## ATTACHMENT C

# VENTURA COUNTYWIDE STORMWATER QUALITY URBAN IMPACT MITIGATION PLAN

## **BACKGROUND**

The Ventura Countywide Stormwater Quality Management Program (Program) was established pursuant to Section 402(p) of the Federal Clean Water Act, which requires that all point source discharges of pollutants into waters of the United States, including discharges from municipal storm drain systems, be regulated by a National Pollutant Discharge Elimination System (NPDES) permit. The requirement to implement a program for development planning is based on, federal and state statutes including: Section 402(p) of the Clean Water Act, Section 6217 of the Coastal Zone Act Reauthorization Amendments of 1990 ("CZARA") and the California Water Code. The Clean Water Act amendments of 1987 established a framework for regulating storm water discharges from municipal, industrial, and construction activities under the NPDES program. The primary objectives of the municipal storm water program requirements are to:

- 1. Effectively prohibit non-storm water discharges; and
- 2. Reduce the discharge of pollutants from storm water conveyance systems to the Maximum Extent Practicable (MEP statutory standard)

The SQUIMP was developed as part of the municipal storm water program to address storm water pollution from new development and redevelopment by the private sector. This SQUIMP contains a list of the minimum required Best Management Practices (BMPs) that shall be used for a designated project. Additional BMPs may be required by ordinance or code adopted by the Co-permittees and applied generally or on a case-by-case basis. The Co-permittees are required to implement the requirements set herein in their own jurisdiction. Developers shall incorporate appropriate SQUIMP requirements into the project plans for the projects covered by the SQUIMP requirements. Each Co-permittee will approve the project plan as part of the development plan approval process.

All projects that fall into one of eight categories are identified in the Ventura Countywide Municipal Permit as requiring SQUIMPs. These categories are:

- Single-Family Hillside Residences
- 100,000 Square Foot Commercial Developments
- Automotive Repair Shops
- Retail Gasoline Outlets
- Restaurants
- Home Subdivisions with 10 or more housing units
- Location within or directly adjacent to or discharging directly to an environmentally sensitive area
- Parking lots with 5,000 square feet or more impervious parking or access surfaces or with 25 or more parking spaces and potentially exposed to storm water runoff

## **DEFINITIONS**

"100,000 Square Foot Commercial Development" means any commercial development that creates at least 100,000 square feet or impermeable area, including parking areas.

"Automotive Repair Shop" means a facility that is categorized in any one of the following Standard Industrial Classification (SIC) codes: 5013, 5014, 5541, 7532-7534, or 7536-7539.

"Best Management Practice (BMP)" means any program, technology, process, siting criteria, operational methods or measures or engineered systems, which when implemented prevent, control, remove or reduce pollution.

"Commercial Development" means any development on private land that is not heavy industrial or residential. The category includes, but is not limited to: hospitals, laboratories and other medical facilities, educational institutes,

recreational facilities, plant nurseries, multi-apartment buildings, car wash facilities, mini-malls and other business complexes, shopping malls, hotels, office buildings, public warehouses, and other light industrial complexes.

"Designated Public Access Points" means any pedestrian, bicycle, equestrian or vehicular point of access to jurisdictional channels in the area of Ventura County subject to permit requirements.

"Directly Adjacent" means situated within 200 feet of the contiguous zone required for the continued maintenance, function, and structural stability of the environmentally sensitive area.

"Directly Connected Impervious Area (DCIA)" means the area covered by a building, impermeable pavement, and/or other impervious surfaces, which drains directly into the storm drain without first flowing across permeable land area (e.g. lawns).

"Directly Discharging" means outflow from a drainage conveyance system that is composed entirely or predominately of flows from the subject, property, development, subdivision, or industrial facility and not commingled with the flows from adjacent lands.

"Environmentally Sensitive Area" means an areas "in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which would be easily disturbed or degraded by human activities and developments" (California Public Resources Code §30107.5)

Areas subject to storm water mitigation requirements area: areas designated as an Area of Special Biological Significance (ASBS) by the State Water Resources Control Board, an area designated as a significant natural resource by the California Resources Agency, or an area identified by the discharger as environmentally sensitive for water quality purposes, based on the Regional Board Basin Plan and Clean Water Act Section 303(d) Impaired Water-bodies List for the County of Ventura.

"Hillside" means property located in an areas with known erosive soil conditions, where the development contemplates grading on any natural slope that is twenty-five percent or greater.

"Infiltration" means the downward entry of water into the surface of the soil.

"New Development" means land disturbing activities; structural development, including construction or installation of a building or structure, creation of impervious surface; and land subdivision.

"Parking Lot" means land area or facility for the temporary parking or storage of motor vehicles used personally, for business or for commerce with an impervious surface area of 5,000 square feet or more, or with 25 or more parking spaces.

"Redevelopment" means, but is not limited to, the expansion of a building footprint or addition or replacement of a structure; structural development including an increase in gross floor area and/or exterior construction or remodeling; replacement of impervious surface that is not part of a routing maintenance activity; land disturbing activities related with structural or impervious surfaces. Redevelopment of one of the eight identified SQUIMP categories that result in the creation or addition of 5,000 square feet or more of impervious surfaces is subject to the requirements for storm water mitigation. If the creation or addition of impervious surfaces is fifty percent or more of the existing impervious surface area, then storm water runoff from the entire areas (existing and additions) must be considered for purposed of storm water mitigation. If the creation or additions is less than fifty percent of the impervious areas, then storm water runoff from only the addition areas needs mitigation.

"Restaurant" means a stand-alone facility that sells prepared foods and drinks for consumption, including stationary lunch counters and refreshment stands selling prepared foods and drinks for immediate consumption (SIC Code 5812).

"Retail Gasoline Outlet" means any facility engaged in selling gasoline and lubricating oils.

"Source Control BMP" means any schedules of activities, structural devices, prohibitions of practices, maintenance procedures, managerial practices or operational practices that aim to prevent storm water pollution by reducing the potential for contamination at the source of pollution.

"Storm Event" means a rainfall event that produces more than 0.1 inch of precipitation and that, which is separated from the previous storm event by at least 72 hours of dry weather.

"Structural BMP" means any structural facility designed and constructed to mitigate the adverse impacts of storm water and urban runoff pollution (e.g. canopy, structural enclosure). The category may include both Treatment Control BMPs and Source Control BMPs.

"Treatment" means the application of engineered systems that use physical, chemical or biological processes to remove pollutants. Such processes include, but are not limited to, filtration, gravity settling, media absorption, biological uptake, chemical oxidation and UV radiation.

"Treatment Control BMP" means any engineered system designed to remove pollutants by simple gravity settling of particulate pollutants, filtration, biological uptake, media absorption or any other physical, biological or chemical process.

## CONFLICTS WITH LOCAL PRACTICES

Where provisions of the SQUIMP requirements conflict with established local codes, (e.g., specific language of signage used on storm drain stenciling), the Co-permittees may continue the local practice and modify the SQUIMP to be consistent with the code, except that to the extent that the standards in the SQUIMP are more stringent than those under local codes, such more stringent standards shall apply.

## SQUIMP PROVISIONS APPLICABLE TO ALL CATEGORIES AS APPROPRIATE

## **REQUIREMENTS**

## 1. PEAK STORM WATER RUNOFF DISCHARGE RATES

The discharger shall control the post-development peak storm water runoff discharge rates to maintain or reduce pre-development downstream erosion, and to protect stream habitat.

SQUIMP category projects, excluding single-family hillside residences that directly discharge to unlined receiving streams shall implement the following design criteria:

- a. 2-year post development discharge rates shall not exceed the predeveloped discharge rates for the 2-year frequency storm event.
- b. Peak flows shall be determined using the procedures set forth in the latest edition of the *Hydrology Manual* and Direct Runoff curves produced by Ventura County Public Works Agency, Watershed Protection District. Additional information is provided in the Ventura Countywide Stormwater Quality Management Program's Technical Guidance Manual for Stormwater Quality Control Measures.

#### 2. CONSERVE NATURAL AREAS

If applicable, the following items are required and shall be implemented in the site layout during the subdivision design and approval process, consistent with applicable General Plan and Local Area Plan policies:

- Concentrate or cluster Development on portions of a site while leaving the remaining land in a natural undisturbed condition
- Limit clearing and grading of native vegetation at a site to the minimum amount needed to build lots, allow
  access, and provide fire protection
- Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants
- Promote natural vegetation by using parking lot islands and other landscaped areas
- Preserve riparian areas and wetlands

## 3. MINIMIZE STORM WATER POLLUTANTS OF CONCERN

Storm water runoff from a site has the potential to contribute oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens to the storm water conveyance system. The development shall be designed so as to minimize, to the maximum extent practicable, the introduction of pollutants of concern that may result in significant impacts, generated from site runoff of directly connected impervious areas (DCIA), to the storm water conveyance system. Pollutants of concern consist of any pollutants that exhibit one or more of the following characteristic: current loadings or historic deposits of the pollutant are impacting the beneficial uses of a receiving water, elevated levels of the pollutant are found in sediments of a receiving water and/or have the potential to bioaccumulate in organisms therein, or the detectable inputs of the pollutant are at concentrations or loads considered potentially toxic to humans and/or flora and fauna. The storm water pollutants of concern currently identified by the Program are total and fecal coliform, mercury, PAHs. DDT and byproducts, diazinon, sediment/TSS, chlorpyrifos, copper, lead, thallium, bis(2-ethylhexyl)phthalate and phosphorous. The program may amend the list of pollutants of concern as additional information becomes available.

In meeting this specific requirement, "minimization of the pollutants of concern" will require the incorporation of a BMP or combination of BMPs best suited to maximize the reduction of pollutant loadings in that runoff to the Maximum Extent Practicable (MEP). Those BMPs best suited for that purpose are those listed in the *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures*.

Examples of BMPs that can be used for minimizing the introduction of pollutants of concern generated from site runoff are identified in Table 2.

#### 4. PROTECT SLOPES AND CHANNELS

Project plans shall include BMPs consistent with local codes and ordinances and the SQUIMP to decrease the potential of slopes and/or channels from eroding and impacting storm water runoff.

- Convey runoff safely from the tops of slopes and stabilize disturbed slopes
- Utilize natural drainage systems to the Maximum Extent Practicable
- Control or reduce or eliminate flow to natural drainage systems to the Maximum Extent Practicable
- Stabilize permanent channel crossings
- Vegetate slopes with first consideration given to native or drought tolerant species
- Install energy dissipaters, such as riprap at the outlets of new storm drains, culverts, conduits, or channels that enter unlined channels in accordance with applicable specifications to minimize erosion, with the approval of all agencies with jurisdiction, e.g., the U.S. Army Corps of Engineers and the California Department of Fish and Game.

## 5. PROVIDE STORM DRAIN SYSTEM STENCILING AND SIGNAGE

Storm drain stencils are highly visible source controls that are typically placed directly adjacent to storm drain inlets. The stencil contains a brief statement that prohibits the dumping of improper materials into the storm water conveyance system. Graphical icons, either illustrating anti-dumping symbols or images of receiving water fauna, are effective supplements to the anti-dumping message.

- All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as: "DON'T DUMP! DRAINS TO OCEAN")
- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at designated public access points along channels and creeks within the project area
- Legibility of stencils and signs shall be maintained

## 6. PROPERLY DESIGN OUTDOOR MATERIAL STORAGE AREAS

Outdoor material storage areas refer to storage areas or storage facilities solely for the storage of materials. Improper storage of materials outdoors may provide an opportunity for toxic compounds, oil and grease, heavy metals, nutrients, suspended solids, and other pollutants to enter the storm water conveyance system. Where

proposed project plans include outdoor areas for permanent storage of materials that may contribute pollutants to the storm water conveyance system, the following Structural or Treatment BMPs are required:

- Materials with the potential to contaminate storm water shall be (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevents contact with runoff or spillage to the storm water conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- The storage area shall be paved and sufficiently impervious to contain leaks and spills.
- The storage area shall have a roof or awning to minimize collection of storm water within the secondary containment area.

## 7. PROPERLY DESIGN TRASH STORAGE AREAS

A trash storage area refers to an area where a trash receptacle or receptacles are located for use as a repository for solid wastes. Loose trash and debris can be easily transported by the forces of water or wind into nearby storm drain inlets, channels and/or creeks. All trash container areas shall meet the following Structural or Treatment Control BMP requirements (individual single-family residences are exempt from these requirements):

- Trash container areas shall have drainage from adjoining roofs and pavement diverted around the area(s)
- Trash container areas shall be screened or walled to prevent off-site transport of trash

#### 8. PROVIDE PROOF OF ONGOING BMP MAINTENANCE

Improper maintenance is one of the most common reasons why water quality controls will not function as designed or systems to fail entirely. It is important to consider who will be responsible for maintenance of a permanent BMP and what equipment is required to perform the maintenance properly. As part of project review, if a project applicant has included or is required to include, Structural or Treatment Control BMPs in project plans, the Copermittee shall require that the applicant provide verification of maintenance provisions through such means as may be appropriate, including, but not limited to legal agreements, covenants, CEQ mitigation requirements and/or Conditional Use Permits.

For all properties, the verification will include the developer's signed statement, as part of the project application, accepting responsibility for all structural and treatment control BMP maintenance until the time the property is transferred and, where applicable, a signed agreement from the public or private entity assuming responsibility for Structural or Treatment Control BMP maintenance. The transfer of property to a private or public owner shall have conditions requiring the recipient to assume responsibility for maintenance of any Structural or Treatment Control BMP included in the sales or lease agreement for that property. The condition of transfer shall include a provision that the property owners conduct maintenance inspection of all Structural or Treatment Control BMPs at least once a year and retain proof of inspection. For residential properties where the Structural or Treatment Control BMPs are located within a common area, which will be maintained by a homeowner's association, language regarding the responsibility for maintenance shall be included in the project's conditions, covenants and restrictions (CC&Rs). Printed educational materials will be required to accompany the first deed transfer to highlight the existence of the requirement and to provide information on what storm water management facilities are present, signs that maintenance is needed, how the necessary maintenance can be performed, and assistance that the Co-permittee can provide. The transfer of this information shall also be required with any subsequent sale of the property.

If Structural or Treatment Control BMPs are located within a public area proposed for transfer, they will be the responsibility of the developer until they are accepted for transfer by the appropriate public agency. Structural or Treatment Control BMPs proposed fro transfer shall meet design standards adopted by the public entity for the CMP installed and should be approved by the appropriate public agency prior to installation.

## 9. DESIGN STANDARDS FOR STRUCTURAL OR TREATMENT CONTROL BMPs

Structural or Treatment Control BMPs selected for use at any project covered by this SQUIMP shall meet the design standards of this Section unless specifically exempted.

Volume-based and flow-based design standards may be used separately or in combination to equivalent treatment of storm water discharges. Volume-based criteria should be used in the sizing of detention/retention or infiltration

structures; flow-based criteria should be used on swales, catch basin devices, or wetlands. Other, BMP-specific criteria may be applicable. Project applicants should refer to the *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures* for further information.

Volume-based BMPs shall be designed to mitigate (infiltrate, filter or treat) the volume necessary to capture and treat 80 percent or more of the average annual runoff volume from the site at the design drawdown period specified in the *Ventura County Technical Guidance Manual for Stormwater Quality Control Measures* Fact Sheet for the proposed treatment control measures.

Flow-based BMPs shall be designed to mitigate (infiltrate, filter or treat) 10% of the 50-year design flow rate.

#### Limited Exclusion

Where the land area for development or redevelopment is less than 5,000 square feet, restaurants are excluded from the numerical Structural or Treatment Control BMP design standard requirement only.

## 10. PROVISIONS APPLICABLE TO INDIVIDUAL PRIORITY PROJECT CATEGORIES

## **REQUIREMENTS**

## A. 100,000 SQUARE FOOT COMMERCIAL DEVELOPMENTS

## 1. PROPERLY DESIGN LOADING/UNLOADING DOCK AREAS

Loading/unloading dock areas have the potential for material spills to be quickly transported to the storm water conveyance system. To minimize this potential, the following design criteria are required:

- Cover loading dock areas or design drainage to minimize run-on and runoff of storm water
- Direct connections to storm drains from depressed loading decks (truck wells) are prohibited

#### 2. PROPERLY DESIGN REPAIR/MAINTENANCE BAYS

Oil and grease, solvents, car battery acid, coolant and gasoline from the repair/maintenance bays can negatively impact storm water if allowed to come into contact with storm water runoff. Therefore, design plans for repair bays shall include the following:

- Repair/maintenance bays shall be indoors or designed in such a way that does not allow storm water run-on or contact with storm water runoff.
- Design a repair/maintenance bay drainage system to capture all washwater, leaks and spills.
  Connect drains to a sump for collection and disposal. Direct connection of the
  repair/maintenance bays to the storm drain system is prohibited. If required by local
  jurisdiction, obtain an Industrial Waste Discharge Permit.

## 3. PROPERLY DESIGN VEHICLE/EQUIPMENT WASH AREAS

The activity of vehicle/equipment washing/steam cleaning has the potential to contribute metals, oil and grease, solvents, phosphates and suspended solids to the storm water conveyance system. Include in the project plans, an area for washing/steam cleaning of vehicles and equipment. The area in the site design shall be:

• Self-contained and/or covered, equipped with a clarifier, or other pretreatment facility and properly connected to a sanitary sewer

## **B. RESTAURANTS**

#### 1. PROPERLY DESIGN EQUIPMENT/ACCESSORY WASH AREAS

The activity of outdoor equipment/accessory washing/steam cleaning has the potential to contribute metals, oil and grease, solvents, phosphates and suspended solids to the storm water

conveyance system. Include in the project plans an area for the washing/steam cleaning of equipment and accessories. This area shall be:

- Self-contained, connected to a grease interceptor, and properly connected to a sanitary sewer
- If the wash area is to be located outdoors, it shall be covered, paved, have secondary
  containment, be connected to a grease interceptor and be connected to the sanitary sewer.

## C. RETAIL GASOLINE OUTLETS

#### PROPERLY DESIGN FUELING AREA

Fueling areas have the potential to contribute oil and grease, solvents, car battery acid, coolant and gasoline to the storm water conveyance system. The project plans shall include the following BMPs:

- The fuel dispensing area shall be covered with an overhanging roof structure or canopy. The canopy's minimum dimensions shall be equal to or greater than the area within the grade break. The canopy shall not drain onto the fuel dispensing area, and the canopy downspouts shall be routed to prevent drainage across the fueling area.
- The fueling dispensing area shall be paved with Portland cement concrete (or equivalent smooth impervious surface) and the use of asphalt concrete shall be prohibited.
- The fuel dispensing area shall have a 2% to 4% slope to prevent ponding and shall be separated from the rest of the site by a grade break that prevents run-on of storm water to the extent practicable.
- At a minimum, the concrete fuel dispensing area shall extend 6.5 feet (2.0 meters) from the corner of each fuel dispenser, or the length at which the hose and nozzle assembly may be operated plus 1 foot (0.3 meters), whichever is less.

## D. AUTOMOTIVE REPAIR SHOPS

#### 1. PROPERLY DESIGN FUELING AREA

Fueling areas have the potential to contribute oil and grease, solvents, car battery acid, coolant and gasoline to the storm water conveyance system. Therefore, design plans, which include fueling areas, shall contain the following:

- The fuel dispensing area shall be covered with an overhanging roof structure or canopy. The canopy's minimum dimensions shall be equal to or greater than the area within the grade break. The canopy shall not drain onto the fuel dispensing area, and the canopy downspouts shall be routed to prevent drainage across the fueling area.
- The fueling dispensing area shall be paved with Portland cement concrete (or equivalent smooth impervious surface) and the use of asphalt concrete shall be prohibited.
- The fuel dispensing area shall have a 2% to 4% slope to prevent ponding and shall be separated from the rest of the site by a grade break that prevents run-on of storm water to the extent practicable.
- At a minimum, the concrete fuel dispensing area shall extend 6.5 feet (2.0 meters) from the corner of each fuel dispenser, or the length at which the hose and nozzle assembly may be operated plus 1 foot (0.3 meters), whichever is less.

#### 2. PROPERLY DESIGN REPAIR/MAINTENANCE BAYS

Oil and grease, solvents, car battery acid, coolant and gasoline from the repair/maintenance bays can negatively impact storm water if allowed to come into contact with storm water runoff. Therefore, design plans for repair bays shall include the following:

- Repair/maintenance bays shall be indoors or designed in such a way that does not allow storm water run-on or contact with storm water runoff.
- Design a repair/maintenance bay drainage system to capture all wash-water, leaks and spills.
  Connect drains to a sump for collection and disposal. Direct connection of the
  repair/maintenance bays to the storm drain system is prohibited. If required by local
  jurisdiction, an Industrial Waste Discharge Permit should be obtained.

## 3. PROPERLY DESIGN VEHICLE/EQUIPMENT WASH AREAS

The activity of vehicle/equipment washing/steam cleaning has the potential to contribute metals, oil and grease, solvents, phosphates and suspended solids to the storm water conveyance system. Include in the project plans, an area for washing/steam cleaning of vehicles and equipment. The area in the site design shall be:

• Self-contained and/or covered, equipped with a clarifier, or other pretreatment facility and properly connected to a sanitary sewer

#### 4. PROPERLY DESIGN LOADING/UNLOADING DOCK AREAS

Loading/unloading dock areas have the potential for material spills to be quickly transported to the storm water conveyance system. To minimize this potential, the following design criteria are required:

- Cover loading dock areas or design drainage to minimize run-on and runoff of storm water
- Direct connections to storm drains from depressed loading docks (truck wells) are prohibited

#### E. PARKING LOTS

#### 1. PROPERLY DESIGN PARKING AREA

Parking lots contain pollutants such as heavy metals, oil and grease, and polycyclic aromatic hydrocarbons that are deposited on parking lot surfaces by motor vehicles. These pollutants are directly transported to surface waters. To minimize the offsite transport of pollutants, the following design criteria are required:

- Reduce impervious land coverage of parking areas
- Infiltrate runoff before it reaches the storm drain system
- Treat runoff before it reaches the storm drain system

## 2. PROPERLY DESIGN TO LIMIT OIL CONTAMINATION AND PERFORM MAINTENANCE

Parking lots may accumulate oil, grease and water insoluble hydrocarbons from vehicle drippings and engine system leaks.

- Treat to remove oil and petroleum hydrocarbons at parking lots that are heavily used (e.g., fast food outlets, lots with 25 or more parking spaces, sports event parking lots, shopping malls, grocery stores, discount warehouse stores)
- Ensure adequate operation and maintenance of treatment systems, particularly sludge and oil removal, and system fouling/plugging prevention control

#### 11. WAIVER

A Co-permittee may, through adoption of an ordinance or code incorporating the treatment requirements of the SQUIMP, provide for a waiver from the requirement if impracticability for a specific property can be established. A waiver for impracticability shall be granted only when all other Structural or Treatment Control BMPs have been considered and rejected as infeasible. Recognized situations of impracticability include, (i) extreme limitations of space for treatment on a redevelopment project, (ii) unfavorable or unstable soil conditions at a site to attempt infiltration, and (iii) risk of ground water contamination because a known unconfined aquifer lies beneath the land surface or an existing or potential underground source of drinking water is less than 10 feet from the soil surface. Any jurisdiction for impracticability shall be separately petitioned by the Co-permittee and submitted to the Regional Board for consideration. The Regional Board may consider approval of the waiver justification or may delegate the authority to approve a class of waiver justifications to the Regional Board Executive Officer. The supplementary waiver justification becomes recognized and effective only after approval by the Regional Board or the Regional Board Executive Officer. A waiver granted by a Co-permittee to any development or redevelopment project may be revoked by the Regional Board Executive Officer for cause and with proper notice upon petition.

If a waiver is granted for impracticability, the Co-permittee shall require the project proponent to transfer the savings in cost, as determined by the Co-permittee, to a storm water mitigation fund operated by a public agency or a non-profit entity to be used to promote regional or alternative solutions for storm water pollution in the watershed.

#### 12. LIMITATION ON USE OF UNFILTRATION BMPs

Three factors significantly influence the potential for storm water to contaminate ground water. They are (i) pollutant mobility, (ii) pollutant abundance in storm water, (iii) and soluble fraction of pollutant. The risk of contamination of groundwater may be reduced by pretreatment of storm water. A discussion of limitations and guidance for infiltration practices is contained in, *Potential Groundwater Contamination from Intentional and Non-Intentional Storm Water Infiltration, Report No. EPA/600/R-94/051, USEPA* (1994).

The distance of the groundwater table from the infiltration BMP may also be a factor in determining the risk of contamination. A historic high water table distance separation of ten feet depth in California presumptively poses negligible risk for storm water not associated with industrial activity or high vehicular traffic except in cases where groundwater basins are unconfined. Unconfined groundwater basins and vulnerable unconfined aquifers are areas that have been identified by the County of Ventura Public Works Agency, Water Resources Division and the Regional Board as areas where the application of infiltration BMPs should be limited to those that provide pre-treatment to ensure groundwater is protected from pollutants of concern.

Infiltration BMP are not recommended for areas of industrial activity or areas subject to high vehicular traffic (25,000 or greater average daily traffic (ADT) on main roadway or 15,000 or more ADT on any intersecting roadway) unless appropriate pretreatment is provided to ensure groundwater is protected and the infiltration BMP is not rendered ineffective by overload.

## 13. ALTERNATIVE CERTIFICATION FOR STORM WATER TREATMENT MITIGATION

In lieu of conducting detailed BMP review to verify Structural or Treatment Control BMPs adequacy, a Copermittee may elect to accept a signed certification from a Civil Engineer or a Licensed Architect registered in the State of California, that the plan meets the criteria established herein. The Co-permittee is encouraged to verify that certifying person(s) have been trained on BMP design for water quality, not more than two years prior to the signature date. Training conducted by an organization with storm water BMP design expertise (e.g., University, American Society of Civil Engineers, American Society of Landscape Architects, American Public Works Association, or the California Water Environment Association) may be considered qualifying.