



**City of Santa Barbara**

**STORM WATER MANAGEMENT PROGRAM  
2010 ANNUAL REPORT  
YEAR 2**

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# City of Santa Barbara SWMP Annual Report

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# ANNUAL REPORT

## General Permit for the Discharger of Storm Water from Small Municipal Separate Storm Sewer Systems (General Permit)

Check box if this is a new name, address, etc.

**A. Permittee Information**

- 1. Permittee (Agency Name): City of Santa Barbara
- 2. Contact Person: Autumn Malanca and/or Cameron Benson
- 3. Mailing Address: 620 Laguna St.
- 4. City, State and Zip Code: Santa Barbara, CA 93101
- 5. Contact Phone Number: 805-897-1910 or 805-897-2508
- 6. WDID#: 3 42MS03023
- 7. Have any areas been added to the MS4 due to annexation or other legal means?  YES  NO  
If YES

Outfall	Has map been updated?		Has SWMP been updated?		Receiving Water Name
	YES	NO	YES	NO	

- 8. Are you subject to the Design Standards contained in Attachment 4 of the General Permit?  YES  NO

If yes, report on the implementation of the Design Standards in section E.5 of this Annual Report Form.

**B. Reporting Period**

- (check one):
- January 1, 2009 to December 31, 2009 (Year 1)
  - January 1, 2010 to December 31, 2010 (Year 2)
  - January 1, 2011 to December 31, 2011 (Year 3)
  - January 1, 2012 to December 31, 2012 (Year 4)
  - January 1, 2013 to December 31, 2013 (Year 5)
- (Report is due by April 1 each year)

**C. Executive Summary**

The City of Santa Barbara’s Storm Water Management Program (SWMP) was prepared in response to State Water Resources Control Board Water Quality Order 2003-0005-DWQ for National Pollutant Discharge Elimination System (NPDES) Phase II General Permit No. CAS000004 (State General Permit). The overall

objective of the City's SWMP is to comply with the NPDES Phase II regulations and State General Permit, and to meet water quality standards contained in the Statewide Water Quality Control Plan, the California Toxics Rule, and the Regional Water Quality Control Board Basin Plan.

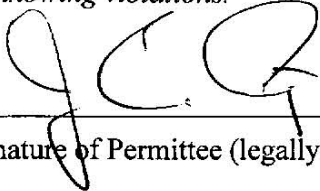
The City Council authorized submittal of the SWMP to the Central Coast Regional Water Quality Control Board (RWQCB) in January 2006, with direction to begin implementation of the SWMP's water quality goals and BMPs, pending the RWQCB's formal approval. Several rounds of Board comments and City resubmittals took place between 2006 and 2008. The RWQCB approved the City's SWMP in November 2008, subject to the inclusion of minor final edits. Year one of formal SWMP implementation began January 5, 2009, and ended December 31, 2009. Year two of SWMP implementation began January 1, 2010 and ended December 31, 2010.

The SWMP demonstrates the City's commitment to surface water quality protection. The Best Management Practices (BMPs) and measurable goals designated in the SWMP have been designed to effectively protect water quality and assess the City's success in the effort. This Year 2 Annual Report (2010) demonstrates effective SWMP implementation and identifies necessary program modifications. At the beginning of this report (Section E), is the City's responses to the Water Board's comments and required actions for the 2009 Year 1 Annual Report per the Central Coast Water Board's notice of violation letter (December 16, 2010). The City's responses *in italics* answer many questions and concerns regarding Year 1 SWMP implementation. Sections 1.0 through 6.0 report the successes and challenges of implementation of the City's six minimum control measures, and Sections 7.0 and 8.0 are the City's Waterfront and Airport Departments' Annual Reports. Section G is the Program Effectiveness Assessment, which confirms the results of the overall program and identifies necessary modifications. Lastly, Section H is a summary of the City's proposed SWMP modifications that staff feels are necessary and justified due to local management changes and staffing abilities.

To compile this Annual Report, City staff reported their SWMP implementation status to the City Creeks Division on a quarterly-basis; January through March, April through June, July through September, and October through December, 2010. Therefore, many of the sections in the report discuss the implementation of BMPs on a quarterly-basis.

**D. Certification**

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*



3/28/2011

Signature of Permittee (legally responsible person)

Date Signed

James L. Armstrong

City Administrator

Name (printed)

Title

## **E. City of Santa Barbara Responses to Comments and Required Actions for the City's 2009 Annual Report Per the Central Coast Water Board's Notice of Violation Letter dated December 16, 2010**

*(City of Santa Barbara Creeks Division responses are in italics, below).*

### **A. Reporting the Status of Measurable Goals**

**#1 Action:** Include, **in the 2010 annual report** and in all subsequent annual reports, full reporting on MGs as described above.

*This action is completed in the City's 2010 Annual Report and will be completed in all subsequent annual reports.*

### **B. Use of Appendices**

**#2 Action:** Include, **in the 2010 annual report** and in all subsequent annual reports, a clear and concise summary and/or analysis of information required by the General Permit, as described above. Raw data, such as inspection reports and sign-in sheets, need not be included in annual reports (though they must be kept for five years in accordance with General Permit Section F.3).

*This action is completed in the City's 2010 Annual Report and will be completed in all subsequent annual reports.*

### **C. Numbering BMPs and MGs**

**#3 Action:** Ensure that BMP and MG identification numbers used **in the 2010 annual report** and in all subsequent annual reports match the numbers used in the SWMP.

*This action is completed in the City's 2010 Annual Report and will be completed in all subsequent annual reports.*

### **D. Numbering Waterfront Department and Airport Department BMPs and MGs**

**#4 Action:** **Revise the SWMP** to provide a unique identification number for each BMP and/or MG. In addition, use these numbers in reference to BMPs and MGs **in the 2010 annual report** and in all subsequent annual reports.

*This action is completed in the City's 2010 SWMP revision, in the 2010 Annual Report, and will be completed in all subsequent annual reports. Waterfront Department BMPs and MGs are prefaced with "WFD" and Airport Department BMPs and MGs are prefaced with "APD."*

### **E. Reporting on WFD Activities**

**#5 Action:** Correct this deficiency and demonstrate compliance **in the 2010 annual report**.

*This deficiency is corrected in the City's 2010 Annual Report.*

### **F. Reporting Format**

**#6 Action:** Use a consistent reporting format for all sections **in the 2010 annual report** and in all subsequent annual reports.

*The City's 2010 Annual Report and all subsequent annual reports does/will have a consistent reporting format for all sections.*

### **G. Effectiveness Reporting**

**#7 Action i:** In **the 2010 annual report**, include only those effectiveness assessment conclusions for which the City has actual data to support the conclusion.

*In the City's 2010 and subsequent annual reports, effectiveness assessments are/will only be based on data and not assumptions.*

**#8 Action ii: Revise the SWMP** to include a BMP to develop, by the end of the fifth permit year (December 31, 2013), quantifiable measures for assessing BMP and SWMP effectiveness. Water Board staff finds that an effectiveness assessment program that complies with the Genreal Permit includes at least the following elements:

- Assessment methodologies that yield numeric estimates of pollutant load reduction, for BMPs that lend themselves to load reduction measurements (such as street sweeping, catch basin cleaning, etc.);
- Assessment methodologies that yield numeric estimates of pollutant load reduction, for BMPs designed to reduce loads but which do not lend themselves to empirical measurement of reductions (such as wet basins, bioswales, etc.);
- Assessment methodologies that yield numeric measurements of behavior and behavior changes, for BMPs designed to change a target audience's behavior (such as training, construction site inspection, commercial facility inspection, etc.);
- A strategy that will quantifiably assess the effectiveness of the program as a whole at CASQA Outcome Level 5 (Improved Runoff Quality) and Level 6 (Improved Receiving Water Quality).

*The City's SWMP is revised to include this BMP to develop quantifiable measures for assessing effectiveness by the end of the fifth permit year.*

#### **H. Requests for Modification of the SWMP**

**#9 Action:** In **the 2010 annual report**, please include a separate section which contains all requests for modification of the SWMP proposed by the City.

*The City's 2010 Annual Report includes a separate section that contains all requests for modifications of the SWMP proposed by the City.*

### **1. MCM #3: ILLICIT DISCHARGE DETECTION AND ELIMINATION**

- **BMP 3.1 – Storm Sewer Map**

**#10 Action:** Include, **as an attachment to the 2010 Annual Report**, a clear statement whether the City revised the storm sewer system map to incorporate all retrofits and alterations made during the reporting period.

*The bulleted list of revisions cited under BMP 3.1 in the 2009 Annual Report reflects all retrofits and alterations made to the storm sewer system map during the 2009 reporting period.*

- **BMP 3.2a – Responding to Illicit Discharge Complaints**

**#11 Action:** Correct the violation and demonstrate compliance **in the 2010 annual report**.

*This violation (noncompliance) occurred, in part, due to the fact that some illicit discharge complaints come to the City after hours and/or during the weekend. Therefore, response time to these calls can take more than 24 hours. Therefore, the City has requested to slightly modify this measurable goal for illicit discharge response in the 2010 Annual Report. It is important to have a reasonably attainable goal; which would be responding to illicit discharge complaints during business hours, and after business hours if/when a discharge is considered hazardous.*

*All illicit discharge complaints were responded to within 24 hours in 2010.*

**#12 Action:** Provide, **as an attachment to the 2010 Annual Report**, a report of any non-stormwater or pollutant discharges to the MS4 or surface waters related to the seven complaints to which the City did not respond within 24 hours.

*A total of 181 enforcement calls were received and responded to during 2009. Creeks staff responded to 161 of the calls (close to 90% of the calls) on the same day they were received; 13 were responded to the next business day (within 24 hours of the call); 4 calls were responded to 2 days later; 1 call was responded to 3 days later; and 2 calls were responded to 4 days later. Of the 181 calls received, 7 calls, or approximately 4% of all the calls, were not responded to within 24 hours. No pollutants were discharged directly to receiving waters as a result of the 7 calls that were not responded to within 24 hours, and therefore a negligible, if any, impact to water quality resulted from the late response.*

**Proposed Modifications For 2010:** Measurable Goal 3.2a should read: “100% call response within 24 business hours.” We are proposing a modification to this measurable goal since enforcement response on weekends is only available for hazardous material spills in the creeks.

- **BMP 3.2c – Illicit Discharge Abatement and BMP 3.4 – Field Investigation and Abatement**

**#13 Action:** Provide, **as an attachment to the 2010 Annual Report**, the following items, and ensure that they are included in all future annual reports:

- A. A summary of discharges which reached receiving waters, or which discharged pollutants into the MS4 that will potentially reach surface waters as a result of future storm events;
- B. A summary of impacts to receiving water quality;
- C. A description of the criteria used by the City to determine which discharges warrant NOVs and/or citations;
- D. A summary of all enforcement actions taken by the City in response to all reported illicit discharges, including a clear statement whether the City issued the NOVs and citations as warranted by the illicit discharges;
- E. A clear statement whether all reported illicit discharges were terminated and/or abated, and whether all pollutants were removed from the MS4 and/or receiving waters; and
- F. A summary of education and outreach efforts conducted toward the dischargers.

*During 2009, 77 Notices of Violation (NOV) or Administrative Citations were sent to discharges that were in violation of the City of Santa Barbara’s Municipal Code (Chapter 16 - regarding water pollution). NOVs were issued if the violation was the 1<sup>st</sup> violation for that offending party within 12 months. Citations up to \$250 were issued for repeat violations.*

*All illicit discharges were stopped by/ before the enforcement officer left the location where the violations occurred.*

*Each NOV and Administrative Citation described the violation and required a clean-up remedy if applicable. They also contained suggested alternatives to discharging pollutants to the storm drain system. For example, car washing violations would include a suggestion for capturing the wash water before it leaves the property with a wet/dry vacuum and either discharging the captured water into the sanitary sewer or landscaping.*

*For cases with a deadline to complete a clean-up remedy, follow-up inspections were conducted to make sure the discharges were cleaned-up by the deadline. Fines are issued if abatement deadlines are not met.*

*“Creek Clean Ups” is another program administered by the Creeks Division that addresses/abates illicit discharges in/near the City’s creeks. The City contracts with ServiceMaster, a local contractor, who picks up*



*trash, debris, dumped items, feces, etc. within the City's creeks and banks, per the City's direction. City staff forwards 8-10 creek locations that need cleaning/pick-up to ServiceMaster, bi-weekly. So, up to 20 creek sites are cleaned (illicit discharges abated) weekly. In 2009, the items removed from creek locations by ServiceMaster during these clean ups weighed 113,910 lbs.*

**#14 Action:** Provide, **as an attachment to the 2010 Annual Report**, a summary of information collected by the City indicating changes in discharger behavior that are both short term (the discharger terminated the current discharge) and long term (the discharger will ensure the discharge is not repeated). In addition, include a description of pollutants that were reduced through the City's efforts.

*The City's investigation, enforcement and abatement program changes discharger behavior (Level 3) by abating pollutants and polluting activities. The main pollutants reduced through the enforcement program are soaps from commercial and residential washing, automotive fluids from auto repair shops, concrete/sediment from construction sites, and trash or bulk items (like couches) from illegal dumping. Of the 181 enforcement calls received in 2009: 83 were for discharges coming from commercial property (largely wash water), 51 were for discharges coming from residential property, 5 were for discharges from mobile businesses, 11 were for discharges from construction sites, 25 were for illegal dumping in the public right-of-way or creeks, and 6 were unclassified.*

*A majority of the enforcement cases are located in the City's downtown area where businesses and residents are adjacent to one another, and in many cases share alleyways, trash containers and/or public space. It is this closely-built environment that results in necessary partnering and communication among neighbors and businesses and the City. This means that if a business or resident is producing an illicit discharge, such as washing off floor mats outside in an uncontained area or dumping/spilling wastes into an area that drains to the storm drain, the neighboring business or nearby resident is often the one to report the discharge to the City. Once the City educates the discharging business and informs them of the potential consequences (i.e., educates them in person and issues a Notice of Violation), the discharger rarely produces the same discharge again. The City's enforcement officer follows up after each violation is reported to confirm that the illicit discharge has been abated before leaving the discharge location (i.e., the behavior has changed for the short term), and the abatement is also confirmed when the City does not receive any more calls/reports about illicit discharges from the location, for the long term. Repeat violations within 12 months result in an automatic \$200 fine.*

**#15 Action:** Provide, **as an attachment to the 2010 Annual Report**, an explanation of how the 77 illicit discharges warranting NOVs or citations relate to the 181 calls regarding illicit discharges that were reported for BMP 3.1.

*Out of the 181 enforcement calls received in 2009:*

- 77 resulted in NOVs*
- 30 resulted in no evidence of a discharge found*
- 36 resulted in discharges that did not warrant a NOV (i.e. clean water discharge)*
- 16 resulted in illicit discharges where the responsible party could not be located*
- 22 were not illicit discharges related to surface water quality and were transferred to another appropriate agency or city department*

- **BMP 3.11 – Monitoring Parking BMPs**

**#16 Action:** **Revise the SWMP** to relate the number of parking lot owners targeted for educational efforts with the number of parking lots inventoried under BMP 3.10.

*On average, parking lots in the City containing 25 spaces have an area of approximately 10,000 square feet. Parking lots of 5,000 square feet contain an average of around 12 parking spaces; so this BMP has been revised to, “Inventory parking lots with a minimum of 5,000 square feet, up to 25 parking spaces (or approximately 10,000 square feet).” Of the 522 lots inventoried, many are adjacent to one another, forming one large lot that has the same owner. Thus, there are only a little over 400 owners for the 522 lots that met the inventory criteria. The City will target/send educational materials to the 408 owners of the 522 lots inventoried that met the criteria.*

- **BMP 3.15 – Illegal Discharge Training**

**#17 Action:** Provide, **as an attachment to the 2010 Annual Report**, a clear statement whether all relevant employees received at least an hour of training related to SWMP implementation in accordance with the SWMP.

*All relevant City employees received at least an hour of training related to SWMP implementation and water quality protection in accordance with the City’s SWMP.*

**#18 Action:** Provide, **in the 2010 annual report**, a clear statement whether the training occurred.

*14 staff trainings occurred in May – August 2009 (per the attached sign in sheets) to include all relevant City staff. The City’s 2010 Annual Report will have a clear statement whether the training occurred.*

## **2. MCM #4: Construction Site Stormwater Runoff Control**

**#19 Action:**

- A.** Provide, **as an attachment to the 2010 Annual Report**, a discussion that includes at least the following elements:
- An analysis of the effectiveness of construction project review procedures at detecting inadequacies in project ECPs, considering how many ECPs were found to be inadequate in the field;
  - An analysis of the effectiveness of the Erosion/Sediment Control Policy at ensuring adequate project ECPs;
  - A strategy for improving the construction plan review procedures to make them more effective at detecting inadequate ECPs;

*All Plans Examiners and Building Inspectors receive a minimum of 1 hour of training on SWMP regulations per year. Inspectors also receive training on the proper installation of BMPs. All applicable plans are reviewed and approved in accordance with SWMP requirements and include the construction BMP requirements clearly printed on the plans. If any violations do occur in the field it is not a reflection of the review or approval of the constructions plans. Once the plans for a project have been issued, then the implementation of the ECPs must occur with the contractor. When the contractor calls for the first inspection, the building inspector determines whether or not the job site is in compliance with the ECPs. If the SWMP requirements are not installed in accordance with the approved construction plans, then a correction notice is written to the contractor. The construction project will NOT progress until the SWMP requirements have been implemented in accordance with the approved plans and approved by the building inspector. City staff feels there are no inadequacies in the City’s plan review procedures or the Erosion/Sediment Control Policy.*

- **BMP 4.1a – Review Construction Projects Subject to Erosion/Sediment Control Policy, BMP 4.1b – Develop Reports and Statistics, BMP 4.4 – Construction Site Inspections, and BMP 4.5 – Construction Site Enforcement**

**#20 Action:** Provide, **as an attachment to the 2010 Annual Report**, clear statements indicating the following:  
9.0 The number of active construction sites in the City during the reporting period;

- 10.0 The number of stormwater inspections the City conducted during the reporting period; and
- 11.0 Whether the City inspected all sites in accordance with the SWMP.

*There were 883 active construction sites during the reporting period. However, of the active sites, not all construction projects required SWMP regulations or ECPs. Some active construction projects may be interior remodels, window change outs, kitchen remodels, etc. that do not entail SWMP/ECP requirements and, therefore, there were no inspections needed or required for these active constructions projects. The number of storm water inspections the City conducted during the reporting period was 626. However, the number of active or non-active construction sites that required SWMP/ECP requirements in the reporting period was 388. Thus, 626 inspections performed indicate that of the 388 active and non-active construction sites, many had more than one SWMP/ECP inspection performed. Please note that a documented inspection does not indicate that a violation of the SWMP/ECP regulations was noted. The City inspected all construction sites during the reporting period (both active and non-active sites) on the required dates of Oct 1st and October 15th for the appropriate compliance in accordance to SWMP.*

**#21 Action:** Include, **as an attachment to the 2010 Annual Report**, clear statements indicating the following:

- II. Whether the City conducted all construction site inspections as required in the SWMP;
- III. A summary of the frequency of “additional inspections” during the course of construction projects; and
- IV. A summary of the criteria used by the City to determine when to conduct additional inspections during the course of construction.

*The City conducted all construction site inspections as required by the SWMP.*

*The City’s Tidemark software system that tracks all inspections does not differentiate between an initial site inspection and “additional inspections”; therefore there is no summary that can be provided.*

*The criteria used to determine when an additional inspection should occur during the course of construction are primarily dependent upon the following:*

- A. *During subsequent inspections at the site the inspector surveys the ECPs installed for compliance.*
- B. *The dates of required erosion control inspections outlined in the SWMP.*
- C. *Current and predicted weather conditions.*

*There is no correlation between the number of inspections performed and active or non-active construction sites. Projects may have progressed to the point that no ECPs need to be inspected because the construction may have progressed to the point that it is deemed substantially complete.*

**#22 Action:** Include, **as an attachment to the 2010 Annual Report**, an evaluation of the effectiveness of the City’s construction site inspection parameters at reducing pollutants to the MEP and protecting water quality. The evaluation must include an analysis of City staff’s effectiveness at determining when sites require additional inspections during the course of construction.

*The Building & Safety Division has recently made changes to the database entries of the permit tracking system to provide more complete documentation of projects requiring inspection prior to the official “start” of the rainy season. These changes will allow plan checkers to verify what level of erosion control plan is required and inspectors will be provided with a complete list of sites that require an inspection prior to October 15th as outlined in the SWMP. This list will be used in conjunction with the existing method of pre-rain event inspections in an attempt to improve upon our current tracking and inspection measures.*

*These improvements to our documentation will not alleviate the inherent issues that surround construction projects as far as site dynamics. Active sites change daily and construction traffic, trenching, grading, clean-up, landscaping, etc., can all modify what was once an ideal erosion control system. Inspection staff typically use*

*correction notices to initiate installation of, or modifications to erosion control systems. In the event sediment does breach the erosion control systems a correction notice is used to require clean up procedures.*

**#23 Action:** Include, **as an attachment to the 2010 Annual Report**, a definition of what the City means when it reports that construction sites were “in compliance,” and justification for this definition.

*The goal of the City is to always correct any inadequate installation of ECPs. City staff does not have direct oversight of the installation of what has been approved on the ECPs. However, every construction site is inspected before work can begin, and when a violation is recognized, proper corrections are required. Follow-up inspections also occur, and when a violation is recognized (after work has begun), an immediate stop work order is written to the contractor to correct the condition. Violations do occasionally occur, but all are corrected immediately (normally via warnings and correction notices) so the City maintains 100 percent compliance by the end of any given day. City Building staff has evaluated the effectiveness of their site inspection parameters and are confident in their approach because each and every correction notice and/or stop work order results in construction sites achieving 100 percent compliance before work can continue.*

**#24 Action:** Include, **as an attachment to the 2010 Annual Report**, a discussion that includes the following elements:

- A. A summary of enforcement actions taken by the City to bring construction sites into compliance;
- B. Clear statements that all sites were brought into compliance through enforcement actions;
- C. A summary of the length of time sites remained out of compliance;
- D. For sites noted in Appendix 4A as having inadequate ECPs, clear statements whether the City received adequate revised ECPs and how long it took to receive adequate ECPs;
- E. An evaluation of the effectiveness of the City’s enforcement procedures (including notices of violation, “stop work” notices, and fines) at achieving compliance at construction sites in a timely manner; and
- F. Where the City’s inspection and enforcement procedures can be improved.

*The term “in compliance” means that all SWMP and ECP requirements have been installed in accordance with the approved plans that list the required SWMP and ECP requirements applicable to the construction site. The justification of “in compliance” is that an actual inspection has taken place and the building inspector physically reviewed the approved plans and SWMP and ECP regulations to ensure conformance. Thus, “in compliance” also means 100 percent in compliance will all applicable SWMP and ECP requirements for each and every site where SWMP and ECP requirements are applicable.*

**#25 Action:** Include, **as an attachment to the 2010 Annual Report**, a summary of pollutant discharges and other water quality impacts resulting from failed BMPs. (Note that Water Board staff’s review of the addendum may indicate further violations of General Permit Section B (Discharge Prohibitions) and Section C (Effluent Limitations).)

*Enforcement Action taken by the City to bring construction sites into compliance includes conducting site inspections of each construction site. If a construction site is found to not be in conformance with the applicable SWMP regulations a correction notice or a stop work notice is issued by the field inspector. Minor violations are corrected within 72 hours or sooner, should rain be projected. Major violations are corrected either at the time of inspection or within 24 hours, again depending on weather conditions. Through these enforcement actions all construction sites were in fact brought into compliance with the applicable SWMP and ECP requirements in 2009. Thus the issuance of a correction notice or stop work order has resulted in compliance at construction sites in a timely manner. The City’s inspection and enforcement procedures are in fact working so that all construction sites are brought into 100 percent compliance and therefore there is no need to improve the enforcement procedures.*

*There were no observed or known discharges or significant water quality impacts resulting from the aforementioned failed BMPs. Small quantities of sediment runoff from bare/open slopes where runoff BMPs were temporarily inadequate is the only discharge that may have occurred, resulting in negligible impacts to water quality.*

*Improvement: It is the City Building Department's goal to help educate clients. By the time all the BMPs were installed on the construction site involving J&S Excavation in 2009, they were well informed as to the proper installation of their BMPs. Improper installation of BMPs on a site can happen even to the best of companies. It is part of the inspection process to verify that all BMPs on all sites meet the SWMP standards and to make corrections where necessary.*

**#26 Action:** Please provide, **in the 2010 annual report** and in all subsequent annual reports, a summary of all relevant information in the body of the Annual Report rather than in appendices.

*In the 2010 Annual Report, and in all subsequent annual reports, the City will provide a summary of all relevant information in the body of the annual report rather than in appendices.*

### **3. Waterfront Department (WFD) MCM #3**

#### **A. WFD BMP 3.2 – Clean Marina Program**

**#27 Action:** Include, **as an attachment to the 2010 Annual Report**, a clear statement whether the City completed its review and update of the Clean Marina Program, a description of the steps the City took to review and update the program, a summary of the results of the City's review, and a list of proposed modifications to the program.

*The Waterfront Department (WFD) reviews the Clean Marina Program annually, during the preparation of the annual report for the Harbor Commission.*

*The WFD reviewed the Clean Marina Program reports for 2009 and compared the results with the goals and objectives previously established. In 2009, the goals and objectives were achieved, with no anomalies. The 2009 reports were then compared with previous reports from 2003 thru 2008. The previous years reports are consistent with the 2009 report. From 2003 thru 2009, the goals and objectives were consistently achieved, indicating an effective and successful program.*

*In 2009, the following modifications were made to the Clean Marina Program:*

- 1) Supported / promoted Mobius Rigging, (a mobile sewage pump-out station) in the harbor.*
- 2) Supported / promoted / tested alternative hull paints. (In response to studies indicating elevated copper levels in many Southern California harbors, statewide research and testing of alternative hull paints has increased in recent years). Santa Barbara Harbor Patrol, California Sea Grant (in partnership with University of California Santa Barbara) and Santa Barbara Channelkeeper are conducting the testing.*
- 3) The WFD, working with the Regional Water Quality Control Board (RWQCB), added to its Marina Rules and Regulations a prohibition against the use of non-biodegradable soaps and disinfectants in vessel wash-down water.*

#### **B. WFD BMP 3.3 – Assess Effectiveness**

**#28 Action:** Include, **as an attachment to the 2010 Annual Report**, a clear statement whether the City completed the effectiveness assessment according to the SWMP, a description of the steps the City took in its assessment, a summary of the results of the City's effectiveness assessment, and a list of proposed modifications to the Discharge Ordinance and the Clean Marina Program to make them more effective.

*In 2009, the WFD completed its effectiveness assessment of the Discharge Ordinance and the Clean Marina Program according to the SWMP.*

*The Department reviewed reports for 2009 and compared the results with the goals, objectives and benchmarks previously established. In 2009, the goals, objectives and benchmarks were achieved, with no anomalies. The 2009 reports were then compared with previous reports from 2003 thru 2008. The previous years reports are consistent with the 2009 report.*

*From 2003 thru 2009, the goals, objectives and benchmarks were consistently achieved, indicating an effective and successful program.*

**C. WFD BMP 3.4 – Illicit Discharge Response and Elimination**

**#29 Action:** Include, **as an attachment to the 2010 Annual Report**, the number of illicit and/or illegal discharges the City detected through complaints or observations, a summary of the types of discharges detected, a description of threats to water quality posed by the discharges, a clear statement that the City responded to 100% of the detected discharges within 24 hours, a summary of the City’s response activities, and a summary of the results of the City’s response to—and resolution of—each episode.

*In 2009, 14 known illicit discharges were recorded (summarized below). These discharges posed potential toxicity problems for marine invertebrates, fish and birds. Each discharge was responded to within 24 hours, and the response/resolution approach is defined below.*

**ILLICIT DISCHARGE**

**RESPONSE / RESOLUTION**

<i>Sanding Dust - 5</i>	<i>Regulation Packet to offender</i>
<i>MSD Dye - 1</i>	<i>Regulation Packet to offender</i>
<i>Paint Chips - 2</i>	<i>Regulation Packet to offender</i>
<i>Oil Sheen - 1</i>	<i>Regulation Packet to offender</i>
<i>Paint - 1</i>	<i>Regulation Packet to offender</i>
<i>Hydraulic Fluid - 1</i>	<i>Regulation Packet to offender</i>
<i>Oil (outboard engine oil leak) - 1</i>	<i>Regulation Packet to offender</i>
<i>Oil (bilge water) - 1</i>	<i>Verbal Warning &amp; Regulation Packet to offender</i>
<i>Transmission Fluid - 1</i>	<i>Citation</i>

**D. WFD BMP 3.5 – Review Harbor Patrol Logs**

**#30 Action:** Include, **as an attachment to the 2010 Annual Report**, a clear statement whether the City completed its review of the Harbor Patrol’s logs according to the SWMP, the number of illicit and/or illegal discharges recorded in the Harbor Patrol’s logs, a list of BMPs the City evaluated, a description of the procedure used by the City to evaluate BMPs, a summary of the results of the City’s evaluation, and a summary of any modifications proposed by the City to make waterfront illicit and/or illegal discharge detection and elimination BMPs more effective.

*In 2009, the Department completed its review of the Harbor Patrol Logs. 14 known illicit discharges were recorded.*

*Harbor Patrol illicit discharge response BMPs implemented in FY2009:*

- 1. Regulation Packets*
- 2. Personal contact by the Harbor Patrol Officers*
- 3. Citation*

*The Waterfront Department reviews Harbor Patrol BMPs annually, during the preparation of the annual report for Harbor Commission. During the review current year data is compared to previous year's data. When FY2009 was compared with the FY2008, the number of illicit discharges decreased 36%. When FY2009 was compared with reports from FY2005, the number of illicit discharges decreased 56%.*

*From 2005 thru 2009, the number of illicit discharges has consistently decreased, indicating an effective and successful use of BMPs.*

#### **4. Airport Department (AD) MCM #3**

##### **A. AD BMP 3.1 – Visually Inspect Outfalls**

**#31 Action:** Include, **as an attachment to the 2010 Annual Report**, a summary of the results of the City's inspection of airport stormwater outfalls, including a description of non-stormwater discharges detected and the City's response to non-stormwater discharges detected, if any.

*Visual observations of stormwater outfalls were conducted by Airport staff in January, May, July, and October, 2009. No unauthorized non-stormwater discharges were observed. The authorized non-stormwater discharges that were observed were all groundwater discharges other than one irrigation discharge detected on July 15<sup>th</sup>, 2009 at outfall 22. However, the inlets contributing to outfall 22 are not within the industrial permit boundary, and the irrigation was flowing from a vegetated swale. The discharge was clear with no sign of contamination. The groundwater discharges did not have any visible source at the surface, and all the discharges were clear with no sign of contamination.*

##### **B. AD BMP 3.2 – Annual Comprehensive Site Compliance Evaluation (ACSCE)**

**#32 Action:** Include, **as an attachment to the 2010 Annual Report**, a summary of the results of the ACSCE as it relates to stormwater and MS4 management and to water quality protection.

*Airport staff conducted the ACSCE inspection during May and June 2009 to evaluate site compliance. Specifically, the following facilities were inspected: The commercial fuel farms, the wash racks, the commercial apron/airline terminal ramp, the "lav cart" waste dump, the airline terminal backup generator, the airport maintenance and storage yard, the aerobrite and powerwash area, the general aviation tie down areas, the Fed-Ex/Empire Airlines area, the DHL Express/Air-Cargo Carriers/Red Baron Aviation area, Santa Barbara City Fire Station 8, the Stratman Aero Services FBO, the Aero-Mars area, the Signature Flight Support area, the Atlantic Aviation area, the FAA facilities, and the airport access and paved service roads. No deficiencies in BMPs or BMP implementation were noted. Both Airport staff persons who conducted the inspections noted that all BMPs were fully implemented and that no additional or revised BMPs were necessary.*

##### **C. AD BMP 3.3 – Sampling**

**#33 Action:** Include, **as an attachment to the 2010 Annual Report**, a summary of the results of the stormwater sampling, including a summary of pollutants detected in the stormwater samples, an analysis of potential sources of these pollutants, and a description of the City's response to the information.

*Airport stormwater sampling efforts were implemented to comply with general industrial stormwater discharge permit requirements. Sample results are compared to benchmarks.*

*In 2009 during the first sample event on February 5, sample results exceeded general industrial permit benchmarks for iron at all locations except site 1. Sample results also exceeded benchmarks at sites 6 & 9 for specific conductance.*

*During the second sample event on October 13, results exceeded the benchmark for total suspended solids at site 6, and for iron at sites 6 and 9.*

*Likely potential sources of Airport:*

***Total Suspended Solids***

- *run-off from sparsely vegetated Airport infield areas,*
- *gopher activity adjacent to inlets.*

***Iron***

- *naturally occurring in soil,*
- *oxidizing metallic infrastructure,*
- *oxidizing metallic equipment.*

***Specific Conductance***

- 1) *high saline soil and tide water influenced environment.*

*To identify potential sources of pollutants, Airport conducts quarterly inspections at all outfalls for non-stormwater discharges. Sites 6 & 9 regularly have authorized non-stormwater discharges. Inlets for those outfalls are inspected on a quarterly basis to identify potential unauthorized non-stormwater discharges. No non-stormwater discharges or specific pollutant sources were identified at either site 6 or 9 during 2009 inspections.*

*If unusual results are found, Airport staff conducts a focused inspection of the collection system in an attempt to locate the source of the high sample result. On October 27, 2009 a focused inspection was conducted on site 6 to investigate high total suspended solid and iron sample results. No unusual conditions were noted during the inspection. A copy of the memo that was produced to document the focused inspection is available, by request.*



## F. Minimum Control Measures

### 1. Public Education and Outreach

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Education Program for School Children	1.1	Document all youth education programs presented and number of students.	X			X		
Enrichment-Based Youth Education	1.2	Identify opportunities to develop and implement after-school educational programs including creek clean-ups and planting days.	X			X		
Distribute Informational Brochures and Postcards	1.3a	Distribute “The Ocean Begins on Your Street” Brochure in English. Document the target audience, number of brochures distributed through community events, reach 50% of intended audience.	X		X	X		
	1.3b	Distribute “The Ocean Begins on Your Street” Brochure in Spanish. Document the target audience, number of brochures distributed through community events, reach 50% of intended audience.	X		X	X		
	1.3c	Document the number of brochures distributed to promote the Clean Water Business Program and in response to illegal discharge investigations. Reach 100% of intended audience. Certify a minimum of 20 businesses per year. Focus on: Automotive Businesses, Restaurants, Mobile Washers, Retail Stores, Hotels, and/or Landscapers or Gardeners	X		X	X		
	1.3d	Develop new informational brochures, document distribution to specific target audiences on an annual basis. Reach 100% of intended audience.	X			X		
Event Participation	1.4a	Earth Day Exhibit	X			X		
	1.4b	Creek Week	X			X		
	1.4c	Green Gardener Program	X		X	X		
	1.4d	Other Relevant Events (2)	X			X		
Storm Drain Marking	1.5	Maintain and replace storm drain markers as necessary.	X		X	X		
Stormwater Hotline/City Information Line	1.6a	Advertise call-in number on SWMP media and educational materials in English.	X			X		

Small MS4 General Permit Annual Report –  
Public Education and Outreach (MCM 1)

<i>Activity</i>	<i>BMP</i>	<i>Description/Implementation</i>	<i>Status</i>					
			<b>Implemented</b>	<b>Not Applicable</b>	<b>Modified</b>	<b>Effective</b>	<b>Unknown</b>	<b>Not Effective</b>
	1.6b	Advertise call-in number on SWMP media and educational materials in Spanish.	X			X		
Neighborhood-based Outreach Program	1.7	Implement annual neighborhood outreach program with educational programming, creek clean-ups, and creek restoration activities.	X			X		
Community-based Social Marketing	1.8	Assess outreach opportunities to utilize community-based social marketing strategies.	X				X	
www.sbcreeks.com	1.9	Maintain and update the Creeks Division website on a quarterly basis.	X			X		
Clean Water Business Program	1.10	Continue certification of automotive service businesses and expand to include certification program for restaurants, hotels, contractors, and mobile businesses (mobile detailers, power washers, carpet cleaners).	X			X		
Community Media Campaigns	1.11a	Develop and air public service announcements on the radio in English.	X			X		
	1.11b	Develop and air public service announcements on the radio in Spanish.	X			X		
	1.11c	Develop and air public service announcements on television in English and Spanish.	X			X		
	1.11d	Develop and publish print advertising in English.	X			X		
	1.11e	Develop and publish print advertising in Spanish.	X			X		
Conduct a Public Opinion Survey	1.12	Hire a consultant to perform the survey.	X			X		

## **BMP 1.1 Education Program for School Children**

**Measurable Goal 1.1:** *Provide 132 presentations/year. Reach 3,000 youth. Conduct annual teacher surveys, where feasible, to evaluate and revise program accordingly.*

**Status:** 2010 Total: 246 presentations: 5,702 youth reached

During the first quarter of 2010 (January-March), a total of 78 presentations were provided to 1,351 youth. Art From Scrap provided 36 watershed presentations to 844 youth. City staff in collaboration with the Multicultural Education for Resource Issues Threatening Oceans (MERITO) program provided 2 presentations to 32 students. As part of the Adams School Bioswale project, City staff provided 29 presentations to 475 students.

During the second quarter of 2010 (April – June), a total of 76 presentations were provided to 1,765 youth. Art From Scrap provided 63 presentations to 1,530 youth. As part of the Adams School Bioswale project, City staff and local poet and educator Sojourner Kincaid Rolle provided 13 presentations to 235 students.

During the third quarter of 2010 (July – September), Art From Scrap provided a total of 22 presentations to 554 youth.

During the fourth quarter of 2010 (October – December), Art From Scrap provided a total of 70 presentations to 2,032 students.

Art From Scrap conducts a teacher survey for classes that participate in their Green Schools Program, which includes the 3-part Creek Kids Series, trips to the Watershed Resource Center, and in-class presentations, to obtain feedback for the purpose of revising the program annually or as needed. Art From Scrap updates their lesson plan to include new water quality and watershed related issues and topics as needed, and Creeks Division staff met with Art From Scrap instructors in November to discuss beach closures and water quality criteria to help them better answer questions from students, parents, teachers, and the public.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

## **BMP 1.2 Enrichment-Based Youth Education**

**Measurable Goal 1.2:** *Document number of youth that participate in programs.*

**Status:** 2010 Total: 130 youth reached

Over the course of 2010, the Youth CineMedia program worked with approximately 100 “at-risk” teens after school to create multi-media projects for the Creeks Division’s Outreach program. These materials have included educational print ads, television public service announcements, short films, and bus ads. Videos produced by the participants were featured at the Santa Barbara International Film Festival in February, and also shown as a regular column online at [www.independent.com](http://www.independent.com), a popular local weekly newspaper. By employing youth in the Youth CineMedia program to create outreach materials and films related to water quality issues and restoration projects, the City is raising awareness of water quality issues and solutions among that group of at-risk teens, who in turn are helping raise awareness among other teens, the Spanish speaking community, and the community at large.

In April, 30 students in the Recreation Afterschool Program (RAP) at Adams Elementary School participated in watershed education activities based around the new bioswale on their campus, including water quality testing, native plant and animal exploration, drawing, and poetry. By involving these students in hands-on activities and educational programs, and creating a “natural” creek on their campus, the children are learning about the benefits of natural creek systems and native plants. This project will be incorporated into the Creek Kids series of watershed presentations and field trips to the Watershed Resource Center at Arroyo Burro Beach. By taking students on a trip down their own watershed, they better understand the concept that the water that flows through the bioswale on their campus ends up at the beach, and that activities in the neighborhood around the school, as well as on their campus, have a direct effect on the health of Arroyo Burro Creek and the ocean. Adams Elementary School teachers also utilize the bioswale and garden area as an outdoor classroom, with one week of science labs taking place at the site each month.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 1.3 Distribute Informational Brochures and Postcards**

**Measurable Goal 1.3a:** *Document the target audience, number of brochures (“The Ocean Begins on Your Street” in English) distributed through community events, reach 50% of intended audience.*

**Status:** 2010 Total: 199 English Brochures Distributed (Additional English language outreach materials distributed at community events throughout 2010 included 73 Watershed Guides, 179 Water Quality Enforcement Hotline Magnets, 20 Creek Tree Program Flyers/Applications, 9 Clean Water Business Program Flyers/Applications, 366 Water Pollution Sticker Sheets, 70 Homeowners BMP Brochures, 23 Our Water Our World Information Sheets, 144 Pest or Pal Coloring/Activity Books, and 71 Be Kind to Animals Coloring/Activity Books)

During the first quarter of 2010, brochures were distributed at two beach clean-ups held on February 3 (5) and February 27 (4), as well as at All Around Landscape Supply’s BBQ and Landscape Expo on March 24 (27).

During the second quarter, brochures were distributed at the Earth Day Festival on April 17 & 18 (17), provided to a local English as a Second Language for adults and elementary school instructor (40), and at Adams Elementary School’s Science Night (27).

During the third quarter, brochures were displayed and picked up in the Parks and Recreation main office (20).

During the fourth quarter, brochures were distributed at the Watershed Resource Center Celebration on October 3 (10), at the Neighborhood & Outreach Services Division’s “Going Green” Event on October 5 (2), at the Harbor & Seafood Festival on October 9 (10), at the Surfrider Foundation’s Paddle Out on October 16 (7), and replenished in the Parks and Recreation main office twice (30).

**Proposed Modifications:** Expand this BMP to include tracking all outreach materials distributed at community events, rather than just “The Ocean Begins on Your Street” brochures.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.3b:** *Document the target audience, number of brochures (“The Ocean Begins on Your Street” in Spanish) distributed through community events, reach 50% of intended audience.*

**Status:** 2010 Total: 181 Spanish Brochures Distributed (Additional Spanish language outreach materials distributed at community events throughout 2010 included 34 Homeowners BMP Brochures, 23 Our Water Our World Information Sheets, and 54 Be Kind to Animals Coloring/Activity Books)

During the first quarter of 2010, brochures were distributed at two beach clean-ups held on February 3 (1) and February 27 (2), as well as at All Around Landscape Supply’s BBQ and Landscape Expo on March 24 (7).

During the second quarter, brochures were distributed at the Earth Day Festival on April 17 & 18 (3), provided to a local English as a Second Language for adults and elementary school instructor (37), and at Adams Elementary School’s Science Night (53).

During the third quarter, brochures were displayed in the Parks and Recreation main office (20).

During the fourth quarter, brochures were distributed at the Neighborhood & Outreach Services Division’s “Going Green” Event on October 5 (16), the Harbor & Seafood Festival on October 9 (2), and replenished in the Parks and Recreation main office twice (40).

**Proposed Modifications:** Expand this BMP to include tracking all Spanish-language outreach materials distributed, rather than just “The Ocean Begins on Your Street” brochures.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.3c:** *Document the number of brochures distributed to promote the Clean Water Business Program and in response to illegal discharge investigations. Reach 100% of intended audience. (Year 1: Automotive; Year 2: Restaurants; Year 3: Mobile Washers; Year 4: Mobile Washers; Year 5: Hotels)*

**Status:** 2010 Total: 409 Brochures Distributed

During 2010, brochures promoting the Clean Water Business Program and the Business Assistance Program were distributed at various community events, including All Around Landscape Supply’s BBQ & Landscape Expo on March 24 (2), the Earth Day Festival on April 17 & 18 (6), and the Harbor & Seafood Festival (1).

Furthermore, a brochure on parking lot BMPs were distributed (in compliance with BMP 3.11) to educate property owners and local businesses about clean water practices in their parking lots. The brochures were mailed to approximately 400 owners.

**Proposed Modifications:** This goal should be partially modified. City staff feels the most efficient and beneficial outreach approach for this BMP is to list the potential business sectors that can be included in the Clean Water Business Program (the businesses in Santa Barbara with the most potential to impact water quality), but not to switch/focus on a new business sector every year. The approach should be to expand to a new business type as needed, once staff feels a business sector has been well-addressed/saturated with the Clean Water Business Program outreach efforts. If a focus/switch to a new business sector each year is required, staff becomes spread too thin with too many businesses to address. For example, there are still

hundreds of restaurants and mobile washers, as well as retail stores that the City has yet to approach with the Clean Water Business Program, after having already focused the program on restaurants, automotive and mobile washers since 2008 (the automotive business sector has been more or less saturated, at this point, with outreach efforts for this program). So, the revised Measurable Goal should read, “*Document the number of brochures distributed to promote the Clean Water Business Program and in response to illegal discharge investigations. Reach 100% of intended audience. Certify a minimum of 20 businesses per year. Focus on: Automotive Businesses, Restaurants, Mobile Washers, Retail Stores, Hotels, and/or Landscapers or Gardeners.*”

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.3d:** *Develop new informational brochures, document distribution to specific target audiences on an annual basis. Reach 100% of intended audience.*

**Status:** In December, staff prepared a new brochure (in English and Spanish) called “Parking Lot Maintenance Best Management Practices.” The brochure includes information on how to properly maintain and clean paved areas and trash enclosures, and provides information on potential additional measures property owners can take to help reduce stormwater runoff and improve local water quality. The English brochures were distributed to a mailing list of 400 property owners in the City with parking lots 5,000 square feet or greater, or 25 or more parking spots. Copies of both English and Spanish versions of the brochure are kept in the enforcement vehicle for distribution to community members contacted through enforcement actions, and brochures will be distributed at community events when appropriate.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

#### **BMP 1.4 Event Participation**

**Measurable Goal 1.4a:** *Earth Day (1 event).*

**Status:** Staff from eight City divisions attended and presented information at the Earth Day Festival on Saturday and Sunday, April 17-18. Participating divisions included Creeks, Wastewater, Water Resources, Parks/Forestry, Environmental Services, Planning/Building, Transportation, and Facilities/Energy. Informational materials, presentations, and raffle prizes were provided to festival attendees. The event organizer (Community Environmental Council) estimates that over 31,000 people attended the festival.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.4b:** *Creek Week (1 event).*

**Status:** The 11<sup>th</sup> annual Creek Week took place September 25 – October 3. Over 1,500 community members participated in 23 events throughout the week, including the 26<sup>th</sup> annual Coastal Cleanup Day on September 25<sup>th</sup>. Throughout the week, over 5,000 lbs of trash and debris was removed from local creeks and beaches, and 311 native plants were planted. The Creeks Division partnered with local organization COAST (Coalition for Sustainable Transportation) for a walk along Mission Creek from Canon Perdido Street to the

beach to discuss restoration, flood control, and fish passage projects. The Creeks Division also hosted a community planting day at the Mission Creek Restoration and Fish Passage Project at the Tallant Road Bridge in Oak Park. Other events included presentations about efforts to restore the endangered steelhead trout to local creeks, tours of the Arroyo Hondo Preserve and the Carpinteria Salt Marsh Reserve, bird walks, and a closing celebration with games and activities at the Watershed Resource Center.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.4c:** *Sponsor and participate in the Green Gardener Program.*

**Status:** The City’s Creeks Division and Water Resources Division are both sponsors of the joint-agency Green Gardener Program, which is led by the City, the County, and Santa Barbara City College. The program trains local landscapers on sustainable landscaping and efficient irrigation in order to reduce contaminated runoff. The Creeks Division’s sponsorship of \$500 and the Water Resources Division’s 60 hours of staff support and sponsorship of \$1,000 helped provide training to 66 program graduates in 2010.

Creeks Division staff also attended All Around Landscape Supply’s BBQ & Landscape Expo on March 24 to present information to local landscape professionals.

**Proposed Modifications:** Per the Water Board’s December 16<sup>th</sup>, 2010 comment letter regarding the City’s 2009 SWMP Annual Report, the proposed, numeric modification for this Measurable Goal is now, “Contribute a minimum of \$1,500 per year to the joint-agency Green Gardener Program to help educate landscape professionals about protecting water quality.”

**Proposed Year 3 Activities:** Ongoing

**Measurable Goal 1.4d:** *Other Relevant Events (2 events).*

**Status:** 2010 Total: 4 Events

Staff attended and presented information at the Watershed Resource Center Celebration on October 3; at the City’s Neighborhood & Outreach Services Division’s “Going Green” Event on October 5 (attended primarily by Spanish-speaking community members); at the Harbor & Seafood Festival on October 9; and, at the Surfrider Foundation’s Paddle-Out on October 16.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 1.5 Storm Drain Marking**

**Measurable Goal 1.5:** *Evaluate and clean 2,300 storm drain markers annually, as necessary.*

**Status:** This goal was not met, and needs to be modified due to new City procedures and a change in available funds for this work (see Proposed Modifications, below). A total of 236 storm drain markers were cleaned in 2010.

The Streets Division cleaned 74 markers in February. On May 15, as part of the annual Looking Good Santa Barbara community clean-up, 12 volunteers cleaned and replaced 88 storm drain markers in the Eastside neighborhood. On August 5, 17 students and counselors in United Way’s “Fun in the Sun” program at La Cumbre Junior High School cleaned and replaced 74 storm drain markers in the Westside neighborhood.

**Proposed Modifications:** Funds that were previously appropriated for cleaning these storm drain markers are no longer designated to this task due to budget changes. Therefore, the City proposes to modify this measurable goal to; “*Evaluate and clean 230 storm drain markers, annually.*” This is a reasonable goal through volunteer efforts and City staff efforts.

**Proposed Year 3 Activities:** Evaluate and clean 230 storm drain markers in 2011.

### **BMP 1.6 Stormwater Hotline/City Information Line**

**Measurable Goal 1.6a:** *4 information pieces through direct mail, media campaigns and/or public events to reach a minimum of 5,000 residents (advertise call-in number in English).*

**Status:** 2010 Total: 7 information pieces, reaching over 37,000 residents.

The Creeks Division call-in number was listed in the Parks & Recreation Spring and Fall Activity Guides, which are published online, and viewed by an estimated 35,000 community members per year (1, 2). The hotline was included in an ad placed in a local high school’s theater production program in April, reaching approximately 1,500 students, staff, and parents, and posted online (3). The hotline is listed on Creeks Division magnets, 179 of which were distributed at community events throughout the year (4). The County’s (Project Clean Water) hotline was listed on interior (all 95 buses, all year) and exterior (12 buses, summer months only) MTD bus ads (5, 6). The buses provide over 8,000,000 passenger trips per year, and the exterior ads are seen by passing motorists, pedestrians, and bus riders. The hotline is also listed in “The Ocean Begins on Your Street” brochure (7), 199 of which were distributed at various community events throughout 2010. The Creeks Division’s general information number was also listed on all printed materials distributed throughout the year, including event flyers, postcards, meeting notices, print advertisements, and brochures.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.6b:** *4 information pieces through direct mail, media campaigns and/or public events to reach a minimum of 5,000 residents (advertise call-in number in Spanish).*

**Status:** 2010 Total: 6 information pieces, reaching over 44,000 residents.

The Stormwater Hotline was included in an ad placed in a local high school’s theater production program in April, reaching approximately 1,500 students, staff, and parents, and posted online (1). The hotline was also listed in the Parks & Recreation Spring Activity Guide, which was published online, and is viewed by an estimated 35,000 community members per year (2). The County’s hotline was listed on interior (all 95 buses, all year) and exterior (12 buses, summer months only) MTD bus ads (3, 4), with over 8,000,000 passenger trips per year. The hotline is also listed in “The Ocean Begins on Your Street” brochure, 181 of which were distributed at various community events throughout the year (5). The Creeks Division’s general information number was also included in 26 print ads in *El Mexicano*, a local Spanish-language bi-weekly newspaper (6). Each issue of *El Mexicano* is distributed directly to 8,000 community members, and another 12,000 are



available throughout the community.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 1.7 Neighborhood-based Outreach Program**

**Measurable Goal 1.7:** *Select neighborhoods for participation, implement 2 programs annually, document number of participants.*

**Status:** A total of 35 community members participated in the neighborhood outreach program in 2010. On May 15, a creek clean-up and native planting took place on Sycamore Creek in the Eastside neighborhood, with 15 community volunteers participating. On September 30, a native planting day took place at the Mission Creek Restoration and Fish Passage Project at Oak Park, with 20 volunteers from the surrounding neighborhood and Horny Toad Activewear employees participating.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 1.8 Community-Based Social Marketing**

**Measurable Goal 1.8:** *Identify at least one opportunity per year for community-based marketing and report why it was or was not an appropriate strategy. If utilized, assess and report on its successes and/or failures by conducting pre and post-project behavior observations.*

**Status:** In 2010 the Creeks Division ran an online banner ad for two weeks at [www.independent.com](http://www.independent.com), a local weekly newspaper, which receives over 275,000 visitors per month. The ad rotated on the top of the site along with 2-3 other ads, and featured an image from the 2010 media campaign of a surfer near a storm drain. The ad included the phrase “The Ocean Begins on Your Street” and asked website visitors to take a “Clean Creeks Pledge” with prizes offered as an incentive. The ad linked to a pledge that included a list of actions that residents can take to help protect and improve local water quality. Visitors were asked to check boxes labeled “I will do this” or “I already do this” next to each action. The form also asked which watershed they lived in, and asked permission to print their first name, last initial, and their watershed in a print ad thanking them for taking the Clean Creeks Pledge. The incentive of being entered for raffle prizes was expected to help garner participation, but only three community members ended up taking the pledge. Those who took the pledge were willing to have their names published in order to make their commitment public, but due to the limited participation, staff opted not to run a print ad. While the pledge did not have many participants, the imagery and phrase used in the ad related back to the print, television, and bus ads the Creeks Division ran this year, reinforcing the message for those who visited the Independent’s website.

The Creeks Division also encourages visitors at all community events to make a written commitment by signing a “Clean Creeks Pledge” to adopt behaviors that will help improve and protect water quality in our creeks and the ocean. Throughout 2010, 53 community members took the Clean Creeks Pledge at public events.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 1.9 [www.sbcreeks.com](http://www.sbcreeks.com)**

**Measurable Goal 1.9:** *Update web page content on a quarterly basis. Advertise website on four media pieces per year. Increase website “hits” (visitors) by 5% annually.*

**Status:** The Creeks Division’s website is updated often on an as-needed basis throughout the year (more often than quarterly). The Clean Water Business page is updated as new businesses are certified. During the first quarter of 2010 a new page was added with descriptions and photos of the Mission Creek Fish Passage projects, a new page was added for the Catch Basin Screens installation project, and new television public service announcements were added to the site’s video library.

During the second quarter, a new Creek Week webpage was setup to include information on the 2010 event. The catch basin screens page was updated to reflect the phases of installation that have been completed, and all links were checked for accuracy and broken links corrected. A new page was also added to inform the public on the invasive species, the New Zealand Mudsnail.

During the third quarter, the Water Quality programs page was updated to include the recently completed Laguna Watershed Study.

During the fourth quarter, the Mission Creek Fish Passage page was updated. The Fiscal Year 2010 Water Quality Report was also added to the website.

The website address is included in all outreach materials, including the Parks & Recreation Spring and Fall Activity Guides, Clean Water Business ads appearing in *The Independent* and *Food & Home Magazine*, interior (all year) and exterior (summer months) MTD bus ads, English and Spanish radio and television public service announcements, Spanish-language print ads in *El Mexicano*, a local Spanish-language bi-weekly newspaper, brochures, project postcards, magnets, event posters and flyers, and more.

The website received 1,540 hits during the first quarter; 1,962 during the second quarter; 2,055 during the third quarter; and 1,425 during the fourth quarter. The 2010 total was 6,982, a decrease of 3% from the 2009 total of 7,228 hits. The Creeks Division is exploring new ways to drive traffic to the website, including online advertising and social media.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Explore new ways to drive traffic to the website, including online advertising and social media.

**BMP 1.10 Clean Water Business Program**

**Measurable Goal 1.10:** *Expand program with one additional business type each year. Certify at least 20 businesses annually and inspect certified businesses every 2 years for possible re-certification.*

**Status:** Creeks Division staff certified 20 businesses in Year 2, with a focus on restaurants and mobile businesses. The program was expanded with mobile businesses in 2010, since the focus had been on automotive and restaurant businesses in Year 1.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** The focus of this program will be shifted to retail stores in the downtown area in Year 3, as well as recertifying/inspecting businesses who have been certified for 2 years or longer.

### **BMP 1.11 Community Media Campaigns**

**Measurable Goal 1.11a:** *Reach 30,000 listeners at least 1/month (English radio PSAs).*

**Status:** English radio public service announcements aired monthly on local Rincon Broadcasting stations KIST 1490 AM, KSBL 101.7 FM, KTMS 990 AM, KTYD 99.9 FM, and KDB 93.7 FM, reaching an estimated 35,000 listeners per month.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.11b:** *Reach 15,000 listeners at least 1/month (Spanish radio PSAs).*

**Status:** Spanish radio PSAs aired monthly on local Spanish-language Rincon Broadcasting stations KIST 107.7 FM and KSPE 94.5 FM, reaching an estimated 19,600 listeners per month.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.11c:** *Reach 40,000 television watchers at least 1/month (English and Spanish television PSAs).*

**Status:** English and Spanish television public service announcements aired monthly on various Cox Media stations (the local cable provider), as well as on KPMR, the local Univision station, reaching approximately 137,000 viewers per month. English public service announcements were also run on local channel KEYT from April through June, reaching approximately 21,000 viewers per month.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.11d:** *12 display ads (English print advertising).*

**Status:** A total of 28 display ads were printed in English in 2010. Display ads were included in the Parks & Recreation Spring and Fall Activity Guides (1, 2). In January and September, ads were run in CASA

*Magazine* (3, 4). Print ads were placed in *The Independent* in January (5), February (6), March (7), April (8, 9), May (10), June (11), November (12), and December (13). Display ads were placed in a local high school’s theater production programs (14, 15), which were distributed to approximately 1,500 students, staff, and families, as well as displayed online. On local MTD buses, display ads were run on the interiors of the full fleet of 85 buses all year (16), with new ads installed in September (17), and on the exterior of 10 buses during the summer months (18). Display ads promoting the Canine Scent Tracking forum held in June were placed in *The Independent* (19), a local weekly newspaper, and in *The Daily Sound* (20), a local daily newspaper. Display ads were created to promote Creek Week, and ran in *The Daily Sound* (21, 22, 23, 24), as well as *The Independent* (25, 26, 27). An ad was also placed in the Adams Elementary School Yearbook in April (28).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 1.11e:** *4 display ads (Spanish print advertising).*

**Status:** A total of 31 display ads were printed in Spanish in 2010. A Spanish language display ad, designed by Youth CineMedia, ran twice per month in *El Mexicano*, a local Spanish-language bi-weekly newspaper, and a new ad began running in the fall (26). In April, a bilingual ad was placed in a local high school’s theater production program (27). A bilingual ad was also included in the Parks & Recreation Fall Activity Guide (28). On local MTD buses, bilingual ads were run on the interiors all year (29), with new ads installed during September (30), and on the exterior of the buses during the summer months (31).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 1.12 Conduct a Public Opinion Survey**

**Measurable Goal 1.12:** *Complete Public Opinion Survey and implement recommendations as appropriate.*

**Status:** The Public Opinion Survey was completed in 2008. On March 10, the Creeks Advisory Committee met to discuss and adopt revisions to the Creeks Division’s Public Education Plan (2002) to reflect findings from the survey, as well as input from the Education and Outreach Subcommittee of the Creeks Advisory Committee. New tactics had already been incorporated into outreach efforts following the survey. The survey found that there was still confusion regarding the role of the storm drain, and outreach materials have been developed to help increase this understanding, including a new series of television, radio, and print ads with the message “The Ocean Begins on Your Street” featuring beach activities at the storm drain.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** None.

## 2. Public Involvement/Participation

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Creeks Advisory Committee Meetings	2.1a	Hold monthly public meetings to discuss creeks, water quality and community outreach	X			X		
	2.1b	Air meetings on the City's Channel 18 television station and streaming video on City website.	X			X		
	2.1c	Post meeting agendas to the City's web site by the Friday prior to the meeting.	X			X		
	2.1d	Mail meeting agendas by the Friday prior to the meeting	X			X		
	2.1e	Dedicate at least one meeting annually to provide the public with the opportunity to review and comment on the SWMP.	X			X		
Project Clean Water Stakeholder Committee Meeting	2.2	Attend quarterly meetings to provide information and seek participation from stakeholders.	X			X		
Regional Coordination	2.3	Attend quarterly public meetings to provide information and seek participation from stakeholders in the City SWMP.	X			X		
Community Forum on Water Quality Issues	2.4a	Hold annual public water quality forum to receive community input about water quality issues.	X			X		
	2.4b	Air the forum on the City's Channel 18 television station in English.	X			X		
	2.4c	Air the forum on the City's Channel 18 television station in Spanish.	X			X		
	2.4d	Post forum flyer to the City's web site, via email and submit to community calendars.	X			X		
	2.4e	Advertise meeting in local daily and weekly newspapers.	X			X		
Community Volunteer Projects	2.5	Conduct at least one creek clean-up per year and solicit participation in storm monitoring program.	X		X	X		

## **BMP 2.1 Creeks Advisory Committee Meetings**

### **Measurable Goal 2.1a:** *12 meetings.*

**Status:** During 2010, there were 10 public meetings held by the Creeks Advisory Committee (12 meetings were noticed, although two of those meetings were cancelled due to lack of a quorum). Regular Meetings were held on February 10, June 16, and November 17. Special Meetings of the Committee were held on March 10, April 21, May 12, and July 1. The Budget Subcommittee met on January 29 and April 6. A Site Visit was held on August 18. The Regular Meeting scheduled for October 13 and the Special Meeting scheduled for December 8 were both cancelled due to lack of a quorum. The Creeks Advisory Committee has been short three members (full Committee should be seven members) for several months, leading to a quorum (four members) being difficult to attain due to members' schedules. In December the City Council appointed three new members to the Committee, and staff expects all 12 meetings to take place as scheduled in 2011.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** In December 2010 the City Council appointed three new members to the Committee, and staff expects all 12 meetings to take place as scheduled in 2011.

### **Measurable Goal 2.1b:** *36 airings and archive on web for one year.*

**Status:** During 2010, there were 44 airings of Creeks Advisory Committee meetings. All televised meetings were archived online at [www.sbcreeks.com](http://www.sbcreeks.com), where they will remain available for at least one year from the meeting date.

The December 16, 2009 meeting was aired five times (January 13, 15, 19, 22, and 23). The February 10 meeting was broadcast live, and aired again 12 times (February 10, 12, 16, 19, 20, 26, March 10, 12, 13, 19, 20, and 26).

The April 21 meeting was broadcast live, and aired again six times (April 23, 30, May 10, 12, 14, and 21). The June 16 meeting aired live, and aired again eight times (June 18, 19, 25, July 31, August 18, 20, and 27).

The November 17 meeting aired live, and aired again 10 times (November 19, 20, 26, December 8, 10, 11, 14, 17, 24, and 31).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **Measurable Goal 2.1c:** *12 postings. All Meetings to be posted according to Brown Act requirements.*

**Status:** All 12 meeting postings in 2010 met the requirements of the Brown Act. The Ralph M. Brown Act requires that agendas for regularly scheduled Committee meetings are posted 72 hours (3 days) in advance of the meeting. For special meetings, the requirement is 24 hours, although staff follows the 72 hour requirement when possible.

The agenda for the Budget Subcommittee meeting held on Friday, January 29 was posted the Monday prior

to the meeting (1). For the regularly scheduled February 10 meeting and the March 10 special meeting, both held on Wednesdays, the agendas were posted the Thursday prior to the meeting date (2, 3).

For the special Tuesday, April 6 Budget Subcommittee meeting, the agenda was posted 24 hours in advance, on Monday, April 5 (5) and staff took appropriate measures to meet the noticing requirements of the Brown Act, including hand-delivering the agenda to a local newspaper's office. For the special Wednesday, May 12 meeting and the regular Wednesday, June 16 meeting, agendas were posted the Thursday prior to the meeting date (6, 7), thereby meeting the 72 hour requirement.

For the special Thursday, July 1 meeting, the agenda was posted 48 hours in advance, on Tuesday, June 29 (8), and staff took appropriate measures to meet the noticing requirements of the Brown Act. For the site visit on August 18, the agenda was posted the Thursday prior to the meeting date (9), thereby meeting the 72 hour requirement.

For the regular October 13 meeting, the agenda was posted the Thursday prior to the meeting date (10), thereby meeting the 72 hour requirement, but the meeting was cancelled due to lack of a quorum. For the regular November 17 meeting, the agenda was posted the Thursday prior to the meeting date (11), thereby meeting the 72 hour requirement. The Special meeting of December 8 was noticed on the Thursday prior to the meeting date (12), but the meeting was cancelled due to lack of quorum.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.1d:** *Distribute agendas to mailing list of 250.*

**Status:** At the start of 2010, there were 283 people on the email notification lists and 55 people on the regular (hard copy) mailing list, for a total of 338 community members receiving the meeting notice. At the end of 2010, there were 273 people on the email notification list and 56 people on the regular (hard copy) mailing list, for a total of 329 community members.

The Creeks Division distributes agendas for each meeting via mail to a list of interested community members, Committee members and liaisons, appropriate staff, and local news organizations who have requested to receive agendas. Email notice is sent with a link to the agenda to subscribers to the City's E-Subscriptions notification list, as well as a separate list of interested parties and news organizations that the Creeks Division maintains.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.1e:** *1 meeting (dedicated to SWMP).*

**Status:** The Creeks Advisory Committee received a presentation on the City's Storm Water Management Program at the June 16, 2010 meeting.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

## **BMP 2.2 Project Clean Water Stakeholder Committee Meeting**

**Measurable Goal 2.2:** *4 meetings (one quarterly).*

**Status:** Creeks Division staff attended all four Project Clean Water County stakeholder meetings in 2010 (held at the Watershed Resource Center at the County’s Arroyo Burro Beach):

- C. January 2010
- D. April 2010
- E. September 2010
- F. October 2010

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

## **BMP 2.3 Regional Coordination**

**Measurable Goal 2.3:** *4 meetings (one quarterly).*

**Status:** Creeks Division staff attended all four of the County’s Association of MS4 Managers (SBCAMM) meetings in 2010 (held at the Cachuma Lake public meeting room):

- January 2010
- April 2010
- July 2010
- October 2010

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

## **BMP 2.4 Community Forum on Water Quality Issues**

**Measurable Goal 2.4a:** *1 meeting.*

**Status:** The 2010 Canine Scent Tracking Community Forum took place on Wednesday, June 9, 2010. Sable the Sewage Sniffing Dog visited Santa Barbara to perform field tests in the Laguna Watershed and other areas around the City. The forum included a presentation by trainer Scott Reynolds of Environmental Canine Services, and a brief introduction to the City’s water quality research program provided by Creeks Division staff.

Along with a Creeks Division table featuring outreach materials and promotional dog waste bag dispensers, informational booths were provided by local organizations Santa Barbara Channelkeeper, Surfrider, UCSB’s Bren School, and the Urban Creeks Council.

**Proposed Modifications:** None.



**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.4b:** *4 airings (English).*

**Status:** The Canine Scent Tracking Forum aired on City TV Channel 18 in English a total of 15 times: June 12 (twice), 13, 19, July 10, 11, 31, August 7, 8, September 4, 5, October 2, November 19, December 10, and 17. It was also archived online at [www.sbcreeks.com](http://www.sbcreeks.com).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.4c:** *2 airings (Spanish).*

**Status:** The Canine Scent Tracking Forum aired on City TV Channel 18 in Spanish a total of 6 times: July 10, August 7, 8, September 4, 5, and October 2. It was also archived online at [www.sbcreeks.com](http://www.sbcreeks.com).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.4d:** *4 postings (flyer online, via email, and to community calendars).*

**Status:** This goal was exceeded. The Canine Scent Tracking Community Forum flyer was posted in local businesses and on community bulletin boards, online at [www.sbcreeks.com](http://www.sbcreeks.com) and on the City's homepage at [www.santabarbaraca.gov](http://www.santabarbaraca.gov), and posted online on various community calendars. Information was included in the Creeks Division e-news sent to approximately 570 community members, and emailed to all City staff. Radio ads promoting the forum were also broadcast in English and Spanish on several local radio stations the week leading up to the Forum. A "screen shot" was produced for City TV Channel 18 to run during the two weeks prior to the event. Quarter page flyers were attached to 150 promotional dog waste bag dispensers that were handed out at the Edhat.com State Street Dog Mile.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.4e:** *Place 2 advertisements (local daily and weekly newspapers).*

**Status:** Quarter page, full color print ads for the Forum ran in the Thursday, June 3 issue of *The Independent* (weekly publication) and the Wednesday, June 9 issue of *The Daily Sound* (daily publication).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 2.5:** *20 participants in a creek clean-up and 6 volunteers for storm monitoring.*

**Status:** Over 300 people participated in creek clean-ups that were either fully or partially organized by the City Creeks Division in Year 2 (summarized below). A total of five community members have expressed interest in storm water monitoring, however, due to storm sampling events taking place during the overnight hours, and the lack of volunteers' availability, no volunteers joined staff for storm monitoring during 2010.

On February 3, 134 volunteers participated in a clean-up of the Mission Creek Lagoon at East Beach. On February 27, 17 volunteers with the Montana Yellowstone Expedition and the Urban Creeks Council conducted a clean-up at East Beach near Sycamore Creek.

On April 24, 35 volunteers with Santa Barbara Rotary Clubs and the Urban Creeks Council conducted a clean-up of the Mission Creek Lagoon at East Beach. On May 15, 15 community members participated in a creek clean-up and native planting on Sycamore Creek as part of the Looking Good Santa Barbara community clean-up.

On July 15, 40 students and instructors from the Santa Barbara Graduate Institute conducted a beach clean-up around the Mission Creek Lagoon and Laguna Channel at East Beach. On July 29 and 30, 30 students and counselors from the United Way's "Fun in the Sun" program at La Cumbre Junior High School participated in an invasive plant removal effort and creek clean-up at Old Mission Creek at Bohnett Park.

On November 16, 15 students with the Youth Wilderness Expedition participated in a clean-up on Mission Creek.

Annual creek clean-ups were held in October and November with staff and community volunteers, for a total of 20 participants over 4 days.

The Creeks Division also coordinates local Adopt-a-Beach activities, which included a total of over 300 volunteers at 54 beach clean-ups throughout the year.

**Proposed Modifications:** Storm monitoring is a difficult task for volunteers because it often involves going out at odd hours (middle of the night). This measurable goal needs to be modified to say: *"20 participants in a creek clean-up and maintain a list of potential volunteers to assist in storm monitoring. Achieve participation from a minimum of two volunteers in storm monitoring activities during daylight hours at least once per year, provided that storm monitoring occurs during daylight hours."*

**Proposed Year 3 Activities:** Ongoing.

**3. Illicit Discharge Detection and Elimination**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Storm Sewer System Mapping	3.1	Maintain and update storm sewer system map via GIS.	X			X		
Municipal Code Enforcement; Document and respond to complaints of illicit discharge and other relevant enforcement issues	3.2a	Maintain database of incoming complaints and enforcement cases that staff identify.	X			X		
	3.2b	Produce and distribute response cards for complainants and include program evaluation survey on cards.	X			X		
	3.2c	Abate illicit discharges through education and outreach, patrols, call response, Notices of Violations, and Citations.	X			X		
Complete review and revision of ordinances that regulate illicit discharges	3.3a	Evaluate current ordinances to determine need to update.	X			X		
	3.3b	Hold public workshops and hearings.		X				
	3.3c	Ordinance adoption.		X				
Field Investigation and Abatement	3.4	Conduct field investigations and follow up with abatement procedures.	X			X		
Inventory of businesses and industries to be monitored for illicit connections and/or discharges	3.5	Create inventory of all Attachment 4 listed businesses and industries to be monitored for potential illicit connections and/or discharges.	X			X		
File a Notice of Intent to discharge water from the water distribution system pursuant to the RWQCB's General NPDES Permit for Discharges with Low Threat to Water Quality (Order No. R3-2006-0063)	3.6	File the Notice of Intent and maintain appropriate records.	X			X		
Inventory commercial facilities 100,000 square feet or greater	3.7	Identify and locate using GIS technology.	X			X		
Inspect commercial facilities 100,000 square feet or greater	3.8	In conjunction with the business outreach program.	X			X		

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Inventory parking lots of 10,000 square feet or greater (or space for 25 or more cars)	3.9	Identify and locate using GIS technology.	X			X		
Monitor maintenance of and BMP application to parking lots of 5,000 square feet or greater (or space for 25 or more cars)	3.10	Work in conjunction with existing enforcement programs, Business Certification Program, & permit applications to monitor, apply and maintain appropriate BMPs.	X			X		
Complete a study of BMPs for washing sidewalks	3.11	Contact coastal communities, survey BMPs and identify costs and other issues.	X			X		
Implement selected sidewalk washing BMPs	3.12	Identify needs and propose budget.	X			X		
Connect City swimming pool to sanitary sewer	3.13	Develop design, make infrastructure drainages to provide pipe connection.	X		X	X		
Illegal Discharge Training	3.14	Provide annual training to all City employees that perform activities that are covered by this permit.	X			X		

**BMP 3.1 Storm Sewer System Mapping**

**Measurable Goal 3.1:** *Update map regularly to reflect any drainage retrofits or alterations.*

**Status:** The City’s GIS Department, who manages and updates the City’s storm drain maps, made the following revisions in 2010 to reflect storm drain retrofits and/or alterations:

- Updated Phase 2 of West Side Storm Water Control Project to existing line work. The missing line work is on Chino St, from Valerio St to Mission St, on Mission St, from Chino St to Monterrey St, and Gillespie St from Mission St to Eucalyptus Ave.
- Updated the Storm GIS for the installation of the private sewer data for "VIA TUSA" per P&S drawings.
- Changed the layer name from U-SD-CB, to U-SD-CALTRANS-CB for: CB-B02-06 and CB-C03-04
- Included private engineered storm channel on 1126 Del Mar
- Updated missing Storm data for St Vincent Hospital’s development addition

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 3.2 Municipal Code Enforcement; Document and Respond to Complaints of Illicit Discharge and Other Relevant Enforcement Issues**

**Measurable Goal 3.2a:** *100% call response within 24 hours.*

**Status:** Creeks Division staff attained 100% call response within 24 hours in 2010. 209 calls and complaints of illicit discharges and other potentially polluting activities were received in 2010. All were responded to within 24 hours. A break-down of calls/reports per quarter is below.

A total of 41 enforcement calls were received and responded to during the first quarter of 2010. A total of 56 enforcement calls were received and responded to during the second quarter of 2010. A total of 65 enforcement calls were received and responded to during the third quarter of 2010. A total of 47 enforcement calls were received and responded to during the fourth quarter of 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing

**Measurable Goal 3.2b:** *Produce response cards in Year 1 and supply response cards to complainants when contact info is available. Review evaluation surveys quarterly and incorporate suggestions as appropriate.*

**Status:** Creeks Division staff produced response cards in July 2009. Creeks Division staff mails response cards to complainants when their contact information (address) is provided. A total of 4 response cards were mailed out by enforcement staff in 2010, and only two responses were received back. In the first and third quarters of 2010 no contact information was received from complainants. Therefore, no response cards were mailed out or received. In the second quarter of 2010 two response cards were mailed out and both were returned completed by the complainants. Both complainants that returned response cards rated their overall experience working with the City Creeks Enforcement Program as excellent. In addition, both complainants felt that the issue reported was resolved, that it was tended to promptly, and that the same discharge had not occurred again. One of the response cards included a comment that read, "Thank you for responding to this problem. People need to be penalized for throwing stuff in our creek. We need to protect our creeks and ocean." In the fourth quarter of 2010, two response cards were mailed to complainants, but no replies were mailed back in response.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Incorporate suggestions received from response cards.

**Measurable Goal 3.2c:** *Pursue appropriate enforcement and resolution.*

**Status:** Appropriate enforcement and resolution was pursued throughout 2010. Of the 209 enforcement calls/complaints received in 2010, 67 warranted a Notice of Violation (NOV) or Administrative Citation (citations are sent for discharges that are in violation of the City of Santa Barbara's Municipal Code, Chapter 16, regarding water pollution). All NOV's and citations were detected through enforcement calls, outreach, and/or patrols. NOV's were issued if the violation was the first for that offending party within 12 months. One citation for a second offense within 12 months was issued for \$200 in the fourth quarter. All illicit discharges were stopped before the enforcement officer left the location where the violations occurred.

Each NOV and Administrative Citation described the violation and required a clean-up remedy if applicable.

They also contained appropriate alternatives to discharging pollutants to the storm drain system. For example, car washing violations would include a suggestion for capturing the wash water before it leaves the property with a wet/dry vacuum and either discharging the captured water into the sanitary sewer or landscaping. For cases with a deadline to complete a clean-up remedy, follow-up inspections were conducted to make sure the discharges were cleaned-up by the deadline. Fines are issued if abatement deadlines are not met.

“Creek Clean Ups” is another program administered by the Creeks Division that addresses/abates illicit discharges in/near the City’s creeks. The City contracts with ServiceMaster, a local contractor, who picks up trash, debris, dumped items, feces, etc. within the City’s creeks and banks, per the City’s direction/contract. City staff forwards 8-10 creek locations that need cleaning/pick-up to ServiceMaster, bi-weekly. So, up to 20 creek sites are cleaned (illicit discharges abated) weekly. In total in 2010, the items removed from creek locations by ServiceMaster during these clean ups weighed 125,165 lbs.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 3.3 Complete Review and Revision of Ordinances that Regulate Illicit Discharge**

**Measurable Goal 3.3a:** *Complete ordinance audit by end of year two of permit.*

**Status:** The ordinance audit was completed early (in Year 1). The Creeks Division hired Geosyntec Consultants in May 2009 to review all applicable City ordinances, policies, guidelines, conditions of approval, and goals to identify inconsistencies toward meeting the requirements of the NPDES General Permit, the City’s SWMP, and/or the City’s Storm Water BMP Guidance Manual. The audit also assessed internal consistency (or inconsistency) of City regulations and goals and storm water requirements with respect to storm water management, water quality, flooding, and creek/riparian resources. The results of the ordinance audit will assist the City with preparation of a storm water ordinance.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Follow and participate in the Region 3 Joint Effort for Hydromodification Control to determine the numeric criteria that will ultimately become a part of the City’s future storm water ordinance.

**Measurable Goal 3.3b:** *4 meetings.*

**Status:** Due to the Water Board’s revised Joint Effort for Hydromodification Control schedule, meetings will be held in Years 4 and 5, as the ordinance is drafted. The meetings will solicit staff and public input in order to tailor an appropriate/effective storm water ordinance.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Follow and participate in the Region 3 Joint Effort for Hydromodification Control to determine the numeric criteria that will ultimately become a part of the City’s future storm water ordinance.

**Measurable Goal 3.3c:** *Implement and enforce new ordinance.*

**Status:** A new storm water ordinance will be implemented and enforced once the new ordinance is completed, after the Region 3 Joint Effort for Hydromodification Control determines the numeric criteria for storm water management requirements.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Follow and participate in the Region 3 Joint Effort for Hydromodification Control to determine the numeric criteria that will ultimately become a part of the City’s future storm water ordinance.

**BMP 3.4 Field Investigation and Abatement**

**Measurable Goal 3.4:** *A minimum of one enforcement staff on duty 100% of the time, and a minimum of 100 field investigations conducted annually.*

**Status:** 209 field investigations were conducted in 2010, and at least one enforcement staff member was on duty 100% of the time.

Several other staff throughout the City also perform enforcement duties that apply to the SWMP goals and intent; such as building inspectors, Environmental Services workers, and Water Resources enforcement officers. All enforcement staff coordinate and notify the appropriate person for different discharges.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 3.5 Inventory of Businesses and Industries to be Monitored for Illicit Connections and/or Discharges**

**Measurable Goal 3.5:** *Complete inventory by end of year two of permit.*

**Status:** An inventory of Attachment 4 listed businesses and industries (automotive repair shops, retail gasoline outlets, and restaurants) was compiled in 2010 for ongoing monitoring for potential illicit connections and/or discharges. The inventory totals 387 businesses within the City.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** The inventory will be used to guide the City’s enforcement patrols and awareness for potential illicit connections and/or discharges.

**BMP 3.6 File a Notice of Intent to Discharge Water from the Water Distribution System Pursuant to the RWQCB’s General NPDES Permit for Discharges with Low Threat to Water Quality (Order No. R3-2006-0063)**

**Measurable Goal 3.6:** *Date NOI is filed.*

**Status:** Both notices were dated 1-24-11. Upon completion of construction at the two wells in 2010, the City filed Notices of Termination for these projects. The City has learned that ongoing water distribution operations, including well operation, are appropriately monitored and reported on under the MS4 permit for the City's Storm Water Management Plan. Accordingly, the City does not plan to file for a separate permit for operation of the wells. A current, separate Notice of Intent for construction at Ortega Groundwater Treatment Plant will be maintained until completion of the project, after which the facility's operation will also fall under the City's MS4 permit.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 3.7 Inventory Commercial Facilities 100,000 Square Feet or Greater**

**Measurable Goal 3.7:** *Complete inventory by end of permit year two.*

**Status:** The commercial facilities inventory was completed early, in Year 1. The inventory was produced using City parcel data and GIS software. A map and list of parcels 100,000 square feet or greater with a commercial land use designation was generated. Some commercial facilities are located on multiple parcels that are each less than 100,000 square feet but the sum square footage of the parcels occupied by each facility is equal to or greater than 100,000 square feet. Since these commercial facilities were not generated by the GIS query, they were manually added to the maps and list.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** None. BMP completed.

### **BMP 3.8 Inspect Commercial Facilities 100,000 Square Feet or Greater**

**Measurable Goal 3.8:** *Inspect 5 commercial facilities annually (or 100% - whichever comes first).*

**Status:** Now that the inventory of facilities has been completed (BMP 3.8), inspections of the City's large commercial facilities (100,000 sq. ft. or greater) will begin in Year 3.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** 5 commercial facilities will be inspected in Year 3 and staff will work to correct any detected runoff issues.

### **BMP 3.9 Inventory Parking Lots of 5,000 Square Feet or Greater (Or Space for 25 or More Cars)**

**Measurable Goal 3.9:** *Complete inventory by end of permit year two.*

**Status:** An inventory of parking lots was completed early, in 2006 and 2007, when the City was informally



implementing the SWMP. The criterion for the inventory was changed from 10,000 to 5,000 square feet or greater (or 25 or more spaces) due to the fact not many parking lots in Santa Barbara are as large as 10,000 square feet.

### ***Approach***

Aerial photographs of Santa Barbara (2004) were used to find parking lots that fit the criteria. The aerial photos were reviewed, grid square by grid square, to find parking lots that have at least 25 parking spaces. In order to identify parking lots that are 5,000 square feet or greater, GIS was used.

### ***Criteria***

- Included contiguous parking lots (i.e. if there were 2 or more lots of under 25 parking spaces each that were connected by a paved surface and combined to equal more than 25 spaces, this was considered a single lot).
- Did not include areas where parking spaces were designated along the edges of a roadway.
- Area calculations were rounded to the nearest foot.

**Proposed Year 3 Activities:** None. BMP completed.

## **BMP 3.10 Monitor Maintenance of and BMP Application to Parking Lots of 5,000 Square Feet or Greater**

**Measurable Goal 3.10:** *Send information to all 500 parking lot parcel owners in permit year two regarding BMP application and follow up with monitoring in permit years three, four, and five.*

**Status:** Staff created a colored, tri-fold brochure (in both English and Spanish) about parking lot maintenance and best management practices in 2010. The brochures were sent to all 500 parking lot parcel owners (lots that have 25 or more spaces, or are 5,000 square feet or greater). The brochure defines how parking lot maintenance and/or lack thereof can contribute to polluting our creeks and ocean and offers numerous solutions for this problem. The brochure also suggests design opportunities, such as pervious pavers, permeable concrete and enhanced swales that can be implemented into parking lots that are redesigned and/or developed within the City. Monitoring parking lots will begin in Year 3.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Monitoring parking lots will begin in Year 3.

## **BMP 3.11 Complete a Study of BMPs for Washing Sidewalks**

**Measurable Goal 3.11:** *Complete in Year 1.*

**Status:** This goal was completed early, in 2007. Several different BMPs for washing sidewalks were studied in 2007, when the City was tasked with developing a proper method for washing downtown sidewalks that contained the wash water runoff. An internet search was conducted for information on what other municipalities have done to address sidewalk washing and through process of elimination, City staff decided that building a custom device for washing sidewalks and capturing runoff for re-use was the best approach.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** None. BMP completed.

### **BMP 3.12 Implement Selected Sidewalk Washing BMPs**

**Measurable Goal 3.12:** *Complete in Year 2.*

**Status:** Sidewalk washing BMPs were implemented early; in 2007-2008 through a City contract with the Downtown Organization (D.O.). The D.O. is a non-profit, Business Improvement District that works to meet the needs of businesses, professionals, and property owners. The D.O. uses a custom-made machine that pressure-washes the sidewalks with a close-looped system with zero discharge and pretreatment for solids and hydrocarbons absorption. The wash water is passed through the pretreatment filter for cleaning and is later used for irrigating the sidewalk planter beds.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** None. BMP completed.

### **BMP 3.13 Connect City Swimming Pool to Sanitary Sewer**

**Measurable Goal 3.13:** *Complete in Year 1.*

**Status:** The City's Parks and Recreation Department remodeled the City's swimming pool (Los Banos Del Mar Pool) in 2008. The project included connecting the pool to the sanitary sewer.

**Proposed Modifications:** The permit year in SWMP Table 4.3 needs to be changed from Year 2 to Year 1.

**Proposed Year 3 Activities:** None. BMP is completed.

### **BMP 3.14 Illegal Discharge Training**

**Measurable Goal 3.14:** *Provide at least one annual training session of one hour in length to Public Works Department, Streets Program, Parking Operations Program, Water Resources Division, Facilities Division, Parks Operations Division, Golf Course, and Fire Operations.*

**Status:** Creeks Division staff provided at least one hour of training related to SWMP implementation and storm water BMPs in 2010 for all relevant/operational City employees who conduct activities that could potentially pollute storm water runoff and/or impact the City's storm drain system. These city staff trainings have been provided by Creeks Division staff since 2007.

In Year 2 (2010), Creeks Division created a power point presentation that began with asking staff questions they should already know about storm water management in order to assess where staff's weaknesses and/or needs for further training on storm water management lie. The presentation reviewed storm water

management BMPs applicable to each City department and/or division. This approach was purposely different from Year 1, which used a training video. The trainings are approximately one hour in length and include an introduction to the City’s SWMP and the importance of protecting water quality. Trainings are conducted in the spring and summer of each calendar year. Staff are required to attend and sign-in sheets are collected.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**4. Construction Site Storm Water Runoff Control**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Evaluate need to revise current erosion and sediment control policy into stronger regulatory mechanism	4.1a	Review construction projects subject to the policy for compliance.	X			X		
	4.1b	Develop reports and statistics.	X		X	X		
	4.1c	Hold meetings with inspectors and developers.	X			X		
	4.1d	Decision to be made during third year of review.		X	X			
Evaluate the SBMC ordinance regarding erosion and sediment control requirements (Chap. 22, Section J111)	4.2a	Develop outline, detailed work program, budget, and schedule to review code relative to other comparable City codes.		X	X			
	4.2b	Develop revisions.		X	X			
	4.2c	Hold public workshops and hearings.		X	X			
	4.2d	Ordinance adoption.		X	X			X
Track BMP inspections, violations, and resolution to violation	4.3	Use CASQA BMP Fact Sheets as checklist for proper implementation and maintenance confirmation and use existing computer permit software to track.	X			X		
Provide ongoing inspection of BMPs throughout course of construction with a focused priority on larger sites with slopes and/or adjacent to a creek	4.4	BMPs must be in place and functional before any other building inspections can be made; this makes sites with detailed erosion control plans a priority.	X			X		
Enforcement of violations related to erosion control issues for construction projects	4.5	Enforcement cases are tracked in database, along with contractor, developer, grading engineer, and any other associated personnel.	X			X		
Achieve compliance with erosion and sediment controls	4.6	Send annual informational email bulletin regarding erosion and sediment control to appropriate groups and individuals.	X		X	X		
Maintain and increase Building and Public Works Inspectors knowledge of design and implementation of erosion control BMPs	4.7	Provide annual training of Building and Public Works Inspectors.	X			X		

**BMP 4.1 Evaluate Need to Revise Current Erosion and Sediment Control Policy into Stronger Regulatory Mechanism**

**Measurable Goal 4.1a:** *Review construction projects subject to the policy for compliance. Document all projects reviewed and % compliance with policy.*

**Status:** 245 City Projects were reviewed for erosion/sediment BMPs on submitted plans, as they met the City criteria to fall under the Erosion/Sedimentation Control Policy. The City's Building Department attained 100% compliance with this goal by working with applicants to ensure that their erosion control plans (ECPs) were sufficient for the site and in compliance with the City's policy.

The Building Department's new reporting approach (modified in 2011) now identifies any/all projects with new or additional square footage or any grading proposed. (Previous reporting identified all projects with Building Department plan review regardless of grading or new square footage data, as all projects require basic BMP's, i.e.; "no washout to street," "hazardous material storage," etc.). This new reporting approach more appropriately focuses on projects with the potential to impact storm water and/or those that require erosion/sediment control BMPs.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 4.1b:** *Develop reports and statistics. Document all projects reviewed and % compliance with policy.*

**Status:** As stated above, 245 projects were reviewed (meaning Erosion Control Plans or "ECPs" were reviewed) in 2010 for erosion/sedimentation BMP compliance on plans and 100 % compliance was attained in 2010.

A 2010 report of erosion control inspections was developed and clearly demonstrates intensive monitoring and necessary adjustments to attain full compliance at each construction site. A total of 496 field inspections occurred in 2010; at 274 active construction sites within the City (normally each site receives more than one inspection, depending on the construction schedule, site challenges and changes, and weather). Of those 496 inspections, 20 correction notices and/or warnings were issued. No "stop work orders" were warranted in 2010. Of the 20 correction notices/warnings, some shared the same address, so this translates to less than 10% of the construction sites requiring BMP improvements or fixes in 2010, resulting in 100% eventual compliance.

**Proposed Modifications:** This measurable goal is redundant with 4.1a. Building staff proposes to slightly modify this goal to be: *Document all projects reviewed/inspected in the field and % compliance with policy. Develop reports and statistics.*

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 4.1c:** *Conduct monthly meetings with Inspectors to review compliance.*

**Status:** The City Building Department exceeded this measurable goal in 2010 by conducting weekly Building Division inspection meetings where many pertinent inspection topics were covered. Leading up to and during the rainy season, the topic usually centers on erosion/sedimentation control. These weekly meetings last for 1 hour. There is a training topic each week and then time for questions and peer review of

issues. During the latter parts of summer and into fall, and as the City approaches the rainy season, erosion control becomes more and more of a weekly topic and training item rather than just a general discussion.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 4.1d:** *Make decision or adopt ordinance by end of permit year three.*

**Status:** This measurable goal is not “due” until Year 3. Please see the proposed modification, below.

The current position of the City’s Building Department regarding this BMP/Measurable Goal is as follows:

The City’s erosion and sediment control policy was originally established in 2003 and has been updated as more effective BMP’s have been developed. Current indications are that by leaving the details of BMP selection in a policy, rather than an ordinance, allows each development application to select BMPs that are the most effective for that specific project. Binding these details into an ordinance would not allow for the easy addition of new BMP’s as they are developed and would require language so vague to provide a “one-size-fits-all” ordinance that would be ineffective.

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate the need for revising the existing ordinance language regarding erosion and sediment control.

**Proposed Year 3 Activities:** The need for an ordinance will be formally reviewed in Year 4.

<b>BMP 4.2 Evaluate the SBMC Ordinance Regarding Erosion and Sediment Control Requirements (Chap. 22, Section J111)</b>
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**Measurable Goal 4.2a:** *Approval of Workplan.*

**Status:** Due to the Region 3 Joint Effort for Hydromodification Control and the ordinance changes that effort will ultimately require; the City’s Building Department will not formally review the code (Chapter 22, Section J111) until the results of the Joint Effort are determined and the City’s storm water ordinance is being drafted.

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate ordinance language pertaining to storm water runoff control and erosion/sedimentation control.

**Proposed Year 3 Activities:** Develop work plan once the City’s storm water ordinance is being drafted.

**Measurable Goal 4.2b:** *Submit revisions to Ordinance Committee for review by end of permit year two.*

**Status:** See proposed modification, below.

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate ordinance language pertaining to storm water runoff control and erosion/sedimentation control.

**Proposed Year 3 Activities:** See above.

**Measurable Goal 4.2c:** *4 meetings.*

**Status:** See proposed modification, below.

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate ordinance language pertaining to storm water runoff control and erosion/sedimentation control.

**Proposed Year 3 Activities:** See above.

**Measurable Goal 4.2d:** *Adopt ordinance by end of permit year three.*

**Status:** Ordinance adoption is currently a Year 3 SWMP task. See the proposed modification, below. Currently, compliance with appropriate BMP selection and proper installation is ensured by not allowing the project to continue without the required criteria being met. This is a much bigger “hammer” than simple fines which would be passed on to the project developer by the contractor and would not ensure continued compliance.

**Proposed Modifications:** The City Building Department proposes to delete this Measurable Goal. The required criteria that results from the current Joint Effort for Hydromodification Control will dictate how the City modifies existing ordinance language. A new or modified ordinance for erosion and sediment control may or may not be needed. The Measurable Goals previous to this one (4.1a, b, c, and d, and 4.2a, b, and c) already require that the City evaluate current policy language and ordinance effectiveness and make a decision about whether or not there are needed improvements. Having a measurable goal that requires ordinance adoption for erosion/sedimentation control (beyond what already exists in Chapter 22, Section J111), is not an appropriate goal, since this may not be an effective outcome.

**Proposed Year 3 Activities:** None.

### **BMP 4.3 Track BMP Inspections, Violations, and Resolution to Violation**

**Measurable Goal 4.3:** *BMP inspections must be completed prior to October 15, or within the first week of work if construction begins after October 15.*

**Status:** All sites with an active building permit and with exposed soil/grading received BMP inspections prior to October 15th, 2010 and/or within the first week of work.

All construction sites are directed to install BMP's as required on a year-round basis. Additional inspections are scheduled for all sites prior to the start of the rainy season and periodic inspections are scheduled prior to and during rain events for prevention and monitoring purposes. The inspections for projects that will have

ground disturbance during the “rainy season” begin once the permit is issued for the project. These inspections occur before any ground disturbance or construction has begun.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** As of January 2011, City inspectors will be provided with a complete list of sites that require an inspection prior to October 15th, or within the first week of work if construction begins after October 15th. This list will be used in conjunction with the existing method of pre-rain event inspections in an attempt to improve upon our current tracking and inspection measures.

**BMP 4.4 Provide Ongoing Inspection of BMPs Throughout Course of Construction with a Focused Priority on Larger Sites with Slopes and/or Adjacent to a Creek**

**Measurable Goal 4.4:** *Building permit date formally kicks off inspection; track permit dates and number of inspections per site. Inspect BMPs using CASQA BMP Fact Sheets.*

**Status:** The inspectors use the CASQA BMP Fact sheets to ensure that the BMP’s are installed correctly and are appropriate for the site. City’s Building Inspectors log all BMP inspections into a computerized permitting system. These inspections are tracked and any “corrections” must be cleared before more inspections are given.

Effective January 2011, the Building Department inspectors now track projects with new or additional square footage or any grading, in order to effectively document projects that require an erosion control plan and therefore have the potential to impact storm water runoff. This new tracking mechanism will help to produce clearer reports and document that all projects with erosion control plans (especially those requiring a “detailed erosion control plan,” such as those with slopes and/or adjacent to a creek) achieve 100% compliance with the policy.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 4.5 Enforcement of Violations Related to Erosion Control Issues for Construction Projects**

**Measurable Goal 4.5:** *Track 100% of enforcement cases and report offenders in Annual Report.*

**Status:** Zero enforcement cases related to erosion control issues were reported by the Building Department in 2010. (The City Creeks Division did have one enforcement case relative to erosion control issues for a construction project; discussed in the following paragraph). The City Building Department utilizes correction and warning notices to address site deficiencies and inspectors work with the contractor community both through trainings and on a site by site basis to maintain full compliance. 100% of all 274 project sites subject to erosion/sedimentation control in 2010 were inspected for violations. Correction and/or warning notices were issued if/when BMPs at a construction site were not sufficient, or a construction site was not designed per the BMPs identified on the plans, or if site dynamics changed and further/additional BMPs were needed. Failure to comply with a correction or warning notice results in a formal enforcement case leading to administrative penalties and legal action by City Attorney's office.



The City Creeks Division received an enforcement complaint in November 2010 for 507 Brosian Way. Sediment from the construction site was discharged into the street and gutter. Enforcement ensued, as follows:

- 11/29/2010 - initial inspection of the site revealed a significant amount of sediment in the street after erosion control measures had recently failed.
- 11/30/2010 – a warning letter was sent to the property owner with required clean-up of all sediment by 12/3.
- 12/6/2010 - the follow-up inspection of the site showed that all sediment was cleaned up and additional erosion control measures had been installed. No new sediment was observed in the street from previous night's .5 inch of rain.
- December 2010 Mandatory 2-week Furlough – it was during this time that a second discharge of sediment from the site occurred after heavy rains. However, the discharge was not immediately addressed due to significantly reduced staffing.
- Early January 2011 – this second discharge that occurred in December 2010 was addressed by staff, resulting in a formal violation and fine.

It should be noted that the City's Building Department did not issue an approved building permit until December 2<sup>nd</sup>, 2010. A 2<sup>nd</sup> Violation at this address was issued in January 2011. This 2<sup>nd</sup> violation is beyond the scope of this Annual Report. However, it should be noted here that the property owner was fined and required to do another detailed clean up, because this was the second instance of the same violation (sediment discharge) within 12 months. The City's Building Department and inspectors were involved in this enforcement case throughout, and diligently worked with the property owner and associated contractor to improve the BMPs onsite and manage the runoff to the maximum extent practicable. No egregious amounts of sediment polluted the storm drain system, as most of it was caught in the street and gutter. The rains in December 2010 were very heavy, record storms, and challenged even appropriately-installed BMPs. This case, however, highlighted the importance of City staff and inter-departmental communication. Now, Creeks Division staff and Building/Inspectors staff communicate immediately when dealing with erosion/sediment discharges.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing. In future years, the City will improve staffing and communication during mandatory furloughs so any discharges can/will be efficiently and effectively addressed.

#### **BMP 4.6 Achieve Compliance with Erosion and Sediment Controls**

**Measurable Goal 4.6:** *Send annual informational email bulletin regarding erosion and sediment control to appropriate groups and individuals.*

**Status:** Information was provided to contractors, architects, engineers, designers, and city staff in the form of an email to the local American Institute of Architects, Santa Barbara Contractors Association, and also in an existing Land Development Team email bulletin in 2010. Information in the email included links to the cabmphandbooks, the City's SWMP document and City's Erosion & Sedimentation Control Policy.

**Proposed Modifications:** The Water Board has requested a specific, numeric goal to replace this measurable goal, as well as a method for tracking reduction in construction site violations over time as a measure of the

effectiveness of construction site stormwater runoff control activities. However, Building Department staff feels that the Water Board's requested numerical documentation of the "reduction in violations" is too vague to be meaningful and impossible to track. This number would vary with construction activity and site challenges and would therefore not be reflective of the City's efforts in reducing "violations". The Building Department is making improvements in 2011 in tracking project sites and their associated erosion control plans. However, even these tracking mechanisms will not alleviate the inherent issues that surround construction projects as far as site dynamics. Active sites change daily and construction traffic, trenching, grading, clean-up, landscaping, etc., can all modify what was once an ideal erosion control system. Inspection staff typically use correction notices to initiate installation of, or modifications to erosion control systems. In the event sediment does breach the erosion control systems a correction notice is used to require clean up procedures. Improper installation of BMPs on a site can happen even to the best of companies. It is part of the inspection process to verify that all BMPs on all sites meet the SWMP standards and to make corrections where necessary.

The proposed 4.6 Measurable Goal to replace the existing goal is: *Send annual informational email bulletin to a minimum of 2,000 appropriate individuals in the design and/or construction community.* This outreach measure will enhance the City's commitment to educating the target audience about the construction BMP requirements and updates.

**Proposed Year 3 Activities:** See above.

<b>BMP 4.7 Maintain and Increase Building and Public Works Inspectors Knowledge of Design and Implementation of Erosion Control BMPs</b>
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**Measurable Goal 4.7:** *100% of all inspectors trained each year.*

**Status:** 100% of all City inspectors were trained in 2010. Inspectors hold weekly training meetings on various construction and code issues. Beginning in late summer through late spring of very year, erosion control BMP installation is an almost weekly topic. Staff comparisons on construction sites are noted for effectiveness and appropriateness. Building staff and inspectors also receive SWMP and LID training from Creeks Division staff a minimum of once a year. Also, inspectors work very hard with the contractors to update and "train" them as well.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**5.Post-Construction Storm Water Management in New Development and Redevelopment**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Implement minimum design standards for post-construction storm water management prescribed by Attachment 4	5.1	Apply appropriate post-construction BMPs (using City’s Storm Water BMP Guidance Manual) through development design review and permit conditions.	X			X		
Require ongoing BMP maintenance and annual inspection and records for discretionary projects requiring Planning Commission permit approval	5.2	Apply post-construction BMP maintenance/inspection requirements through development permit conditions. Document annual list of audits and inspections.	X			X		
Take enforcement action to ensure BMP implementation/maintenance on projects conditioned with BMPs that fall under Attachment 4	5.3	Undertake enforcement actions through City enforcement program procedures, and document enforcement actions.	X				X	
Develop and implement City ordinance provisions that incorporate design standards	5.4a	Develop outline, detailed work program, budget, and schedule. Develop draft ordinance.		X	X			
	5.4b	Conduct an ordinance audit to identify and remedy areas in the municipal code and other policies/goals that conflict with enforcing design standards.	X			X		
	5.4c	Hold public workshops and hearings. Develop final ordinance. Ordinance adoption.		X	X			
	5.4d	Apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects. (Begin implementation by end of Q9 of Joint Effort – Actual Date TBD).		X				
Derive municipality-specific criteria for controlling hydromodification in new and redevelopment projects using Water Board-approved methodology developed through the Joint Effort.	5.4.1	Participate in Water Board’s Joint Effort to develop hydromodification control criteria.	X			X		
Select Applicability Thresholds for applying Hydromodification Control Criteria to new development and redevelopment projects. Applicability thresholds will be consistent with long-term watershed protection.	5.4.2	Identify appropriate thresholds for applying hydromodification criteria thresholds to new and redevelopment projects.		X				

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 Post-Construction Storm Water Management in New Development & Redevelopment (MCM 5)

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Update and implement post-construction volumetric and flow-based design standards and BMPs	5.5a	Study and consider additional standards for volumetric or flow-based treatment control design standards.	X				X	
	5.5b	Apply design standards for non-discretionary projects requiring ministerial permits.	X			X		
	5.5c	Update standard provisions for CEQA impact analysis.	X			X		
	5.5d	Update standard mitigations and conditions.	X			X		
Develop and enact a strategy for implementing LID and hydromodification control for new and redevelopment projects. The strategy will provide appropriate education and outreach for all applicable target audiences, and will include specific guidance for LID BMP design and for complying with hydromodification control criteria. The strategy will also apply LID principles and features to new and redevelopment projects during the two-year period preceding adoption of hydromodification control criteria.	5.5.1a	Develop, advertise, and make available LID BMP Design Guidance suitable for all stakeholders. (Complete by end of Q4 of Joint Effort – Actual Date TBD).		X				
	5.5.1b	Specific guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements made available to new and redevelopment project applicants. (Complete by end of Q8 of Joint Effort – Actual Date TBD).		X				
	5.5.1c	Documentation of goals, schedules, and target audiences for education and outreach the municipality will conduct in support of the following strategic objectives: enforceable mechanisms, hydromodification control criteria, applicability thresholds, LID BMP design, and compliance with LID and hydromodification control criteria. (Complete by end of Q2 of Joint Effort – Actual Date TBD).		X				
	5.5.1d	Tracking report indicating municipality’s accomplishments in education and outreach supporting implementation of LID and hydromodification control of appropriate new and redevelopment projects. (Complete by end of Q8 of Joint Effort – Actual Date TBD).		X				
	5.5.1e	Apply LID principles and features to all applicable new and redevelopment projects. (Apply from Q2 through Q8 of Joint Effort – Actual Dates TBD).		X				

Small MS4 General Permit Annual Report -  
 Post-Construction Storm Water Management in New Development & Redevelopment (MCM 5)

Activity	BMP	Description/Implementation	Status						
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective	
	5.5.1f	Tracking Report, for the period Q2 to Q8 (2/1/10-10/30/10), identifying LID design principles and features incorporated into each applicable new and redevelopment project. (Complete by end of Q9 of Joint Effort – Actual Date TBD).		X					
Storm Water Quality Monitoring Program	5.6	Implement monitoring program and update/revise annually.	X			X			
Microbial Source Tracking Protocol Development Project	5.7	Implement source tracking project and continue research based on funding.	X			X			
Biological Assessment Program	5.8	Implement assessment program by collecting and analyzing benthic macro invertebrate (BMI) samples and other pertinent physiochemical and biological data in creeks.	X			X			
General Plan Update	5.9	Scope affiliated EIR to include policy changes that will continue, update, and expand programs that specifically support watershed planning.	X					X	

**BMP 5.1 Implement Minimum Design Standards for Post-Construction Storm Water Management Prescribed by Attachment 4**

**Measurable Goal 5.1:** Document annual list of discretionary projects for which post construction BMPs were included. Provide report to RWQCB annually.

**Status:** The following 37 projects had required “Tier 3” post construction storm water BMPs included/implemented into project plans during Year 2:

- 15 E. Cabrillo
- 22 N Calle Cesar Chavez
- 34 W. Victoria
- 130 N. Calle Cesar Chavez
- 220 E. Ortega St.
- 226 Eucalyptus Hill Drive
- 230 Lighthouse Rd
- 309 E Canon Perdido St
- 401 Old Coast Hwy
- 410 State St
- 512 Bath

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Post-Construction Storm Water Management in New Development & Redevelopment (MCM 5)

540 W. Pueblo  
604 Santa Barbara St  
623 Surf View Dr  
800 Cacique St  
900 Blk E Cabrillo Blvd  
921 Arbolado Rd.  
1032 E Mason  
1131 Los Pueblos Rd.  
1150 Harbor Hills Dr  
1150 San Roque Road (Cater Water Treatment)  
1220 Shoreline  
1240 Northridge Rd  
1253 Dover Ln  
1335 Mission Ridge Rd.  
1409 La Cima Rd  
1431 Shoreline Dr.  
1519 Shoreline Dr  
1617 Franceschi Rd.  
1628 Overlook Ln.  
1816 State  
1900 Lasuen Rd  
1920 Mission Ridge Rd  
2501 Medcliff  
3052 State St.  
3240 Braemar Dr.  
3626 San Remo

All of the Tier 3 projects listed above included one or more of the following conditions of approval (the blue text is where staff uses discretion/changes/etc. as appropriate to the project):

- I. Any increase in project site runoff (pre vs. post construction) must be avoided per the City's adopted Storm Water Management Plan (SWMP), and the NPDES General Permit for Storm Water Discharges. Storm water runoff BMPs shall provide detention such that the post-development peak storm water runoff discharge rate shall not exceed the pre-development rate for the 25-year storm event.
- II. The project must retain on-site the larger of the two volumes: The volume difference between the pre-and post-conditions for the 25-year, 24-hour storm, or the volume generated from a one-inch, 24-hour storm event.
- III. The city and state requires that onsite capture, retention, *and treatment* of storm water are incorporated into the design of the project. In an attempt to treat the small, frequent storm events that impact water quality in Santa Barbara, the City requires that at a minimum, proposed treatment devices are designed to capture and treat the calculated amount of runoff from the project site for a 1 inch storm event over a 24-hour period. Passive/natural capture and filtration design options are recommended as opposed to mechanical/underground options, which pose maintenance problems and often times, do not treat runoff as efficiently. Please refer to the City's Storm Water BMP Guidance Manual (June 2008), posted at [www.sbcreeks.com](http://www.sbcreeks.com).

4. **Storm Water Pollution Control and Drainage Systems Maintenance.** Owner shall maintain the drainage system and storm water pollution control devices intended to intercept siltation and other potential pollutants (including, but not limited to, hydrocarbons, fecal bacteria, herbicides, fertilizers, etc. ) in a functioning state (and in accordance with the Operations and Maintenance Procedure Plan prepared in accordance with the Storm Water Management Plan BMP Guidance Manual). Should any of the project's surface or subsurface drainage structures or storm water pollution control methods fail to capture, infiltrate, and/or treat water, or result in increased erosion, the Owner shall be responsible for any necessary repairs to the system and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the applicant shall submit a repair and restoration plan to the Community Development Director to determine if an amendment or a new ([Building Permit](#)) ([and Coastal Development Permit](#)) is required to authorize such work. The Owner is responsible for the adequacy of any project-related drainage facilities and for the continued maintenance thereof in a manner that will preclude any hazard to life, health, or damage to the Real Property or any adjoining property.
5. **Public Works Submittal Prior to Final/Parcel Map Approval.** The Owner shall submit the following, or evidence of completion of the following, to the Public Works Department for review and approval, prior to processing the approval of the Final/Parcel Map and prior to the issuance of any permits for the project:
6. **Drainage and Water Quality.** Project drainage shall be designed, installed, and maintained such that stormwater runoff from the first inch of rain from any storm event shall be retained and treated onsite in accordance with the City's NPDES Storm Water Management Program. Runoff should be directed into a passive water treatment method such as a bioswale, landscape feature (planter beds and/or lawns), infiltration trench, etc. Project plans for grading, drainage, stormwater treatment methods, and project development, shall be subject to review and approval by City Building Division and Public Works Department. Sufficient engineered design and adequate measures shall be employed to ensure that no significant construction-related or long-term effects from increased runoff, erosion and sedimentation, urban water pollutants ([such as ...](#)), or groundwater pollutants would result from the project. The Owner shall maintain the drainage system and storm water pollution control methods in a functioning state.

The Owner shall provide an Operations and Maintenance Procedure Plan (describing replacement schedules for pollution absorbing pillows, etc.) for the operation and use of the storm drain surface pollutant interceptors. The Plan shall be reviewed and approved consistent with the Storm Water Management Plan BMP Guidance Manual.

The following 45 projects had "Tier 2" basic storm water BMPs included/implemented into project plans during Year 2:

623 1/2 State St  
120 S Hope Ave E-144  
27 Rubio Rd.  
31 S. Salinas St.  
112 Calle Bello  
201 N. Milpas  
207 E Canon Perdido St  
226 S Voluntario St  
309 W Figueroa St  
322 E Canon Perdido St  
345 Conejo Rd.  
501 N Milpas St  
520 Castillo St

521 Santa Barbara St  
608 Anacapa St  
614 E Haley St  
616 W. Micheltorena St.  
813 Olive St  
826 E Anapamu St  
929 Isleta Ave.  
1002 N Milpas St  
1201 Cima Linda Ln  
1216 E Montecito St  
1234 Bajada Dr  
1351 Santa Rita Cir  
1460 La Cima Rd  
1517 Cliff Rd.  
1528 Santa Rosa  
1557 La Cresta Cir.  
1730 Anacapa St.  
1809 Stanwood Dr  
1812 San Pascual St  
1957 Eucalyptus Hill Rd  
2016 Cleveland Ave  
2102 Edgewater  
2323 Red Rose Way  
2324 Santa Barbara St  
2420 Garden St.  
2819 State Street  
2936 De La Vina St  
2950 State St.  
3020 Serena Rd  
3707 State St  
3888 State St.  
4119 San Martin Way

What is important to note about these “Tier 2” Projects is that they are proving to serve as a very valuable and successful outreach tool for storm water management in the City. These small-to-medium residential projects require property owners to consider and implement simple approaches to storm water management on their project site when the “normal/Tier 3” state and city storm water requirements would not apply. This Tier 2 City requirement is not only unique and apart from other small MS4 permit requirements, it is significantly increasing the number of project applicants who have to think about, understand, and implement post-construction storm water management designs. Due to the fact that the Tier 2 design options are relatively simple and low-cost; applicants are generally receptive and even enthusiastic about improving water runoff quality from their site.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 5.2 Require Ongoing BMP Maintenance and Annual Inspection and Records for Discretionary Projects Requiring Planning Commission Permit Approval**



**Measurable Goal 5.2:** *Track “large projects” (i.e., “Tier 3 projects” as defined in the City’s Storm Water BMP Guidance Manual) for required BMP implementation, annual inspection, and reporting. Provide report to RWQCB annually.*

**Status:** The Planning Division tracks projects and their required BMP implementation. A total of 82 projects within the City implemented post-construction BMPs in Year 2. The City’s Planning Division developed new/additional protocols and procedures in 2009 to ensure SWMP compliance prior to Design Review approvals. The intention was/is to improve project SWMP compliance in future reporting years.

The following direction has been provided to Staff regarding SWMP compliance:

1. Any project that requires a Master Application (MST) with a Building Permit (BLD) that has not been issued will be required to comply with SWMP requirements
  - SWMP compliance is to be shown on the building permit plans
  - SWMP compliance will be reviewed by Design Review Staff
  - Design Review Staff will send a letter to the property owner/applicant informing them of SWMP requirements if compliance was missed.
  - Design Review Staff will enter a DESIGN REVIEW ROUTING (or similar) activity in all the current BLD's and enter a correction to comply with SWMP shown on the plans; or the activity will indicate that SWMP compliance is already confirmed
  - This activity should be added to all affected BLDs now, so that when the permit gets resubmitted, the correction is already there, (the activity needs to print on the BLD correction list)
  
2. Any MST project with no BLD case yet will be required to comply with SWMP requirements
  - SWMP compliance is to be shown on the building permit plans
  - SWMP compliance will be reviewed by Design Review Staff
  - Design Review Staff will send a letter to the property owner/applicant informing them of SWMP requirements; the letter will request that the applicant submit ASAP to Design Review Staff a plan that shows SWMP compliance
  - Once SWMP compliance is confirmed, Design Review Staff will update the MST case Project Statistics to indicate compliance
  - When BLD plans are routed to the Zoning Plans Examiner for the Initial Review, the Zoning Plans Examiner will check the Project Statistics in the MST case to see if the project complies with SWMP.
  - If it does not, The Zoning Plans Examiner will add the DESIGN REVIEW ROUTING (or similar) activity in the BLD and route to Design Review Staff.
  - Design Review Staff will enter a correction in the DESIGN REVIEW ROUTING activity for the project to comply with SWMP
  
3. As of Jan 1, 2010, ALL MST cases must show SWMP compliance tier level on plans and in MST cases prior to Final Approval
  - The Zoning Plans Examiner will not have to check or route any BLD plans to design review staff that received a Final Approval after March 1, 2010

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Planning staff will continue to improve their working knowledge of the SWMP requirements, how to use and implement the Storm Water BMP Guidance Manual, and how to track project implementation of the requirements. Year 1 demonstrated a learning curve and Year 2 reflected more efficient and consistent SWMP implementation in City project proposals (30 projects in Year 1 (2009),

versus 82 in Year 2 (2010)). Staff is working directly with applicants to make sure that SWMP requirements are clearly indicated on project plans. This not only ensures SWMP compliance on projects; it also applies to implementation by demonstrating BMPs on project plans so they are clear for building inspections, thereby guaranteeing proper installation.

**BMP 5.3 Take Enforcement Action to Ensure BMP Implementation/Maintenance on Projects Conditioned with BMPs that Fall Under Attachment 4**

**Measurable Goal 5.3:** *BMP compliance for all enforcement cases completed annually. Provide report to RWQCB annually.*

**Status:** Enforcement of required BMPs occurs during the construction phase of a project. Projects are not allowed to be finished without all of the required post-construction BMPs as noted on the plans being installed. Violations that occur after the project is completed will instigate an enforcement case that would require the violation to be remedied. Due to the fact the City has just completed Year 2 of formal SWMP implementation, no enforcement cases have been necessary, as projects are only now beginning to be built that have conditions for storm water BMPs. Enforcement actions will ensue in the future if/when compliance is not achieved.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 5.4 Develop and Implement City Ordinance Provisions that Incorporate Design Standards for Post-Construction Stormwater Management BMPS, Including Peak Stormwater Discharge Rates, Capture and Treatment of the One-Inch Storm, and Preserving Natural Areas**

**Measurable Goal 5.4a:** *Completion of draft ordinance by end of year two permit.*

**Status:** The first step to drafting a storm water ordinance was initiated and completed in Year 1; the storm water ordinance audit. A storm water ordinance will be drafted after the current Regional Board's Joint Effort for Hydromodification Control concludes. This Effort will determine the terms/criteria for the storm water ordinance.

**Proposed Modifications:** Begin implementation by end of Q9 of Joint Effort – Actual Date TBD.

**Proposed Year 3 Activities:** See above.

**Measurable Goal 5.4b:** *Complete ordinance audit by end of year two of permit.*

**Status:** The City Creeks Division contracted with a local consultant May – August 2009 (Year 1) to conduct an ordinance audit and identify all ordinances, policies, and guidelines (City documents) applicable to storm water management, and highlight conflicts (or potential conflicts) and/or other issues (incentives/disincentives) that exist among these City documents in relation to: the NPDES General Permit requirements, City SWMP requirements, and/or the City's Storm Water BMP Guidance Manual. The audit assesses internal consistency of City regulations and goals with respect to storm water management, water quality, flooding, and creek/riparian resources. The audit was completed in September 2009.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Goal completed.

**Measurable Goal 5.4c:** *4 meetings. Completion and adoption of final ordinance by end of year three of permit.*

**Status:** Meetings for drafting the ordinance will commence once the Regional Board’s Joint Effort for Hydromodification Control concludes. A final ordinance will be drafted and adopted once the City has the necessary terms/criteria that should result from the Joint Effort.

**Proposed Modifications:** Begin implementation by end of Q9 of Joint Effort – Actual Date TBD.

**Proposed Year 3 Activities:** See above.

**Measurable Goal 5.4d:** *Apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects.*

**Status:** Enforceable mechanisms will be identified and applied to new and redevelopment projects once the City has the necessary terms/criteria that should result from the Joint Effort.

**Proposed Modifications:** Begin implementation by end of Q9 of Joint Effort – Actual Date TBD.

**Proposed Year 3 Activities:** See above.

**BMP 5.4.1 Derive Criteria for Controlling Hydromodification In New And Redevelopment Projects Using Water Board-Approved Methodology**

**Measurable Goal 5.4.1:** *Participate in the Water Board’s Joint Effort to develop hydromodification control criteria.*

**Status:** City staff is currently participating in the Water Board’s Joint Effort for Hydromodification Control.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Continue to participate in the Water Board’s “Joint Effort for Developing Hydromodification Control Criteria” to determine final standards for volumetric and flow-based treatment control design standards.

**BMP 5.4.2 Select Applicability Thresholds**

**Measurable Goal 5.4.2:** *Identify appropriate thresholds for applying hydromodification criteria thresholds to new and redevelopment projects.*

**Status:** Appropriate thresholds will be identified and applied to new and redevelopment projects once the City has the necessary terms/criteria that should result from the Joint Effort.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Continue to participate in the Water Board’s “Joint Effort for Developing Hydromodification Control Criteria.”

**BMP 5.5 Update and Implement Post-Construction Volumetric and Flow-Based Design Standards and BMPs**

**Measurable Goal 5.5a:** *Complete study and establish new standards by end of year three of permit.*

**Status:** The City hired a local consultant to produce a Storm Water BMP Guidance Manual in 2008. This effort included an intensive outreach effort to City staff and local design professionals (engineers, architects, builders, etc.) to consider and adopt appropriate design standards and BMPs. Assessing all the staff and public input and studying other existing Guidance Manuals produced by other cities/counties, resulted in the production of the City’s Storm Water BMP Guidance Manual, which is tailored to the City’s local conditions. The volumetric and flow-based design standards are discussed in detail in Chapter 6 of the Manual, and the BMPs are tailored for different levels of development (referred to as project “tiers.”), defined throughout the Manual. The Manual can be downloaded from several places on the City’s website, one of which is: [www.sbcreeks.com](http://www.sbcreeks.com).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Continue to participate in the Water Board’s “Joint Effort for Developing Hydromodification Control Criteria” to determine final standards for volumetric and flow-based treatment control design standards.

**Measurable Goal 5.5b:** *Incorporate BMPs in ministerial projects through design review/permitting. Report to Regional Board annually.*

**Status:** BMPs are currently being implemented into smaller, ministerial projects through the City’s design review process. The City’s Storm Water BMP Guidance Manual requires storm water BMP implementation to both ministerial and discretionary projects, through the “tiered” approach defined in the Manual. As stated in BMP 5.2; the following direction has been provided to Staff regarding SWMP compliance in order to incorporate BMPs into ministerial projects:

1. Any project that requires a Master Application (MST) with a Building Permit (BLD) that has not been issued will be required to comply with SWMP requirements
  - SWMP compliance is to be shown on the building permit plans
  - SWMP compliance will be reviewed by Design Review Staff
  - Design Review Staff will send a letter to the property owner/applicant informing them of SWMP requirements if compliance was missed.
  - Design Review Staff will enter a DESIGN REVIEW ROUTING (or similar) activity in all the current BLD's and enter a correction to comply with SWMP shown on the plans; or the activity will indicate that SWMP compliance is already confirmed
  - This activity should be added to all affected BLDs now, so that when the permit gets resubmitted, the correction is already there, (the activity needs to print on the BLD correction list)

2. Any MST case with no BLD case yet will be required to comply with SWMP requirements
  - SWMP compliance is to be shown on the building permit plans
  - SWMP compliance will be reviewed by Design Review Staff
  - Design Review Staff will send a letter to the property owner/applicant informing them of SWMP requirements; the letter will request that the applicant submit ASAP to Design Review Staff a plan that shows SWMP compliance
  - Once SWMP compliance is confirmed, Design Review Staff will update the MST case Project Statistics to indicate compliance
  - When BLD plans are routed to the Zoning Plans Examiner for the Initial Review, the Zoning Plans Examiner will check the Project Statistics in the MST case to see if the project complies with SWMP.
  - If it does not, The Zoning Plans Examiner will add the DESIGN REVIEW ROUTING (or similar) activity in the BLD and route to Design Review Staff.
  - Design Review Staff will enter a correction in the DESIGN REVIEW ROUTING activity for the project to comply with SWMP
  
3. As of Jan 1 2010, ALL MST cases must show SWMP compliance tier level on plans and in MST cases prior to Final Approval
  - The Zoning Plans Examiner will not have to check or route any BLD plans to design review staff that received a Final Approval after March 1, 2010

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 5.5c:** *Utilize updated CEQA checklist and guidelines in project review.*

**Status:** As a part of environmental review for discretionary projects, a DART SWMP checklist is used to guide analysis of impacts associated with stormwater. Based on the type and size of development proposed, staff applies BMP's per the Storm Water BMP Guidance Manual (June 2008) and based on the findings of the DART SWMP checklist, staff applies mitigation measures and/or conditions of approval to development applications to address stormwater drainage concerns and SWMP requirements.

As a part of the CEQA Initial Study, City staff includes the following standard language (or similar) and an analysis that demonstrates compliance:

*The City and State require that onsite capture, retention, and treatment of storm water be incorporated into the design of the project. Pursuant to the City's Storm Water Management Plan (SWMP) and the NPDES General Permit for Storm Water Discharges, the City requires that any increase in stormwater runoff (based on a 25-year storm event) be retained on-site and that projects be designed to capture and treat the calculated amount of runoff from the project site for a 1 inch storm event, over a 24-hour period.*

The process of formally updating the Initial Study Checklist and Master Environmental Assessment Guidelines is underway. In addition, staff is also developing a new CEQA Exemption checklist and preliminary and final plan check checklists to better screen all projects for storm water impacts and to ensure that appropriate BMPs are applied to all projects (i.e. including those that are exempt from CEQA).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 5.5d:** *Utilize updated standard mitigation measures and conditions of approval in project review/permitting.*

**Status:** Based on the findings of the DART SWMP checklist, staff applies mitigation measures and/or conditions of approval to development applications to address stormwater drainage concerns and the SWMP requirements.

The following standard mitigation measure is applied to development applications requiring preparation of an Initial Study under the provisions of CEQA. Other mitigation measures that are project specific are also applied.

**Water Resources – Mitigation:**

***Drainage and Water Quality.*** *Project plans for grading, drainage, stormwater facilities, and project development shall be subject to review and approval by City Building Division and Public Works Department per City regulations, (and Regional Water Quality Control Board). Sufficient engineered design and adequate mitigation measures shall be employed to ensure that no significant construction-related or long-term effects from increased runoff, erosion and sedimentation, urban water quality pollutants, or groundwater pollutants would result from the project.*

During November/December 2010, staff updated the standard conditions of approval applied to development applications as appropriate. The City case planner chooses the most appropriate and applies it to the project (The blue text is where staff uses discretion/changes/etc. as appropriate to the project):

**Standard Conditions of Approval:**

- a. **Recorded Conditions Agreement.** Prior to the issuance of any Public Works permit or Building permit for the project on the Real Property, **except a demolition or other appropriate (as determined by City staff) building permit for work in anticipation of primary project improvements**, the Owner shall execute an *Agreement Relating to Subdivision Map Conditions Imposed on Real Property*, which shall be reviewed as to form and content by the City Attorney, Community Development Director and Public Works Director, recorded in the Office of the County Recorder concurrent with the **Parcel / Final Map**, and shall include the following:
  - i. **Storm Water Pollution Control and Drainage Systems Maintenance.** Owner shall maintain the drainage system and storm water pollution control devices in a functioning state. Should any of the project's surface or subsurface drainage structures or storm water pollution control methods fail to capture, infiltrate, and/or treat water, or result in increased erosion, the Owner shall be responsible for any necessary repairs to the system and restoration of the eroded area. Should repairs or restoration become necessary, prior to the commencement of such repair or restoration work, the Owner shall submit a repair and restoration plan to the Community Development Director to determine if an amendment or a new **(Building Permit) (and Coastal Development Permit)** is required to authorize such work. The Owner is responsible for the adequacy of any project-related drainage facilities and for the continued maintenance thereof in a manner that will preclude any hazard to life, health, or damage to the Real Property or any adjoining property.

B. **Public Works Submittal Prior to Parcel / Final Map Approval.** The Owner shall submit the following, or evidence of completion of the following, to the Public Works Department for review and approval prior to processing the approval of the Parcel / Final Map and prior to the issuance of any permits for the project except a demolition or other appropriate (as determined by City staff) permit for work in anticipation of primary project improvements:

- **Drainage and Water Quality.** The project is required to comply with Tier 3 of the Storm Water Management Plan (treatment, rate and volume). The Owner shall submit (drainage calculations) (a hydrology report) (worksheets from the Storm Water BMP Guidance Manual for Post Construction Practices) prepared by a registered civil engineer or licensed architect demonstrating that the new development will comply with the City’s Storm Water Management Plan. Project plans for grading, drainage, stormwater facilities and treatment methods, and project development, shall be subject to review and approval by the City Building Division and Public Works Department. Sufficient engineered design and adequate measures shall be employed to ensure that no significant construction-related or long-term effects from increased runoff, erosion and sedimentation, urban water pollutants (including, but not limited to trash, hydrocarbons, fertilizers, bacteria, etc.), or groundwater pollutants would result from the project.

The Owner shall provide an Operations and Maintenance Procedure Plan (describing replacement schedules for pollution absorbing pillows, etc.) for the operation and use of the storm drain surface pollutant interceptors. The Plan shall be reviewed and approved consistent with the Storm Water Management Plan BMP Guidance Manual.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMPs 5.5.1a – 5.5.1f Develop And Enact A Strategy For Implementing LID And Hydromodification Control For New And Redevelopment Projects.**

**Status:** The measurable goals for this BMP will be implemented and reported in subsequent years, once the Joint Effort for Hydromodification Control determines the necessary criteria and applicability thresholds.

**BMP 5.6 Storm Water Quality Monitoring Program**

**Measurable Goal 5.6:** *Produce storm water quality monitoring reports annually and use results to revise existing BMPs.*

**Status:** The Creeks Division Monitoring Program conducted sampling in compliance with BMP's 5.6, 5.7, and 5.8 throughout Year 2. The Storm Water Quality Monitoring Program targeted bacteria, nutrients, and hydrocarbons during dry weather monitoring at several sites. Creeks staff also conducted weekly and biweekly sampling for indicator bacteria and field properties to assess beach water quality and investigate performance of water quality BMPs. In addition, the Creeks Division conducted storm monitoring to test for pollutants levels during the “First Flush” and to investigate the toxicity of runoff in storm drains and from fresh slurry sealed streets. A second storm was sampled to test the performance of the City’s Upper Las Positas Creek Project at the municipal Golf Course (water quality project designed and implemented by the

Creeks Division in Years 1 and 2). The water quality monitoring results are included in the Fiscal Year 2010 Annual Water Quality Report and the FY11 First and Second Quarterly Report. These reports can be accessed on the City's website at:

[http://www.santabarbaraca.gov/Resident/Community/Creeks/Reports\\_and\\_Studies.htm](http://www.santabarbaraca.gov/Resident/Community/Creeks/Reports_and_Studies.htm)

Key findings of the report are:

- Sediment testing in Arroyo Burro Estuary, Mission Lagoon, Sycamore Lagoon, and Laguna Channel over three years has shown that the sediments are generally nontoxic to bottom-dwelling organisms. However, pyrethroid pesticides are an emerging constituent of concern and have been found in estuarine sediments.
- Storm monitoring also found high levels of pyrethroids in creek water samples, including high levels of Esfenvalerate and L-Cyhalothrin in Mission Creek and high levels of Cyfluthrin in Sycamore Creek.
- Toxicity testing of storm drain samples collected during a late-season storm showed no toxicity to fathead minnows.
- In very limited sampling that was conducted to investigate water quality effects from the Jesusita Fire, no increases in metals, PAHs, or toxicity were observed.
- A pilot test showed increased toxicity and foam associated with slurry sealing of road surfaces. Additional field work was conducted in summer and fall 2010; data analysis is still underway.
- Results from monitoring the Summer Urban Runoff Facility, the UV disinfection project at the Westside Drain, shows that the project continues to reduce fecal indicator bacteria to near zero levels in the effluent. However, indicator bacteria numbers rise to background levels very quickly downstream. The increase is likely due to indicator bacteria growth in Old Mission Creek rather than from new sources.
- Additional data analysis supports conclusions in the Fiscal Year 2009 report that there have been long-term improvements in indicator bacteria levels at Santa Barbara beaches.
- High frequencies of beach warnings for indicator bacteria were seen at all beaches in Fiscal Year 2010 due to the large number of rain storms during the wet season.
- Arroyo Burro Beach exhibited a high number of beach warnings in dry weather as well, which was likely due to indicator bacteria growth in the estuary and the open status of the estuary mouth throughout the summer.
- Statistical analyses of indicator bacteria from Santa Barbara beaches showed a strong relationship between bacteria levels and rainfall, lagoon status (open or closed), and a modest influence of tide level and direction. Results suggest that during dry weather, the status of coastal lagoons has an enormous impact on the frequency beach warnings. When the coastal lagoons at beaches are open to ocean, bacteria levels are approximately four times more likely to trigger beach warnings.

A status update/summary presentation about the Creeks Division Water Quality Program was given to the Creeks Advisory Committee in June, 2010. Results from water quality monitoring were used in 2010 to revise the maintenance plan for the Westside SURF project (BMP #5.2), and outreach was designed based on the pyrethroid (bifenthrin) results and were released in the Creeks Division E-News.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 5.7 Microbial Source Tracking Protocol Development Project**



**Measurable Goal 5.7:** *Incorporate results into annual water quality monitoring report and use results to revise existing BMPs.*

**Status:** Funding was restored in Year 2 for the grant-funded Microbial Source Tracking Protocol Development Project and results were incorporated into the Fiscal Year 2010 Annual Water Quality Report (see BMP 5.6, above). The Creeks Division and its partner for this project, UCSB, conducted planning and field reconnaissance early in Year 2 in support of sampling that occurred for this project throughout 2010.

Substantial work was conducted in Year 2 for the Source Tracking Protocol Development Project. Field sampling and smoke and dye testing of storm drain lines was conducted. In addition, a second, related project involving canine scent tracking (sewage sniffing dogs) was conducted. The project sought to test the use of this new qualitative tool for source tracking, to provide real-time results and low sample cost for illicit discharge detection. Canine responses were compared against traditional wastewater indicators, illicit discharge detection tracers, and emerging human-specific waste markers in storm drain locations in Santa Barbara, CA. The canine scent tracking was also tested for effectiveness in locating contaminated inputs to storm drains, addressing a specific hypothesis of contamination arising from illicit dumping from recreational vehicles, and conducting systematic outfall and storm drain reconnaissance. Based on the statistical and qualitative results presented in this pilot-scale study, canine scent tracking is a tool that should be expanded for use by researchers and stormwater managers. A highlight of the work was uncovering a direct leak from the sanitary sewer to the Hope St. storm drain. The leak was fixed very quickly. Fortunately, this drain has been diverted to the sanitary sewer during dry weather for several years. In addition, two instances of leaking black water tanks from recreational vehicles were detected, and fixed promptly.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 5.8 Biological Assessment Program**

**Measurable Goal 5.8:** *Incorporate results into annual water quality monitoring report and use results to revise existing BMPs.*

**Status:** Data is presented in the 2010 Bioassessment Report by Ecology Consultants. The results are also summarized in the Annual Water Quality Monitoring Report. In 2010 monitoring sites were added to collect baseline data for future water quality projects. Results from the 2010 report will be incorporated into the Creeks Division annual water quality monitoring report. These reports can be accessed on the City's website at: [http://www.santabarbaraca.gov/Resident/Community/Creeks/Reports\\_and\\_Studies.htm](http://www.santabarbaraca.gov/Resident/Community/Creeks/Reports_and_Studies.htm)

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 5.9 General Plan Update**

**Measurable Goal 5.9:** *Track General Plan update process and EIR. Report on outcome.*

**Status:** In 2010, the *Plan Santa Barbara* General Plan update process was in “Phase III” which included preparation and public review of two drafts of the General Plan Goals and Objectives, Land Use Element and Map, Housing Element, Adaptive Management Program, and selected policy amendments to other Elements.

The draft General Plan policies incorporate environmental sustainability principles, and draft Policy ER25-Storm Water Management Guidelines directs the inclusion of City SWMP policies into an Environmental Resources Element, toward reducing storm water run-off and water pollution. (Preparation of an updated Environmental Resources Element would occur in a subsequent year and phase of work.)

The Draft Program EIR for the General Plan update was completed and underwent public review in 2010, and the Final EIR was completed and certified. The EIR includes analysis of hydrology, flooding, water quality, water supply, and wastewater management issues and includes reference to SWMP provisions as programmatic mitigation. The EIR analysis is expected to inform the development of community indicators and benchmarks for monitoring the effectiveness of storm water management and water quality policies and mitigation programs as part of the Adaptive Management Program of the General Plan.

The Draft General Plan Update is presently (2011) undergoing final review by the City Council, the adopting authority for the Plan.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** In 2011, the *Plan Santa Barbara* process is scheduled to complete Phase III work with City Council adoption of the General Plan Update, and to begin Phase IV “implementation work.”

Small MS4 General Permit Annual Report -  
 Pollution Prevention/ Good Housekeeping for Municipal Operations (MCM 6)

**6.Pollution Prevention/Good Housekeeping for Municipal Operations**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Develop and implement Pollution Prevention Plans for operations divisions	6.1	Develop and implement pollution prevention plans.	X			X		
Training	6.2a	Update training presentation materials based on input from operational division.	X			X		
	6.2b	Train all operations division staff.	X			X		
Vehicle and Equipment Cleaning	6.3a	Provide facilities for vehicle wash that are equipped to contain pollutants generated from vehicle washing.	X			X		
	6.3b	Require fleet vehicle wash service to contain car wash water, with permit for disposal of wash wastewater.	X			X		
Exterior Building Washing	6.4	Identify and implement appropriate BMPs.	X			X		
Evaluate contractor for compliance with BMPs for City contracts	6.5	Develop checklist to be completed for every contract service where there is potential for polluted runoff. Amend existing contracts to include implementation of pollution prevention BMPs and compliance with General Permit.	X			X		
Trench Excavation	6.6a	Maintain a list of trench excavations in unpaved areas.	X			X		
	6.6b	Inspect unpaved trenches after first rainy season following backfill.	X			X		
De-Watering Operations	6.7a	Maintain on-hand stock of filter bags, fiber rolls and sand bags for unplanned incidents requiring sediment control.	X			X		
	6.7b	Maintain open purchase order with appropriate suppliers to expedite access to additional sedimentation control devices as needed.	X			X		
	6.7c	Inspect service vehicles and warehouses annually to confirm appropriate inventory of materials on hand.	X			X		
Paving and Grinding Operations	6.8	Install and maintain vacuum cleaning equipment on vehicles involved in cutting and grinding operations.	X			X		
Construction Waste Management	6.9	Implement policy of no material piles left on street at end of workday.	X			X		

Small MS4 General Permit Annual Report -  
Pollution Prevention/ Good Housekeeping for Municipal Operations (MCM 6)

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Spill Prevention and Cleanup	6.10	Have spill containment materials on service trucks and vehicles that support backhoes, loaders and graders.	X			X		
Storm Drain Inlet Cleaning	6.11	Inspect all City inlets annually.	X			X		
Inline Storm Filter Maintenance	6.12	Implement 1 annual cleaning of inline filters before the rainy season.			X			
Annex Yard BMP Maintenance	6.13	Implement an inspection program of Annex Yard BMPs.	X		X	X		
Street Sweeping	6.14a	Implement sweeping of City streets.	X			X		
	6.14b	Addition of San Roque neighborhood.	X			X		
	6.14c	Addition of Hidden Valley neighborhood.	X			X		
	6.14d	Addition of Mesa neighborhood.	X			X		
Parking Lot Sweeping/Trash Removal	6.15	Implement daily cleanup of parking lots.	X			X		
Parking Garage Washing	6.16	Implement steam/power washing of parking garage floors, with full recovery of wastewater.	X			X		
Integrated Pest Management	6.17	Implement IPM program.	X			X		
Cleaning Trash Enclosures	6.18	Use only wash unit with full vacuum recovery for cleaning trash enclosures.	X			X		
Illicit Discharge Inspection and Elimination	6.19	Implement an annual inspection of maintenance yards and shops, along with review of facility inspection reports, to identify and eliminate potential sources for polluted runoff.	X			X		
Place portable toilets adjacent to creeks	6.20	Maintain contracts for the placement and service of portable toilets in areas adjacent to creeks that are known (or become known) for human use.	X			X		

**BMP 6.1 Develop and Implement Pollution Prevention Plans**

**Measurable Goal 6.1:** *Plans fully implemented by year one; Plans evaluated annually.*

**Status:** The Streets Division adheres to a Pollution Prevention Plan at the City Annex Yard (managed by the Streets Division) for vehicle washing, material dumping, and storage. As of 2010, Streets no longer staffs a full time operator at the Annex Yard due to budget cuts, however operations of the facility are overseen by

Street's weekday and weekend staff on a rotating basis. The Streets Division concrete and asphalt crews follow pollution prevention procedures to reduce and eliminate debris or polluted water discharges into the storm drain system during maintenance projects. Debris is mechanically swept and cleared away from the maintenance sites during construction and after the project is completed. Streets staff uses a Yanonali Annex Yard Checklist to report on details about the general yard area, the vehicle wash bays, the material delivery area, the waste spoils storage areas, the oil emulsion tank area, and the storm drain catch basin in the Annex Yard. The Streets Division also follows landscaping maintenance and clean up procedures/BMPs, including placing sand bags at storm drains or in gutters to stop debris and/or polluted water from entering the storm drain. Asphalt particles and debris created during the work are swept up and disposed of at the City Annex Yard.

Water Distribution System staff apply City specified best management practices in the course of all construction, maintenance, repair and operations of the water distribution system, as detailed in the City's *Procedures for the Control of Runoff into Storm Drains and Watercourses*. The most commonly used pollution prevention controls for Water Distribution staff are BMPs applied to vehicle and equipment fueling and cleaning, water line breaks, trench excavations, dewatering operations, paving and grinding, concrete waste management, spill prevention and control, and equipment parking and storage. The City's *Operations Division Storm Water Pollution Prevention Plan (Facilities Worksheet)* clearly defines these BMPs. Other BMPs from the *Procedures* are used as necessary.

For Wastewater Collection staff, evaluation for pollution prevention is a daily, ongoing process. Pollution Prevention Plans are continually reviewed with both Wastewater Collection staff and the Water Board. Along with other City departments and divisions, the Wastewater Collection staff also follows the *City's Procedures for the Control of Runoff Into Storm Drains and Water Courses*. In addition, the Wastewater Department also produced a stand-alone Pollution Prevention Plan in 2009 that specifically defines the measures necessary to prevent sanitary sewer overflows and infiltration and inflow, as well as BMPs for when a sewage overflow occurs, how to eliminate the discharge of fats, oils and grease (FOG) into the sewer system, and good housekeeping practices, as well as staff training.

The Parking Department follows pollution prevention BMPs on a daily basis, and produced a written Pollution Prevention Plan in 2009. The plan defines cleaning procedures for parking lots, parking garages, sidewalks, driveways, and Paseo's (both with soap and without), as well as good housekeeping practices, staff training, and spill procedures. To ensure compliance to pollution prevention, parking facilities are inspected daily, and dry clean-up techniques are used for oil spills. All parking garages have a daily report form that is filled out, noting any fluid spills and needed clean up. Furthermore, the Parking Division currently adheres to detailed specifications for power washing any parking lots and/or facilities, in order to avoid wash water runoff into the storm drain system.

The Facilities Division mainly conducts work indoors and/or within covered/enclosed shop locations, and therefore simply complies with the following protocol:

- Run off from roof washing will be captured or diverted to permeable planters or sanitary sewer drains
- Wastewater from janitorial services will be disposed of to sanitary sewer drains
- Solid construction waste will be contained and disposed of using solid waste management containers

The Parks Department continues to use the *Procedures for the Control of Run-Off into Storm Drains and Watercourses* and provides training on a yearly basis. Parks also manages the City's Integrated Pest Management (IPM) Program and reports the successes and challenges to the City Council, annually.

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The Golf Course staff adheres to their Pollution Prevention Plan on a daily basis. Golf's Pollution Prevention Plan addresses BMPs for managing reclaimed water, the equipment fueling station and storage area, the equipment wash station, and the clubhouse area, as well as using and storing fertilizers and pesticides, and implementing the City's Integrated Pest Management (IPM) Program. The Golf Course Division also uses a vehicle/equipment inspection form that is completed monthly for each piece of equipment.

The City Fire Department has five Standard Operating Procedures (SOP's) established that focus on Pollution Prevention. SOP E-IX-3 addresses correct decontamination procedures required during a Hazardous Material Incident. SOP E-IX-7 addresses sewer emergencies. SOP E-IX-4 addresses fuel spills. SOP A-I-5 addresses fueling procedures. SOP E-IX-8 addresses waste disposal.

The Fire Department also incorporates practices to reduce runoff of vehicle and equipment cleaning. Staff cleans apparatus and equipment with wet chamois and/or rags. The chamois are rinsed in buckets of water which is discharged into laundry sinks. Chamois are used to clean the apparatus of dirt and dust. Rags are used to wipe oil and grease from the apparatus. The rags are placed in a can for pick up. When the apparatus require washing it is our practice to use the city furnished vehicle wash facilities located at City Yards and/or Fire Station 8 at the Airport. Fire Station cleaning is done with water and biodegradable cleansers using sponges and mops. The mops and sponges are rinsed in the laundry sinks and any soiled water is poured down the sanitary sewer drains.

When the Fire Department has to extinguish a flammable liquid fire or keep a flammable liquid spill or leak from igniting, we use Aqueous Film Forming Foam (AFFF). This foam forms a blanket that prevents or extinguishes fire on a hydrocarbon liquid. Our engine companies use a 3%-6% AFFF and our airport response trucks use a 3% AFFF. For the time being our Battalion Chiefs are responsible for the oversight and proper environmental handling of AFFF.

The City's Motor Pool staff operates with BMPs in place on a daily basis to prevent contamination to storm water resulting from vehicle and equipment maintenance. In general, Motorpool performs maintenance and repairs inside the repair shop. All equipment is cleaned in the wash rack to remove any oil and grease (wash rack is connected to the sanitary sewer). Drip pans or absorbent is always used during repairs and maintenance work that involves fluids, and shop equipment is inspected for leaks or conditions which may lead to storm water contamination. Furthermore, all bulk fluid containers are stored on spill containment pallets or in above-ground storage containers w/secondary containment. In the event of repairs or maintenance that constitutes working outside, staff first verifies there are spill kits and absorbent contents available. Cars and equipment are washed first in the designated wash rack to remove excess build up of oil and grease, and once outside of the shop, drip pans are used. Spills are promptly cleaned using spill kits, absorbents and sweeping.

In 2009, waste oil tanks at Motorpool were inspected and emptied (as needed), ten times. Used oil filters were removed and steel drum containers were replaced six times, and waste anti-freeze containers were inspected and removed four times throughout the year. Motor Pool's "parts washing machine" was cleaned, inspected, and waste removed four times, batteries were properly disposed of on a monthly basis, and garbage, solid waste, and recyclable materials were collected and disposed of weekly. Motor Pool continues to use "Nu-Cool Redigreen," for recycling the coolant used in the maintenance of city vehicles and equipment.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing. Creeks Division staff is working with several city departments, including Streets, Water, Environmental Services, and Fire to create a unified and efficient chain of command Emergency Response Policy to clearly define city response to spills and/or illicit discharge of both hazardous and non hazardous materials along with sewage spills and other bio hazards. This policy is a work in progress and will need the continued support and cooperation from all city agencies. It is anticipated that this protocol will be finalized in 2011.

### **BMP 6.2 Training**

**Measurable Goal 6.2a:** *Update training materials annually.*

**Status:** Creeks Division staff updated the training materials for all “operational division” staff trainings in 2010. Creeks Division staff created a power point presentation that began with asking staff questions they should already know about storm water management in order to assess where staff’s weaknesses and/or needs for further training on storm water management lie. The presentation reviewed storm water management BMPs applicable to each City department and/or division. This approach was purposely different from Year 1, which used a training video. The trainings are approximately one hour in length and include an introduction to the City’s SWMP and the importance of protecting water quality. Trainings are conducted in the spring and summer of each calendar year. City staff are required to attend and sign-in sheets are collected.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 6.2b:** *100% staff trained.*

**Status:** 100% of operational division staff were trained in Year 2. A “make-up” session was held in December 2010 for Fire staff who were originally unable to attend the previously scheduled trainings.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.3 Vehicle and Equipment Cleaning**

**Measurable Goal 6.3a:** *2 facilities maintained and equipped.*

**Status:** This goal has been exceeded. Four City vehicle/equipment wash bays have been maintained and equipped through Year 2.

Most City departments/divisions wash their vehicles at local, commercial car wash facilities where wash water is contained and sent to the sanitary sewer. The contracts are maintained through the Motor Pool Division. Motor Pool also maintains one wash rack at their garage facility, which discharges wash water into a clarifier, then to the sanitary sewer. Washing at the Motor Pool wash rack is performed with the

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following considerations:

- Verify wash rack is clean prior to using to prevent driving through a spill
- Clean wash rack when cleaning process is completed
- Inspect wash rack for cleanliness on a weekly basis
- Prompt cleaning of any spills

Larger City equipment and the Streets Division vehicles are washed at the City's Annex Yard, where there are two wash bays that capture and filter wash water (via a clarifier) and then send it to the sanitary sewer. The wash bays are monitored and maintained by the City Streets Division. Staff has identified clogging and overflow issues with one wash bay (the east bay) at the Annex Yard (see the discussion under BMP 6.20, below). A new catch screen was installed in the wash rack of the east wash bay in 2010 on behalf of the Creeks Department to temporarily resolve this issue by capturing more of the gravel and debris that clogs the drain valve. This basket is easily removed and dumped by someone servicing the wash bay. The diversion valve still needs to be modified, but in the meantime, Streets staff is maintaining the bay more frequently.

The Golf Division staff use a "Landa Water Stax" system to wash maintenance equipment. The system uses bioremediation to remove oil, grease, hydrocarbons and grass clippings from wash water prior to draining it to the sewer. This system meets all current and proposed E.P.A. regulations. Two staff members are assigned to maintain the system and haul away the solids to the recycle bin, daily. A contracted monthly service for the Landa system maintains all service logs and performs technical work and services with new microorganisms to facilitate the breakdown of oils, solids, etc.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Modify the diversion valve on the east wash bay at the City's Annex Yard in order to permanently fix the associated clogging.

**Measurable Goal 6.3b:** *Track purchase orders annually beginning in permit year two, 100% implementation.*

**Status:** Motor Pool tracked purchase orders for City fleet vehicle wash services throughout Year 2 and ensured that wash water is contained and properly disposed of, 100% of the time. Motor Pool used the following vendors in Year 2, who contain their wash water and are required to have permits to dispose the waste water:

- Educated Car Wash
- Prestige Hand Car Wash and Detail

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

#### **BMP 6.4 Exterior Building Washing**

**Measurable Goal 6.4:** *Use of City approved BMP will be required on 100% of building wash services.*



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**Status:** Wash water capture and proper disposal for City building wash services was required and implemented throughout Year 2. Building washing is a rare occurrence, and when it does happen, contractors are required to capture and contain the wash water for proper disposal to the sanitary sewer. The Facilities Department has incorporated this BMP into their contract language.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.5 Evaluate Contractor Compliance with BMPs for City Contracts**

**Measurable Goal 6.5:** *Track and file amended contracts and completed checklists and take enforcement action when contractors do not comply. Achieve 100% compliance and report on compliance in annual report.*

**Status:** The City achieved 100% compliance with this BMP. The Facilities Division tracked and filed contractor compliance with wash water and other storm water BMPs. The City currently employs only one contractor who performs work (washing) that creates runoff; “Waterworks.” Waterworks contains and properly disposes of their wash water, and the wording to reflect this requirement is included in their contract with the City.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.6 Trench Excavation**

**Measurable Goal 6.6a:** *Maintain a list of trench excavations in unpaved areas. Update list annually.*

**Status:** The Wastewater Collection section continually maintains an active list of Wastewater infrastructure improvement projects with locations within City limits. City Engineering staff also maintains a list and tracks associated monitoring for Capital Improvement Projects involving trenching in unpaved areas. Trench excavation work within the City is covered or plated at all times during construction before leaving the site for more than eight hours.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 6.6b:** *Written report on status and any corrections required and completed.*

**Status:** Reports and status of trench excavations were tracked in 2010. Staff inspects any uncompleted repairs in unpaved areas before and after storm events to check for erosion. This may include the installation of sandbag dikes as necessary to prevent erosion. Straw mulch may also be used to prevent disturbed soil erosion. There are currently no outstanding trench excavations in unpaved areas requiring monitoring.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.7 De-Watering Operations**

**Measurable Goal 6.7a:** *Report annual inventory of supplies on hand and material orders.*

**Status:** No new sediment control inventory was needed for the Water Distribution Department in Year 2. Water Distribution ordered 18 fiber rolls (called “gullygards”) in 2009. A minimum of one roll is kept in each service truck, and the emergency response vehicle has 8-10 sand bags at all times. In 2011, Water Distribution will be ordering more Gullygards through a new purchase order with J2A Environmental.

Wastewater Collection staff utilizes sand bags for containment and control of sediment runoff and verifies proper cleanup related to in-house sewer system repair work, as required. Wastewater staff makes their own sandbags and normally keep a minimum of 20 sandbags in stock.

The City’s Central Storage Warehouse maintains a minimum of 10,000 sand bags. Presently, spill kits are purchased by City departments/divisions on an individual, need-basis. Absorbent materials, such as sand, are stocked and maintained by the City’s Annex Yard; which is managed and staffed by the City Streets Division.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 6.7b:** *Track approved purchase orders annually, maintain supplies to control all non-storm water discharges.*

**Status:** The Wastewater Collection section has established purchase orders, including local vendor information, in order to obtain immediate supplies and material for sediment control. Wastewater Collection maintains a blanket purchase order (#381968) with Vendor #036960 - Bedrock Building Supplies, Inc. The Department also has accounts with Santa Barbara Home Improvement, Agri-Turf Supplies, Inc., and Aqua-Flo Supply for needed supplies.

The Water Distribution Division maintains an ongoing purchase order with J2A Environmental for “gully guards,” which are curb guards used to contain water during main breaks.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 6.7c:** *Number of service vehicles inspected annually (for dewatering operations); list warehouses inspected annually (for water distribution and/or sewer collection facilities), achieve 100% preparedness.*

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**Status:** The City’s numerous service vehicles and warehouses for water distribution, dewatering operations, and/or sewer collection work are managed and maintained by the Water Distribution and Wastewater Departments. Combined, they inspected/maintained 21 service vehicles and 15 warehouses/facilities in 2010.

Water Distribution’s five service vehicles are inspected weekly, at the end of each week. Their vehicles are 614/1191, 616/1612, 617/2138, 618/2139, and the emergency response vehicle; 638/2115. Water Distribution’s warehouse facilities (i.e. pump stations, reservoirs, and wells) are inspected daily, bi-monthly, and/or monthly (see below).

Facility	Action/Results	Facility	Action/Results	Facility	Action/Results
Tunnel Reservoir/ Pump Station	Bi Monthly Checks	Hope Reservoir/ Campanil Pump Station	Bi Monthly Checks	Escondido Reservoir/ Pump Station	Bi Monthly Checks
Calle Las Carleras Pump Station	Bi Monthly Checks	Sheffield Reservoir/El Cielito Pump Station	Bi Monthly Checks	La Vista Reservoir	Bi Monthly Checks
Rockynook Pump Station	Bi Monthly Checks	Northridge Pump Station	Bi Monthly Checks	Reservoir Number One	Bi Monthly Checks
La Mesa Reservoir	Bi Monthly Checks	Northridge Hydro Tank	Bi Monthly Checks	Reservoir Number Two	Bi Monthly Checks
Skofield Reservoir	Bi Monthly Checks	Cater Cross Tie Pump Station	Bi Monthly Checks	El Cielito Reservoir/ Skofield Pump Station	Bi Monthly Checks
Sheffield Pump Station	Bi Monthly Checks	Vic Trace Reservoir/ La Coranilla Pump Station	Bi Monthly Checks	East Reservoir/ Bothin Pump Station	Bi Monthly Checks

Wells	Action/Results
Corporation Well	Daily/Monthly
Los Robles Well	Daily/Monthly
Vera Cruz Well	Daily/Monthly
City Hall Well	Daily/Monthly
Ortega Well	Daily/Monthly
Alameda Well	Daily/Monthly
Hope Well	Daily/Monthly
San Roque Well	Daily/Monthly

The Wastewater Collection staff maintains a list of sixteen City vehicles assigned to their section, and inspects the vehicles regularly. The Wastewater Department vehicles are:

	vehicle I.D. #	radio I.D. #	
1	2203	613	Honda Sedan
2	1799	619	Construction Lrg. Flat bed
3	2232	623	Utility Pick up (Lead)
4	2289	624	Supervisor Pick up (AL)
5	1744	627	Rodder
6	1820	628	Dump Truck
7	2222	629	FOG pick up
8	1938	633	CCTV unit Pick up
9	1959	634	Utility Flat Bed
10	2049	635	Pick up / Stand by truck
11	2436	636	Van -CCTV unit
12	1786	642	Backhoe
13	2048	650	Supervisor Pick up (Rich)
14	1960	667	Small Jetter
15	2401	668	Vactor- Combo
16	1801	669	Peterbuilt Vactor- Combo

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 6.8 Paving and Grinding Operations**

**Measurable Goal 6.8:** *Complete annual inspections of all vehicles (used for paving/grinding operations). Document date equipment inspected and compliance.*

**Status:** In Year 2 (and for years previously) the Wastewater Collection staff used a seven-gallon wet vac portable vacuum system to recover all wash water from saw cutting operations. The vacuum system is used infrequently, but is inspected before and after each use. Wastewater Collection saw cutting operations are limited to a small amount of conventional dig-and-replace repair work. Most wastewater infrastructure repair/replacement work is contracted to local underground utility construction companies, which are required to adhere to the City’s SWMP and BMPs of capturing/containing water runoff.

Water Distribution’s Hepa Vacuum (Pullman Holt) is inspected bi-weekly, usually on Fridays. Crews inspect the filter, switch, cord, hose, wheels, and clamps, and start the equipment to verify suction.

The Streets Division inspects all vehicles every Tuesday morning, and staff is currently using vehicle inspection forms. Streets staff use sandbags to prevent discharges into a storm drain during paving and grinding work. The Streets crew mechanically sweeps up debris during the paving or grinding operation and at the end of each job.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 6.9 Construction Waste Management**

**Measurable Goal 6.9:** *Report if any material is left on street overnight. Achieve 100% compliance in non-*

**Status:** Both the Wastewater Collection section and Water Distribution staff achieved 100% compliance with the measurable goal by leaving no material piles on the street at the end of a workday. City staff conducts site inspections to verify that construction materials are stored offsite and/or in a manner which could not cause storm water pollution. Staff also monitors and maintains street locations to ensure they are clear of sediment and debris.

The Streets Division performs a variety of maintenance activities on City owned roads, including painting, striping, asphalt repair and pothole patching. Staff cleans up all materials and debris at work sites at the end of each day. Clean-up at the end of the day is part of the standard operations for the Streets Division crews. Paint and emulsion products are applied during the daytime hours and dry rapidly before staff leaves. The Streets Division has written procedures for all work the Division performs. These include the “*Sidewalk, Curb and Gutter Maintenance --- Concrete*”; the “*Pavement and Sidewalk Maintenance --- Asphalt*” and the “*Landscape Maintenance and Misc. Clean Ups*” procedure pages.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

#### **BMP 6.10 Spill Prevention and Cleanup**

**Measurable Goal 6.10:** *Document and maintain spill kits readily accessible to all crews, contain all spills.*

**Status:** The Wastewater Collection section uses sandbags to control and recover any spills from defective trucks and equipment. Water Distribution staff maintains spill kits on 12 hydraulic vehicles.

The Streets Division has spill containment materials on each vehicle. Staff is trained on the use of the spill containment materials. The safety coordinator includes the use of spill clean-up materials and the use of sandbags to prevent debris from entering the storm drain system during one or more of the weekly scheduled “safety meetings.” Additionally, staff participates in local training opportunities through the MSA (Maintenance Superintendents Association) training events. Staff also receives annual storm water BMP training from the Creeks Division. Spill prevention materials are obtained from the City’s “central storage” warehouse.

The City’s Central Storage Warehouse is staffed by an employee who takes inventory and maintains stock levels. The warehouse maintains a minimum of 10,000 sand bags, which are commonly used by the Water Distribution, Wastewater, and Streets Departments. Presently, spill kits are purchased by City departments/divisions on an individual, need-basis. Absorbent materials, such as sand, are stocked and maintained by the City’s Annex Yard; which is managed and staffed by the City Streets Division.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

#### **BMP 6.11 Storm Drain Inlet Cleaning**

**Measurable Goal 6.11:** *Annually inspect a minimum of 500 City inlets with the greatest potential for storm water pollution, and clean as necessary.*

**Status:** In 2010, the Streets Division inspected and cleaned 2,758 drain inlets. Crews were sent out to targeted inlets before and during the rainy season to remove debris and sediments that can block storm water drain inlets, prevent water flow, and cause water pollution. The crews are split up into sections with all work and dates recorded into Cartegraph system.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.12 Inlet Filter Cleaning**

**Measurable Goal 6.12:** *Number of filters cleaned; yards of material removed.*

**Status:** As stated in the Year 1 Annual Report, this BMP shall be deleted due to the fact that storm drain filters in the City are currently being removed. (The BMP numbers have been adjusted, below). It has become evident that the maintenance of the filters far outweighs the benefits they provide. Catch basin debris screens have been replacing filters in Year 2, and this debris screen project will be completed in Year 3. Yards of material captured from the new debris screens will be portrayed in BMP 6.15 – street sweeping. The City did not receive confirmation from the Water Board whether or not this proposed modification/deletion has been accepted, so the justification for this deletion is reiterated from last year’s Annual Report, below.

The catch basin filters were originally installed in 98 catch basins as a pilot program between 2001 and 2009, and the performance of the filters and maintenance costs were assessed during this period. During this assessment, numerous observations during rainstorms revealed that the filters quickly became clogged with sediment and leaves, so that the majority of storm water bypassed the filter and flowed untreated into the storm drains. This occurred despite monthly cleaning of the filters using a vacuum truck. The cleaning costs and debris removed were assessed from 2006-2008. The cleaning costs averaged \$846.00 per cubic yard of debris removed from the filters. Due to the incomplete capture of storm water runoff and the high cost of maintenance for the filters, the City decided not to expand the program and instead to replace the filters with catch basin debris screens. The catch basin debris screens are designed to prevent gross pollutants (trash and debris) from entering the storm drains via the catch basins during dry periods and moderate rain events, but are partially bypassed during heavy rains. At the same time, the catch basin screens are designed to work with street sweeping and don’t require additional maintenance to remain functional. Because the filters are easily clogged, causing storm water to bypass during rain events, they don’t offer a significant performance advantage over catch basin screens. Because of the low maintenance costs of the screens the City is able to install them city-wide and therefore prevent trash and debris from entering the storm drains in a much wider area. Screens are currently being installed in every eligible catch basin in the City.

**Proposed Modifications:** See above.

**Proposed Year 3 Activities:** None.

### **BMP 6.12 Inline Storm Filter Maintenance**

**Measurable Goal 6.13:** *Number of cleanings; gallons of waste disposed.*

**Status:** The City Creeks Division currently maintains the Haley Street Continuous Deflective Separation (CDS) filter unit and the Parks Yard interceptor. There has been a large Haley Bridge replacement project upstream of the Haley CDS unit, so that unit has been largely out of commission during Year 2, and therefore no cleanings have occurred. Once the Haley Bridge project is completed, the Creeks Division will enter a contract to have the unit properly maintained and cleaned, annually. The Parks Yard interceptor also did not receive a cleaning in Year 2, due to lack of operational personnel that has resulted from citywide budget cuts. Once the new contract for the Haley CDS unit is in place in Year 3, the Parks Yard interceptor will be added to that contract for an annual cleaning.

**Proposed Modifications:** This BMP originally called for “3 annual cleanings.” This requirement is excessive due to limited operational staff. Furthermore, Year 1 cleaning of the two inline filters demonstrated that one cleaning per year before the rainy season is sufficient. The BMP should be partially modified to read “*Implement a minimum of one annual cleaning of inline filters.*”

**Proposed Year 3 Activities:** See above.

### **BMP 6.13 Annex Yard BMP Maintenance**

**Measurable Goal 6.14:** *Daily inspection of BMPs. All BMP maintenance entered on daily inspection form.*

**Status:** The Streets Division maintained and inspected the Annex Yard throughout Year 2 on a daily basis, but does not staff a full time person anymore to fill out daily inspection reports, due to recent budget cuts resulting in a lack of staff resources.

**Proposed Modifications:** This measurable goal should be “*Daily inspection of BMPs.*” And no longer read “*All BMP maintenance entered on a daily inspection form.*”

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.14 Street Sweeping**

**Measurable Goal 6.15a:** *Curb miles swept; yards of material.*

**Status:** The 2010, over 19,000 curb miles were swept and over 2,250 tons of material was collected. A summary follows:

From January through March; 4,515 curb miles were swept, and 573 tons of material (debris) was collected. From April through June, 4,945 curb miles were swept, and 607 tons of material was collected. From July through September; 5,018 curb miles were swept and 567 tons of material was collected. From October through

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December; 4,569 curb miles were swept and 506 tons of material was collected. This totals 19,047 curb miles swept and 2,253 tons of material collected during Year 2 (2010). Logs are kept to track street sweeping results.

The Streets Division manages a contracted street sweeping program and has an in-house sweeper vehicle. 81% of all City streets are swept on a minimum of one day each month. The sweeping program added the final neighborhood in July of 2008. The leaves, sediment and trash debris are weighed periodically throughout the year and tracked. The amount of debris cleaned off the city streets each month has stayed relatively constant, with slight variances, since the beginning of the street sweeping program. The in-house street sweeper is used for special sweeping requests in areas not on the contract sweeping route. The Streets Division tracks the street sweeping program through their Performance Measures quarterly reports.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing. The City is going out to bid for a new residential and commercial sweeping contract in Year 4 (scheduled for July of 2012).

**Measurable Goal 6.15b:** *Approve contract by City Council by end of permit year one (San Roque).*

**Status:** The San Roque neighborhood was already included in the street sweeping program prior to 2009.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 6.15c:** *Approve contract by City Council by end of permit year one (Hidden Valley).*

**Status:** The Hidden Valley neighborhood was already included in the street sweeping program prior to 2009.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**Measurable Goal 6.15d:** *Approve contract by City Council by end of permit year one (Mesa).*

**Status:** The Mesa neighborhood was already included in the street sweeping program prior to 2009

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP 6.15 Parking Lot Sweeping/Trash Removal**

**Measurable Goal 6.16:** *Track hours spent sweeping/removing trash annually.*



**Status:** Downtown Parking staff spent 11,911 hours removing trash and debris from City Parking lots in 2010. The City's Cartegrpah Work Order program tracks the hours. Purchase orders are maintained and updated quarterly with Venco Power Sweeping and Washing. Staff is required to fill out daily logs to record the condition of the parking lots, stairs and elevators, landscaping, walkways, and lighting in the garages and lots, and what clean up is performed.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.16 Parking Garage Washing**

**Measurable Goal 6.17:** *Track hours spent using wash & vacuum recovery system annually.*

**Status:** Downtown Parking staff completed 780 hours of pressure washing with a full recovery system during 2010. The Parking Division holds a discharge permit with the City for discharging this recovered water to the sanitary sewer.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.17 Integrated Pest Management**

**Measurable Goal 6.18:** *Complete annual IPM report, document annual goals achieved.*

**Status:** The City's Parks Department oversees, implements, and educates staff and the public about the City's IPM program. The 2009 Annual IPM Report was approved by City Council in Year 2 (May 5, 2010). The 2010 Annual IPM Report was drafted in Year 2 and is anticipated for approval early in Year 3. Links to Park's Annual IPM Reports are available on the City's website:

[http://www.santabarbaraca.gov/Resident/Community/Parks\\_and\\_Beaches/Integrated\\_Pest\\_Management.htm](http://www.santabarbaraca.gov/Resident/Community/Parks_and_Beaches/Integrated_Pest_Management.htm)

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.18 Cleaning Trash Enclosures**

**Measurable Goal 6.19:** *Report number of enclosure cleanings done annually.*

**Status:** The Parking Division contracts with a local contractor to clean trash/recycle enclosures at City lots 8, 9, 10, 11, and 13. The contractor cleans twelve enclosures at five locations. This totaled 144 cleanings during 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP 6.19 Illicit Discharge Inspection and Elimination**

**Measurable Goal 6.20:** *Develop annual inspection schedule and estimated number of facilities to be inspected, including: Corporation Yard, Annex Yard, Facilities Maintenance Shops, Motor Pool, Parks Yard, Golf Maintenance Shop, Cater Plant and Parking Garages. Report deficiencies and corrections.*

**Status:** Annual inspections of maintenance yards, shops, and facilities were conducted in November and December 2010. The inspection schedule works best for staff at the end of each calendar year and all seven of the major City facilities with the potential to impact storm water are inspected, which include the Corporation Yard (Parks Yard), Corporation Annex Yard, Facilities Maintenance Shops, Motor Pool, Golf Maintenance Shop, Cater Water Treatment Plan, and the Parking Garages. Inspection checklists are filled out. No new issues/deficiencies were reported in 2010. Previous deficiencies recorded in 2009 at the Annex Yard and Parks Yard were addressed and a small “to do” list will be addressed in Year 3, as discussed below:

Annex Yard (deficiencies and solutions):

1. To correct a clogging and overflow issue previously reported in 2009, City staff ordered a custom-fitted basket strainer and installed it in the trench drain that accepts the initial wash bay runoff. This basket strainer is visually inspected and cleaned when it fills with debris. In addition, City staff installed a drain plug at the top of the storm drain pipe in the diverter box. This plug prevents any wash water from flowing to the storm drain even if the sewer valve becomes clogged. Last of all, City staff clean the sewer diverter valve more frequently (at least once a day) to maintain proper drainage to sewer. There is a plan to address the overall design of the entire system, but the above fixes have ensured that no wash water will enter the storm drain.
2. To correct a drainage issue previously reported in 2009, City staff moved the street sweeping dumping site to a water tight roll-off bin that is picked up by the local refuse collector when it fills. Because of this, polluted water seeping from the dumped street sweeper waste no longer drains to the storm drain.
3. The third issue at the Annex Yard reported in 2009 is the tank used to store tar for street asphalt repairs. The steel cylindrical tank is raised about 5 feet on a concrete support and is surrounded by a 4 inch high berm in the parking lot. This berm is not sufficient to achieve secondary containment and will not be effective in the event of tank ruptures, valve leaks, or any other moderate to large-sized spill. In 2010, City staff budgeted funds for design and construction of a new and larger containment structure to accommodate the 6000 gallon emulsion tank. Completion is planned for November 2012.

Parks Corporation Yard (deficiencies and solutions):

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- c) To correct a containment issue previously addressed in 2009, the secondary containment tray for the waste oil was serviced. The oil/water mixture was collected and disposed of properly. The tray was virtually empty as of the December 2010 inspection.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing. Staff will work to address the remaining deficiencies at the City's Annex Yard in Year 3.

#### **BMP 6.20 Place Portable Toilets Adjacent to Creeks**

**Measurable Goal 6.21:** *Track the use and maintenance frequency of portable toilets that are placed adjacent to City creeks.*

**Status:** Due to ongoing issues with people using the creek and banks as a toilet in 2010, there was a portable restroom placed adjacent to Mission Creek at Montecito Street. This portable restroom was serviced twice a week due to the high level of use. This high level of use is an indication that less waste is being discharged to the creek and/or banks. There are no plans to remove this restroom from this site. Invoice records for the maintenance of the portable toilet are maintained by the City Creeks Division.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**7. Waterfront Department (WFD)**

**1. Public Education and Outreach**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Public Education and Outreach	WFD 1.1	Distribute brochures to tenants and slip holders annually as part of billing statements.	X			X		
	WFD 1.2	Create postings for all slip entrances identifying existing water quality tips and regulations, and potential enforcement actions, using resources from the California Clean Boating Network, and including an information and spill reporting telephone number.	X			X		
	WFD 1.3	Include a copy of informational brochures supplied to Waterfront tenants and users on local environmental groups website's, including but not limited to the Community Environmental Council, Project Clean Water, and City of Santa Barbara.	X			X		
	WFD 1.4	Formalize presentation process and identify presentation schedule and information number on WFD website.	X			X		
	WFD 1.5	Assess effectiveness through annual review of the program.	X			X		
	WFD 1.6	Expand program to interface with Regional Clean Marina Programs.	X			X		
	WFD 1.7	Publish and distribute "Docklines" three times per year.	X			X		
	WFD 1.8	Continue to coordinate with Santa Barbara Channel Keeper and Heal the Ocean to disseminate water quality information at their booths at the annual Harbor & Seafood Festival.	X			X		

**BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.1:** *Distribute brochures to tenants and slip holders annually as part of billing statements. Year 1-5*

**Status:** Completed through monthly slip billing to tenants and slip holders throughout Year 2.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue coordination in Year 3.

### **BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.2:** *Create postings for all slip entrances identifying existing water quality tips and regulations, and potential enforcement actions, using resources from the California Clean Boating Network, and including an information and spill reporting telephone number. Year 2-5*

**Status:** Compiled information, as needed, for postings throughout Year 2.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue coordination in Year 3.

### **BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.3:** *Include a copy of informational brochures supplied to Waterfront tenants and users on local environmental groups website's, including but not limited to the Community Environmental Council, Project Clean Water, and City of Santa Barbara. Year 2-5*

**Status:** Completed through monthly slip billing to tenants and slip holders throughout Year 2..

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue coordination in Year 3.

### **BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.4:** *Formalize presentation process and identify presentation schedule and information number on WFD website. Year 2-5*

**Status:** The Waterfront Department website was created and launched in Year 2.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** WFD will continue to update the presentation process and information on the website as necessary in Year 3.

**BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.5:** *Assess effectiveness through annual review of the program. Year 3-5*

**Status:** Quarterly reporting results will be compiled for the annual Harbor Commission Report and assessed at the end of year 3.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Complete assessment in Year 3.

**BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.6:** *Expand program to interface with Regional Clean Marina Programs. Year 3-5*

**Status:** On schedule for implementation in Year 3.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Implement this measurable goal in Year 3.

**BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.7:** *Publish and distribute "Docklines" three times per year. Year 1-5*

**Status:** Docklines was published and distributed three times in Year 2; in March, June, and December 2010.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue to publish and distribute "Docklines" three times in Year 3.

**BMP WFD 1.0 Public Education and Outreach**

**Measurable Goal 1.8:** *Continue to coordinate with Santa Barbara Channel Keeper and Heal the Ocean to disseminate water quality information at their booths at the annual Harbor & Seafood Festival. Year 1-5*

**Status:** Santa Barbara Channel Keeper and Heal the Ocean organizations disseminated water quality information during the Santa Barbara Harbor & Seafood Festival, October 9, 2010.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue coordination in Year 3.

**2. Public Involvement/Participation**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Public Involvement and Participation	WFD 2.1	Annual Reporting	X			X		
	WFD 2.2	Regional Agency Coordination	X			X		
	WFD 2.3	Notify, at a minimum, 5 schools per year and 2 community groups to encourage local participation in education activities involving the WFD. Increase the number of community groups/organizations or numbers of attendees each year through advertising or other means of announcements.	X			X		
	WFD 2.4	Implement the first Annual Harbor Clean-up Day to encourage and engage the community with the BMPs adopted by the WFD and to encourage community groups to participate in maintenance activities involving the WFD.	X			X		

**BMP WFD 2.0 Public Involvement and Participation**

**Measurable Goal 2.1:** *Annual reporting at the Harbor Commission. Year 1-5*

**Status:** Annual report for 2010 will be compiled and presented to the Harbor Commission.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Annual reporting at the Harbor Commission in Year 3.

**BMP WFD 2.0 Public Involvement and Participation**

**Measurable Goal 2.2:** *Regional Agency Coordination. The WFD is currently responsible to present all BMPs, monitoring activities, water quality sampling, and pollution citation logs to the RWQCB in an Annual Report and in a SWPPP (if updated with additional BMPs / regulations). This documentation is available to the public at the WFD administrative offices and at the RWQCB. Year 1-5*

**Status:** The Annual Report and any additional updates to the SWPPP are reported to the RWQCB by July 1 for the previous year (July to June). The Annual Report and SWPPP updates are in progress.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Annual Report and SWPPP updates (if needed) at the end of Year 3.

### **BMP WFD 2.0 Public Involvement and Participation**

**Measurable Goal 2.3:** *Notify, at a minimum, 5 schools per year and 2 community groups to encourage local participation in education activities involving the WFD. Increase the number of community groups/organizations or numbers of attendees each year through advertising or other means of announcements. Year 1-5*

**Status:** Waterfront conducted 12 tours / public relations events in the last quarter of 2010.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue notifications and maintain involvement of community groups/organizations in Year 3.

### **BMP WFD 2.0 Public Involvement and Participation**

**Measurable Goal 2.4:** *Implement the first Annual Harbor Clean-up Day to encourage and engage the community with the BMPs adopted by the WFD and to encourage community groups to participate in maintenance activities involving the WFD. Year 3-5*

**Status:** On schedule for implementation in Year 3.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Implement Measurable Goal 2.4 in Year 3.



### 3. Illicit Discharge Detection and Elimination

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Illicit Discharge Detection and Elimination	WFD 3.1	The WFD proposes to submit to the RWQCB an application to allow low-threat, non-storm water discharge. These discharges occur as part of general public use at the harbor and may include the rinsing of boats with fresh water when they are removed from the harbor and washing of WFD vehicles in the maintenance yard.	X			X		
	WFD 3.2	Review and update the Clean Marina Program annually.	X			X		
	WFD 3.3	Assess effectiveness of Discharge Ordinance and Clean Marina Program. Performed through routine inspections and analysis of the Watch Log and Pollution Warning Log performed by Harbor Patrol and WFD staff.	X			X		
	WFD 3.4	Respond to 100% of all complaints / detection of illicit / illegal discharge within 24 hours of receiving the complaint / detection. Perform follow-up inspections on 100% of these cases to ensure elimination of the discharge.	X			X		
	WFD 3.5	Review Harbor Patrol warning & citation logs for illicit discharges and coordinate implementation of additional BMPs as necessary. Monitor and improve existing BMPs as needed as part of existing monitoring requirements. BMPs are monitored and evaluated monthly during the wet season (physically during rain events) and quarterly year-round in dry conditions as part of the Annual Site Evaluation, and SWPPP Annual Reporting.	X			X		

**Measurable Goal 3.1:** *The WFD proposes to submit to the RWQCB an application to allow low-threat, non-storm water discharge. These discharges occur as part of general public use at the harbor and may include the rinsing of boats with fresh water when they are removed from the harbor and washing of WFD vehicles in the maintenance yard. Year 2-5*

**Status:** RWQCB staff directed WFD to identify and include low-threat discharges, including BMPs, in SWPPP. SWPPP was updated in July 2008.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Goal Completed.

### **BMP WFD 3.0 Illicit Discharge Detection and Elimination**

**Measurable Goal 3.2:** *Review and update the Clean Marina Program annually. Year 1-5*

**Status:** The review and updating of the Clean Marina Program occurred in Year 2.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** The review and update (if needed) will occur again in Year 3.

### **BMP WFD 3.0 Illicit Discharge Detection and Elimination**

**Measurable Goal 3.3:** *Assess effectiveness of Discharge Ordinance and Clean Marina Program. Performed through routine inspections and analysis of the Watch Log and Pollution Warning Log performed by Harbor Patrol and WFD staff. Year 1-5*

**Status:** The effectiveness of the Discharge Ordinance and Clean Marina Program was assessed during the compilation of the harbor Commission Report in 2010.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue assessment and inspections in Year 3.

### **BMP WFD 3.0 Illicit Discharge Detection and Elimination**

**Measurable Goal 3.4:** *Respond to 100% of all complaints / detection of illicit/illegal discharge within 24 hours of receiving the complaint/detection. Perform follow-up inspections on 100% of these cases to ensure elimination of the discharge. Year 1-5*

**Status:** The Harbor Patrol responded to and followed-up on all notifications and observations of illicit or

illegal discharges in 2010, as well as kept a warning & citation log of such occurrences, which is included in the SWPPP Annual Report to the RWQCB.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue response and follow-up in Year 3.

**BMP WFD 3.0 Illicit Discharge Detection and Elimination**

**Measurable Goal 3.5:** *Review Harbor Patrol warning & citation logs for illicit discharges and coordinate implementation of additional BMPs as necessary. Monitor and improve existing BMPs as needed as part of existing monitoring requirements. BMPs are monitored and evaluated monthly during the wet season (physically during rain events) and quarterly year-round in dry conditions as part of the Annual Site Evaluation, and SWPPP Annual Reporting. Year 1-5*

**Status:** There were 5 Illicit Discharges recorded in 2010.

**Illicit Discharge**

Sanding Dust (2)  
Cutting Debris (2)  
Hydraulic Fluid (1)

**Response / Resolution**

Regulation Packet to offender  
Regulation Packet to offender  
Regulation Packet to offender

Review of the Harbor Patrol warning & citation logs is performed annually during the preparation of the SWPPP Annual Report. BMPs were monitored and evaluated monthly during rain events within one hour of the start of run-off and during quarterly monitoring during dry conditions.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Continue SWPPP requirements with wet and dry condition monitoring in Year 3.

**4. Construction Site Storm Water Runoff Control**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
n/a		n/a						

No Measurable Goals for the Waterfront Department have been established for MCM 4 or MCM 5. The existing General Industrial Permit covers operations within the Waterfront area. Construction within the Waterfront area is considered an independent action and is permitted and managed under the purview of the Public Works Department and therefore regulated under the City of Santa Barbara’s NPDES Storm Water Management Plan (SWMP). No substantial construction would likely occur because the waterfront area is

generally built out and no expansion is proposed. Should construction occur in the form of remodels/redevelopment within the waterfront area, construction BMPs would be implemented through the Public Works Department following requirements outlined in the SWMP. Enforcement of post-construction BMPs would be conducted through existing daily monitoring at the waterfront by the Harbor Patrol and through existing storm water management program monitoring protocols. Any operations associated with redevelopment and new construction would be managed under the existing General Industrial Permit and in the event that redevelopment/new construction changes the general uses of the waterfront area (very unlikely), the SWPPP will be revised to incorporate the new programs.

**5. Post Construction Storm Water Management**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
n/a		n/a						

Same as MCM 4; See above.

**6. Pollution Prevention/ Good Housekeeping for Municipal Operations**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Pollution Prevention/Good Housekeeping	WFD 6.1	Monitor pollution prevention/good housekeeping practices daily, weekly, monthly, yearly as appropriate.	X			X		
	WFD 6.2	Assess effectiveness of pollution prevention/good housekeeping practices by thorough review of monitoring, recording, and reporting efforts.	X			X		
	WFD 6.3	Update SWPPP to include modified or additional BMPs as appropriate.	X			X		
	WFD 6.4	Monitor storm water quality twice annually during wet season, as part of existing storm water pollution prevention program (SWPPP).	X			X		
	WFD 6.5	Review Waterfront Department SWPPP annually for compliance with City of Santa Barbara SWMP.	X			X		

**BMP WFD 6.0 Pollution Prevention/Good Housekeeping**

**Measurable Goal WFD 6.1:** *Monitor pollution prevention/good housekeeping practices daily, weekly, monthly, yearly as appropriate. Year 1-5*

**Status:** The Harbor Patrol conducts daily monitoring of pollution prevention/good housekeeping practices. Monthly and quarterly monitoring is conducted under the SWPPP monitoring plan by a consultant to the WFD.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Monitoring will continue in Year 3.

**BMP WFD 6.0 Pollution Prevention/Good Housekeeping**

**Measurable Goal WFD 6.2:** *Assess effectiveness of pollution prevention/good housekeeping practices by thorough review of monitoring, recording, and reporting efforts. Year 1-5*

**Status:** Thorough review of monitoring, recording, and reporting efforts is conducted annually during the preparation of the SWPPP Annual Report or more frequently if issues occur.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Assessment to continue in Year 3.

**BMP WFD 6.0 Pollution Prevention/Good Housekeeping**

**Measurable Goal WFD 6.3:** *Update SWPPP to include modified or additional BMPs as appropriate. Year 1-5*

**Status:** The SWPPP was updated in July 2008 to add BMPs associated with low-threat discharges.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** SWPPP update to occur, if necessary, in Year 3.

**BMP WFD 6.0 Pollution Prevention/Good Housekeeping**

**Measurable Goal WFD 6.4:** *Monitor storm water quality twice annually during wet season, as part of existing storm water pollution prevention program (SWPPP). Year 1-5*

**Status:** Storm water samples were collected during the first two qualifying rain events during monthly wet

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monitoring that occurred on 25 November 2008 and 5 February 2009. Analysis of water quality will be reported in the SWPPP Annual Report.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** Monitoring will continue in Year 3.

**BMP WFD 6.0 Pollution Prevention/Good Housekeeping**

**Measurable Goal WFD 6.5:** *Review Waterfront Department SWPPP annually for compliance with City of Santa Barbara SWMP. Years 1-5*

**Status:** The Santa Barbara Harbor SWPPP was last updated in July 2008 for compliance with the City of Santa Barbara SWMP.

**Proposed Modifications:** No changes are recommended.

**Planned Year 3 Activities:** SWPPP will be reviewed for compliance with the City's SWMP in Year 3.

**8. Airport Department (APD)**

**1. Public Education and Outreach**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Public Education and Outreach	APD 1.1	Identify and label 100% of “at risk” storm water inlets.	X			X		
	APD 1.2	Annually provide storm water educational materials to Airport tenants via direct mail.	X			X		
	APD 1.3	Annually produce and distribute storm water management articles to Airport staff and Airport users via <i>The Beam</i> employee newsletter and/or the General Aviation newsletter.						
	APD 1.4	Provide links to storm water resources on the <a href="http://flysba.com">flysba.com</a> website with an emphasis on pollutants of concern.	X			X		

**BMP APD 1.0 Public Education and Outreach – Storm Drain Labeling**

**Measurable Goal 1.1:** *100% of “at risk” inlets labeled.*

**Status:** All Airport storm drains were labeled in Year 1. An inventory of decals is kept and new inlets are marked and replacements are made, as needed.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 1.0 Public Education and Outreach – Tenant Outreach and Education**

**Measurable Goal 1.2:** *100% of Airport tenants receiving direct mailers.*

**Status:** Educational materials related to storm water were mailed to Airport tenants in the Summer and Fall of 2010. The Summer 2010 Sustainability newsletter included a feature encouraging Integrated Pest Management practices, and the Fall 2010 Sustainability newsletter included public information on storm water pollution and pollution prevention practices.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 1.0 Public Education and Outreach – Employee and User Awareness Campaign**

**Measurable Goal 1.3:** *100% of Airport staff and/or based aircraft owners receive storm water educational materials.*

**Status:** This goal was not met in Year 2. No staff or user awareness materials were distributed during the first or second quarters, and neither the Beam of the GA Newsletter were published in the third or fourth quarters.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Meet this measurable goal in Year 3.

**BMP APD 1.0 Public Education and Outreach – Provide Internet Access to Storm Water**

**Measurable Goal 1.4:** *Number of webpage visits.*

**Status:** The Airport's storm water page on fliesba.com includes storm water permit information and links to related resources. The storm water page was visited 1,419 times by internet users in 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.



**2. Public Involvement and Participation**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Public Involvement and Participation	APD 2.1	Airport Department will report to GSMC and seek comments biennially in years 2 & 4.	X			X		
	APD 2.2	Airport Department will continually post the current SWMP and annual reports on the Airport's website. Public will be invited to review and comment on the materials provided.	X			X		
	APD 2.3	Continue standard notice procedure for public meetings.	X			X		
	APC 2.4	Continue to provide opportunity for public comment during public meetings.	X			X		

**BMP APD 2.0 Public Involvement and Participation – Goleta Slough Management Committee Review of SWMP**

**Measurable Goal 2.1:** *Airport Department will report to GSMC and seek comments biennially in years 2 & 4.*

**Status:** Airport staff met with the Goleta Slough Management Committee in December 2010 to discuss slough management, 2009 results and to solicit comments. Committee members posed questions about the plan and suggested that we include copper as an analytical parameter for storm water testing.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 2.0 Public Involvement and Participation – Public Review of the SWMP**

**Measurable Goal 2.2:** *Airport Department will continually post the current SWMP and annual reports on the Airport's website. Public will be invited to review and comment on the materials provided.*

**Status:** A link to the Santa Barbara SWMP and Annual Report page is posted on the Airport's website, and no comments have been received.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 2.0 Public Involvement and Participation – Public Notification**

**Measurable Goal 2.3:** *Continue standard notice procedure for public meetings.*

**Status:** All Airport Commission meetings were publically noticed. However, no Airport Commission agenda items were directly related to the City’s SWMP in 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 2.0 Public Involvement and Participation – Public Meetings**

**Measurable Goal 2.4:** *Continue to provide opportunity for public comment during public meetings.*

**Status:** The public was provided an opportunity to comment at each 2010 Airport Commission meeting.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**3. Illicit Discharge Detection and Elimination**

Activity	BMP	Description/Implementation	Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Illicit Discharge Detection and Elimination	APD 3.1	Visually inspect storm water outfalls quarterly during dry weather and monthly during qualifying wet season rain events.	X			X		
	APD 3.2	Conduct an ACSCE of Industrial Permit coverage area to assess conditions and effectiveness of Industrial Storm Water Program	X			X		
	APD 3.3	Sample storm water twice from collection systems 1,2,5,6,9b and 10 per criteria established in the SWPPP.	X			X		
	APD 3.4	Distribute storm water related information to Airport employees, tenants and users.	X			X		
	APD 3.5	Maintain list of tenants with County Business Plans.						
	APD 3.6	Investigate all reports received of non-storm water discharges and illicit connections reported via the storm water hotline and other channels.	X			X		
	APD 3.7	Airport staff use storm drain system map (block book) and submit error reports when inaccuracies are noted. Map is update periodically to reflect corrections noted in error reports.	X			X		
	APD 3.8	When illicit storm sewer system connections are detected, use Municipal Code to encourage removal in cases where alternative enforcement mechanisms, such as enforcement of existing lease terms, are ineffective.	X			X		

**BMP APD 3.0 Illicit Discharge Detection and Elimination - Visual inspection**

**Measurable Goal 3.1:** *Conduct quarterly dry weather inspections and monthly inspections during the wet season.*

**Status:** Dry weather inspections of the Airport storm water collection system was conducted quarterly in 2010.

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A wet weather inspection occurred in April 2010. However, no other rain events triggered wet weather sampling or inspections. The Airport complied with the conditions of their Industrial Permit. None of the other rain events in 2010 met the criteria established in the general permit.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP APD 3.0 Illicit Discharge Detection and Elimination - Annual Site Inspection**

**Measurable Goal 3.2:** *Conduct annual ACSCE inspection.*

**Status:** The ACSCE associated with the Industrial Storm Water Discharge permit annual report was completed in May and June 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP APD 3.0 Illicit Discharge Detection and Elimination - Sampling**

**Measurable Goal 3.3:** *Samples collected during 2 qualifying storm events.*

**Status:** The second and final sampling event for the 2010 wet season was completed on April 20, 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

### **BMP APD 3.0 Illicit Discharge Detection and Elimination - Information**

**Measurable Goal 3.4:** *See MCMI, BMPs 1b and 1c*

**Status:** Educational materials related to storm water were mailed to Airport tenants in the Summer and Fall of 2010. The Summer 2010 Sustainability newsletter included a feature encouraging Integrated Pest Management practices, and the Fall 2010 Sustainability newsletter included public information on storm water pollution and pollution prevention practices.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 3.0 Illicit Discharge Detection and Elimination - County Business Plans**

**Measurable Goal 3.5:** *Update list annually.*

**Status:** The list of County Business Plan holders displayed on the County Hazmat/CUPA website has not been updated since May 2009. So, no update is available. The Airport staff currently holds the 2009 list.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 3.0 Illicit Discharge Detection and Elimination - Hotline for public to report non-storm water discharges and illicit connections**

**Measurable Goal 3.6:** *Investigate 100% of reports of non-storm water discharges and illicit connections.*

**Status:** Airport staff investigated 100% of reports, which totaled three reported and/or observed non-storm water discharges in 2010.

One report of non-storm water discharge was received in the first quarter of 2010. The report involved a tenant discharging rain water collected in a containment area sump to a storm drain. Airport staff consulted with RWQCB staff and met with the tenant to eliminate the discharge.

One observed and one reported non-storm water discharge was investigated during the second quarter, 2010. The reported discharge was allegedly associated with on-going operations by an Airport tenant. The site was inspected and no illicit discharge or evidence of discharge was found. The observed discharge occurred from a business outside the Airport property/City boundary. The discharge involved wash water flowing to San Pedro Creek. The business voluntarily eliminated the discharge when approached by City staff.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 3.0 Illicit Discharge Detection and Elimination - Maintain storm drain system map**

**Measurable Goal 3.7:** *Periodically update map as needed.*

**Status:** The Airport's storm drain map is in place. Necessary changes are noted and tracked for future map updates.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 3.0 Illicit Discharge Detection and Elimination - Enforce SBMC 14.56.070, titled  
“Connecting with City Drain System - Permit Required”**

**Measurable Goal 3.8:** *Eliminate 100% of illicit storm sewer connections that are detected.*

**Status:** No illicit connections to the Airport storm drain were detected in 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**4. Control of Construction Site Runoff**

Activity	BMP	Description/Implementation	2010 Status					
			Implemented	Not Applicable	Modified	Effective	Unknown	Not Effective
Control of Construction Site Runoff	APD 4.1	All Airport Department construction projects requiring a building permit will continue to be governed by City conditions of approval, including control of construction site runoff.	X			X		
	APD 4.2	All Airport tenant construction projects requiring a building permit will continue to be governed by City conditions of approval, including control of construction site runoff.	X			X		

**BMP APD 4.0 Control of Construction Site Runoff - Comply with City permit conditions regarding control of construction site runoff**

**Measurable Goal 4.1:** *Minimize percentage of construction projects with violations of permit conditions related to storm water management with a goal of 100% compliance.*

**Status:** No violations were noted or reported in 2010, resulting in 100% compliance with permit conditions related to storm water management.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 4.0 Control of Construction Site Runoff - Airport tenant projects comply with permit conditions regarding control of construction site runoff**

**Measurable Goal 4.2:** *Minimize percentage of construction projects with violations of permit conditions related to storm water management with a goal of 100% compliance.*

**Status:** No violations were noted or reported in 2010, resulting in 100% compliance with permit conditions related to storm water management.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**5. Post-Construction Storm Water Management**

<i>Activity</i>	<i>BMP</i>	<i>Description/Implementation</i>	<i>Status</i>					
			<i>Implemented</i>	<i>Not Applicable</i>	<i>Modified</i>	<i>Effective</i>	<i>Unknown</i>	<i>Not Effective</i>
Post – Construction Storm Water Management	APD 5.1	All Airport Department construction projects requiring a building permit will continue to be governed by City conditions of approval, including post-construction storm water management.	X			X		

**BMP APD 5.0 Post-Construction Storm Water Management - Comply with City (and other agencies with jurisdiction) permit conditions regarding post-construction storm water**

**Measurable Goal 5a:** *Maintain 100% of structural storm water BMPs in accordance with conditions of approval established for the project .*

**Status:** Airport structural BMPs are regularly maintained via preventative maintenance work orders. See the Airport’s annual report on MCM 6, below, for frequency of inspection on specific structural BMPs.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.



**6. Pollution Prevention and Good Housekeeping**

<i>BMP</i>	<i>Year</i>	<i>Implementation Details</i>	<i>Status</i>					
			<i>Implemented</i>	<i>Not Applicable</i>	<i>Modified</i>	<i>Effective</i>	<i>Unknown</i>	<i>Not Effective</i>
Pollution Prevention and Good Housekeeping	APD 6.1	Perform regular maintenance of Airport vehicles and equipment off-site.	X			X		
	APD 6.2	Provide covered storage areas for most Airport vehicles, equipment and materials.	X			X		
	APD 6.3	Provide annual training for Airport Maintenance staff on each of the following topics: <ul style="list-style-type: none"> <li>• Best management practices,</li> <li>• Spill prevention and response</li> <li>• Hazard communication</li> </ul>	X			X		
	APD 6.4	Airport tenants that fuel aircraft are required to comply with FAR Part 139 fueling requirements.	X			X		
	APD 6.5	Provide wash racks for rental cars, aircraft and equipment.	X			X		
	APD 6.6	Provide an aircraft lavatory disposal station.	X			X		
	APD 6.7	Provide a used oil collection station for pilots.	X			X		
	APD 6.8	Maintain an adequate inventory of spill response supplies.	X			X		
	APD 6.9	Post a City Integrated Pest Management Strategy link on the Airport website to educate the public and reduce the use and potential discharge of pesticides.	X			X		
	APD 6.10	Encourage Airport employees to remain vigilant in covering dumpsters.	X			X		
	APD 6.11	Airport staff use dry clean-up practices when possible and deploy appropriate BMPs when wet wash techniques are required.	X					
	APD 6.12	Applies to outdoor storage of materials by the Airport Department not associated with permitted construction projects	X			X		
	APD 6.13	Quarterly inspect and clean or replace, if necessary, filters	X			X		

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		and traps in structural BMP devices installed on the Airport.						
APD 6.14		Sweep Airport streets at least six times annually (once prior to the rainy season - November 1) to reduce sources of metals, pathogens, sedimentation/siltation and priority organics in Airport storm water. Commercial parking lots, runways and taxiways will be swept at least quarterly.	X			X		
APD 6.15		Enforce “no camping” ordinance to reduce potential for pathogens to be discharged from transient encampments to the Goleta Slough.	X			X		
APD 6.16		Conduct quarterly cleaning of the air carrier ramp.	X			X		
APD 6.17		Work with County Flood Control to continue maintenance of sediment catch basins in Goleta Slough tributaries.	X			X		

**BMP APD 6.0 Pollution Prevention/Good Housekeeping - Off-Site Preventative Vehicle and Equipment Maintenance**

**Measurable Goal 6.1:** *Continue agreement with City Motor Pool to perform regular maintenance off-site.*

**Status:** Routine preventative maintenance and major repairs of Airport vehicles and equipment are performed at the City’s motor pool maintenance facility, off the Airport property.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping - Covered Vehicle and Equipment Storage Areas**

**Measurable Goal 6.2:** *Provide at least 5625 square feet of covered parking for Airport equipment and vehicles.*

**Status:** A minimum of 5625 square feet of covered parking is available for Airport equipment and vehicles.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping - Employee Training**

**Measurable Goal 6.3:** *100% of maintenance employees attending storm water training.*

**Status:** 100% of maintenance employees attended storm water training in 2010. Airport Patrol and Operations staff completed online storm water pollutant source training during the first quarter. Spill prevention and response training as well as Hazard Communication training was provided for Maintenance staff during the second quarter, and an online Airport BMP and pollution prevention training was completed by Maintenance staff in the fourth quarter.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping - Aircraft Fuel Dispenser Training**

**Measurable Goal 6.4:** *Compliance with FAR Part 139 fuel dispenser training requirement.*

**Status:** Compliance with FAR Part 139 was maintained in 2010. FAA Airport Certification inspection was conducted in January 2010, and no discrepancies were noted regarding fuel dispenser training.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping - Airport Wash Racks**

**Measurable Goal 6.5:** *Inspect wash racks quarterly.*

**Status:** All wash racks were inspected quarterly. The aircraft wash rack was inspected a total of 13 times (exceeding the quarterly requirement), the equipment wash rack was inspected a total of 25 times, and the rental cars were relocated and now use an indoor carwash, so inspections for this facility are no longer necessary.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Lavatory Disposal Station**

**Measurable Goal 6.6:** *Inspect lav cart disposal station quarterly.*

**Status:** The lift stations, including the lav cart dump station, were inspected a total of 51 times in 2010 (exceeding the quarterly requirement). Note that the lift station adjacent to the lav cart dump station was replaced and decommissioned during the fourth quarter.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Used Oil Collection Station**

**Measurable Goal 6.7:** *Inspect used oil collection facility monthly.*

**Status:** The used oil collection station was inspected a total of 26 times in 2010 (exceeding the monthly requirement).

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Spill Response Supplies**

**Measurable Goal 6.8:** *Inspect Airport spill supplies monthly.*

**Status:** The spill cart was inspected a total of 15 times in 2010 (exceeding the monthly requirement) and restocked as needed.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Integrated Pest Management**

**Measurable Goal 6.9:** *Number of visits to IPM webpage.*

**Status:** The storm water resources webpage on [flysba.com](http://flysba.com) includes links to IPM resources, and had over 1,000 visits in 2010. Furthermore, the Airport's Summer2010 Sustainability Newsletter featured an article on IPM.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Covered Dumpsters**

**Measurable Goal 6.10:** *Incorporate topic in Airport maintenance employee BMP training.*

**Status:** Airport staff completed the on-line storm water BMP/source control training in December 2010. The training covered dumpsters as an Airport BMP.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Used Dry Clean-up Practices**

**Measurable Goal 6.11:** *Incorporate topic in Airport maintenance employee BMP training.*

**Status:** Dry clean-up methods were emphasized during the spill prevention and response training provided during the second quarter, 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Outdoor Material Storage**

**Measurable Goal 6.12:** *Airport facilities 100% compliant with outdoor material storage BMPs.*

**Status:** No raw materials were stored in the yard in 2010, other than a small pile of mulch generated and stored adjacent to the maintenance yard, to be used on site.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Inspection of Structural BMP Devices**

**Measurable Goal 6.13:** *At least 70% of Airport inlets equipped with a structural BMP, inspected quarterly.*

**Status:** 70% of the Airport's inlets have been equipped with a structural BMP, and all filtered inlets were inspected quarterly; in January, June, August, and November 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping - Sweeping**

**Measurable Goal 6.14:** *Sweep Airport streets 6 times annually. Sweep Airport runways, taxiways and commercial parking lots quarterly.*

**Status:** This goal for sweeping was met and exceeded. The streets were swept between 11-12 times in 2010, and all runways, taxiways and parking lots were swept at least quarterly, throughout 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Enforce “No Camping” Ordinance**

**Measurable Goal 6.15:** *Number of field investigation cards completed related to illegal camping on the Airport.*

**Status:** A total of six investigation cards were completed related to illegal camping on Airport property in 2010. The incidents were investigated and remedied, usually by asking/requiring the campers to leave.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Clean Air Carrier Aircraft Ramp Quarterly**

**Measurable Goal 6.16:** *Clean air carrier ramp four times annually.*

**Status:** The air carrier ramp was steam cleaned three times in 2010 as well as swept three times during the fourth quarter, in lieu of steam cleaning.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

**BMP APD 6.0 Pollution Prevention/Good Housekeeping – Sediment Basin Maintenance**

**Measurable Goal 6.17:** *Facilitate access for County Flood Control*

**Status:** Airport staff facilitated ongoing access for County Flood Control in 2010. County Flood Control removed sediment from the Airport’s basins during the first and third quarters in 2010.

**Proposed Modifications:** None.

**Proposed Year 3 Activities:** Ongoing.

## G. Program Effectiveness Assessment

The following effectiveness assessment stems from the Municipal Stormwater Program Effectiveness Assessment Guidance, developed by the California Storm Water Quality Association (CASQA). The purpose is to confirm the desired results of the City’s SWMP and identify modifications that may be needed, thus ensuring the iterative process is used as an effective management tool throughout the permit implementation.

The following primary questions, or Outcome Levels, help to categorize and describe the desired results of the program:

- Level 1 Outcome – The Program Element is implemented in accordance with the Permit Provisions and SWMP
- Level 2 Outcome – The Program Element raises the target audience’s awareness of an issue
- Level 3 Outcome – The Program Element changes a target audience’s behavior, resulting in the implementation of recommended BMPs
- Level 4 Outcome – The Program Element reduces the load of pollutants from the sources to the storm drain system

Although each level has value in informing and/or supporting management decisions, not all Outcome Levels are used for each BMP and the Outcome Levels are not necessarily conducted in sequence.

In addition to the systematic CASQA effectiveness assessment discussions that follow (used for each of the BMP groupings within each of the six minimum control measures), each section includes a table summary of effectiveness that looks collectively at all BMPs within each minimum control measure. This programmatic evaluation is intended to ascertain if each of the minimum control measures as a whole is appropriate and effective, to evaluate whether certain BMPs are more successful and/or cost effective than others, and ultimately to determine if the overall storm water management program is working effectively. *Only the BMPs/Measurable Goals that are required for Years 1 and 2 implementation are discussed in this section. BMPs that are scheduled for future Years (3-5) are omitted from this Section.*

The City will continue this effectiveness evaluation through the remaining three permit years so that appropriate and meaningful modifications can be made to the City’s SWMP, thereby increasing the overall success of the program and achieving the maximum benefit with limited City resources.

### MCM 1.0 Public Education and Outreach

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The Public Education and Outreach portion of the SWMP focuses on communicating consistent messages regarding storm water quality to a broad audience through the continuation of existing programs and the development and implementation of new programs. The BMPs implemented for this minimum control measure are intended to teach the public and reinforce the importance of protecting storm water quality, both for the benefit of the environment and human health.

Although its effectiveness can be difficult to measure, public education is essential to achieving behavioral changes that can protect water quality. Because the SWMP focuses on non-point source pollution, the role of the individual in preventing this pollution is key. The BMPs selected for implementation educate community members about steps they can take both at work and at home to prevent and reduce water



Collectively, all the BMPs within the public education and outreach component of the City's storm water program are highly effective in increasing awareness about water quality issues in order to change behavior. The wide diversity of venues, events, means of communication, and partnering opportunities allows different segments of the City's population to hear a consistent message in a variety of ways thereby sustaining public interest in the program. All of the BMPs addressed in MCM 1 were successful at Level 1, as they were all documented and implemented.

Since education of youth is likely the single most effective way to significantly alter behavior of the general population over time, youth education remains a focal point and one of the most resource-intensive components of the storm water program. Teacher evaluations of the City's watershed presentations (BMP 1.1) indicate that the City's efforts in youth education are extremely successful and effective.

The City's business outreach component has been expanding and gaining a great deal of community interest and participation in Year 2, as well as before the City's SWMP was formally implemented. The City's participation in local events where information about water quality is shared and distributed as well as the City's expanding Clean Water Business Program are both elements of the City's program that are proving to effectively increase water quality awareness and even change behaviors. The public opinion survey that was conducted in 2008 demonstrates these measurable successes, as well as areas for improvement.

a) Education: Youth Education and After-School Programs, (BMPs 1.1 and 1.2)

The City currently partners with several organizations to accomplish education and outreach program goals. *Art From Scrap* and local educators conduct many of the City's youth education presentations. The *Youth CineMedia* Program and *Recreation Afterschool Program* (RAP) also play a key role in the City's enrichment-based youth education efforts and have included after school programs such as creating outreach materials and films related to water quality issues and conducting native planting projects.

- Education Program for School Children. In 2010, 246 presentations were given to 5,702 children. These numbers essentially double the numbers reached last year, in 2009. This high level of education/outreach not only exceeds the SWMP's measurable goal; it makes the program successful at Level 2, raising awareness, as the Teacher evaluations indicated. Evaluations will continue to be used to revise program content, as needed.
- Enrichment-Based Youth Education. By employing youth in the Youth CineMedia program to create outreach materials and films related to water quality issues and restoration projects, the City is raising awareness of water quality issues and solutions among that group of at-risk teens, who in turn are helping raise awareness among other teens, the Spanish speaking community, and the community at large. Furthermore, by involving students in hands-on activities and educational programs at Adams Elementary School, they are learning about the benefits of natural creek systems and native plants. By taking students on a field trip down their own watershed, they better understand the concept that the water that flows through the bioswale on their campus ends up at the beach, and that activities in the neighborhood around the school as well as on their campus, have a direct effect on the health of Arroyo Burro Creek and Beach. These programs are successful at Level 2, raising awareness.

b) Outreach: Brochures/Postcards, Public Events, Neighborhood Outreach, Website and Media (BMPs 1.3, 1.4, 1.7, 1.9, and 1.11)

Outreach with the public through print information, face-to-face contact, community events, website use and media campaigns include:

- Brochures/Postcards. Target audiences include general residents that attend community events such as Earth Day, community workshops, and Creek Week, among others. Specific audiences, such as business owners and residents, are reached through personal contact when illegal discharge issues are addressed. Materials are also distributed in conjunction with specific projects and events. Overall outreach materials are successful at Level 2.
- Website. The City Creeks website ([www.sbcreeks.com](http://www.sbcreeks.com)) provides an easily accessible method for the public to access storm water management information; water quality data and reports; information about restoration, stewardship projects, and business programs; as well as announcements and reports. In 2010 there were 6,982 visitors reported on the City Creek’s website; a decrease of 3% from 2009. The Creeks Division is exploring new ways to drive traffic to the website, including online advertising and social media. Overall the website is successful at Level 2.
- Events. Earth Day, Creek Week, World Ocean Day, Summer Solstice, and the Harbor and Seafood Festival are only a few of the public outreach events that the City attended and/or helped to present to the community. Public events have been highly effective in increasing community knowledge and awareness of the storm water program and water quality issues. This increase in awareness hopefully translates into changed behaviors, but this is difficult to measure. Events such as Creek Week draw large numbers of people to various community locations, programs, and events, where the importance of protecting water quality is the main emphasis. Overall outreach at events is successful at Level 2.
- Neighborhood Outreach. Neighborhood outreach in Year 2 included planting and clean up efforts of 35 community members. This BMP is effective at Levels 2 and 4; due to the fact awareness is raised during these efforts with the hands-on approach of planting and cleaning an area in need of attention, and pollutant loads are reduced by removing trash and stabilizing eroding areas.
- Media. Media messages on preventing water pollution were transmitted via various newspaper ads, radio spots, bus ads, and targeted television PSAs. The City’s English radio announcement reached an estimated 35,000 listeners per month, and the Spanish radio ads reached an estimated 19,600 listeners per month. The City’s English and Spanish television PSAs reached approximately 137,000 viewers per month, and print display ads included 28 in English, and 31 in Spanish. These numbers surpass the SWMPs measurable goals for community media campaigns. Overall media campaigns are highly successful at Level 2.

c) Storm Drain Marking (BMP 1.5)

The bilingual message of “No Dumping, Drains to Ocean” raises awareness about the connection between storm drains and receiving waters and they are intended to help deter littering, dumping, and other practices that contribute to nonpoint source pollution. Storm drain marking has also been incorporated into the Creeks Division’s outreach activities, with two volunteer events taking place in Year 2, for a total of 162 markers being cleaned or replaced by approximately 30 volunteers. Storm drain marking is successful at Level 2 for raising awareness.

d) Hotline (BMP 1.6)

Use of the hotline remains constant and continues to provide effective service to all members of the community in reporting water pollution. The hotline was promoted through City English and Spanish media, which ended up reaching over 37,000 residents in 2010. Overall the hotline is successful at all Levels. Level 1 for implementation; Level 2 for making people aware that pollution is an issue and there is a City program for addressing the issue; Level 3 because it allows City staff to identify and target those residents and businesses who need to be educated about their impacts on water quality (thanks to callers reporting discharges), which in turn often results in a change in behavior; and Level 4 when calls result in a field discovery, illicit discharge abatement, and load reduction, as occurred with 67 cases in 2010 (67 Notices of Violation were issued requiring discharge clean up/abatement; see BMP 3.2c).

e) Business Outreach: (BMP 1.10)

The City’s Clean Water Business Program helped train community members and professionals in reducing polluted runoff. Mobile washers were added to the program (which already included Restaurants and Automotive Services) in Years 1 and 2, thereby expanding the program’s audience and targeting specific businesses prone to polluting creek and ocean water quality. 20 businesses were inspected and certified as Clean Water Businesses in Year 2. This direct outreach and interaction between the public and City staff has been an effective way to increase the awareness of City business owners and operators to water quality impacts. Business outreach is successful at all Levels; Level 1 for implementation; Level 2 for increasing the awareness of business owners who were previously unaware that their actions can impact water quality; Level 3 for changing their behavior by becoming a certified Clean Water Business (staff is assured that their behavior/practices are truly changed by confirming that discharges do not occur from their property); and at Level 4 for load reduction when City staff inspects business operations and/or responds to complaints or discoveries in the field.

**Table G.1 Effectiveness Assessment Summary for Public Education and Outreach**

Outreach Program Activities	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reduction
Education	X	X		
Outreach	X	X		X (Neighborhood Outreach, BMP 1.7)
Storm Drain Marking	X	X		
Hotline	X	X	X	X
Business Outreach	X	X	X	X

## MCM 2.0 Public Participation and Involvement

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The Public Participation and Involvement Minimum Control Measure is intended to foster active community support for the SWMP. Participation by the public ensures that the program reflects community values and priorities and thus has the highest potential for success.

Stakeholders are informed of program updates and announcements via regular emails to e-mail group lists. Often these emails are equally effective and more efficient than meetings. Much of the input we receive from our most involved stakeholders occurs immediately through electronic communication.

The City not only holds monthly meetings with the Creeks Advisory Committee (CAC) to keep the public informed about outreach efforts, creek restoration projects and water quality issues and efforts; staff also participates in quarterly stakeholder meetings with county Project Clean Water staff as well as quarterly intergovernmental meetings, (Santa Barbara County Association of MS4 Managers, i.e., SBCAMM) to exchange information with other local municipalities and stakeholders.

The City conducts an annual community forum on water quality to seek community input, share ideas and vision, and to establish opportunities to form stronger water quality partnerships in the community. This community participation is also encouraged through the City's volunteer projects, which seek citizen participation in reducing creek pollution and understanding water quality concerns by conducting creek clean-ups and/or collaborative planting days.

The City will continue to evaluate appropriate vehicles to increase stakeholder involvement and the effectiveness of holding and attending meetings.

### a) Creeks Advisory Committee Meetings (BMP 2.1)

CAC meetings are publicly noticed and held 12 times, annually. These meetings are also aired on local TV and archived on the City's website in order to make the covered content widely available to the public. Before meetings are held, agendas are emailed to a list of interested community members, Committee members, appropriate staff, local news organizations who have requested to receive agendas, and liaisons (totaling over 300 people). A minimum of one CAC meeting per year is dedicated to updating the public on the City's SWMP. CAC meetings are successful at Levels 1 and 2.

### b) Stakeholder Meetings and Regional Coordination (BMPs 2.2 and 2.3)

- Project Clean Water Stakeholder Committee Meetings. City staff has attended the County's (Project Clean Water) Stakeholder Committee Meetings for the past several years. In 2010, staff attended all four quarterly meetings. This BMP is effective at Levels 1 and 2.
- Regional Coordination. Participating in the quarterly intergovernmental meetings is appropriate for coordinating among the different storm water management programs in the County. Local population perspectives and pollution sources vary, and obtaining input from various agencies is useful in understanding these local differences. The intergovernmental meetings are efficient venues for planning joint pollution reduction efforts. Attendance is steady and is regularly represented by most of the Phase II agencies in Santa Barbara County. Overall coordination among agencies is successful at Level 2 for raising awareness.

### c) Community Forum on Water Quality Issues (BMP 2.4)

The City's annual community forum is an effective way to involve the public in current water quality issues. A new water quality topic is covered each year; the 2010 forum focused on canine scent tracking and "Sable the Sewage Sniffing Dog." This event not only includes local organizations, it has proven to be an excellent way to involve the public by covering interesting and up-to-date topics and inviting knowledgeable and recognized presenters. The forum is aired on Channel 18 (local television) in both English and Spanish, and

postings for the forum are on the City’s web site, sent via email, and posted in local newspapers and community websites. This public participation tool is effective at Level 2; raising awareness.

d) Community Volunteer Projects (BMP 2.5)

- Creek Clean-Ups. Community creek clean-ups attract residents who are typically enthusiastic about making a tangible difference in improving water quality and offer opportunities for involvement in the City’s SWMP activities. Volunteers removed large amounts of trash from the creeks and beaches in 2010. This is measurable evidence that community clean-ups are successful at all levels. Over 300 community members experienced the pollution levels of our creeks and ocean by hiking the creek corridors and lagoons (increasing their awareness). This hands-on experience for people is the best way to change behavior, and it results in an immediate reduction in pollution loads.
- Volunteer Storm Water Monitoring. Volunteer storm monitoring is appropriate for fostering the involvement of community members. This outreach effort is primarily used as an educational tool to inform and engage the public in the current health and function of local creeks. However, storm monitoring is a difficult task for volunteers because it often involves dedicating their time at odd hours (middle of the night). Therefore, rather than expecting to engage 6 volunteers annually in storm monitoring, the City is proposing to change this BMP to maintaining a list of potential volunteers to assist in storm monitoring, and achieve participation from a minimum of two volunteers in storm monitoring activities during daylight hours at least once per year, provided that storm monitoring occurs during daylight hours. Overall volunteer storm monitoring is successful at Level 2.

**Table G.2 Effectiveness Assessment Summary for Public Participation and Involvement**

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reduction
<b>Creeks Advisory Committee</b>	X	X		
<b>Stakeholder Meetings/Regional Coordination</b>	X	X		
<b>Community Forum</b>	X	X		
<b>Community Volunteer Projects</b>	X	X	X	X

## MCM 3.0 Illicit Discharge Detection & Elimination

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The following is an assessment regarding the effectiveness of the first year of implementation of MCM 3.0 Illicit Discharge Detection and Elimination (IDDE) Program as outlined in the SWMP. The City has effectively implemented the IDDE program through ongoing program elements such as training city staff about protecting water quality, maintaining the City’s storm drain facility map, field investigations and abatement, developing and distributing targeted educational materials to potential polluters, creating inventories of businesses, properties, and facilities that are potential polluters, conducting inspections, and administering the creation of a storm water ordinance.

Collectively, all the BMPs within the IDDE program are effective at reducing pollution in storm water by working to identify and eliminate sources of illicit discharge and illegal dumping. The IDDE program depends on participation from the public and other City Departments. While this is an effective approach, it does present challenges as the public and other City departments often have competing priorities and different mandates. BMP 3.3 calls for adopting a storm water ordinance (timing will be dependent on the Region 3 Joint Effort for Hydromodification Control effort and pending outcome), which will require a large amount of interdepartmental coordination and public review. Currently, should a responsible party continue to employ practices that could result in a serious threat to water quality or if a responsible party fails to abate a discharge that does or may result in a serious threat to water quality, there are tools available for enforcement including administrative fines. Our current ordinance provides legal authority to stop unauthorized discharges and to enforce storm water requirements. However, the SWMP calls for updating existing ordinances and/or creating a new storm water ordinance in Years 4 and 5.

### a) Storm Sewer System Mapping (BMP 3.1)

Storm Drain Facility Map – Drainage facility maps expedite location of illicit discharges and are a requirement of the General Permit. This is a permit requirement and as such, is successful at Level 1. Additionally, where staff and the public are able to utilize the map data for investigating sources of discharges, this BMP is successful at Level 2.

### b) Municipal Code Enforcement, Storm Water Ordinance, and Field Investigation and Abatement (BMPs 3.2, 3.3, and 3.4)

- Municipal Code Enforcement. 209 calls were received and responded to within 24 hours in Year 2, resulting in 67 Notices of Violation. As of 2010, the City now has a dedicated enforcement person who focuses on maintaining the database of incoming complaints and quickly responding to and abating illicit discharges. The response cards produced last year will help to evaluate and improve the City’s enforcement program by getting feedback from the public (Level 2). The Notices of Violation sent to dischargers change polluting behavior, at least temporarily (Level 3), or fines are administered, and the Creek Clean-ups ordered by the City and administered by the contractor (Service Master) are also effective in reducing pollutant loads from the City creeks and ocean (Level 4).
- Storm Water Ordinance. The City currently adheres to Title 16 of the Municipal Code (*Chapter 16.15; Urban Pollution Controls, Non-Point Source Discharge Restrictions*) for protecting water quality. This existing ordinance has been effective by assuring city staff the authority to conduct inspections where there appears to be an illicit discharge present and administer fines via the Administrative Code. This and other related City ordinances, goals and policies were reviewed in Year 1 to determine the need for an ordinance update and identify any inconsistencies with the City’s SWMP, Storm Water BMP Guidance Manual, and/or the Phase II General Permit. Public workshops and hearings have been postponed until the Region 3 Joint Effort for Hydromodification Control

determines the requirements and criteria that will ultimately become part of the City’s storm water ordinance. This process (BMP 3.3) is not only effective at raising the awareness (Level 2) of storm water quality issues and requirements through the audit, workshops, and hearings; but it can also ultimately change behavior by providing the appropriate enforcement mechanisms to do so (Level 3).

- Field Investigation and Abatement. The City’s field investigation and abatement program is effective on all levels. Response time to calls/reports is very short and therefore issues are addressed as quickly as possible. Field investigations and abatement efforts inevitably result in communicating and/or interacting with residents and business owners to educate them about the importance of protecting surface water quality and why the City has to enforce water quality laws. This raises awareness (Level 2) and often changes behaviors through education (Level 3), especially when discharges are not intentional and/or simply the result of ignorance. Changed behavior is confirmed by City staff by following up on cases and checking that discharges have been properly abated and/or sites are no longer conducting polluting activities. Abating illicit discharges through this program ultimately results in reducing pollutant loads from the City’s creeks and ocean (Level 4).

d) Reporting and Documentation (BMPs 3.6, 3.7 and 3.14)

These BMPs are only effective at Level 1. They simply require that records are maintained, confirming that a specific goal has been implemented. See Section 3 of this Annual Report for details confirming implementation.

e) Inventories and Inspections (BMPs 3.8, 3.9, and 3.10)

- Inventory Commercial Facilities. A map and list of parcels 100,000 square feet or greater with a commercial land use designation was generated using GIS. This list will continue to be used in future years for inspections required by the SWMP. This measurable goal is completed and effective at Level 1.
- Inspect Commercial Facilities. This measurable goal is currently successful at Levels 1 and 2, and hopefully will become successful at Levels 3 and 4 as facilities are inspected in Years 3 – 5 and issues are found that can be corrected.
- Inventory Parking Lots. Similar to BMP 3.8, a map and list of parking lots was developed using GIS. The criterion for the inventory was changed to 5,000 square feet or greater (or 25 or more spaces) due to the fact not many parking lots in Santa Barbara are as large as 10,000 square feet. This measurable goal is completed and effective at Level 1.

f) Sidewalk Washing (BMPs 3.12 and 3.13)

- Complete a Study. An internet search was conducted for information on what other municipalities have done to address sidewalk washing. Through process of elimination, City staff decided that building a custom device for washing sidewalks and capturing runoff for re-use was the best approach. This study enabled the City to implement the downtown sidewalk washing program (Level 1), and ultimately changed how the City addresses sidewalk washing, thereby changing a potentially polluting City maintenance action and drastically reducing its potential to impact water quality (Level 3).
- Implement Sidewalk Washing BMP. The City worked with the Downtown Organization to create a custom-made machine that pressure-washes the sidewalks with a close-looped system with zero discharge and pretreatment for solids and hydrocarbons absorption. The wash water is passed through the pretreatment filter for cleaning and is later used for irrigating the sidewalk planter beds. This BMP is successful at Levels 2 and 4. Using the machine has directly changed the behavior of City maintenance workers (in the case, the Downtown Organization), and in such a publicly-visible place (downtown, State Street), many people notice the water is being captured and reused, thereby

raising awareness that wash water runoff can and should be contained and reused. This may not specifically change the common observer’s behavior, but it obviously helps in reducing the overall runoff loads from downtown washing activities (Level 4).

g) **Illegal Discharge Training (BMP 3.15)**

Annual training for all “Operational Division” staff (employees that perform outdoor activities that could pollute storm water) is provided annually. In years past, City staff created power point presentations and handouts, using in-house photos and existing data, for these training presentations. In Year 2, Creeks Division staff created a power point presentation that began with asking staff questions they should already know about storm water management (from past years trainings) in order to assess where staff’s weaknesses and/or needs for further training on storm water management lie. The presentation reviewed storm water management BMPs applicable to each City department and/or division. This approach was purposely different from Year 1, which used a training video, in order to keep things as new and interesting as possible. The trainings are approximately one hour in length and include an introduction to the City’s SWMP and the importance of protecting water quality. These training sessions are well attended, as they are carefully scheduled and staff is required to attend. This BMP is effective on all Levels 1, 2, 3 and 4. It is apparent by the questions and comments at these trainings that awareness regarding water quality is raised. Also, staff makes more calls into the City’s storm water pollution enforcement line after the trainings, which demonstrates that they are working to change polluting behaviors, which ultimately results in enforcement staff abating discharges, thereby reducing pollutant loads.

**Table G.3 Effectiveness Assessment Summary for Illicit Discharge Detection and Elimination Program**

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reduction
<b>Storm Sewer Mapping</b>	X	X		
<b>Municipal Code Enforcement</b>	X	X	X	X
<b>Storm Water Ordinance</b>	X	X	X	
<b>Field Investigation and Abatement</b>	X	X	X	X
<b>Reporting and Documentation</b>	X			
<b>Inventories</b>	X	X		
<b>Inspections</b>	X	X		
<b>Sidewalk Washing</b>	X	X	X	X
<b>Illegal Discharge Training</b>	X	X	X	



## MCM 4.0 Construction Site Storm Water Runoff Control

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The Construction Site Storm Water Runoff Control minimum control measure is implemented and enforced under authority of the City's Building Division, through City code, policy, and practice.

Collectively, the BMPs in the City's SWMP related to construction site storm water runoff are effective. Evaluating the current erosion and sediment control policy and the municipal ordinance for erosion and sediment control requirements will demonstrate whether or not the City has adequate legal authority in place to control pollutants from construction sites. *\*(Questions/issues regarding the Building Department's management of construction sites and erosion/sediment control is also addressed at length in the City's responses to the Central Coast Water Board's Comment/Action letter from December 2010, included at the beginning of this 2010 Annual Report).* The recently improved tracking system employed by Building staff creates a good inventory of construction sites and logging inspections ensures that their threat to water quality is kept in check. SWMP implementation in Years 3-5 will continue to demonstrate more clearly how effective the construction program element is and where improvements can be made, as progress and/or failures become apparent through these annual assessments.

### a) Evaluate Erosion and Sediment Control Policy (BMP 4.1)

The Building & Safety Division is tracking projects and evaluating the current Erosion/Sedimentation Control Policy. This policy was originally established in 2003 and has been updated as new and more effective BMP's have been developed. Building & Safety staff's current sentiment is that leaving the details of BMP selection in the existing policy allows each development application to select BMPs that are the most effective for that specific project. Binding these details into an ordinance would reduce flexibility, and not allow for the easy addition of new BMP's as they are developed. This approach would also require the use of vague language in order to provide a "one-size-fits-all" ordinance, which would likely reduce the overall effectiveness of the policy.

Review of Erosion and Sediment Control Plans provide ongoing site-specific evaluation. The review of plans via the Grading Permit process is successful at multiple levels. It is effective at outcome Level 1 by meeting the General Permit requirements; successful at Level 2 where submittals require awareness of potential pollutant discharges from grading sites; and successful at Level 3 where plans are used to correct or modify contractor behavior to prevent pollutant discharges.

### b) Inspections, Violations and Resolution (BMPs 4.3 and 4.4)

All sites permitted for grading are inspected regularly at various intervals based upon the phase of construction and the time of year. The Building & Safety Division has recently made changes (in Year 2) to the database entries of the permit tracking system to provide more complete documentation of projects requiring inspection prior to the official "start" of the rainy season. These changes will allow plan checkers to verify what level of erosion control plan is required and inspectors will be provided with a complete list of sites that require an inspection prior to October 15th as outlined in the SWMP. This list will be used in conjunction with the existing method of pre-rain event inspections in an attempt to improve the effectiveness of the Building Department's current tracking and inspection measures.

Inspection reports are generated each day by each City inspector and logged into a computerized permitting system. These reports show previous inspections and any corrections that were required. This allows the inspectors to ensure that incorrect erosion/sediment control installations are fixed before the project can proceed. Projects are required to install erosion control before any inspections are given. If a project site tries to call for an inspection without the erosion control measures in place, or if measures are placed incorrectly, a correction notice is given and the inspection that was called for is not completed. Depending on the weather, if a call-back inspection on the erosion control measures is not received, the inspector will do

a follow-up inspection of the site to see if any progress is being made. No construction is allowed until the required erosion control measures are in place. This is an excellent compliance tool, as it can cost the contractor money in down time and payroll for idle workers.

The inspection of construction sites operating under a Grading Permit is successful at multiple levels. It is effective at outcome Level 1 in accordance with the General Permit requirements; successful at Level 2 where inspections result in a communication between inspector and contractor, whether written or verbal, increasing awareness of potential pollutant discharges; successful at Level 3 where inspections result in correction or modification of contractor behavior; and, Level 4 where inspections result in proper use, maintenance, or abatement of improper practices, thus preventing pollutants from being discharged into the City's storm drain system.

c) Enforcement (BMP 4.5)

Zero enforcement cases related to erosion control issues were reported by the Building Department for Year 2. (The City Creeks Division did have two enforcement cases relative to erosion control issues for construction projects; one of which was 507 Brosian Way, of which Water Board staff was made aware, and documentation is cited in this Annual Report, under BMP 4.5). The City Building Department utilizes correction and warning notices to address site deficiencies and inspectors work with the contractor community both through trainings and on a site by site basis to maintain full compliance. 100% of all 274 project sites subject to erosion/sedimentation control in 2010 were inspected for violations. Correction and/or warning notices were issued if/when BMPs at a construction site were not sufficient, or a construction site was not designed per the BMPs identified on the plans, or if site dynamics changed and further/additional BMPs were needed. Failure to comply with a correction or warning notice results in a formal enforcement case leading to administrative penalties and legal action by City Attorney's office.

Stop work orders are a strong tool for City inspectors (they work as a Level 2 to raise awareness of local contractors) and avoiding these are good incentive for contractors to make immediate and responsive corrections to avoid punitive action. So this BMP is also effective at a Level 3 for changing behavior.

d) Training (BMPs 4.6 and 4.7)

- Training Construction Site Operators. Staff does currently provide BMP training to local contractors, at least once, annually, and Building staff claims great success in achieving compliance with the construction community through mutual respect and ongoing communication. These training and communication approaches are successful at Levels 1, 2, and 3 by working with the construction community to implement the City's Erosion/Sediment Control Program, increasing the awareness of the City's requirements and expectations, and changing the behavior of contractors on a site-by-site, case-by-case basis.
- Training Building and Public Works Inspectors. Inspectors hold weekly training meetings on various construction and code issues. Beginning in late summer through late spring of very year, erosion control BMP installation is an almost weekly topic. Staff comparisons are noted for effectiveness and appropriateness. Also, inspectors work very hard with the contractors during this time to update and "train" them as well. This coordinated effort among the Building Inspectors shares information, thereby raising awareness (Level 2), and also often changes behaviors for the better (Level 3), based on what lessons are learned.

**Table G.4 Effectiveness Assessment Summary for Construction Site Storm Water Runoff Control**

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reduction
<b>Evaluate Erosion and Sediment Control Policy</b>	X	X	X	
<b>Inspections, Violations and Resolution</b>	X	X	X	X
<b>Enforcement</b>	X	X	X	
<b>Training</b>	X	X	X	

The Post-Construction Storm Water Management in New and Redevelopment minimum control measure is implemented under authority of the City’s Community Development Department through project proposal applications, review, and permitting. Other City departments such as Public Works, Fire, and City Creeks (Parks and Recreation) provide early input to the permitting and development process.

The City has been informally implementing the SWMP since 2006 per direction from the City Council. Section 4.5 (MCM 5.0) of the City’s SWMP clearly defines standard requirements for both discretionary and ministerial projects; to implement State required minimum design standards (Attachment 4 of the State General Permit), as well as address peak storm water runoff discharge rates and protect water quality through conservation, minimization of pollutants, and structural and/or treatment control BMPs. These requirements are explained in more detail in the City’s *Storm Water BMP Guidance Manual* (Guidance Manual), produced and finalized in 2008. By directing project applicants and contractors to the City’s SWMP and Guidance Manual, the City provides consistent review of water quality impacts and appropriate BMP design requirements to protect water quality from storm water runoff. The City’s post-construction storm water management program and Guidance Manual will continue to evolve over the next several years with the region’s development and implementation of hydromodification control criteria; a current and ongoing topic among the State Water Board, the regional water quality control boards, and municipalities.

Staff training will also continue to evolve. The need for SWMP and Guidance Manual training became apparent in 2008, during production of the City’s Guidance Manual. Creeks Division staff (SWMP administrator) has become intimately familiar with the SWMP requirements and BMP designs in the Guidance Manual, but other City staff had not. Staff trainings, both small and large, were offered and very well attended in Years 1 and 2. City Creeks staff remains directly involved in the development review process and will monitor if and when additional, focused or revised training of City staff is necessary.

The City has begun to explore and implement opportunities for Low Impact Development (LID) demonstration projects as well as incentive programs for installing storm water BMP designs. The City Creeks Division is currently designing an LID demonstration project in the City’s MacKenzie Park parking lot (using permeable paver designs). However, effectiveness of this MCM will best be measured over the 5-year implementation period once post-construction regulations, including hydromodification control, are fully developed and awareness from the development community increases over time. During these first few years of SWMP implementation, MCM 5 effectiveness will focus on Outcome Level 2 (raise awareness) and Outcome Level 3 (change behavior, resulting in implementation of post-construction project BMPs), with the goal of the overall storm water program obtaining Outcome Level 4 (Reduce Pollutant Load).

**a) Post-construction BMP Implementation and Tracking (BMPs 5.1 and 5.2)**

A total of 82 projects implemented post-construction BMPs in Year 2. This is an increase of more than 50 projects from Year 1, thereby demonstrating that the City’s understanding and implementation of post-construction storm water BMP requirements is successfully improving. In order to ensure this project SWMP compliance and better track its project implementation, staff was directed at the end of Year 1 to display SWMP compliance (BMPs) on building permit plans and to include this activity in the City’s “Tidemark” tracking system. Tracking the implementation of SWMP requirements, both on paper and electronically, effectively documents this requirement (Level 1), and raises the awareness of both City staff and project applicants (Level 2) of applicable SWMP requirements. These efforts made to ensure the implementation of post-construction BMPs inherently changes the behavior (Level 3) of project applicants and their contractors by forcing them to design their project with water quality in mind, rather than simply using traditional designs that often disregard the impacts of polluted storm water runoff.

**b) Enforcement for BMP Compliance (BMP 5.3)**

Enforcement of required BMPs occurs during the construction phase of a project. Projects are not allowed to be finished without all of the required post-construction BMPs as noted on the plans being installed. Violations that occur after the project is completed will instigate an enforcement case that would require remediation. Due to the fact the City has just completed Year 2 of formal SWMP implementation, no enforcement cases have been necessary, as projects are only now beginning to be built that have conditions for BMPs. Enforcement actions will ensue in the future when projects are built and if/when compliance is not achieved. This BMP will eventually become effective as a Level 2 by raising awareness of project applicants and designers/contractors, and Level 3 by changing their behavior through requiring specific BMP designs for storm water management. However, right now this BMP is effective at Level 1.

c) Ordinance for Storm Water Design Standards (BMP 5.4)

The City hired a contractor to conduct an ordinance audit of existing City policy, code and ordinances in Year 1. The intent was to identify areas that relate to the enforcement of storm water objectives and thereby recognize these areas as potential conflicts to a future storm water ordinance. This activity involved staff from all the related City departments and divisions, which effectively raised the awareness (Level 2) of storm water regulations and how they are implemented and/or conflicted by the City. Production of a draft ordinance will begin once the Region 3 “Joint Effort for Developing Hydromodification Control Criteria” (Joint Effort) ultimately determines storm water requirements and criteria that will be essential for drafting the City’s future storm water ordinance. Once an ordinance is produced and implemented, it will be effective at Level 3.

d) Update/Implement Post-construction Design Standards and General Plan (BMP 5.5 and 5.9)

- Storm Water BMP Guidance Manual. The City hired a local consultant to produce a Storm Water BMP Guidance Manual in 2008. This effort included an intensive outreach effort to City staff and local design professionals (engineers, architects, builders, etc.) to consider and adopt appropriate design standards and BMPs. Assessing all the staff and public input and studying other existing Guidance Manuals produced by other cities/counties, resulted in the production of the City’s Storm Water BMP Guidance Manual, which is tailored to the City’s local conditions. The volumetric and flow-based design standards are discussed in detail in Chapter 6 of the Manual, and the BMPs are tailored for different levels of development (referred to as project “tiers”), defined throughout the Manual. This “study” of design standards is effective at Level 2 by raising the awareness of City staff and the public, and at Level 3 by providing a document that specifically changes the common practice of project design to an approach that addresses storm water management and water quality.

The City is currently participating in the Water Board’s Joint Effort in order to study and consider additional standards for volumetric or flow-based treatment control. This effort will also be effective at Levels 2 (throughout the Joint Effort) and Level 3 (once the criteria are established and implemented).

- Design Standards for Ministerial Projects. BMPs are currently being implemented into smaller, ministerial projects through the City’s design review process. As discussed in BMP 5.2, staff was directed at the end of Year 1 to display SWMP compliance (BMPs) on building permit plans and to include this activity in the City’s “Tidemark” tracking system. Tracking the implementation of SWMP requirements, both on paper and electronically, effectively documents this requirement (Level 1), and raises the awareness of both City staff and project applicants (Level 2) of applicable SWMP requirements. These efforts to ensure the implementation of post-construction BMPs inherently changes the behavior (Level 3) of project applicants and their contractors by forcing them to design their project with water quality in mind, rather than simply using traditional designs that often disregard the impacts of polluted storm water runoff.

- Update CEQA Checklist and Standard Conditions of Approval. Staff updates conditions of approval periodically, every year or two. They were updated again in Year 2, and clarifying SWMP requirements have become part of each update. The City's Design Application Review Team (DART) currently uses a City SWMP checklist that was produced in 2006/2007. It is used to guide internal (City) project analysis of impacts associated with storm water. These checklists, mitigations, and conditions all work to raise awareness (Level 2) and change behaviors (Level 3).
- General Plan Update. The Plan Santa Barbara General Plan update process is undertaking work (a phased approach) to prepare draft updated General Plan documents, based on draft policy direction determined by City Council (January 2009). The draft policy direction includes incorporating environmental sustainability principles into the General Plan, and Policy ER25-Storm Water Management Guidelines, which directs the inclusion of City SWMP policies into an Environmental Resources Element, toward reducing storm water run-off and water pollution. (Preparation of an updated Environmental Resources Element would occur in a subsequent year and phase of work). Draft documents under preparation include the updated General Plan format, Land Use Element, Land Use Element Map, Housing Element, and Adaptive Management Program. This effort is working to raise awareness, Level 2, and the policies established in the update will eventually work to change behaviors (Level 3). This BMP is currently effective at Level 2.

e) Storm Water Quality Monitoring Program, Microbial Source Tracking, and Biological Assessment Program (BMPs 5.6, 5.7, and 5.8)

- Storm Water Quality Monitoring. The Storm Water Quality Monitoring Program conducted sampling in Year 2 (effective at Level 1) and targeted bacteria, nutrients, and hydrocarbons during storm and dry weather monitoring at several sites. The results are included in the Fiscal Year 2010 Annual Water Quality Report and the FY11 First and Second Quarterly Report. The City's monitoring efforts raise internal staff awareness (Level 2). It is difficult to claim that any improvements in water quality detected through monitoring are a result of the City's SWMP changing behaviors and/or pollutant loads. However, it is a valuable tool to keep staff and the public up to date on the current state of our watersheds.
- Microbial Source Tracking. The Creeks Division and its partner for this project, UCSB, conducted planning and field reconnaissance early in Year 2 in support of sampling that occurred for this project throughout 2010. Field sampling and smoke and dye testing of storm drain lines was conducted. In addition, a second, related project involving canine scent tracking (sewage sniffing dogs) was conducted. The canine scent tracking was tested for effectiveness in locating contaminated inputs to storm drains, addressing a specific hypothesis of contamination arising from illicit dumping from recreational vehicles, and conducting systematic outfall and storm drain reconnaissance. A highlight of the work was uncovering a direct leak from the sanitary sewer to the Hope St. storm drain. The leak was fixed very quickly. Fortunately, this drain has been diverted to the sanitary sewer during dry weather for several years. In addition, two instances of leaking black water tanks from recreational vehicles were detected, and fixed promptly. Therefore, this BMP not only raises awareness (Level 2), it can change how the City manages drainage from a specific location (Level 3), and can reduce pollution to the storm drain (Level 4). This BMP proved its increased effectiveness in Year 2 by successfully implementing canine scent tracking and storm drain reconnaissance, thereby uncovering an illicit discharge.
- Biological Assessment. In 2010 monitoring sites were added to collect baseline data for future water quality projects. Data is presented in the 2010 Bioassessment Report by Ecology Consultants. The results are also summarized in the Annual Water Quality Monitoring Report. This BMP remains effective at Level 2.

**Table G.5 Effectiveness Assessment Summary for Post-Construction Storm Water Management in New and Redevelopment**

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reduction
<b>Post-Construction BMP Implementation and Tracking</b>	X	X	X	
<b>Enforcement for BMP Compliance</b>	X			
<b>Ordinance</b>	X	X		
<b>Update/Implement Design Standards and General Plan</b>	X	X	X	
<b>Storm Water Monitoring, Microbial Source Tracking, and Biological Assessment</b>	X	X	X	X

The Municipal Operations Pollution Prevention portion of the Storm Water Management Program is intended to ensure that City operations and the delivery of public services occurs in a manner that protects storm water quality and serves as a good example for the community. The BMPs contained in this minimum control measure require city staff to implement appropriate and effective pollution prevention practices for the various activities that the City conducts.

Collectively, all the BMPs within the municipal operations component of the City's SWMP are effective in increasing awareness among City staff in order to change behavior and ultimately to reduce pollution. Inspections of City facilities will demonstrate the awareness levels of City staff through the years and whether or not they are following good housekeeping practices and are implementing pollution prevention measures on a routine basis in order to avoid pollutant loads to the storm drains.

Year 2 facility inspections (BMP 6.20) proved successful in documenting City staff's commitment to storm water pollution prevention. Deficiencies previously noted at the City's Annex Yard in Year 1 (managed by the Streets Division) and the Parks Corporation Yard (managed by the Parks Department) were addressed and future upgrades/fixes are scheduled. These efforts to rectify deficiencies have resulted in staff and contractor behavior changes and pollutant load reductions, which is the intention of these ongoing inspections.

Street sweeping is a large City investment in good housekeeping practices that demonstrates a measurable benefit in reducing pollutant loads. Over 19,000 curb miles were swept and over 2,250 tons of material was collected in Year 2. It is anticipated that these collected loads may increase in future years due to the City's current endeavor of installing debris screens on all catch basin inlets (to be completed in Year 3). The screens serve as a barrier to trash and landscaping debris during dry weather that would normally fall into the catch basin and storm drain system. These screens require little/no maintenance, as opposed to the older approach of catch basin inserts, and they work hand-in-hand with the existing street sweeping effort of removing pollutants from the street gutters.

In Years 3 through 5, the City will continue to explore additional opportunities to improve municipal operations and the effectiveness of BMPs, including partnering with other City businesses, properties, parking lot owners, etc. to target storm water management and water quality improvements.

**a) Pollution Prevention Plans (BMP 6.1)**

All City Departments/Divisions who conduct operations with the potential to pollute public areas or water quality have implemented pollution prevention plans. These plans focus on storm water pollution prevention and they are reviewed annually and updated periodically. Several pollution prevention plans were updated and reissued last year in Year 1, raising staff awareness and changing old, potentially polluting activities. This BMP, in combination with annual storm water BMP staff training, works toward ensuring staff awareness and model practices. Pollution Prevention Plans are effective at Level 2 when staff is educated about the plans during training, and at Level 3 as staff adjusts their potentially polluting behaviors to comply with the plans and avoid discharging pollutant loads.

**b) Staff Training (BMP 6.2)**

Training materials were revised again in Year 2, as discussed under BMP 6.2. The City's staff training approach has proven effective for raising awareness (Level 2) among staff, as there are always questions and stories shared about personal accounts of witnessing illicit discharges around the City. Calls to the City's storm water hotline always increase after staff trainings, as awareness is refreshed. This results in more opportunities for enforcement staff to educate polluters, thereby changing behaviors (Level 3) and actively reducing pollutant loads (Level 4) that may have been overlooked or not reported before staff was trained.



- c) Cleaning, Washing, Trenching, De-watering, Paving and Grinding, Construction Waste Management, Parking Lot Sweeping/Trash Removal, and Service Contracts (BMPs 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.10, 6.16, 6.17, and 6.19)

Many of the BMPs in MCM 6.0 address hands-on, outdoor activities conducted by City staff that have the potential to pollute storm water runoff. The BMPs require a myriad of pollution prevention practices and tools for City staff to employ in these day to day activities in order to avoid sending pollutants to the storm drain. These include using vehicle wash bays that contain pollutants, and hiring washing contractors who commit to capturing and containing runoff. Tracking and maintaining construction areas in the City where potential runoff can occur, and tracking staff hours spent to sweep, wash and vacuum City parking facilities and trash enclosures are BMPs that document compliance and remind staff that they are setting the example for City residents and business owners (effective at Level 2). Maintaining warehouses and inspecting vehicles to ensure they are stocked with supplies for capturing and containing spills is another important pollution prevention practice to prepare City staff for emergency spill response. Together, these BMPs combine to raise staff awareness of how to conduct their work in a way that protects water quality (Level 3). These BMP requirements avoid pollutant loads (Level 4), although these are not directly measurable, and therefore these BMPs are effective at Levels 1, 2, and 3.

- d) Storm Drain Inlet Cleaning, Inlet Filter Cleaning, and Inline Storm Filter Maintenance (BMPs 6.11, 6.12 and 6.13)

In 2010, the Streets Division inspected and/or cleaned 2,758 drain inlets. Cleaning inlet filters is a deleted BMP due to the fact that storm drain filters in the City are being removed. It has become evident that the maintenance of the filters far outweighs the benefits they provide. Catch basin debris screens have been replacing filters throughout Year 2. Yards of material captured from the new debris screens will be portrayed in BMP 6.15 – street sweeping. Lastly, the City Creeks Division maintains the Haley Street Continuous Deflective Separation (CDS) filter unit and the Parks Yard interceptor. There has been a large Haley Bridge replacement project in Year 2, upstream of the Haley CDS unit, so that unit has been largely out of commission during Year 2, and therefore no cleanings have occurred. Once the Haley Bridge project is completed, the Creeks Division will enter a contract to have the unit properly maintained and cleaned, annually. The Parks Yard interceptor also did not receive a cleaning in Year 2, due to lack of operational personnel that has resulted from citywide budget cuts. Once the new contract for the Haley CDS unit is in place in Year 3, the Parks Yard interceptor will be added to that contract for an annual cleaning. With few exceptions, (like the CDS unit being largely out of commission during Year 2), these BMPs are effective at Level 4, pollutant load removal.

- e) Annex Yard BMP Maintenance (BMP 6.14)

The Annex Yard is managed by the City's Streets Division. This BMP is currently effective for raising awareness of maintenance issues at this City yard (Level 2) by requiring daily inspections and maintenance. Year 1 inspections of this yard resulted in identifying deficiencies, which called for changed management behaviors to correct the deficiencies in Year 2 (Level 3). These physical changes to the Annex Yard have resulted in avoiding specific pollutant loads that previously made their way to the storm drain system, thereby becoming an effective BMP at Level 4.

- f) Street Sweeping (BMP 6.15)

As discussed above, street sweeping is a large City investment in good housekeeping that demonstrates a measurable benefit in reducing pollutant loads (Level 4). Over 2,250 tons of debris was collected from City street sweeping in Year 2.

- g) Integrated Pest Management (BMP 6.18)

Annual reporting on pesticide use has resulted in increased awareness and behavior changes in City staff by

implementing pest management efforts which minimize, and in some cases eliminate, the use of pesticides where feasible. Implementation of this program is successful at Level 3.

**h) Illicit Discharge Inspections and Elimination (BMP 6.20)**

Deficiencies identified in Year 1 inspections were appropriately addressed in Year 2. This process of inspecting city-managed facilities not only raises awareness (Level 2), it forces changed behavior when deficiencies are identified (Level 3).

**i) Portable Toilets Adjacent to Creeks (BMP 6.21)**

The portable toilet placed adjacent to Mission Creek demonstrates a high level use, based on the maintenance need to service/clean the facility twice a week. This indicates that this BMP is effective at Level 3 (it’s apparently working to change people’s habit of using the creek as a restroom) and Level 4 (reducing loads), assuming the waste collected in the toilet would likely be a polluting source to the creek if the toilet was not available there.

**Table G.6 Effectiveness Assessment Summary for Pollution Prevention / Good Housekeeping Practices for Municipal Operations**

BMP	Effectiveness Assessment Outcome Levels			
	Level 1	Level 2	Level 3	Level 4
	Implement Program	Increase Awareness	Behavior Change	Load Reduction
Pollution Prevention Plans	X	X	X	
Staff Training	X	X	X	X
Cleaning, Washing, Trenching, etc.	X	X	X	
Storm Drain Cleaning and Maintenance	X			X
Annex Yard Maintenance	X	X		
Street Sweeping	X			X
Integrated Pest Management	X	X	X	
Inspections	X	X	X	
Portable Toilets	X		X	X

## H. Proposed SWMP Modifications

### BMP 1.3 Distribute Informational Brochures and Postcards

**Measurable Goal 1.3a:** *Document the target audience, number of brochures (“The Ocean Begins on Your Street” in English) distributed through community events, reach 50% of intended audience.*

**Proposed Modifications:** Expand this BMP to include tracking all outreach materials distributed at community events, rather than just “The Ocean Begins on Your Street” brochures.

**Measurable Goal 1.3b:** *Document the target audience, number of brochures (“The Ocean Begins on Your Street” in Spanish) distributed through community events, reach 50% of intended audience.*

**Proposed Modifications:** Expand this BMP to include tracking all Spanish-language outreach materials distributed, rather than just “The Ocean Begins on Your Street” brochures.

**Measurable Goal 1.3c:** *Document the number of brochures distributed to promote the Clean Water Business Program and in response to illegal discharge investigations. Reach 100% of intended audience. (Year 1: Automotive; Year 2: Restaurants; Year 3: Mobile Washers; Year 4: Mobile Washers; Year 5: Hotels)*

**Proposed Modifications:** This goal should be partially modified. City staff feels the most efficient and beneficial outreach approach for this BMP is to list the potential business sectors that can be included in the Clean Water Business Program (the businesses in Santa Barbara with the most potential to impact water quality), but not to switch/focus on a new business sector every year. The approach should be to expand to a new business type as needed, once staff feels a business sector has been well-addressed/saturated with the Clean Water Business Program outreach efforts. If a focus/switch to a new business sector each year is required, staff becomes spread too thin with too many businesses to address. For example, there are still hundreds of restaurants and mobile washers, as well as retail stores that the City has yet to approach with the Clean Water Business Program, after having already focused the program on restaurants, automotive and mobile washers since 2008 (the automotive business sector has been more or less saturated, at this point, with outreach efforts for this program). So, the revised Measurable Goal should read, “*Document the number of brochures distributed to promote the Clean Water Business Program and in response to illegal discharge investigations. Reach 100% of intended audience. Outreach for this program shall focus on: Automotive Businesses, Restaurants, Mobile Washers, Retail Stores, Hotels, and/or Landscapers/Gardeners.*”

### BMP 1.4 Event Participation

**Measurable Goal 1.4c:** *Sponsor and participate in the Green Gardener Program.*

**Proposed Modifications:** Per the Water Board’s December 16<sup>th</sup>, 2010 comment letter regarding the City’s 2009 SWMP Annual Report, the proposed, numeric modification for this Measurable Goal is now, “*Contribute a minimum of \$1,500 per year to the joint-agency Green Gardener Program to help educate landscape professionals about protecting water quality.*”

### **BMP 1.5 Storm Drain Marking**

**Measurable Goal 1.5:** *Evaluate and clean 2,300 storm drain markers annually, as necessary.*

**Proposed Modifications:** Funds that were previously appropriated for cleaning these storm drain markers are no longer designated to this task due to budget changes. Therefore, the City proposes to modify this measurable goal to; “*Evaluate and clean 230 storm drain markers, annually.*” This is a reasonable goal through volunteer efforts and City staff efforts.

### **BMP 2.5 Community Volunteer Projects**

**Measurable Goal 2.5:** *20 participants in a creek clean-up and 6 volunteers for storm monitoring.*

**Proposed Modifications:** Storm monitoring is a difficult task for volunteers because it often involves going out at odd hours (middle of the night). This measurable goal needs to be modified to say: “*20 participants in a creek clean-up and maintain a list of potential volunteers to assist in storm monitoring. Achieve participation from a minimum of two volunteers in storm monitoring activities during daylight hours at least once per year, provided that storm monitoring occurs during daylight hours.*”

### **BMP 3.7 Document Responses To Septic System Pumper Inspection Reports And Identify Deficiencies**

**Note:** This BMP and associated Measurable Goal has been deleted from the City’s SWMP because septic tank inspections are conducted by the County, and the County no longer regularly shares inspection results with the City. Subsequent numbering for the following BMPs in MCM 3 have been adjusted.

### **BMP 3.13 Connect City Swimming Pool to Sanitary Sewer**

**Measurable Goal 3.13:** *Complete in Year 1.*

**Proposed Modifications:** The permit year in SWMP Table 4.3 needs to be changed from Year 2 to Year 1.

### **BMP 4.1 Evaluate Need to Revise Current Erosion and Sediment Control Policy into Stronger Regulatory Mechanism**

**Measurable Goal 4.1b:** *Develop reports and statistics. Document all projects reviewed and % compliance with policy.*

**Proposed Modifications:** This measurable goal is redundant with 4.1a. Building staff proposes to slightly modify this goal to be: *Document all projects reviewed/inspected in the field and % compliance with policy.*

**Measurable Goal 4.1d:** *Make decision or adopt ordinance by end of permit year three.*

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate the need for revising the existing ordinance language regarding erosion and sediment control.

**BMP 4.2 Evaluate the SBMC Ordinance Regarding Erosion and Sediment Control Requirements (Chap. 22, Section J111)**

**Measurable Goal 4.2a:** *Approval of Workplan.*

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate ordinance language pertaining to storm water runoff control and erosion/sedimentation control.

**Measurable Goal 4.2b:** *Submit revisions to Ordinance Committee for review by end of permit year two.*

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate ordinance language pertaining to storm water runoff control and erosion/sedimentation control.

**Measurable Goal 4.2c:** *4 meetings.*

**Proposed Modifications:** This measurable goal should be moved to Year 4, due to the Joint Effort for Hydromodification Control and the ordinance changes it will require. Those provisions should be clear before the City can effectively evaluate ordinance language pertaining to storm water runoff control and erosion/sedimentation control.

**Measurable Goal 4.2d:** *Adopt ordinance by end of permit year three.*

**Proposed Modifications:** The City Building Department proposes to delete this Measurable Goal. The required criteria that results from the current Joint Effort for Hydromodification Control will dictate how the City modifies existing ordinance language. A new or modified ordinance for erosion and sediment control may or may not be needed. The Measurable Goals previous to this one (4.1a, b, c, and d, and 4.2a, b, and c) already require that the City evaluate current policy language and ordinance effectiveness and make a decision about whether or not there are needed improvements. Having a measurable goal that requires ordinance adoption for erosion/sedimentation control (beyond what already exists in Chapter 22, Section J111), is not an appropriate goal, since this may not be an effective outcome.

**BMP 4.6 Achieve Compliance with Erosion and Sediment Controls**

**Measurable Goal 4.6:** *Send annual informational email bulletin regarding erosion and sediment control to appropriate groups and individuals.*

**Proposed Modifications:** The Water Board has requested a specific, numeric goal to replace this measurable goal, as well as a method for tracking reduction in construction site violations over time as a measure of the effectiveness of construction site stormwater runoff control activities. However, Building Department staff feels that the Water Board’s requested numerical documentation of the "reduction in violations" is too vague to be meaningful and impossible to track. This number would vary with construction activity and site challenges and would therefore not be reflective of the City’s efforts in reducing "violations". The Building Department is making improvements in 2011 in tracking project sites and their associated erosion control plans. However, even these tracking mechanisms will not alleviate the inherent issues that surround construction projects as far as site dynamics. Active sites change daily and construction traffic, trenching, grading, clean-up, landscaping, etc., can all modify what was once an ideal erosion control system. Inspection staff typically use correction notices to initiate installation of, or modifications to erosion control systems. In the event sediment does breach the erosion control systems a correction notice is used to require clean up procedures. Improper installation of BMPs on a site can happen even to the best of companies. It is part of the inspection process to verify that all BMPs on all sites meet the SWMP standards and to make corrections where necessary.

The proposed 4.6 Measurable Goal to replace the existing goal is: *Send annual informational email bulletin to a minimum of 2,000 appropriate individuals in the design and/or construction community.* This outreach measure will enhance the City’s commitment to educating the target audience about the construction BMP requirements and updates.

**BMP 5.4 Develop and Implement City Ordinance Provisions that Incorporate Design Standards for Post-Construction Stormwater Management BMPS, Including Peak Stormwater Discharge Rates, Capture and Treatment of the One-Inch Storm, and Preserving Natural Areas**

**Measurable Goal 5.4a:** *Completion of draft ordinance by end of year two permit.*

**Proposed Modifications:** Begin implementation by end of Q9 of Joint Effort – Actual Date TBD.

**Measurable Goal 5.4c:** *4 meetings. Completion and adoption of final ordinance by end of year three of permit.*

**Proposed Modifications:** Begin implementation by end of Q9 of Joint Effort – Actual Date TBD.

**BMP 6.12 Inlet Filter Cleaning**

**Measurable Goal 6.12:** *Number of filters cleaned; yards of material removed.*

**Proposed Modifications:** As stated in the Year 1 Annual Report, this BMP shall be deleted due to the fact that storm drain filters in the City are currently being removed. It has become evident that the maintenance of the filters far outweighs the benefits they provide. Catch basin debris screens have been replacing filters in Year 2, and this debris screen project will be completed in Year 3. Yards of material captured from the new

debris screens will be portrayed in BMP 6.15 – street sweeping. The City did not receive confirmation from the Water Board whether or not this proposed modification/deletion has been accepted, so the justification for this deletion is reiterated from last year’s Annual Report, below.

The catch basin filters were originally installed in 98 catch basins as a pilot program between 2001 and 2009, and the performance of the filters and maintenance costs were assessed during this period. During this assessment, numerous observations during rainstorms revealed that the filters quickly became clogged with sediment and leaves, so that the majority of storm water bypassed the filter and flowed untreated into the storm drains. This occurred despite monthly cleaning of the filters using a vacuum truck. The cleaning costs and debris removed were assessed from 2006-2008. The cleaning costs averaged \$846.00 per cubic yard of debris removed from the filters. Due to the incomplete capture of storm water runoff and the high cost of maintenance for the filters, the City decided not to expand the program and instead to replace the filters with catch basin debris screens. The catch basin debris screens are designed to prevent gross pollutants (trash and debris) from entering the storm drains via the catch basins during dry periods and moderate rain events, but are partially bypassed during heavy rains. At the same time, the catch basin screens are designed to work with street sweeping and don’t require additional maintenance to remain functional. Because the filters are easily clogged, causing storm water to bypass during rain events, they don’t offer a significant performance advantage over catch basin screens. Because of the low maintenance costs of the screens the City is able to install them city-wide and therefore prevent trash and debris from entering the storm drains in a much wider area. Screens are currently being installed in every eligible catch basin in the City.

**BMP 6.12 Inline Storm Filter Maintenance**

**Measurable Goal 6.12:** *Number of cleanings; gallons of waste disposed.*

**Proposed Modifications:** This BMP originally called for “3 annual cleanings.” This requirement is excessive due to limited operational staff. Furthermore, Year 1 cleaning of the two inline filters demonstrated that one cleaning per year before the rainy season is sufficient. The BMP should be partially modified to read “*Implement a minimum of one annual cleaning of inline filters.*”

**BMP 6.13 Annex Yard BMP Maintenance**

**Measurable Goal 6.13:** *Daily inspection of BMPs. All BMP maintenance entered on daily inspection form.*

**Proposed Modifications:** This measurable goal should be “*Daily inspection of BMPs.*” And no longer read “*All BMP maintenance entered on a daily inspection form.*”