solid waste accumulation and disposal BMPs, and, 4) field documentation.

Review of training programs created by EPA, the State, or other organizations should be done to determine if one of the programs suits the needs of the City. The training materials must include employee training to prevent and reduce storm water pollution for activities such as park and open space maintenance, buildings maintenance, new construction and land disturbances, and storm water drainage systems maintenance as well as defining what constitutes illicit and illegal connection and/or discharge to storm water drainage system. Additionally, the training program should address the various municipal activities that could potentially contribute pollutants to storm water discharges. To ensure subject matter comprehension, testing of staff after each training session will be implemented and documented.

A program will be developed citywide for distributing the BMP Fact Sheet "Citywide Employee BMPs". This Fact Sheet provides general direction to all City employees through new employee orientation to protect water quality both at work and at home. City staff will be knowledgeable regarding permit requirements and how to process complaints and violations that are observed in the field.

Training will also focus on ensuring that runoff from all maintenance activities is reduced, prevented, and/or eliminated completely. (The City does not maintain the City fleet) The training program will be reviewed and revised to better augment the activities undertaken by each department as well as listing those training practices found to be most effective.

9.2.8 Mutt Mitt Program

A pet waste management program will be established to address the problem of pet waste being disposed of in public areas, such as parks and open spaces. Such pet waste contains bacteria that can contaminate nearby storm water systems. In addition, pet waste contains nitrogen and phosphorus, two elements that contribute to rapid aquatic plant growth.

The Mutt Mitt program consists of providing pet waste disposal bags at eleven City parks and open spaces for use by the public. This program is successful in reducing pet waste pollution. City Park facilities and operations are discussed in Section 6.0, Illicit Discharge Detection and Elimination.

The City will conduct a public education program in various media forums to inform residents of the value of the Mutt Mitt Program. Pet waste education brochures can be made available at local pet stores and veterinaries' offices as well as at City Hall.

The City will evaluate Mutt Mitt stations to determine if such locations work and include more visible signage at various parks and trails as needs are identified. Evaluation of the placement of additional stations will be conducted during the second year. Additional locations may be suggested as well as increased signage after the program has been active for a pre-determined length of time. The evaluation will track the

effectiveness of the program, whether other programs may be added, or if this program should be replaced.

9.2.9 Trash Control

Trash accumulation in MS4 storm water drainage systems is an expected issue that must be addressed after heavy rains or high winds. Trash is not only a pollutant in the storm water, but adversely affects the aesthetics of the City. The City will approach trash control at the source and with effective removal practices.

Currently, trash receptacles are placed on the north and south side of Hollister Avenue as well as in the City parks. Source control will evaluate the trash receptacles physical condition (e.g., rusty, covered in graffiti) and their location in convenient places for easy use by the public.

Staff will develop a log of all trash receptacles noting their placement location, dates of inspections, and incidents, if any, of excess trash accumulation. Inspection will also determine if the trash receptacle location is effective or should be moved. When conducting this inspection, staff will note any areas which have a higher incident of trash accumulation and determine if additional receptacles are needed. If staff identifies any problem areas, illegal or illicit use of trash receptacles, enforcement policies may include signage to inform the public of the City's pollution prevention policy. If documented improper trash disposal occurs penalties may be levied.

9.2.10 Household Hazardous Waste Disposal Prevention

Household Hazardous Waste Disposal Prevention addresses the need to ensure proper disposal of hazardous waste within the city limits, what constitutes a hazardous waste, and to prevent the discharge of materials into the MS4 drainage systems, whether deliberately or accidentally.

HHW includes a variety of materials which, if improperly disposed of, may enter the storm water drainage systems. Such waste may include paints, paint thinners, solvents, used motor oils, fuel additives, and photoprocessing chemicals. A new area of concern for HHW is 'Universal Waste'. Universal waste may consist of electronics items such as computer, monitors, television sets, cell phones, small business machines as well as fluorescent light bulbs, household batteries and thermostats containing mercury. Further education on what is considered universal waste will be considered to prevent disposal of such items into the trash or discarded into the storm water systems.

The City contracts with the County of Santa Barbara to provide a HHW collection center which is available to all City residents and business thus encouraging proper disposal of household hazardous waste. The City will continue to educate the public on what is illegal disposal of household hazardous waste through the use of newsletters, mailers, website, city scroll and promotion of local collection events.

9.3 Measurable Goals

The City will use the following measurable goals to track the implementation and effectiveness of the BMPs.

Table 9-1
BMP Implementation: Pollution Prevention and Good Housekeeping For Municipal Operations

BMP#	BMP	Current Status	Implementation Details	Measurable Goals	Year
PPGH 1	Maintenance Plan: Facilities Survey and Maintenance Schedule	All existing facilities are currently being reviewed for storm water quality impacts. Develop a schedule for each area of operation and maintenance program	Facility specific storm water quality plans to be developed for appropriate City owned facilities. Review and modify Maintenance Schedule as needed. Evaluate the schedule for pressure washing and repair of sidewalks and walkways.	Complete survey of all existing and planned facilities. Determine possible impact on the storm water systems. Evaluate selected BMPs for feasibility and cost effectiveness.	1
				Inventory all City vehicles and equipment yearly. Maintain records of inspections, repairs and potential pollution problems. Annually inspect and tabulate number of BMPs implemented and verify if they are being properly maintained.	1-5
				Facility-specific plans completed.	2
				Prioritize current list of City facilities for potential pollutant runoffs; add or delete facilities as needed and re-prioritize list each year.	2-5
				Track activities and corresponding storm water and watershed qualities. Maintain and repair sidewalks and other pathway utilizing debris capture systems such as that found on concrete grinding machines.	On-going

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year
PPGH 2	Maintenance Plan: MS4 Storm Water Drainage System	Existing storm water drainage systems are inspected and catch basins are cleared in the Fall of each year.	Annually all catch basins are inspected and cleaned of debris as required. Debris is properly disposed of at a local disposal facility. Illicit discharges to be investigated and prevention measures to be implemented. City will utilize storm water system software programs for tracking inspection, cleaning, and repair efforts.	Establish a Maintenance Schedule that identifies all City-owned MS4 storm water systems. Categorizes them as high, medium, or low	1
				The City will total the length of the storm drains cleaned, number of outfalls cleared, the schedule of cleaning, volume or amount of material cleaned from the drains. The City will also observe any changes in the water quality at the outfall that have been cleaned.	1-5
				Revise MS4 Maintenance Program as necessary Track the storm water systems inspections, cleanings and repairs annually	2-5
PPGH 3	Street Sweeping	Street sweeping twice per month began in FY July 2008.	The City will sweep all streets east of La Patera. Residential streets are swept 2 times per month. Streets, arterials, commercial/industrial areas are swept 2 times per month.	The City will track the scheduled cleaning and the volume or tons of material collected by the street sweeper. Occasional inspections of contractor's work will be made. These inspections will determine if improvements need to be made, that contractor is employing best BMPs to control pollutions and to assess if and when resurfacing or repair of streets needs to be done. *Note: An independent Special District sweeps the remaining streets in the City.*	1-5
PPGH 4	Urban Forestry	Public Urban Forest Management Plan is being developed	The City's General Plan Conservation Element has existing policies in place to protect, preserve and enhance the Goleta's Urban Forest	City will maintain a tree inventory Monitor the existing condition of all trees, and coordinate the installation of new trees and removal of older trees.	1-5
				Post signs indicating Goleta as a "Tree City USA"	2
				Develop the Public Urban Forest Management Plan	2-5

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year
PPGH 5	Pesticide Free Maintenance Program	Implemented	100% of the Parks and Open Space are maintained by the pesticide free maintenance program.	Ensure that pesticides are included on the list of waste accepted at the HHW collection site.	1
				Staff will coordinate with the appropriate contractor for the on-going support of this program. Ongoing inspection shall be done to ensure compliance with this program. The improved condition of the City parks and open spaces will serve as the guideline for the effectiveness of this program.	1-5
				Add language to landscape and maintenance contracts that contractors will adhere to all federal, State, and local regulations in regards to what is a pesticide or herbicide and use of alternative methods.	2
				Usage of the various products and their overall effectiveness will be evaluated annually by the Parks Manager.	2-5
				Create a brochure promoting the use of alternatives to pesticides and herbicides. Include in staff training.	3
PPGH 6	Purchasing & Contracts	City contracts that may affect water quality are often performed by outside contractors and are conditioned to implement BMPs.	New contracts will have language requiring the implementation of BMPs and the description of storm water pollution prevention methods to protect water quality.	Tabulate number of projects that require BMPs or plans. Annually, conduct quality assurance audits of 1/4 of contracts with storm water pollution prevention specifications or BMPs included. Address any deviations from contract requirements and enforce as necessary. Report the number of Notice of Violations or Corrective actions. Non-compliance enforcement procedures will include, but are not limited to: 1st offense: notice of non-compliance with a set amount of days to correct non-compliance; 2nd offence: termination of contract. Non-compliance enforcement procedures will be enforced throughout the term of the contract. Collected data will be used in future contract awards.	1-5
				Standard contracts will be modified to include specification for standard BMPs and description of storm water pollution prevention requirements in accordance with the SWMP.	2

				Evaluate contractors' compliances pursuant to their individual contract requirements.	**2, 4**

BMP #	BMP	Current Status	Implementation Details	Measurable Goals	Year
PPGH 7	Staff Training	Approximately 10% of the existing staff has been trained in the protection of water quality.	Annually, staff will receive appropriate training on water pollution prevention measures. It is estimated that the annual class is one hour in length.	Review training materials currently available for use in staff training sessions.	1
				Track number of staff attending each training session. Track number of email messages on water quality. 100% of all staff will be trained.	1-5
				Assess the effectiveness of the training program through testing and determine if additional instructions need to be incorporated.	2, 4
				Create a pocket guide for distribution to staff outlining what an Illicit Discharge Detection and Elimination is.	3
PPGH 8	Mutt Mitt Program	City of Goleta currently provides Mutt Mitts at their Parks and Open Space Facilities	Staff will continue to promote and expand the use of Mutt Mitts to reduce the animal waste in the parks.	City will log the number and locations of the Mutt-Mitts stations and update the list as new stations are added.	1-5
				The usage of Mutt Mitts will be evaluated to ensure that the program is being properly used. This is evidenced by the increase in usage at individual locations. The City is also developing new parks and installing additional dispensers at these facilities.	2-5
PPGH 9	Trash Control	Trash receptacles are located along the north and south side of Hollister Avenue.	Create a list of public properties that do not currently have trash receptacles. Determine effectiveness of each location for the trash receptacles.	Develop list of public properties that do not currently have trash receptacles.	1
				Have contractor place additional trash receptacles using information formulated from the list of public properties.	2-3
				Develop signage if needed for "problem areas."	3-4
PPGH 10	Household Hazardous Waste Disposal Prevention	Ongoing Household Hazardous Waste (HHW) program contracted with the County of Santa Barbara.	City will promote the proper disposal of HHW through the City's website, City scroll, newsletters and advertisements. Contracted haulers will also participate in various HHW collections.	City will log the advertising done, track participants at the County collection facility and log the material collection by City staff. Staff will review any educational materials developed by haulers for publication either in the billings, local newspaper or a relevant brochure.	1-5

9.4 Reporting

Data collected for each measurable goal will be compiled, reviewed and summarized as part of Annual Reports to the RWQCB. If significant variance from targets is determined, City employees, community interest groups, and other stakeholders input will be used to modify BMPs or the measurable goals, as appropriate. The basis for any changes will be included in the subsequent Annual Report. The City will retain storm water records for five years, and each applicable governmental department will keep their records for five years.

10.0 MONITORING AND REPORTING REQUIREMENTS

The purpose of monitoring and reporting is to document successful implementation of the SWMP. The draft General Permit requires that the first Annual Report be due on September 15 after the first partial fiscal year term (July 1-June 30) that the municipality is covered by the general permit. Annual Reports shall be submitted thereafter in August. The City intends these Annual Reports to cover the fiscal year immediately prior to the reporting period.

The City will monitor the implementation of its program and its overall effectiveness by measuring and reporting the data discussed in the individual Minimum Control Measures sections (Sections 1.4 and 9.1)

In general, four types of data will be collected:

- Progress establishing and implementing BMPs that are developed during the SWMP implementation period, or establishing existing BMPs in newly identified permit areas
- Training of City staff (and contractors as appropriate contractors)
- Objective measures of ongoing BMPs such as public participation or education outreach
- Response time and results of pollution cleanup

10.1 Effectiveness Assessment

The City will evaluate both current conditions and individual BMP effectiveness, and, as appropriate, will update BMPs and measurable goals to achieve the objective of meeting water quality standards to the maximum extent practicable.

The City will develop an effectiveness assessment strategy within the first two years of permit enrollment, incorporating the following components to establish measurements of effectiveness.

1. Measurable goals will be used as assessment parameters for appropriate BMPs

2. Measurable goals will be developed with interim milestones and implementation frequency where appropriate

3. Program effectiveness will be assessed in terms of achieving permit requirements and measurable goals

4. Program effectiveness will be assessed in terms of protecting and restoring water quality and beneficial uses

5. Quantifiable effectiveness measurements for each BMP will be identified, including measurements that link BMP implementation with improvement of water quality and beneficial use conditions

6. Assessment of BMPs specifically targeting primary pollutants of concern will be emphasized

7. The CASQA Quantifiable Approach incorporates the Water Board's expert Blue-Ribbon Panel's Action Level concept, CASQA's Effectiveness Assessment method, and standard regulatory options for NPDES permitting and TMDL implementation. The approach introduces two significant enhancements to compliance determination: (1) triggers, and (2) measures of achievement. The City will develop a similar program to the CASQA's *Municipal Stormwater Program Effectiveness Assessment Guide*.

8. The City will review the following California Stormwater Quality Association (CASQA) assessment outcome levels, and determine appropriate steps (policy revision, BMP implementation effectiveness) based upon similar outcome levels

   Level 1 – Documenting Stormwater Program Activities

   Level 2 – Raising Awareness

   Level 3 – Changing Behavior

   Level 4 – Reducing Loads from Sources

   Level 5 – Improving Runoff Quality

   Level 6 – Protecting Receiving Water Quality

9. Quantifiable effectiveness measurements that address outcome levels 5 and 6, (improving runoff quality and protecting receiving water quality) will be identified, as defined in the *Municipal Stormwater Program Effectiveness Assessment Guide,* to be used during long-term effectiveness assessments (e.g., every three to five years)

10. If necessary, steps will be taken to revise the SWMP to optimize BMP effectiveness, when effectiveness assessments identify BMPs or programs that are ineffective or can be improved. Such changes would be based on the results of monitoring provided in the Annual Reports and developed in consultation with the Community Interest Group and the Central Coast RWQCB.

10.2 Form and Content of Annual Report

The State Annual Report form and Annual Report guidance to the General Permit shall be used when preparing the Annual Report. The Annual Report will be posted for public comment as defined in Table 4-1. It will be available at:

http://www.swrcb.ca.gov/stormwtr/phase_ii_municipal.html

The City will also provide summaries of data in tabular form. Data such as number of employees trained, and number of construction sites inspected, will be presented in summary tables. Because the City is required to keep records for five years, and due to the intent of the reporting requirement, the Annual Report will focus on a summary of progress and discuss any changes to the SWMP to be implemented in meeting the MEP standard. The reporting format may need to be flexible and, if changed, justification will need to be provided. The focus will be to clearly show progress, to discuss program adjustments, and respond to challenges in implementing the SWMP.

10.3 Reporting and Compilation of Data

The City is developing a central reporting program to allow reporting of BMPs. This citywide program is intended to track BMP selection and implementation, identify schedules for all facilities, and provide opportunity for feedback and clarification on BMPs. Report results will be used directly in the Annual Report to the RWQCB to identify BMPs implemented by the City.

Pursuant to the State's draft General Permit, the City will retain storm water records for five years. Each department responsible for implementing substantive elements of the SWMP will be directed to keep their records for five years. These records will be the source of compiled data contained in the Annual Report.