California Regional Water Quality Control Board
Central Coast Region

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Linda S. Adams
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September 12, 2008

Mr. Brian A. Tetley
Planner
Santa Barbara County Planning and Development
624 West Foster Road, Suite C
Santa Maria, CA 93455-3623

Dear Mr. Tetley:

LAND DISPOSAL PROGRAM: SANTA YNEZ AIRPORT CLOSED LANDFILL, SANTA BARBARA COUNTY – RESPONSE TO DRAFT MITIGATED NEGATIVE DECLARATION FOR SANTA YNEZ AIRPORT IMPROVEMENTS, SCH # 2008071091

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) reviewed the County of Santa Barbara's Draft Mitigated Negative Declaration for proposed Santa Ynez Airport improvements. It is our understanding that some of the proposed improvements are on top of or immediately adjacent to the Santa Ynez Airport Closed Landfill (Closed Landfill). The Central Coast Water Board is the lead regulatory agency for the Closed Landfill for issues related to water quality. This letter includes comments on the proposed improvements as they relate to the Closed Landfill, and general comments on stormwater and low impact development considerations.

History of the Closed Landfill

1. The Closed Landfill received waste from 1969 to 1970 and covers approximately 1.6 acres.
2. The Closed Landfill was closed prior to November 27, 1984; it is therefore defined by California Code of Regulations (CCR) Title 27 as a closed, abandoned, or inactive (CAI) Unit and is generally not subject to CCR Title 27 requirements. However, pursuant to CCR Title 27, section 20080 (g) the persons responsible for the CAI Unit may be required to develop and implement a detection monitoring program, and if water quality impairment is found, may be required to develop a corrective action program.
3. The Santa Ynez Airport Closed Landfill is enrolled in the General Waste Discharge Requirements for Post-Closure Maintenance of Closed, Abandoned or Inactive Nonhazardous Waste Landfills within the Central Coast Region (Order No. R3-2004-0006).
4. Existing groundwater pollution from the Closed Landfill is primarily attributed to landfill gas migration; however, leachate generation and migration may also be a factor.

5. Santa Barbara County initially planned to clean-close the Closed Landfill as corrective action for groundwater impacts and dispose of the waste in the nearby Foxen Canyon Landfill. Although Water Board staff supported this plan to remove the source of the contamination, clean-closure was abandoned as an option due to opposition by local community groups on December 5, 2004.
6. In an April 7, 2005 letter, the Central Coast Water Board approved a phased cleanup approach for the Closed Landfill. Phase 1 consisted of three tasks including installation of a gas extraction system, vapor recovery system, and an air sparging system. The need to install the air sparging system is dependent on the effectiveness of the first two tasks. Phase 2 of the proposed remediation plan includes installation of a final cover system. Santa Barbara County postponed design and installation of the final cover to allow the Santa Barbara Airport Authority to finalize its plans for the area.

Proposed Santa Ynez Airport Improvements Summary

According to the Draft Mitigated Negative Declaration, the proposed Santa Ynez Airport improvements are divided into two development groups. Group one includes new hangars, additions to existing hangars, and fencing around the entire perimeter of the airport. Group two includes construction of an apron for six helicopters and two hangar rows. These improvements are primarily in the vicinity of the Closed Landfill. No buildings are proposed on top of the Closed Landfill. Both development groups include the possibility of water consumptive fixtures and may require septic tanks with leachfield disposal.

Central Coast Water Board Staff Comments

Central Coast Water Board staff believe that the Santa Ynez Airport improvements, as described in the Draft Mitigated Negative Declaration, are not likely to cause additional impacts to groundwater from the landfill, as long as the following conditions are met:

- Development and land use in the vicinity of the Closed Landfill must not compromise the long-term containment of waste, ongoing source control efforts, or prevent future groundwater corrective actions and monitoring.
- Development and land use must allow for appropriate maintenance of the final cover.
- Development and land use must allow for access to the Closed Landfill by the Santa Barbara County Public Works Department and appropriate regulatory agencies.
- Installation of septic tanks or leachfields must be greater than 100 feet from the perimeter of the landfill.

Please note, the Central Coast Water Board is in the process of evaluating the Santa Barbara County Public Works Department final cover design for the Closed Landfill. Since development and land use must be compatible with the Closed Landfill's final cover, we encourage the Santa Ynez Airport Authority work with the Santa Barbara

County Public Works Department to ensure that the County designs a final cover that is compatible with proposed development and land use in the area surrounding the Closed Landfill.

General Comments on Stormwater and Low Impact Development Considerations

The County of Santa Barbara is subject to the NPDES Phase 2 Municipal Stormwater Permit (General Permit). As part of its responsibility, the Water Board must determine permittees' compliance with General Permit requirements. This includes determining whether municipalities have reduced pollutant discharges to the Maximum Extent Practicable (MEP)[1]. The MEP standard is an ever-evolving and flexible standard which balances technical feasibility, cost, effectiveness, and public acceptance. The General Permit requires permittees to prevent or minimize water quality impacts from new development and redevelopment projects[2]. The volume and velocity of storm water discharged from impervious surfaces can cause increased bank erosion and downstream sedimentation, scouring, and channel widening which significantly impact aquatic ecosystems and degrade water quality. Therefore, permittees must develop and implement Storm Water Management Programs (SWMP) that require that new and re-developments maintain pre-development hydrologic characteristics, such as flow patterns, surface retention, and recharge rates in order to minimize post-development runoff impacts to water bodies. In most cases, MEP standards are not met by conventional site layouts, construction methods, and storm water conveyance systems with "end of pipe" basins and treatment systems that do not address the changes in volume and rates of storm water runoff and urban pollutants (including thermal pollution). Low Impact Development (LID) practices meet the MEP standard and are more effective at reducing pollutants in storm water runoff at a practicable cost.

LID is an alternative site design strategy that uses natural and engineered infiltration and storage techniques to control stormwater runoff where it is generated. The objective is to disperse LID devices uniformly across a site to minimize runoff. LID serves to preserve the hydrologic and environmental functions altered by conventional stormwater management. LID methods provide temporary retention areas, increase infiltration, allow for pollutant removal and control the release of stormwater into adjacent waterways (Anne Guillette, Whole Building Design Guide). For further reference please see:

http://www.epa.gov/owow/nps/lid/

[1] "Permittees must implement Best Management Practices (BMPs) that reduce pollutants in storm water runoff to the technology-based standard of Maximum Extent Practicable (MEP) to protect water quality." Effluent Limitations, General Permit Fact Sheet, pg. 6.

[2] "Post-Construction Storm Water Management in new Development and Redevelopment – The Permittee must: 1) Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects...by ensuring that controls are in place that would prevent or minimize water quality impacts", General Permit, pg 11, Provision e.1.

or

http://www.lowimpactdevelopment.org/

Eight Common LID Practices Include:

1. Reduced and Disconnected Impervious Surfaces
2. Native Vegetation Preservation
3. Bioretention
4. Tree Boxes to Capture and Infiltrate Street Runoff
5. Vegetated Swales, Buffers, and Strips
6. Roof Leader Flows Directed to Planter Boxes and Other Vegetated Areas
7. Permeable Pavement
8. Soil Amendments to Increase Infiltration Rates

Water Board staff considers a project that meets the following descriptions (inclusive) to be a "Low Impact Development" project:

A. Runoff Volume Control. The pre-development stormwater runoff volume is maintained by a combination of minimizing the site disturbance, and providing distributed retention BMPs. Retention BMPs are structures that retain the excess (above pre-development project volumes) runoff resulting from the development for the design storm event (2-, 10-, and 25-year, 24-hour duration storm). Note that "retention" is required, as opposed to "detention"; retention may be achieved using infiltration methods, and capture-for-use methods.

B. Peak Runoff Rate Control. Low impact development practices maintain the pre-development peak runoff discharge rate. This is done by maintaining the pre-development time of concentration and then using retention and/or detention BMPs (e.g., rain gardens, open drainage systems, etc.) that are distributed throughout the site, to control runoff volume. If retention practices are not sufficient to control the peak runoff rate, detention practices may be added.

C. Flow Frequency Duration Control. Since low impact development emulates the pre-development hydrologic regime through volume and peak runoff rate controls, the flow frequency and duration of post-development conditions must be identical (to the greatest extent possible) to those of pre-development conditions. Maintaining pre-development hydrologic conditions will minimize or eliminate potential impacts on downstream habitat due to erosion and sedimentation.

Permittees must, therefore, incorporate LID methodology into new and redevelopment ordinances and design standards unless permittees can demonstrate that conventional BMPs are equally effective, or that conventional BMPs would result in a substantial cost savings while still adequately protecting water quality and reducing discharge volume. In order to justify using conventional BMPs based on cost, permittees must show that the cost of low impact development would be prohibitive because the "cost would exceed any benefit to be derived." (State Water Resources Control Board Order No. WQ 2000-11). You must require Low Impact Development or equivalent techniques be included as mitigations in the Mitigated Negative Declaration for this project.

We appreciate the opportunity to comment on your Draft Mitigated Negative Declaration. If you have any questions regarding the Closed Landfill, please contact Martin Fletcher by phone at (805) 549-3694 or by email at mfletcher@waterboards.ca.gov, or Thea Tryon at (805) 542-4776. If you have any questions regarding Stormwater or LID please contact Brandon Sanderson at (805) 549-3868.

Sincerely,

FOR Roger W. Briggs
Executive Officer

cc:

Santa Ynez Airport Closed Landfill IPL, November 2007
Mr. Mark Schleich
Mr. Chris Wilson
Ms. Imelda Cragin
Ms. Lisa Sloan
Ms. Joddi Leipner
Mr. Brian Tetley
Mr. Daniel Gainey
Ms. Dianne Ohiosumua
Ms. Robin Cobb
Mr. Steve Pappas
Mr. Dough Herthel
Ms. Jan Crosby
Ms. Kim Brown
Mr. John Bowen
Mr. Jim Kunkle
Mr. Willy Chamberlin

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