City of Buellton

Storm Water Management Program

City of Buellton
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ACRONYMS

BMP	Best Management Practice
BPW	City of Buellton Public Works Department
CASQA	California Storm Water Quality Association
CCRWQCB	Central Coast Regional Water Quality Control Board
CEQA	California Environmental Quality Act
CPW	County Public Works Department
EHS	County Environmental Health Services Division
GIS	Geographic Information System
IPM	Integrated Pest Management
LUDP	Land Use Development Policy
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Works
RWQCB	Regional Water Quality Control Board
SOPs	Standard Operating Procedures
SUSMP	Standard Urban Storm Water Mitigation Plans
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USEPA	United States Environmental Protection Agency

INTRODUCTION

This is a Storm Water Management Program (SWMP) prepared by the City of Buellton (City) in response to State Water Resources Control Board Water Quality Draft Order No. 2003 – 0005 – DWQ[1] (GENERAL PERMIT NO. CAS000004) for National Pollutant Discharge Elimination System (NPDES) Phase II. This program covers the incorporated area of the City of Buellton (See Figure 1-1, City of Buellton). Although none of the streams in the City have been identified as "impaired," both Zaca Creek and Thumbelina Creek flow into the Santa Ynez River, which is listed in the 303D List of Impaired Water Bodies as "impaired" by the State of California and identified nutrients, salinity (TDS, chlorides) and sedimentation/siltation as Pollutants of Concern (POC). The City's storm water quality program has been derived from ongoing City activities and the County of Santa Barbara's non-point source control program (Project Clean Water, "PCW") active in the surrounding area.

Common pollutants include oil from roadways, pesticides and fertilizers from lawns, and sediment from construction sites. Major sources of non-point pollution include agricultural runoff and runoff from urban areas. Siltation and nutrients are the pollutants responsible for a majority of the non-point source impacts to surface waters.

The goal of this SWMP is to protect the health of the recreational public and the environment, meet Clean Water Act mandates through compliance with Phase II NPDES Permit requirements and applicable regulations, and to foster heightened public involvement and awareness. Storm drains typically flow into creeks that have already passed through a variety of land uses, including natural, agricultural, urban and industrial, and often through more than one permit jurisdiction. The City is faced with the challenge of requiring and implementing controls to reduce the discharge of pollutants in storm water runoff to the technology-based standard of "Maximum Extent Practicable" (MEP) as required by § 402(p)(3)(B)(iii) of the Clean Water Act, 33 U.S.C. § 1342(p)(3)(B)(iii).

The County has responsibility for implementing Phase II regulations in the unincorporated areas surrounding the City (See Figure 1-1). In addition, the County started PCW in 1998 to address both community concerns regarding water quality in local creeks and the ocean and to address the NPDES regulations. To take advantage of the County's experience, the City contracted with the County to prepare the initial submittal of the SWMP. During the initial period of implementation of the approved SWMP, the City program will be managed and staffed by both members of the City of Buellton and their contractors. The City's intent is to coordinate with other agencies responsible for the surrounding unincorporated areas adjacent to Buellton to ensure appropriate implementation of BMPs.

For more information on the City storm water program or this SWMP, please contact:
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[1] The State Water Resources Control Board promulgated a Phase II Storm Water General Permit (No. CAS000004) through Order NO. 2003 – 0005 – DWQ on April 30, 2003.

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Regulatory Requirements and Applicable Standards

According to 40 CFR 122.26(b)(8), "municipal separate storm sewer" means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

- Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law)...including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act that discharges into waters of the United States.
- Designed or used for collecting or conveying storm water;
- Which is not a combined sewer; and
- Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2."

USEPA categorizes MS4s as either "small," "medium," or "large." Regulated small MS4s are automatically designated if they are located in "urbanized areas" (as defined by the US Census Bureau). The City of Buellton is not in an automatically designated area. However, the City of Buellton is designated by the SWRCB as a regulated small MS4 in accordance with the designation criteria contained in the General Permit due to a high population density ("urban cluster") and discharges into a sensitive water body (Santa Ynez River, a 303(d)-listed waterbody for nutrients and sediment).

City Responsibilities

The City is responsible for submitting and implementing its SWMP within its corporate boundaries. 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 Citywide. The City operates a sewer treatment facility that operates under a WDR permit. In addition, the City may implement certain BMPs in topics of overlapping interest, such as public education, with the County and other cities (See Section 1.0).

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 Storm Water Management Program (SWMP) to obtain coverage under an NPDES storm water permit. The plan is 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), evaluation/assessment and 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" (MEP) 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), that establishes the level of effort in reducing pollutants that MS4 operators must achieve through implementation of a storm water management program. The City of Buellton will comply with the Small Cities Permit and will meet the requirements of the six minimum control measures enumerated in the General Permit. See General Permit at Part D.2, p. 8.

The SWRCB's Draft Phase II Rule defines a storm water management program for a small MS4 as a program composed of six elements that, when implemented together, are expected to reduce pollutants discharged into receiving water-bodies to the MEP. These six program elements are:

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

Because so many diverse factors can dictate the specifics of a storm water management program, the City will regularly evaluate both current conditions and BMP effectiveness, and as appropriate update BMPs and measurable goals to achieve the objective of reducing the discharge of storm water pollutants to the Maximum Extent Practicable. It may be necessary to expand or better tailor existing BMPs after implementing the minimum control measures described in this SWMP. Such changes would be based on the results of monitoring the SWMP annually and changes would be noted in subsequent annual reports.

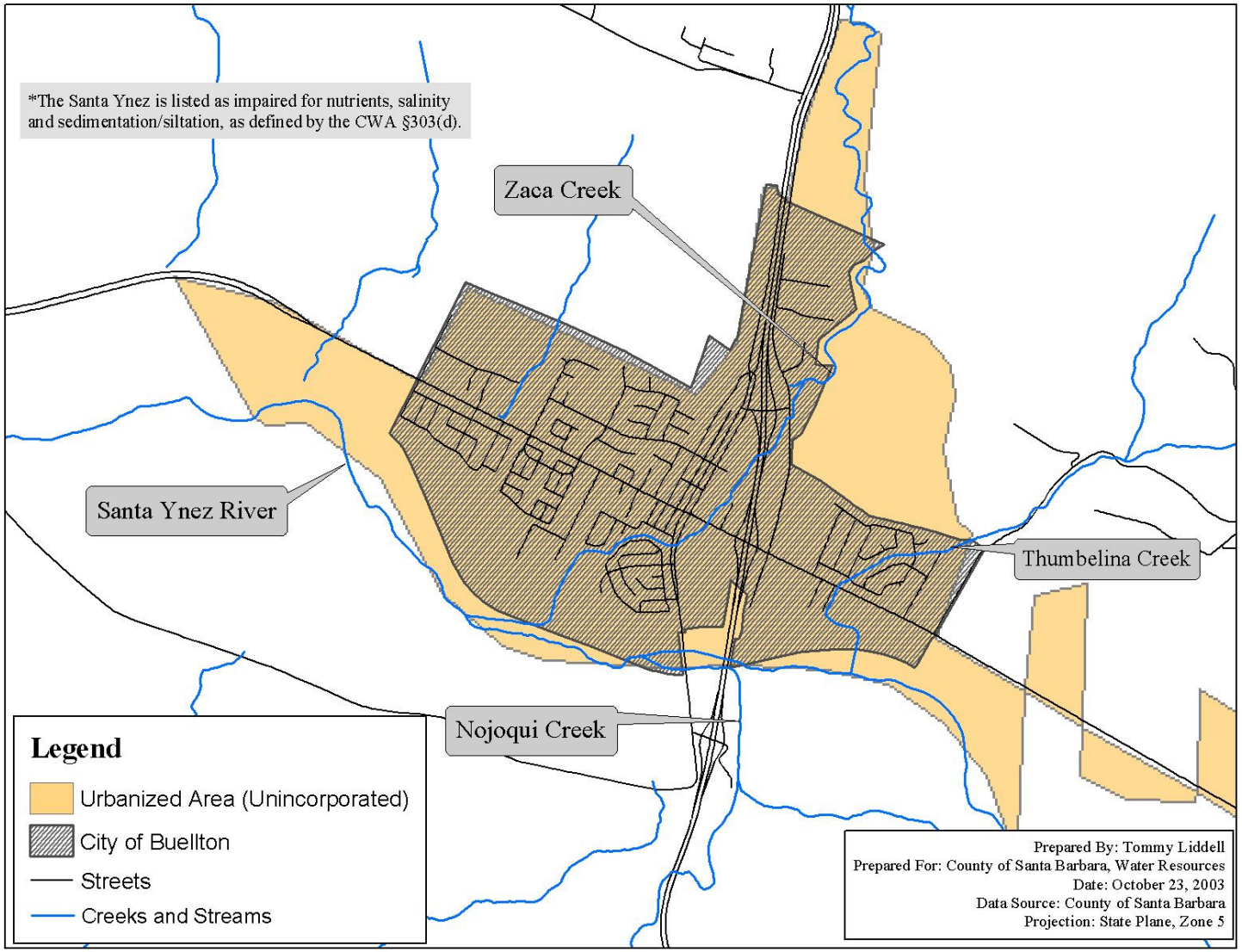
Notice of Intent

The City has filed a Notice Of Intent (NOI) to apply for coverage under the State of California General Permit. As required, the NOI and this SWMP contain the following information:

- The area covered by the SWMP;
- Best management practices (BMPs) for each of the six minimum control measures;
- Measurable goals for each of the BMPs (i.e., narrative or numeric standards used to gauge program effectiveness);
- A timeline for implementation of each measure (estimated months and years to implement each measure, including interim milestones and frequency of measurement); and
- Individual(s) or group(s) responsible for implementing or coordinating the storm water program.

Each of these topics is discussed in the SWMP; BMPs and their implementation are discussed under the appropriate MCM section. Because significant overlap exists between MCM efforts, some sections contain cross-references to other sections in order to avoid redundancy.

Figure 1-1. City of Buellton



MINIMUM CONTROL MEASURES

The implementation and evaluation of the six minimum control measures, listed on page 7 and detailed below, comprise the heart of the City's Storm Water Management Program. Within each MCM category, specific BMPs were selected based on a number of factors including input from community members and the results of physical observations of local creeks. Information collected by the City and other reports pertaining to this SWMP may be reviewed at the City offices (City of Buellton, 140 W. Highway 246. Buellton, California 93427) or at the City website at www.cityofBuellton.com. The information collected by the County is summarized in annual reports and other studies posted on the County website at www.countyofsb.org/project_cleanwater.

1.0 PUBLIC EDUCATION AND OUTREACH

This minimum control measure is intended to ensure greater public support and compliance for the storm water management program. Specifically these efforts are to teach the public the importance of protecting storm water quality, both for the benefit of the environment and human health. The role of each community member, both at home and work, are a particular emphasis.

1.1 Minimum Requirements

USEPA guidelines establish the following "Best Management Practices" for Public Education and Outreach Minimum Control Measure (*Fact Sheet 2.3 – Public Education and Outreach Minimum Control Measure, 01/00*):

- Distribute educational materials on the impact of storm water discharges and steps that can be taken to reduce storm water pollution
- Brochures or fact sheets
- Alternative information sources such as web sites, bumper stickers, and refrigerator magnets
- A library of educational materials
- Volunteer citizen educators
- Event participation
- Educational programs for school children
- Storm drain stenciling
- Storm water hotlines

1.2 Best Management Practices

Those BMPs that are or will be implemented are described in more detail below.

- **Brochures:** The City will have available and distribute a series of informational brochures on storm water quality targeting dog and horse owners, creekside residents, and homeowners. Additional informational brochures include a general storm water brochure called "The Ocean Starts at Your Door", and a brochure on proper disposal of and alternatives to hazardous household products. These materials are all produced in

both English and Spanish. These brochures will be available at City offices and distributed at special events, by mail, through enforcement activities, and by request. The brochures will be updated annually as necessary to keep up with new information regarding storm water quality best management practices or to improve on public awareness.

- **Alternative information sources**: The City will add a page to their existing web site to explain storm water issues and include a copy of the SWMP. The City will also link to the County of Santa Barbara's web site, which features general information, copies of reports, studies, and educational materials, and a calendar of events. The City will also distribute materials that list the web site address and a hotline phone number (described below).
- **Event participation**: The City will participate in relevant public events (i.e. City Founding Day) to distribute information about the stormwater program.
- **Educational programs for school children**: The City will offer classroom presentations for grades K-8 and distribute materials such as a coloring book on nonpoint source pollution, stickers, and storm drain marker decals. The City will also encourage annual training for teachers on the "Mountains to the Sea" watershed curriculum, and Project WET curriculum to reinforce classroom presentations provided by the City.
- **Storm drain marking**: The City will complete marking all storm drain drop inlets with markers that say "Don't Dump – Drains to River".
- **Storm water hotline**: The regional Water Quality Hotline is accessible at 1-877-OUR-OCEAN. The City will be included so that callers from Buellton can report water quality issues or get information such as where to dispose of hazardous waste.
- **Media Campaigns:** Each year a print ad campaign will be run to coincide with Creek Week/Watershed Month events. Printed advertisement will be used to promote events related to water quality or events where information about water quality will be presented. Other means of media such as television, radio public service announcements, and website postings are proposed to be incorporated when deemed appropriate or necessary for further outreach and education to the public.
- **Business Outreach:** The City will distribute brochures and posters, in English and Spanish, which target restaurants, automotive services, construction contractors, and mobile cleaners. These are distributed during site visits by City staff and EHS restaurant inspectors. The City will also coordinate its ongoing outreach from the Buellton Wastewater Treatment Plant to offer BMP training to restaurant managers.

1.3 Measurable Goals

The City will educate the general public about storm water quality issues and their role in the solutions by outreach to the community, school children, and businesses. Measurable goals for each BMP are listed below.

BMP: Brochures, Alternative Information Sources, Event Participation

- Compile the number of brochures and alternative information sources distributed, web site hits, and events attended with displays as well as the number of people who attended the event.

- Reach 20% of the permit area population each year for 5 years.

BMP: Educational programs for school children

- A minimum of 50% of school children (K-8) in the permit area will be educated every two years on storm water quality by providing school districts with classroom presentations, copies of the Mountains to the Sea Watershed Curriculum, and curriculum training workshops for teachers.

BMP: Storm Drain Marking

- Maintain storm drain decals in the City by checking decals annually and replacing as necessary.
- 100% of all storm drains in the City shall have decals in good condition at the completion of year 3.

BMP: Water Quality hotline

- Promote use of the hotline by publicizing the number on all printed materials and through the web site.
- Respond to all hotline calls within 24 hours

BMP: Business outreach

- Maintain outreach efforts to targeted businesses, compiling the number of brochures distributed.
- Measure participation in the restaurant outreach program with Buellton Wastewater Treatment Plant; include 20% of the restaurants in the outreach program each year for 5 years.

BMP: Media Campaign

- Sponsor one media campaign per year for 5 years associated with Earth Day, Pollution Prevention Week, Watershed Month, or Creek Week (October).
- Compile the number of print ads run, and storm water related press releases/media coverage.

1.4 Reporting

The data collected for each measure (such as number of brochures distributed, number of print ads run, number of students in attendance, etc.) will be compiled, reviewed and summarized in annual reports. Significant variance from targets will be assessed and discussed in annual reports. Progress in implementing goals that have multi-year timelines (such as educational programs, event participation, and media campaign) 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 next annual report.

Table 1-1
BMP Implementation: Public Education & Outreach

Year	BMP	Current Status	Implementation Details	Measurable Goal	Responsible Party
1 thru 5	Brochures Events	Brochures and posters are available in English and Spanish.	Brochures provide info on how community members can prevent storm water pollution. Storm Water page will be added to City web site.	Compile number of brochures and alternative information sources distributed, add web page and document web site hits, number of people attending public events. Target is to reach 20% of permit area annually for 5 years.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Educational Programs for children	Ongoing	Classroom presentations are available on request and annual training is held for the Mountains to the Sea watershed curriculum and Project WET curriculum.	Educate 50% of school children (K-8) every two years.	City William Albrecht Public Works Director 805-688-5177
1 thru 3	Storm drain marking	Decals applied to approximately 10% of City storm drain inlets.	Install Decals reading "Don't Dump – Drains to River"	Install decals on 30% of City storm drain inlets each year for 3 years. Check decals and repair/replace every year as needed for the life of the permit.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Storm water hotline	Regional hotline is established; City connection needs to be added.	Hotline directs complaints and gives information.	Promote use of hotline through printed materials and web site.	City/County William Albrecht Public Works Director 805-688-5177 1-877-OUR-OCEAN
1 thru 5	Business Outreach	Program focuses on restaurants, automotive services, mobile cleaners, and construction trades.	Written materials and brochures are distributed to businesses, during complaint response, and at events. A Restaurant Recognition Award is presented annually.	Compile number of materials/brochures distributed annually to businesses. Target is to reach 20% of business in permit area.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Media Campaign	Media campaigns are run on an annual basis.	Media campaigns are run around events such as Founding Day and Pollution Prevention Week.	Sponsor one media campaign each year. Compile number of print ads and amount of press coverage annually.	City/County William Albrecht Public Works Director 805-688-5177

2.0 PUBLIC PARTICIPATION AND INVOLVEMENT

This minimum control measure is intended to foster active community support for the SWMP and direction as to its implementation. Participation by the public ensures that the program reflects community values and priorities and thus has the highest potential for success. All public notices related to this minimum control measure will be conducted in compliance with all State and local public notice requirements.

2.1 Minimum Requirements

USEPA guidelines recommend the following "Best Management Practices" 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"*):

- Establish a steering committee
- Hold regular public meetings
- Establish regular coordination among agencies
- Volunteer water quality sampling
- Community clean-ups

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

2.2 Best Management Practices

The City will implement the Best Management Practices described below.

2.2.1 Hold regular public meetings

Annual NPDES permit reports will be presented in a public forum, such as at a City Council meeting, to update the community on the storm water program, address any storm water concerns, City accomplishments, and future goals. In addition, City staff will work with other local Phase II permittees and the Regional Water Quality Control Board to explore alternative public forums on water quality.

2.2.2 Establish regular coordination among local agencies/stakeholders

Since 1998, the County has hosted a quarterly meeting of local, state and federal agencies with interests in local and regional storm-water issues. This meeting of the "intergovernmental committee" includes both regulators (such as RWQCB) and regulated entities such as the City. The City will participate in this Intergovernmental Committee. 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. On behalf of the City and other local agency stakeholders, the County is a member of the 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.

2.2.3 Community clean-ups

Each year the City will sponsor at least one creek clean-up effort within the City limits. The City will solicit community participation through the local school district, local clubs and youth organizations.

2.2.4 Additional Measures

Water Quality Hotline
See discussion under "Public Education & Outreach" Minimum Control Measure. The hotline encourages community members to report water quality problems that they observe. The hotline is promoted on all printed materials and through the City and County web sites.

2.3 Measurable Goals

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

BMP: Hold regular public meetings

- NPDES annual report will be presented in a public forum (i.e. City Council meeting) and the number of attendees will be documented.

BMP: Establish regular coordination among agencies

- The City will attend quarterly meetings of the Intergovernmental Committee, and attendance and actions will be documented. In addition the City will also coordinate with the County of Santa Barbara on information, discussions, updates on storm water BMPs, and other findings at CASQA meetings.

BMP: Community clean-ups

- The City will sponsor a volunteer creek clean-up annually and record location and number of attendees.

BMP: Water quality hotline

- See Public Education and Outreach Measurable Goals

Table 2-1
BMP Implementation: Public Participation

Year	BMP	Current Status	Implementation Details	Measurable Goal	Responsible Party
1 thru 5	Regular Public meetings		NPDES annual report will be presented in a public forum and the number of attendees will be documented	Present report annually.	City William Albrecht Public Works Director 805-688-5177

Year	BMP	Current Status	Implementation Details	Measurable Goal	Responsible Party
1 thru 5	Coordination among agencies	Ongoing	Attend the Intergovernmental Committee quarterly	Attend IC meetings, document attendance, coordinate with County on CASQA and document.	City/County William Albrecht Public Works Director 805-688-5177
1 thru 5	Community Clean-ups		The City will sponsor creek clean-ups annually.	Document creek clean-up locations and attendance Try to increase attendance annually.	City William Albrecht Public Works Director 805-688-5177
1	Water Quality Hotline	See Public Education and Outreach section			

2.4 Reporting

The data collected for each measure will be compiled, reviewed and reported in annual reports. Significant variance from targets will be assessed and discussed in annual reports. 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 groups and other sources will be used to improve implementation of all six minimum control measures.

3.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION

This minimum control measure of the Storm Water Management Program 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 will enhance its current system to identify and eliminate illicit discharges throughout the permit area. This system will primarily depend on City employees periodically reviewing and checking on common problem areas in the City. The system will also depend on input and reporting by the public on illegal dumping by contacting the City or the hotline as previously described in this SWMP. The specific requirements for this system are described in detail below, including measurable goals for determining effectiveness.

3.1 Minimum Requirements

USEPA guidelines establish the following "Best Management Practices" for Illicit Discharge Detection and Elimination Minimum Control Measure *(USEPA Fact Sheet 2.6, 01/00):*

- Develop, implement and enforce a program to detect and eliminate illicit discharges
- Develop a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls
- To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the storm sewer system and implement appropriate enforcement procedures and actions;
- Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system; and

- Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

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 3-1:
Discharges Exempted From SWMP Regulation

Irrigation Water	Emergency Fire Fighting Discharges
Landscape Irrigation	Springs
Diverted Stream Flows	Water From Crawl Space Pumps
Rising Ground Waters	Footing Drains
Lawn Watering	Dechlorinated Swimming Pool Discharges
Foundation Drains	Uncontaminated Pumped Ground Water
Air Conditioning Condensation	Individual Residential Car Washing
Flows From Riparian Habitats And Wetlands	

Items listed above have such a minimal affect on the storm water quality of the area that they can be exempted from the SWMP. Though they are not addressed specifically in this SWMP it is still important to educate the public and City employees on the BMP's regarding these items to prevent them from becoming a POC. For example:

1. Street and sidewalk washing is mentioned in this SWMP section 6.2.4 while car washing is addressed in section 6.2.3 under training of Vehicle Maintenance.
2. Water line Flushing is mentioned in this SWMP in Table 6-2 under water pressure testing and fire hose testing.
3. Swimming pool discharge is neglected due to the minimal number of pools in the City.
4. Irrigation in the City is mentioned in section 6.2.7 of this SWMP, and its affects are limited by the use of native and drought resistant plants.
5. Rising Groundwater, pumped groundwater, foundation and footing drains, etc. issues are on a case by case basis and installed with BMP's such as leach lines and gravel and filter fabric wraps where necessary.
6. Diverted stream flows are also neglected due to the fact the streams are allowed to flow on their natural path.

3.2 Best Management Practices

The City intends to maintain ongoing efforts to control illicit discharges at current levels and will implement additional suggested "Best Management Practices" listed in this section. Currently the City's ordinance related to illicit discharges is the same as the County of Santa Barbara, adopted by reference. During year two of the permit, the City will begin the process of evaluating the need for a storm water ordinance or other regulatory mechanism. The future ordinance must provide "right of entry" to private property for the inspection of individual sources of illicit discharges.

3.2.1 Storm Drain System Mapping

The City has an atlas of its underground storm drains that shows major pipes and outfall locations of the City's storm drain system. Additional research is necessary to confirm the completeness of the storm drain system map, in particular storm drain inlet locations, particularly in most recently developed areas. This existing storm drain system map is attached for reference. It is anticipated that the storm drain atlas will be completed by the end of year two. The atlas will be continually updated as new development installs drainage structures within the City.

3.2.2 Storm Water Ordinance

The City and County share jurisdiction over various facilities and potential dischargers (such as restaurants and schools). The City and County currently have a number of ordinances prohibiting inappropriate waste disposal, including prohibitions against unpermitted discharge of liquid waste, and illegal disposal of solid waste. These ordinances also apply to and regulate the prevention of storm water impairment through the prohibition, enforcement and abatement remedies that they encompass. Although these ordinances have been sufficient to meet storm water protection objectives to date, a future evaluation of existing City ordinances is part of this SWMP.

The need for an additional ordinance to specifically address non-storm water discharges will be initiated in year two of the permit. At the completion of year one the City will evaluate the scope of existing ordinances and the level of success in addressing illicit discharge under existing regulations. All appropriate City departments will evaluate existing regulations in the context of a new blanket storm water ordinance to ensure that any new ordinance does not conflict, interfere with, duplicate or negate existing law and enforcement.

Authority for detection and elimination of illicit dischargers and illegal connections are referenced or described in:

- Adoption of "conditions of approval" for new development projects. Per AB 3180 (PRC 21081.6). The City has established a program to monitor CEQA mitigation measures adopted as conditions of approval on new development projects
- City Excavation and Grading Code, which includes preparation and implementation of erosion control plans.

The City will evaluate the effectiveness of existing laws to ensure that they are adequate to address pet/animal waste and other sources of potential creek contamination. To the extent that new regulations are necessary to meet the objectives of NPDES Phase II regulations and the State's General Permit, the City will adopt appropriate regulations before the completion of year 5.

The following evaluations will be part of this assessment to determine the current needs and abilities of the City to regulate and enforce water quality protection measures through a new ordinance:

- Primary enforcement responsibilities may need to be further clarified among the various City Departments and other enforcement entities.
- A determination will be made regarding whether additional staff resources are needed for enforcement. Additional funding sources for enforcement, if necessary, will be provided to the appropriate departments.

Existing ordinances and laws will be reviewed by City staff to determine effectiveness and what will be done for improvement. Enforcement is conducted by City staff and includes items such as stop work notices and fines. These enforcement measures will still be applicable until they are reviewed by the City staff and determined how effective they are. Effectiveness can be measured by number of violations, repeat offenses, and reports of illicit discharge in the City.

Table 3-2: Legal References

Animal waste
County Code Chapter 17 Solid Waste
County Code Chapter 26 Parks & Recreation
Health and Safety Code §§5410 et.seq.
Water Code §§13000 et.seq.
Fish and Game Code §§5650 et.seq.
Penal Code §§374.3 et.seq.

General dumping of trash
County Code Chapter 17, Solid Waste
County Code Chapter 24 Prohibition of Dumping in Watercourse
Health and Safety Code §§5410 et.seq.
Health and Safety Code §§117550
Water Code §§13000 et.seq.
Fish and Game Code §§5650 et.seq.
Penal Code §§374.3 et. seq.

Liquid discharge from commercial vehicles

Health and Safety Code §§5410 et. seq.
Water Code §§13000 et. seq.
Fish and Game Code §§5650 et.seq.
Penal Code §§374.3 et. seq.

Discharge of liquid waste from recreational vehicles
County Code Chapter 17
Code Chapter 24County
County Code Chapter 26 Parks & Recreation

Health and Safety Code §§117550
Water Code §§13000 et.seq.
Fish and Game Code §§5650 et.seq.
Penal Code §§374.3 et.seq.
Health and Safety Code §§5410 et.seq

3.2.3 Education & Outreach

One effective action in 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 efforts for educating the community about eliminating illicit discharges, listed below, are discussed in greater detail in Section 1.0 - Public Education and Outreach:

- City and County web sites
- Regional Water Quality Hotline (1-877-OUR-OCEAN)
- Business outreach
- Sanitary system pre-treatment inspections
- Brochures
- Public events

- Media campaign

Since many illicit discharges can occur due to 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 best management practices to be used in the future is enough to convince businesses and homeowners to cease discharging, dumping or to eliminate an illegal storm-drain connection. In most cases the individual responsible can be motivated to do the right thing, and will implement appropriate BMPs. Targeted information brochures are in the process of being developed for creek-side residents, owners of domesticated animals, and various businesses to educate them on appropriate BMPs to reduce these types of violations.

3.2.4 Identification and Elimination of Illicit Discharge Sources

In order 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), and characterization of nearby land uses as industrial, commercial, and older residential areas. In addition, the sources shown in Table 3-3 will be evaluated on an on-going basis for their potential impacts to the storm water quality within City watersheds.

Table 3-3: Potential Illicit Discharge Sources

- Accidents
  - Spills of Vehicle Fluids (antifreeze, gas, oil, grease, hydraulic fluids, lubricants)
  - Glass
  - Asbestos Brake Fibers
- Auto Dealers
- Auto Shops
- Auto - Residential Cleaning
- Businesses Washdown
- Commercial Irrigation
- Construction
  - Sediment
  - Asphalt Cuttings
- Carpet/Residential Cleaning
- Cement Washing
- Equipment Cleaning
- Food Facility Cleaning
  - Facility Cleaning - gray water
  - Cooking Equipment - grease, oil and hazardous cleaning agents
  - Grease Trap
  - Dumpsters
- Gas Stations/Vehicle Service Stations
- Car Wash
- Illicit Connections
  - Residential
  - Commercial
  - Industrial
- Illegal Dumping
  - Solids
  - Liquids
- Industrial Cooling Water
- Oil Drips/Fuel Leaks (new/used)
  - Commercial
  - Residential
  - Apartments
- Paint
- Parking Lots
- Pools and Spas
- Residential
  - Grey Water
  - Hazardous Materials
  - Pesticides
  - Fertilizers
  - Sediments
- RV Waste
- Sewage Spills
- Septic Spills
- Sumps/Dewatering

The City's existing program for identification and elimination of illicit discharge sources comprises two parts:

1. Spill and/or Complaint Response
2. Field Investigation and Abatement

These two program elements are discussed in more detail below. City Public Works, County Environmental Health Services, County Flood Control/Water Resources, the County Fire Department, and other agencies are all engaged in detection and elimination of illicit discharge activities within the City of Buellton.

The following procedures are used to address the ongoing identification and abatement of illicit discharges:

<u>Spill and Complaint Response</u>

- Receive complaint or notice of the spill, discharge or illegal connection. Complaints are often received from other local agency 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.
- Impose BMPs if applicable to assure on-going compliance.
- Maintain records of response to establish database, and to identify re-occurrence patterns.
- Establish ongoing compliance through subsequent site visits/inspections.

Field Investigation and Abatement

- Identify and prioritize areas of potential illicit discharge and/or illegal connections for residential, commercial and industrial locations based on specified criteria
- Conduct annual creek walks to identify potential sources
- Conduct field/manhole/site inspections
- Verify illicit discharge/illegal connection and identify the source
- Use education and/or enforcement to eliminate the discharge to the storm drain/sewer or ground surface
- BMPs if applicable to assure on-going compliance
- Maintain records of response to establish data base and to identify reoccurrence patterns
- Establish ongoing compliance through subsequent site visits/inspections

Enforcement of existing policies and ordinances is crucial to the effort of maintaining water quality in the creeks and oceans. The City and County use a “single point’ system for reporting water quality problems, tracking follow-up, and insuring enforcement of water quality policies/ordinances. These efforts include a water quality reporting hotline (1-877-OUR-OCEAN), coordination between various enforcement agencies and personnel, and increased report follow-up.

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

In addition to complaints, creek walks conducted in each watershed will identify places where solid waste has been discarded into the creek or along the creek banks. To address these issues, letters and informational brochures are sent to property owners whose parcel is clearly identified as the source of contamination. For example, if a large pile of greenwaste is seen directly on the creek bank behind a home, a letter would be sent to the owner of that parcel explaining the impacts greenwaste has on water quality and outlining alternative methods of disposal or composting of greenwaste. Existing water-quality brochures, such as “Gardener’s Guide to Clean Water”, “Creekside Concerns”, “A Dog-Owner’s Duty”, and “Helpful Hints for Horse Owners” are included in the letter 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 Sections 1.0 and 2.0 of this document. In addition to educating the public, City employees will also participate in in-house training to increase awareness at work and at home of illicit discharges and the hazardous effects they have and the best management practices to implement.

Activities to identify and eliminate illicit discharges are summarized by City and County departments below:

City Public Works: City staff responds to complaints regarding water quality throughout the year. Response occurs within twenty-four hours of notification, resulting in compliance with the performance measures regarding service response. Complaints range from illegal dumping of trash, horse manure and green-waste 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.

The "Mutt Mitt" program consists of providing pet waste disposal bags at City parks and open spaces for use by the public. This program is successful in eliminating pet waste pollution. The City will evaluate new Mutt Mitt stations and more visible signage at various parks and trails as needs are identified. City Park facilities and operations are discussed in Section 6.0.

County Environmental Health Services (EHS): Another program that abates illicit discharge violations is the EHS Community Health Program. District Specialists perform routine annual inspections and complaint investigations at all retail food facilities. EHS has expanded their normal inspection techniques (such as time and temperature controls for perishable foods) to include storm water management activities. Due to increased public awareness, EHS has received a greater number of complaints associated with unlawful discharges from permitted food facilities. Illegal activities include floor mat and floor wash-down discharge to storm drains. EHS responds to each complaint and takes appropriate enforcement action. The appropriate Health and Safety Code authority is cited for each violation and abatement obtained.

Additionally, EHS also cooperates with the staff of the Cities of Buellton, Santa Barbara, Goleta and Carpinteria to create a regional outreach and recognition program for restaurants that have established good operational practices to prevent the discharge of liquid waste off-site and into storm drains. See County of Santa Barbara Storm Water Management Program.

EHS Liquid Waste Program: This program investigates and abates violations of liquid waste discharge. Illegal and/or illicit discharges of liquid waste onto the ground surface and/or into the storm drain collection system may be the result of discharges from faulty sewer laterals, sewer mains or failing septic systems. Correction notices are issued to owners of deficient septic systems, requiring them to make repairs or upgrades as necessary to meet current septic system sanitary standards. Inspections to ensure remediation of the problem may be made by EHS and/or City Planning staff.

In an effort to prevent illicit discharges from faulty septic systems, in April 1999, Environmental Health Services revised Chapter 29 of the County Code to include mandatory reporting of septic system servicing and inspection. This ongoing reporting system of voluntary septic system servicing reveals operational problems in existing septic systems. These systems are required to make repairs or modifications to meet minimum operational sanitary standards.

County Fire Department – Protection Services: Labeling and storage of hazardous material is within the jurisdiction of the County Fire Department. For new businesses that use or store hazardous materials, conditions of approval are included in the standard conditions and mitigation measures enforced by this department. These require that a safe, storage area for pesticides, herbicides, and fertilizers be designed to contain spills. In addition, a Hazardous Materials Business Plan must be submitted to the Fire Department for review and approval for each business in order to detect potential hazards associated with the chemicals.

The Fire Department is responsible for inspecting sites and monitoring their compliance with hazardous materials best management storage practices and spill response. First responders and the hazardous materials response team, may conduct a spill response, depending on the hazard level and severity of the spill. Emphasis is made on containment and cleanup with public health and safety as the foremost consideration in an environmentally sensitive manner. The Fire Department facilities and operations are discussed in Section 6.0.

3.2.5 Wastewater Programs

City of Buellton Public Works
The City operates a wastewater treatment plant serving the City. The system serves approximately 1,328 connections and collects, treats and disposes of 400,000 gallons of wastewater per day. Wastewater is generated primarily from approximately 1,300 domestic sources with 28 connections from non-domestic sources but does not include storm water collection. The City maintains one lift station and approximately 20 miles of collection sewers. All of the water is treated and discharged to percolation basins located south of the main developed area of City.

The wastewater treatment plant meets or exceeds all permit requirements. The City conducts routine flushing of the collection system every two years. In addition, preventative maintenance is provided on a regular basis for older portions of the system. Pipeline video inspection is done routinely to further assess the system's condition. Identified trouble spots are then scheduled for repair. At this time, the City has only a few minor industrial discharges and does maintain a set of requirements for pretreatment for these facilities. The State Water Resources Control Board permits the wastewater treatment plant.

Pursuant to their permit, the treatment facility employs procedures designed to discover illicit discharges and illegal connections to the storm sewer system. These include:

- Good housekeeping and preventative maintenance of facility equipment and machinery to capture and prevent spills and discharges.

- Smoke testing of the City sewer system. Smoke testing is used to detect interconnections and leaks (cross connections) between the sewer system and the storm drain system, groundwater, and creeks. The City also performs smoke testing to detect illicit storm drain connections to the sewer, including residential rain gutters and other hard piped connections collecting surface runoff to the sewer. Diverting storm water discharge away from the sewer prevents sewer overflows to storm drains and creeks in wet weather conditions.
- Closed circuit television video of sewer lines is part of their ongoing program to assess the condition of the sewer lines. As part of their maintenance program the City can prioritize problem areas and detect and fix leaks, plugs, root balls, oil and grease buildup, and replace aging sewer lines.
- Development of public education programs. The City's compliance inspector conducts outreach during inspections of facilities of non-domestic sources as part of pre-treatment inspection program to teach them about the hazards of illicit discharges and illegal connections.

3.3 Measurable Goals

The following measurable goals for best management practices have been selected to ensure that illicit discharges are detected, eliminated and prevented. The effectiveness of the best management practices for this minimum control measure will be evaluated by tracking and evaluating the following:

BMP: Storm Drain System Mapping

- Verification of existing mapping of storm drain system and 100% complete map by end of year 2. Update atlas as necessary with new development through the end of year 5.

BMP: Storm Water Ordinance

- Assessment of existing ordinances/policies beginning in year 2.
- Development and adoption of storm water ordinance or other regulatory mechanism by end of year 5.

BMP: Education & Outreach

- The number of brochures that are printed and delivered to target groups (See Section 1.0)
- The number of commercial training events and the number of attendees that visit each event
- 100% City employee participation in annual in-house training for illicit discharge awareness and best management practices at work and home.
- The quantity of mutt mitts for pet waste disposal that are provided

BMP: Spill & Complaint Response

- Response to complaints of illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice
- Numbers of complaints, notices and referrals received/responded to

BMP: Illicit Discharge Field Investigation & Abatement

- Inspection of targeted creeks within the City on a routine basis of once per year with follow-up inspections as appropriate to ensure abatement of violations.
- Response to inspection reports from septic system pumpers that identify deficiencies in order to ensure that the deficiencies are repaired or eliminated. Corrections of reported septic system failures with surfacing sewage (failures that are repaired, modified, replaced to meet minimum sanitary standards)
- Number of septic to sewer conversions
- Numbers of Notices to Correct issued to septic system owners
- Numbers of illegal connections identified by the City Wastewater Division

3.4 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 in annual reports. Measurable goals will be adjusted as appropriate; the basis for any changes will be included in the next annual report. Feedback from Community Interest Groups and other sources will be used to improve implementation of all six minimum control measures.

Table 3-4
BMP Implementation: Illicit Discharge Detection & Elimination

Year	BMP	Current Status	Implementation Details	Measurable Goal	Responsible Party
1 thru 2	Storm Sewer Mapping	The City's storm drain system is approximately 85% complete	Update and revise map to 100% complete by the end of year 2. Utilize maps to track sources of illicit discharges.	100% complete map by the end of year 2.	City William Albrecht Public Works Director 805-688-5177
3 thru 5	Storm Sewer Mapping		Update and revise Storm drain map with new development.	100% complete map annually from years 3 to 5.	City William Albrecht Public Works Director 805-688-5177
1	Storm Water Ordinance	Reliant on existing City ordinances	Evaluate scope of existing ordinances to determine need for new ordinance at end of year one.	Have evaluation of existing ordinances complete by end of year 1.	City William Albrecht Public Works Director 805-688-5177
2 thru 5	Storm Water Ordinance		Following evaluation at end of year 1, develop and adopt new ordinance if needed.	Develop and adopt new ordinance if needed by end of year 5.	City William Albrecht Public Works Director 805-688-5177

Year	BMP	Current Status	Implementation Details	Measurable Goal	Responsible Party
1 thru 5	Education & Outreach	Ongoing	Continue to utilize web sites, hotline, brochures, public events, and media campaigns to educate the community and in-house training for City staff.	Document education material handouts annually; document training session attendance annually; also documentation in accordance with the measurable goals stated in Section 1.0 Public Education and outreach.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Spill & Complaint Response	Ongoing	Respond to complaints received through the water quality hotline, observations, and reports from field personnel and public.	Respond to complaints within 24 hours of receiving complaint, referral or notice. Document number of complaint responses.	City/County William Albrecht Public Works Director 805-688-5177
1 thru 5	Field Investigation & Abatement	Ongoing	Perform field investigations to identify and abate septic system problems	Inspect creeks annually to identify illicit discharges. Respond to septic inspection reports to insure repair or elimination of deficiencies. Document number of septic to sewer conversions, Notices to Correct, and illegal connections.	City William Albrecht Public Works Director 805-688-5177

4.0 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; during 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.

4.1 Minimum Requirements

USEPA guidelines establish the following "Best Management Practices" 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
- Requirements for construction site operators to implement appropriate erosion and sediment control BMPs
- Requirements for construction site operators to control waste such as…
    - Procedures for site plan review which incorporate consideration of potential water quality impacts
    - 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 (with the RWQCB) and development of a Storm Water Pollution Protection Plan pursuant to RWQCB regulation.

4.1.1 Program Development

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.

4.2 Best Management Practices

The City's Excavation and Grading Code (17.01) regulates all new grading, fills, and borrow areas with certain exceptions. Requirements for an erosion and dust control plan are provided in Section 17.01.090.

The City will review its current Excavation and Grading Code and standard practices for compliance with the minimum requirements described above. One element of proposed requirements shall be to require applicants to provide a copy of their SWPPP and NOI for City approval prior to issuance of any grading permit. Any recommended revisions will be considered by the City and reported as part of its implementation of this SWMP. The City will also require all construction projects to collect construction waste and materials on site and dispose of it in a legal and proper manner. Concrete washout stations are also required to prevent contaminants from reaching the soil on any site where concrete shall be poured. All construction sites are also required to provide onsite sanitary facilities to be properly kept in working order and regularly maintained.

4.2.1 Construction Site Enforcement, Inspections

Section 17.01.210 of the Excavation and Grading Code specifies 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. Non-compliance is subject to construction site activity suspension ("red-tagging"), fines or both. The need for additional inspections will be evaluated as part of review of the Excavation and Grading Code. Site inspectors will enforce clean sites and proper and legal disposal of litter and construction waste materials. Potentially hazardous chemicals and materials will be required to be stored in a proper manner and used appropriately to prevent any contamination.

4.2.2 Discretionary Projects –Conditions of Approval

In addition to the regulations under the Excavation and Grading Code, the City will apply conditions of approval relating to construction site controls to new discretionary projects. For example, large projects will be required to develop erosion control plans for construction (and post-construction) using BMP's to the maximum extent possible and will have specific requirements relating to fueling and maintenance of equipment and control of construction site debris by providing receptacles/bins throughout the site. The City will review its approach to conditioning discretionary projects for compliance with the minimum requirements described above.

4.2.3 Staff Training

Construction inspection staff will be responsible for understanding and enforcing erosion and sediment control requirement of the Excavation and Grading Code or Storm Water Pollution Prevention Plans, as appropriate. Staff will receive annual training in currently applicable regulations and compliance standards and techniques.

4.2.4 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.

The following measurable goals will be applied to the construction program.

BMP: Update Excavation and Grading Code

- Review City Excavation and Grading Code and make recommendations for revisions to conform to the State General Permit by end of year 2.
- Adopt revised Excavation and Grading Code to conform to the State General Permit by end of year 5.

BMP: Construction Site Enforcement, Inspections

- 100% compliance with City code for construction sites
- Daily inspections on active projects one acre or larger of land disturbance
- Minimum of monthly inspections conducted throughout project duration
- City-implemented enforcement action at 100% of sites where BMPs failed, which may include verbal warnings, letters to correct, stop work order, use of construction bonds, etc.

BMP: Discretionary Projects – Conditions of Approval

- 100% annual training of planning staff in the appropriate selection and application of appropriate conditions related to construction activities.

BMP: Staff Training

- Annual training of City grading inspectors.

4.3 Reporting

Feedback from City inspectors, RWQCB staff, construction contractors, project owners and the public will be evaluated and potential changes to the Grading Ordinance and its implementation will be evaluated. The extent these changes could change the level of protection to storm water quality will be discussed in the annual report.

Table 4-1
BMP Implementation: Construction Site Runoff Control

Year	BMP	Current Status	Implementation Details	Measurable Goals	Responsible Party
1 thru 2	Review City Excavation and Grading Code	Erosion and dust control measures required in permit application	Make recommendations for revisions to conform to the State General Permit	Review 100% of the existing Grading code and have revisions recommended.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Construction Site Enforcement & Inspections	Existing Excavation and Grading Code provides for inspections and enforcement.	Make recommendations regarding existing Excavation and Grading Code. Inspections will be conducted according to currently adopted Excavation and Grading Code.	Document project site inspections~~,~~ and enforcement actions and provide in annual report.	City William Albrecht Public Works Director 805-688-5177
3 thru 5	Adopt revised Excavation and Grading Code		Code to conform to the State General Permit by end of year 5~~July 05~~	Adopt revised code.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Discretionary Projects – conditions of approval	Conditions of approval include construction site controls.	Existing practice will be reviewed as part of recommendations for revisions to Excavation and Grading Code. Staff will be trained to implement any changes.	Annual training of 100 % of the planning staff in selection and application of adopted standard conditions	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Staff Training	No specific training on storm water BMPs	Staff will be trained in currently applicable regulations.	Annual training of grading inspectors	City William Albrecht Public Works Director 805-688-5177

5.0 POST-CONSTRUCTION RUNOFF CONTROL

One opportunity to reduce the generation of non-point source pollution from urban runoff is through planning and design, before developments are built. Once built, it is complex and expensive to correct 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, so 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 to protect water quality.

5.1 Minimum Requirements

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

- 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
- Develop and implement strategies that include a combination of structural and/or non-structural best management practices (BMPs)
- 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

Furthermore, 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 this General Permit." Based on current population, the requirements of Attachment 4, which address Receiving Water Limitations and Design Standards, do not apply to the City of Buellton. However the City will review the efficacy of regulations intended to address the issues discussed in Attachment 4 of the General Permit, and Appendix A of this Storm Water Program, as part of the revision of its General Plan, City Code, and standard conditions of approval and mitigation measures.

5.1.1 Background

Under state planning law and the California Environmental Quality Act (CEQA), the City is responsible for evaluating new development and redevelopment projects, therefore the City has a key role in implementing the NPDES Phase II post-construction runoff control measures. The City's existing land use policies and development review process provide a general framework for water quality protection and compliance. These include:

- City of Buellton General Plan
- CEQA initial study checklist
- Standard conditions of approval and mitigation measures for discretionary projects.
- Engineering Permit Conditions
- Buellton Municipal Code

New projects are also reviewed on behalf of the City by a consultant team of engineers and policy reviewers. The team supports City staff and conducts the bulk of new development review and evaluation.

5.2 Best Management Practices

The City will encourage and recommend designs that use practical structural means of controlling post-construction runoff such as wet ponds and dry basins, grassy swales, bio-swales, and filter strips. Other structural design standards that will be desired are infiltration basins/trenches, dry wells, and porous pavement to percolate runoff through the soil to the groundwater. Non-structural BMP's include general protection of surface water quality which occurs during evaluation of potential impacts in CEQA review and/or in establishing conditions for project approval. These protective policies and guidelines are discussed below.

5.2.1 Review Regulations

Water Quality Protection Policies:
The City will review existing water quality protection policies such as the General Plan and Municipal Code and revise, if appropriate, to apply to all new development and redevelopment projects of one acre or more in area in the City. These policies will provide City staff and the development community with a framework to identify appropriate water quality protection measures for proposed projects, including the development of reasonable and feasible best management practices.

As anticipated, these policies would direct growth away from sensitive areas, encourage environmentally sensitive site design, protect wetland and riparian resources, and minimize degradation of water quality.

CEQA Initial Study Checklist:
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 is the current recommended checklist contained in the State CEQA Guidelines (see http://ceres.ca.gov/topic/env_law/ceqa/guidelines/Appendix_G.html). Presently, the City checklist includes direct reference to water quality impacts resulting from project-related discharges.

Standard Conditions of Approval/Mitigation Measures and Engineering Permit Conditions:
The City's Standard Conditions of Approval and Mitigation Measures and Engineering Permit Conditions will be evaluated to assure compliance with the minimum requirements described above to protect water quality where impacts are identified during the project review and CEQA processes. The Conditions/Measures are developed in conjunction with other City and County departments (e.g., County Fire), therefore these parties would be consulted prior to revising the Standard Conditions of Approval and Mitigation Measures. New conditions would address both

construction site pollution control and post-construction runoff control for new development and redevelopment.

Conceptual Review:
Conceptual review meetings are used for moderately complex or complex projects where there is the potential for significant environmental or policy concerns. During the meeting staff advises the applicant and can suggest changes in the project to avoid policy or environmental conflicts before the plans are submitted. The conceptual review process will be evaluated to determine whether water quality issues are adequately addressed.

5.2.2 Staff Training

Planning staff and supporting consultants will be trained to recognize potential storm water impacts during design review, and to condition projects appropriately. Training can be used to initiate new staff, and to provide updates on innovative site design for existing staff.

5.2.3 Monitor Discretionary Projects

Discretionary projects will be monitored for compliance with water quality measures, and non-compliance may include a correction notice, stop work order, collection of any bonds, and establishing a time frame for developer to take corrective steps to resume work.

5.2.4 Master Drainage Plan

The City is in the process of developing a Master Drainage Plan. This plan will be an opportunity to include new development strategies to protect water quality and will be evaluated as such.

5.3 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 an opportunity to assess and evaluate the program and a feedback mechanism to measure and update the program as appropriate. The following measurable goals would be applied toward the new development and redevelopment minimum control measure:

BMP: Update Land Use Regulations

- Review City Code, General Plan, and CEQA checklist to determine effectiveness; recommend modifications and or revisions by end of year 2.
- Adopt or revise City Code, General Plan, and revised CEQA checklist to provide appropriate water quality protection standards, conditions and policies by end of year 5.

BMP: Staff Training

- 100% of all Public Works and Planning staff participate in an annual City water quality training (in-house)

- 100% of Planning staff encourage and recommend design of projects to incorporate structural and non-structural BMP's.

BMP: Monitor Discretionary Projects

- Evaluate 100% of all discretionary projects which are subject to storm-water regulation and that receive approval after for construction, implementation, and as appropriate, proper functioning and maintenance of water quality measures.
- Where there is non-compliance on conditioned projects with approved water quality design, operation and/or maintenance procedures, City will take enforcement actions on 100% of all projects, which may include a correction notice, stop work order, collection of any bonds, and establishing a time frame for developer to take corrective steps to resume work.

5.4 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, the Community Interest Group, etc. will be used to modify BMPs or the measurable goals, as appropriate; the basis for any changes will be included in the following annual report.

Table 5-1
BMP Implementation: Post construction Runoff Control

Year	BMP	Current Status	Implementation Details	Measurable Goals	Responsible Party
1 thru 2	Update land use regulations	Review existing policies and regulations.	City will evaluate General Plan, CEQA, conditions of approval, engineering conditions, and all municipal codes to address water quality	Determine effectiveness and recommend modifications.	City William Albrecht Public Works Director 805-688-5177
3 thru 5	Update land use regulations	Existing policies and regulations provide some level of control.	Adopt and implement recommended revisions	Adopt and implement recommended revisions.	City William Albrecht Public Works Director 805-688-5177
1 thru 5	Staff training	Permitting and review staff responsible for conditioning projects to protect water quality	Training will be used to initiate new staff, and to provide updates on innovative site design utilizing structural and non-structural BMPs.	Document attendance at annual training. Document all BMPs incorporated in annual report	City William Albrecht Public Works Director 805-688-5177

Year	BMP	Current Status	Implementation Details	Measurable Goals	Responsible Party
1 thru 5	Monitor discretionary projects	No specific monitoring in effect.	Implemented during construction and post-construction monitoring.	Evaluate all discretionary projects for function of water quality protection measures implemented. Enforcement action on all non-compliant projects.	City William Albrecht Public Works Director 805-688-5177

6.0 POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

The purpose of this minimum control measure for Municipal Operations/Good Housekeeping Practices is to assure that the City's delivery of public services occurs in a manner protective of storm water quality. In this way the City may serve as a model to the community.

6.1 Minimum Requirements

The State's General Permit states that the City must develop and implement an operations and maintenance plan the will prevent or reduce pollutants in runoff from municipal operations (*USEPA Fact Sheet 2.8 – Pollution Prevention/Good Housekeeping, 01/00*).

The minimum requirements are:

- To consider municipal activities and identify those that may contribute pollutants to storm water;
- To select and implement Best Management Practices (BMPs) that will reduce or eliminate pollutants in storm water runoff from these activities to the Maximum Extent Practicable; and
- To train new and existing employees on the potential impacts to storm water from municipal activities and the implementation of BMPs to prevent and reduce these impacts.

6.2 Best Management Practices

Tables 6-1 and 6-2 summarize the City facilities and services and identify those that may contribute pollutants to storm water.

Table 6-1: City Facilities

Facility	Potential Pollutant Sources	Responsible Division
City Hall	Trash bin, parking lot, janitorial wastes, landscaping	Public Works (Maintenance), all City staff Parks

Facility	Potential Pollutant Sources	Responsible Division
City Office/Library Annex	Public recycling bins, staff picnic area, parking lot, landscaping.	Public Works, Parks and Rec, all City staff
Water & Maintenance Shop, including storage areas	Equipment storage, parking, trash bins, public recycling bins (all shop maintenance conducted indoors)	Public Works
Wastewater Treatment Plant	Two-vehicle parking lot, small shop, equipment storage, trash bins.	Public Works, Wastewater
Oak Valley Park	Trash bins, parking, equipment storage, two rest rooms	Maintenance, Parks and Rec
Parking lots (4)	Vehicle wastes, litter	Maintenance (Public Works)
Police Department	Trash bins, parking, equipment storage	Maintenance (Public Works)
Streets and storm drains	Vehicle wastes, litter, unknown material including illegal dumping	Maintenance (Public Works)
Water Supply Reservoirs (3) and groundwater wells (4)	Belowground tanks, no potential pollutants	Water (Public Works)

Table 6-2: City Activities

Activity	Potential Pollutant Sources	Responsible Division
Park maintenance	Over application of pesticides, herbicides, spills during mobilization and storage, improper greenwaste disposal	Public Works
Trash removal and temporary storage	Trash that misses the bins, trash bin liquid discharges	Maintenance (contractor)
Vehicle maintenance, Washing, Minor repairs (i.e., oil changes)	Improperly managed wastes, including solids, liquids, and hazardous materials, contaminated washwater,	All (about 15 vehicles distributed in each division, including tractors, and other equipment)
Janitorial service (in-house and contractor)	Improper disposal of washwater and other waste products into storm drain	Contractor

Activity	Potential Pollutant Sources	Responsible Division
	system	
Construction (contractors)	Improperly managed construction wastes, sediment runoff, staging area runoff (equipment leaks or spills)	Public Works/Contract Engineers
Water pressure testing – discharged into storm drain	Pollutants which may be present in gutters, & storm drains, i.e., trash, organics, etc.	Water (Public Works)
Water supply reservoir maintenance	Every two years cleaned with rinse waters disposed to storm drain (no cleansers)	Water (Public Works)
Fire hose testing –discharged into storm drain	Any pollutants present in street, gutters, & storm drains	County Fire (See County of Santa Barbara SWMP)

6.2.1 Development of Citywide Best Management Practices (BMPs)

BMP guidance material will be developed for all City facilities and activities with identified pollutant sources, shown above in Tables 6-1 and 6-2. The guidance material will be used by City staff to 1) assure that water quality is being protected at municipal operations through the use of BMPs, 2) track implementation of BMPs, 3) develop a plan for future implementation of BMPs, and 4) prepare annual reports for internal purposes and for the annual monitoring report required under the NPDES permit.

The guidance material will contain a menu of suggested BMPs that either are or will be implemented by the City. Those BMPs that are appropriate to the City's municipal operations will be identified on a case-by-case basis. The menu approach for listing BMPs provides flexibility for similar activities at different locations and allows the city to track implementation for reporting. The menu approach also allows flexibility when operations change. For example, a landscaped area of lawn could be replanted using a xeriscape design, and little or no application of pesticides would be necessary afterward. In this case, the activity remains the same (Landscaping) but the BMPs employed would have changed.

The City's guidance material will also make excellent reference tools for public education, applicable to residential and commercial interests within the City.

6.2.2 Purchasing and Contracts

The City will review contractual language for venders and contractors under service, and determine whether to include a requirement to employ the City's storm water Best Management Practices. Such services and contracts may include roadwork, vehicle maintenance, housekeeping, painting, and construction.

Contracts may be reworded to include specific language requiring contractors to obtain approval from the City of project-oriented BMPs or activity-related Water Quality Plan (similar to a Storm Water Pollution Prevention Plan as required for construction activities under the Federal NPDES program). The contractor's approved BMPs or Water Quality Plan would describe how storm water conveyances would be protected from potential pollutants specific to the project undertaken. If the contractor violates the plan, it would be sufficient reason for termination of the contract without harm to the City.

6.2.3 Training by City Departments

All City employees will receive an appropriate level of training on storm water pollution prevention based on their work responsibilities. Most of the training programs will be integrated into existing training presented to staff, such as safety training. A program will be developed City-wide for distributing the BMP Fact Sheet developed. The Fact Sheet relating to training will provide general direction to all City employees through new employee orientation to protect water quality both at work and at home.

Depending on personnel involved, storm water training will occur at least quarterly or annually. City managers will develop guidance on their departmental responsibilities for storm water management and provide this information to all relevant personnel. Frequency and type of training will depend on the activities targeted, ranging from the general "City-Wide Employee BMPs" to activity-specific BMPs such as "Vehicle Maintenance."

6.2.4 Street Sweeping

The City contracts for street sweeping for 100% of its streets plus City-owned public parking lots on a regular basis. Sweeping is currently conducted twice per month. No water is discharged from the street sweeping with the exception of dust control spray. Wastes are removed and disposed of by the contractor.

Sidewalks are swept as-needed in the downtown area; no chemicals are used in the process. Solids are collected by-hand prior to and subsequent to steam cleaning.

6.2.5 Storm Drain Cleaning

Currently, the storm drain system, including pipelines, catch-basins, and drop inlets, is cleaned as needed to maintain capacity. Minor maintenance is conducted by hand, prior to the rain season each year, to remove fallen leaves and other debris collected in the system. Where more serious blockages occur, the City utilizes a Vactor truck for cleaning the storm drain. For the most part, the storm drain system operates without blockages and therefore maintenance is on an as-needed basis.

City staff will evaluate the cost-effectiveness of employing the Vactor truck on a regular basis for clean out of the storm drain system.

6.2.6 Trash, Green Waste and Recycling

In order to prevent solid wastes from entering the storm drain system, the City provides trash, green waste, and recycling services. There are 30 public trash containers maintained by the City. These are emptied four days a week, or more frequently if needed, often daily for some receptacles. A private waste-haul contractor removes the trash.

The City has enacted a Green Waste Ordinance, requiring residential and commercial users of the waste service to separate green waste from trash and use the green waste bins provided by the hauler. There are also three public green waste bins available to the public. The City also enacted a ban on the disposal of cardboard.

The City also provides commingled recycling bins to the public. There are two bins located near the City Hall and Annex, and four three bin recycling sites located around town. In addition, the regional recycling and hazardous materials collection site is located within the City and is available to the public.

6.2.7 Landscaping, Parks, and Open Space Maintenance

The Public Works Department maintains the following facilities in the City:

- City Hall (landscaping)
- Annex (landscaping)
- Oak Park (landscaping, buildings)
- Avenue of the Flags median (landscaping)
- Riverview Park (landscaping)

Maintenance activities include mowing, trimming, watering, and weed management. Occasionally, work is contracted to outside vendors for specialty services (i.e., tree trimming, large weed mowing jobs) or low-cost labor (SWAP, Community Service). Most sidewalk planters are maintained under contract.

Most of the City's landscaping includes drought tolerant or native species to minimize maintenance needs. Pesticide use is kept at a minimum and applied only an as as-needed basis. City staff are trained in the proper use of pesticides and supervised under a state-certified pesticide applicator. Non-restricted chemicals used in landscaping are reported monthly to the Santa Barbara County Agriculture Office, as required.

6.3 Measurable Goals

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

BMP: Development of Citywide BMPs for Municipal Operations

- Staff will identify appropriate BMPs and tabulate the BMPs by Year 1.

- BMPs already implemented will be reported on during first annual report to RWQCB; timetables for implementation of additional BMPs will be defined by Year 1. Implementation will be ongoing through 5-year implementation period.

BMP: Purchasing and Contracts

- Identify and evaluate contractual language used in all City contracts by Year 1.
- Determine whether contractors have policies protective of water quality by Year 1.
- Revise contractual language to include provision to protect water quality by Year 5
- Report the number of Notice of Violations per project and the number of Corrective actions with their schedules – ongoing Years 2 through 5.

BMP: Training

- Distribute information on the City's NPDES permit and permit requirements to all staff by Year 1. Information will include the timetable for developing the City-wide Best Management Practices for Municipal Activities and outline various levels of responsibility by City staff.
- Prepare training material and conduct training appropriate for divisional practices by Year 2; content, frequency, method of presentation, and subsequent reporting will be developed by each divisional manager as appropriate for staff.

BMP: Street Sweeping

- Conduct street sweeping as currently practiced and provide annual report documenting lane-miles, solids removed, and status of sweeping contract.

BMP: Storm Drain Cleaning

- Determine cost-effectiveness of scheduling clean-out of the storm drain system as part of routine maintenance by Year 1. Make recommendation for future assessments.

BMP: Trash, Green Waste and Recycling

- Continue providing trash, green waste, and recycling receptacles to public.
- Evaluate effectiveness of waste program and provide brief assessment in annual NPDES report.
- Evaluate additional BMPs as outlined in City-wide BMPs.

BMP: Landscaping, Parks, and Open Space Maintenance

- Continue providing landscape maintenance to City facilities.
- Evaluate additional BMPs as outlined in City-wide BMPs by Year 1.

6.4 Reporting

Data collected for each measurable goal will be compiled, reviewed and summarized as part annual report to the RWQCB. Significant variance from targets, City employees and the Community Interest Groups input, and other sources will be used to modify BMPs or the measurable goals, as appropriate; the basis for any changes will be included in the following

annual report. The City will retain storm water records for five years. Each department will also keep their records for five years.

Table 6-3
BMP Implementation: Pollution Prevention and Good Housekeeping for Municipal Operations

Year	BMP	Current Status	Implementation Details	Measurable Goals
2 thru 5	Implementation of BMPs	Generic lists of BMPs for various operations are available.	Staff will review draft BMPs and select those appropriate for facilities and operations. Staff will utilize reporting format to verify BMP implementation.	Develop implementation schedule for future BMPs. Tabulate number of BMPs implemented. Evaluate implemented BMPs.
2 thru 5	Staff Training - BMPs	No current storm water training.	Staff will receive appropriate training on water pollution prevention BMPs.	Number of training sessions presented per year. Number of staff attending. Number of email or other mass-distributed messages on water quality / permit.
2 thru 5	Purchasing & Contracts	Municipal activities that could affect water quality are often performed by outside contractors; these need to be reviewed.	Contract language will be reviewed and contractors will be required to implement BMPs to protect water quality. Some contracts will be revised.	Number of projects or city-contracted activities that affect water quality. Evaluate contractor compliance with BMPs. Report the number of Notice of Violations or Corrective actions taken.
1 thru 5	Street Sweeping	Ongoing	Continue sweeping Evaluate program annually	Area and lane miles swept Frequency swept Volume / weight of material removed
1 thru 5	Storm Drain Cleaning	Only performed as-needed (due to blockages)	Determine cost-effectiveness of scheduling clean-out of the storm drain system as part of routine maintenance	Number of catch basins maintained Material removed
1 thru 5	Trash, Green Waste and Recycling	Ongoing	Continue providing services Evaluate program annually	Material removed Accessibility of dump sites to public
1 thru 5	Landscaping, Parks, and Open Space Maintenance	Ongoing minimal use of chemicals and reliance on drought-tolerant vegetation	Continue services Evaluate program annually.	BMPs employed under this activity

MONITORING PROGRESS AND REPORTING

7.0 MONITORING AND REPORTING REQUIREMENTS

The purpose of monitoring and reporting is to document successful implementation of the SWMP. The draft General Permit requires annual reports be submitted annually upon approval of the City's SWMP. 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 the overall effectiveness by measuring and reporting the data discussed in the individual Minimum Control Measures sections discussed above.

In general, four types of data will be collected:

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

The City will evaluate both current conditions and BMP effectiveness and, as appropriate, update BMPs and measurable goals to achieve the objective of meeting water quality standards to the Maximum Extent Practicable. It may be necessary to expand or better tailor existing BMPs after implementing the minimum control measures described in this SWMP. 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 Regional Water Quality Control Board (RWQCB).

Form and Content of Annual Report

The State has not yet provided specific guidance as to the specific form and content of the annual report. The City intends to provide summaries of data in tabular form. Data such as number of employees trained, number of construction sites inspected, etc. 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 "maximum extent practicable" standard. Of necessity, the reporting format needs to be flexible and if changed, reasons will be given. Focus will be to clearly show progress, discuss program adjustments, and respond to challenges in implementing the SWMP.

Reporting and Compilation of data

The City is developing a central reporting system to allow a web-based reporting of BMPs. This City-wide 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.

APPENDIX A

MEASURES TO BE CONSIDERED IN REVIEW OF CITY LAND USE POLICIES AND DESIGN GUIDELINES

Site Planning Measures (these minimize impervious surface and maximize infiltration):

- Cluster development
- Preserve natural drainages
- Reduce sidewalk widths, especially in low-traffic areas
- Avoid curb and gutter along driveways and streets where appropriate
- Use alternate paving materials/porous/permeable materials, where appropriate
- Reduce the length of driveways or infiltrate driveway runoff
- Reduce street width by eliminating on-street parking
- Reduce alley width or use alternate materials for paving alleys
- Set aside open space

Source Control Measures (these avoid pollution in the long run by eliminating sources):

- Provide green areas where pets can be exercised
- Install landscaping or other ground cover
- Incorporate low-maintenance landscaping that does not require frequent fertilizer or water
- Require labeling of storm drains to discourage dumping
- Where possible, eliminate gutters/roof drains draining to paved areas or direct runoff to landscaped areas
- Construct designated vehicle wash area in new residential developments
- Encourage underground parking and the construction of multi-storied parking structures
- Encourage cooperative or shared parking
- Encourage use of alternate paving materials for parking lots
- Reduce building footprint and increase use of taller structures (where appropriate)
- Use berms around waste storage areas
- Install valves on storm drain inlets in loading dock areas

Treatment Control Measures (these capture and treat the polluted runoff before it enters the city's storm drain system or other receiving waters):

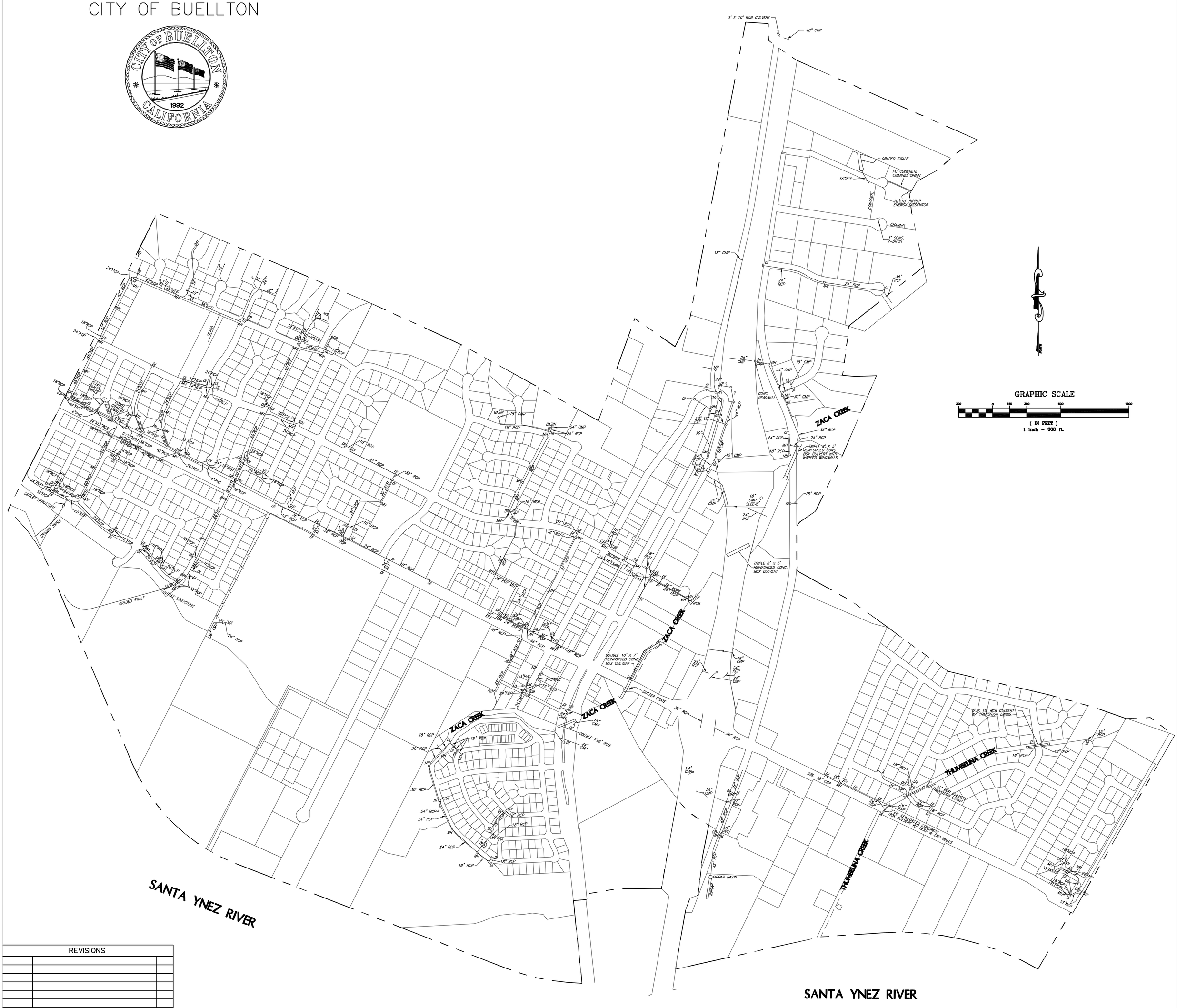
- Rooftop Catchment Systems
- Vegetated Filter Strips
- Vegetated Swales
- Infiltration Basins
- Infiltration Trenches
- Dry Detention Ponds/Basins
- Retention Ponds/Wet Basins
- Constructed/Restored Wetlands
- Filtration Systems
- Oil/Grit Separators

APPENDIX B

CITY OF BUELLTON STORM WATER ATLAS

STORM DRAIN SYSTEM

CITY OF BUELLTON



GRAPHIC SCALE

300 0 150 300 600 1200

(IN FEET)

1 inch = 300 ft.

REVISIONS		

BC026-130 • BC026-WATER-SYSTEM.dwg • 02/03 • RLS • E-FILE