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California Regional Water Quality Control Board Central Coast Region



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May 1, 2008

Ms. Stacy L. Lawson
Senior Environmental Coordinator
City of Lompoc
P.O. Box 8001
Lompoc, CA 93438-8001

Dear Ms. Lawson:

WATER BOARD STAFF COMMENTS ON DRAFT STORM WATER MANAGEMENT PROGRAM SEPTEMBER 2008 – SEPTEMBER 2013

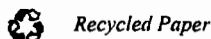
On April 11, 2008, the Central Coast Water Quality Control Board (Water Board) received the City of Lompoc Draft Storm Water Management Plan (SWMP) September 2008 – September 2013. Water Board staff has reviewed the April 11 draft SWMP and we find the City has been responsive to much of our March 26, 2008 communication regarding water quality issues. We also recognize the City's effort to provide greater context for the stormwater program in Sections 1.0 and 7.0, and we believe the document is improved considerably by this additional information.

This letter identifies revisions that we require to recommend approval of the SWMP. In addition to several specific issues identified in the attached Table of Required Revisions, we have three overarching concerns with the SWMP:

Pollutant Load Reduction as a Central Goal of the SWMP

Pollutant load reduction is the broad goal of municipal stormwater management programs. As such this goal should be explicit in each of the minimum control measures' list of goals. The City SWMP only includes pollutant reduction as an "objective" in Section 4.0, Illicit Connection and Discharge Detection and Elimination: ("prohibit non-storm water..." and "...illicit discharges"), Section 6.0, Construction Site Control Program, and Section 7.0, New and Re-Development Control Program: ("reduce potential for discharge of pollutants..."). Asserting pollutant load reduction as a principal goal of each control measure will support improvements in Best Management Practices (BMPs) over the life of the program. It will also ensure that measures of effectiveness of program elements and BMPs are always compared to this ultimate goal. For example, with pollutant load reduction as a goal of the Municipal Operations Control Program, it is logical to attach the following effectiveness measurement to the street sweeping BMP (5.3.1): "Amount of material removed from street sweeping." Currently the effectiveness measurement for this BMP only identifies tracking of street sweeping, "number of months in which all public streets were swept."

California Environmental Protection Agency



Item No. 9 Attachment No. 3
City of Lompoc SWMP
October 17, 2008 Meeting

City Jurisdiction or Control over Entities and Facilities Discharging to City Stormdrains

The SWMP identifies certain entities, areas and facilities as being outside of the City's "control" (p. 15), or, "over which the City has no jurisdiction" (p. 10). The SWMP includes industrial facilities along the railroad tracks, mobile home parks, utility facilities, railroad properties, County facilities and flood control basins, channels and stormdrains within the City limits, as facilities over which the City asserts it has no control (pp. 10, 15). Where these facilities discharge waste illegally into the City's stormdrain system, the City must address them in the SWMP, regardless of the entities' autonomy or possible exemption from City regulations.

Through the NPDES permit, the City is charged with maintaining water quality in the Municipal Separate Storm Sewer Systems (MS4). By virtue of owning the MS4, the City provides a stormwater utility service to these entities and it must ensure that they discharge only clean stormwater to the MS4. The SWMP must recognize this and provide for additional BMPs that promote clean stormwater discharges. BMPs could include, for example, agreements with agencies (e.g., County, California Department of Transportation, U.S. Postal Service), education and outreach to facility owners (e.g., railroad, auto dismantlers, mobile home parks), or terminating dischargers' connections to the City's MS4.

Hydromodification Controls

The SWMP includes a selection of proposed criteria, (BMPs 7.4.9) 1-3, for hydromodification control that differ from the interim criteria in the Water Board's February 15, 2008 Notification Letter. At this phase of SWMP review, and in the absence of technical documentation supporting the City's proposed criteria, Water Board staff can not evaluate these criteria for their stringency relative to our interim criteria. We therefore can not recommend approval of the criteria as part of the SWMP. We propose that the City delete these BMPs and replace them with a schedule for development and adoption of control standards for hydromodification, which include:

- Numeric criteria for controlling stormwater runoff volume and rates from new development and redevelopment.
- Numeric criteria for stream stability required to protect downstream beneficial uses and prevent physical changes to downstream stream channels that would adversely affect the physical structure, biologic condition, and water quality of streams.
- Specific applicability criteria, land disturbance acreage thresholds, and exemptions.
- Performance criteria for control BMPs and an inspection program to ensure proper long-term functioning over time.
- Education requirements for appropriate municipal staff on hydromodification and Low Impact Development (see related required change for BMP 5.3.4).

The City must make the modifications in the attached **Table of Required Revisions**.

Please address all required revisions and submit a copy of your amended SWMP no later than **May 23, 2008**. We request two versions of the revised SWMP. One revised SWMP showing additions and deletions in underline and strikethrough format, and one




without underline and strikethrough formatting. All submitted materials must be provided in hard copy and electronic format (MS Word).

Water Board staff will review your May 23 draft SWMP from May 27 to June 13 and develop a second draft Table of Required Revisions, which we will make available to you on June 16. We will then post the draft SWMP and Table of Required Revisions on June 23 for a period of 60 days, during which any member of the public, including City of Lompoc staff and elected officials, can make comments or request a hearing before the Water Board. At the conclusion of the 60-day public comment period, on August 22, Water Board staff will commence final preparation of a recommended action to approve the Lompoc SWMP, including a Response to Comments and, if necessary, all preparations for a Water Board hearing on October 17, 2008.

If you have questions regarding this matter, please contact **Dominic Roques at (805) 542-4780**, or droques@waterboards.ca.gov.

Sincerely,



 Roger W. Briggs
Executive Officer

cc:
Kira Redmond, Santa Barbara Channelkeeper
714 Bond Ave.
Santa Barbara, CA 93103

Hilary Hauser,
Heal the Ocean
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TABLE of REQUIRED REVISIONS
Lompoc Draft SWMP September 2008 – September 2013

Acronyms:

- BMP - Best Management Practice
- MG - Measurable Goal
- SWMP - Storm Water Management Plan
- SWPPP - Storm Water Pollution Prevention Plan

Item Number	SWMP Section	Subject	Concern	Required Revisions
1	Section 1.3	Pollutants of Concern (POCs)	POCs found in urban runoff include sediments, non-sediment solids, nutrients, pathogens, oxygen-demanding substances, petroleum hydrocarbons, heavy metals, floatables, polycyclic aromatic hydrocarbons (PAHs), trash, and pesticides and herbicides. The SWMP acknowledges only sediment and oil and grease. Nutrients and trash are clearly POCs, given the impairment of the Santa Ynez River for Nutrients and the observed quantities of trash on the streets and accumulated in stormdrain channels.	Expand the list of POCs to include all contaminants found in urban pollutants until such time that is can demonstrate they are not of concern.
2	BMP 3.4.3	Education in Schools	a) Absent examples of materials to be provided, the City's commitment to the goals of education and awareness is unclear; is its goal raising awareness and/or changing behavior?	a) Provide detail about the educational material provided to 100 school-aged children.

Item Number	SWMP Section	Subject	Concern	Required Revisions
			b) The selection of 100 students is not explained; how many school children are there in Lompoc? Does this effort reach K-12? c) Text on p. 26 inconsistent with Table 3, p. 30.	b) and c): Edit accordingly.
3	BMP 3.3.6	Citywide Clean-up and Refuse Collection	Means of publicizing events not described.	Describe the publicizing of the three times-per-year Citywide cleanups, once-per-year bulky item collection, and Waste Tire Roundups.
4	BMP 3.3.8	Sandbag Program	Improper use of sandbags could result in additional sediment delivery to stormdrains.	Identify a companion educational component to the sandbag program, e.g., a bilingual fact sheet identifying appropriate handling of sandbags after use.
5	BMP 3.3.10	Used Oil Recycling	Text refers to varying numbers (up to 10) of recycling centers in different places.	Clarify the number of centers the City will maintain or explain why the MG is only 5, when there are currently 10.
6	BMP 3.3.12	Business and Industrial Informational Consultations	No clear commitment to focusing on identified pollutants such as winery facility wash-off and trash.	City must commit to consultations with businesses and industries that are known or suspected sources of pollutants of concern.
7	BMP 4.3.3	Master Storm Drain Map	Maps included in Appendices A and C contain information that would be better integrated into a single map. The maps are missing key facilities and City boundaries, e.g., does San Miguelito Channel leave City jurisdiction downstream of V St. and Central Ave?	Revise the storm drain map to produce a comprehensive view of the system, including, but not necessarily limited to, all stormwater facilities (including those maintained by Santa Barbara County Flood Control), a map legend, and a complete City boundary.
8	BMPs 4.3.5 and 4.3.6	Surveys for detecting illicit discharges	a) Additional detail is needed regarding the protocol for the survey and how the survey would result in abatement of	In Year 1 or 2, prior to implementing the surveys in Years 3 – 5, develop the protocol for surveying surface and subsurface components of the stormdrain system.

Item Number	SWMP Section	Subject	Concern	Required Revisions
			<p>discharge. Will the survey be conducted in both wet and dry seasons?</p> <p>b) Water Board staff identified industrial sites lining the freight rail tracks and wineries as areas with higher risk of non-stormwater discharge; the survey protocol should prioritize areas of higher risk of water quality impact.</p> <p>c) Auto dismantlers outside City limits are potential dischargers to the City stormdrains; they must be included in the surveys.</p> <p>d) Text on p. 35 contains formatting errors and is not consistent with text on pp. 37, 38.</p>	<p>a),b),c) and d): Edit accordingly</p>
9	BMP 4.3.9	Public Information	<p>Unclear why SWMP targets 200 people per year for education. Does it intend to contact 200 businesses?</p>	<p>Refine the measurable goal for BMP 4.3.9 and explain the basis for the target number.</p>
10	BMP 5.3.1	Street Sweeping	<p>a) The effectiveness measurement for sweeping fails to measure pollutant load reduction.</p> <p>b) Discrepancy between texts on pp. 40, 42 regarding frequency of sweeping.</p>	<p>a) Include more appropriate measure of BMP effectiveness,</p> <p>b) Correct the discrepancy.</p>
11	BMP 5.3.4	Training	<p>a) Specific training for Low Impact Development and hydromodification not specified,</p> <p>b) Quantitative performance</p>	<p>a) Include an education requirement for appropriate municipal staff on hydromodification and Low Impact Development as part of the City's schedule for development and adoption of control standards</p>

Item Number	SWMP Section	Subject	Concern	Required Revisions
			goals for training are ambiguous and inconsistent between text (pp. 41, 41) and Table 5.	for hydromodification. b) Clarify frequency of training for staff.
12	Section 5.0	Municipal Operations (City Landfill)	SWMP contains no schedule for improvements to City Landfill drainage.	Include commitment to prepare a plan and schedule for modifying the City Landfill's detention basin and other measures to address potential discharge of unfiltered runoff into the City's stormdrain system.
13	BMP 6.4.2	Ensure Construction Site Erosion Control BMPs	The BMP description identifies only review of SWPPP; the MG indicates this is an inspection BMP.	Rectify and refine the BMP description and the Measurable Goals for clarity.
14	BMP 6.4.5	Receipt and Response to Complaints	Same as above	Same as above
15	BMP 6.4.6	Conduct Inspections of Construction Sites	Inspection frequency differs from BMP 6.4.2. How do these BMPs differ? Does BMP 6.4.6 include all sites, including those under 1 acre?	Same as above
16	BMP 7.4	Formatting errors	Formatting errors in numbering of MGs (should be 7.5.X, etc.).	Correct formatting error
17	Table 7	Maintenance conditions	BMP and MG not described or labeled in text.	Include description and appropriate labeling of BMP and MG
18	BMP 7.4.8	Hydromodification Plan	BMP lacks detail.	Describe content of Hydromodification Management Plans per expectations of February 15, 2008 Notification Letter from Water Board
19	BMPs 7.4.9)1-3	Hydromodification/ Low Impact Development	Proposed criteria are not supported by technical findings and are inconsistent with Water Board expectations as explained in February 15, 200 Notification Letter.	Remove the BMPs and replace with BMP(s) identifying a schedule for development and adoption of control standards for hydromodification