

City of Paso Robles - Guidance Document for Municipal Stormwater Permit 2013-2018

Section	Permit Element	Implementation Year					Responsible Department	New BMP Measurable Goal
		1	2	3	4	5		
	<b>PROGRAM MANAGEMENT ELEMENT</b>	1	2	3	4	5		
<i>E.6.a</i>	<i>Legal Authority</i>							
(a)	Adopt Ordinance	x					Stormwater	The Draft Water Quality Ordinance has been revised to include required legal authorities in the permit and will be considered by City Council for approval by September 2013.
<i>E.6.b</i>	<i>Certification</i>							
E.6.b	Certification		x				Public Works Stormwater	The City will certify by it's Duly Authorized Representative as described in 40CFR122.22(b) that it will maintain legal authority implement and enforce the Permit. Certification to include (a) - (e) of this section.
<i>E.6.c</i>	<i>Enforcement Measures and Tracking</i>							
E.6.c	Enforcement Response Plan			x			Stormwater	Develop and implement an Enforcement Response Plan (ERP) that will contain enforcement procedures for responding to violations and how to address repeat and continuing violations. ERP will include items (ii)(a) - (f).
<b>E.7.</b>	<b>EDUCATION AND OUTREACH PROGRAM</b>							
<i>E.7.a</i>	<i>Public Education and Outreach</i>							
E.7.a	Public Education & Outreach - Select outreach option (if regional program - develop agreements)	x					Stormwater	Determine if the City will participate in a Regional Education and Outreach Program, fulfill the Education and Outreach requirements within our jurisdiction or do a combination of the two.
(a)	Public Education & Outreach - Develop/implement comprehensive education and outreach program.		x				Stormwater	Develop and implement a comprehensive storm water public education and outreach program designed to increase storm water knowledge and awareness in target audiences.
(b)	Public Education & Outreach - Conduct surveys 2x during permit term		x			x	Stormwater	Conduct surveys twice during the permit term to gauge the public's level of awareness.

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(c)	Develop and convey a specific stormwater messages.	x	x	x	x	x	Stormwater	Develop and convey a specific stormwater message that focuses on: local pollutants of concern, target audience, and regional water quality issues.
(d)	Develop & disseminate education materials to target audiences.	x	x	x	x	x	Stormwater	Develop and disseminate appropriate educational materials to target audiences. Educational materials will be disseminated in a variety of ways to reach different audiences.
(e)	Utilize public input in developing outreach program	x	x	x	x	x	Stormwater	Utilize public input in the development of the stormwater program.
(f)	During the development of the PE strategy determine appropriate methods of disseminating PE materials.		x	x	x	x	Stormwater	Distribute the educational materials, using whichever methods and procedures determined appropriate during development of the PE strategy.
(g)	Provide water efficient/stormwater friendly landscaping information	x	x	x	x	x	Water Conservation	Convey messages to explain the benefits of water-efficient and environmentally friendly landscaping using existing materials developed and distributed by the City's Water Conservation Program.
(h)	Promote reporting of illicit discharges	x	x	x	x	x	Stormwater	Develop and convey messages specific to reducing illicit discharges with information on how the public can report illicit discharges or water quality impacts through a central contact point using the City's stormwater web site and Stormwater Pollution Line.
(i)	Provide pesticide/fertilizer application information	x	x	x	x	x	Stormwater	Develop and convey messages specific to the proper application of pesticides, herbicides, and fertilizers. Continue to promote the OWOW Program for residents and local participating stores.
(j)	Provide materials to school children	x	x	x	x	x	Stormwater, Water Conservation	Provide independent, parochial, and public schools with materials to effectively educate school-age children about stormwater runoff and water conservation.
(k)	Provide information on reducing discharges from organized car washes, mobile cleaning, pressure washing, and landscape irrigation.	x	x	x	x	x	Stormwater, Water Conservation	Develop and convey messages specific to reducing discharges from organized car washes, mobile cleaning, pressure washing, and landscape irrigation.
(l)	Provide stormwater-friendly education for organized car wash participants on reducing car wash discharges.		x	x	x	x	Stormwater	Conduct storm water-friendly education for organized car wash participants.
(m)	Provide information on specific to Mobile cleaning and pressure wash businesses.	x	x	x	x	x	Stormwater	Develop and and convey messages specific to mobile cleaning and pressure wash businesses.

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CBSM	Implementation of a reduced set of Community Based Social Marketing (CBSM) requirements as described in the May 3, 2013 letter from the CCRWQCB.	x	x	x	x	x	Stormwater	Work with other local MS4s that participate in the Central Coast Partners for Water Quality to determine if a regional CBSM program will be developed or the City will comply individually with the May 3, 2013 letter from the CCRWQCB.
(a)	Implement a CBSM pilot project to address its highest priority water quality issue.		x	x	x	x	Stormwater	Implement a CBSM pilot project to address its highest priority water quality issue. This can be related to a specific type of pollutant, pollutant source, community behavior, or watershed. The Pilot program shall include the following actions: 1)Research barriers to desired behaviors and benefits of desired behaviors. 2) Elicit commitment to implement desired behavior from target audience. 3) Provide prompts reminding target audience of desired behavior from target audience. 4) Use the concept of social norms/modeling of desired behavior. 5) Use education messages that are specific, easy to remember, from a credible source, and appropriate for the target audience. 6) Create incentives for the desired behavior. 7) Remove barriers to the desired behavior.
(b)	Reporting						Stormwater	Submit a summary of the past year CBSM activities and certify compliance with the May 3, 2013 letter. The summary must include: 1) Pilot program. 2) Research on barriers to desired behaviors and benefits of desired behaviors. 4) Implementation of social norms/modeling. Also the use of: 1) Commitments from target audiences to implement desired behaviors. 2) Prompts, 3) education messages, 4) incentives for desired behaviors, 5) Methods for removing barriers to behavior change.
<i>E.7.b</i>	<i>Staff and Site Operator Training and Education</i>							
b.1	Illicit discharge detection and elimination training for City staff.	x	x	x	x	x	Stormwater	Illicit discharge detection and elimination staff training to include: what is an illicit discharge or connection, procedures for reporting and responding, follow-up training, training for new staff within 6 months of hire, information on reporting illicit discharges in all fleet vehicles.
b.2.	Construction outreach /training for City staff							

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(a)	Plan Reviewers and Permitting Staff		x	x	x	x	Community Development Stormwater	Plan Reviewers and Permitting Staff will be trained to be knowledgeable in Erosion & Sediment Control (ESC) Plans. Staff reviewing ESC plans will be certified as a QSD or work under the designated person on staff that possesses the QSD credential. ESC plans will be reviewed by the City Engineer or the Water Quality Specialist.
(b)	ESC/Stormwater Inspectors	x	x	x	x	x	Stormwater	ESC/Stormwater Inspectors shall be certified and maintain certification as a QSD or QSP.
(c)	Contract Plan Reviewers		x	x	x	x		The City shall ensure that contract plan reviewers, permitting staff, and Inspectors are trained if used.
E.7.b.2.(b)	Construction Site Operator Education							
(a)	Provide information each year on training opportunities for construction Operators.	x	x	x		x	Stormwater	Provide information each year on training opportunities for construction operators on BMP selection, installation, implementation, and maintenance as well as overall compliance.
(b)	Develop outreach tools for educating construction operators.	x	x	x	x	x	Stormwater	Develop outreach tools aimed at educating construction operators on appropriate selection, installation, implementation, and maintenance of stormwater BMPs and program compliance.
(c)	Distribute outreach materials to construction operators disturbing land.	x	x	x	x	x	Stormwater	Distribute appropriate outreach materials to all construction operators disturbing land within the City.
(d)	Update existing website to include information on BMPs.	x	x	x	x	x	Stormwater	Update the existing stormwater website, as necessary to include information on appropriate selection, installation, implementation, and maintenance of stormwater BMPs.
E.7.b.3	<i>Pollution Prevention and Good Housekeeping Staff Training</i>							
(a)	Biennial training for all staff implementing this program element.	x	x	x	x	x	Stormwater	Develop a biennial employee training program for appropriate employees involved in implementing pollution prevention and good housekeeping practices as specified in E.11. Conduct training during alternate years when necessary. Train all new hires within the first year of the hire date.
(b)	Biennial assessmet.		x		x		Stormwater	Biennial assessmet of trained staff's knowledge.
(c)	Contractors performing O&M activities.		x				Public Works Stormwater	Require contractors hired to perform O&M activities shall be contractually required to comply with all stormwater BMPs, & SOPs.

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(d)	Provide oversight of contractor activities.		x	x	x		Public Works Stormwater	Provide oversight of contractor activities to ensure BMPs, housekeeping practices, and SOPs followed.
<b>E.8</b>	<b>PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM</b>							
<i>E.8</i>	<i>Public Involvement and Participation Program</i>							
E.8	Involve the public in the development and implementation of activities related to the program.	x	x	x	x	x	Stormwater	Involve the public in the development and implementation of activities related to the program. The program shall encourage volunteerism, public comment and input on policy, and activism in the community.
(a)	Public Involvement and participation strategy.		x				Stormwater	Develop public involvement strategy that establishes who is responsible for specific tasks and goals.
(b)	Consider development of a citizen group.	x	x	x	x	x	Stormwater	The City will continue to attend the Partners for Water Quality which is open to the public and includes NGO members.
(c)	Create opportunities for citizens to participate.	x	x	x	x	x	Stormwater	Create opportunities for citizens to participate in the implementation of BMPs through sponsoring activities such as clean-ups, and educational activities. The City will continue to: run the Adopt-a-Street program and tracking the amount of trash picked up by volunteers, organize and host the annual Creek Day and track the number of volunteers and amount of trash collected, and give the public a means to report unmarked publicly owned storm drains.
(d)	Information on program	x	x	x	x	x		Ensure the public can find information on the stormwater program by posting information related to the program on the stormwater web page.
(e)	Actively engage in the Integrated Regional Water Management Plan (IRWMP) or watershed planning effort.	x	x	x	x	x	Water Dept., Wastewater	The City's Water Department is involved in development of the revised IRWMP. The City's Wastewater Department is involved in the development of a regional Salts Management Plan for the Upper Salinas River.
<b>E.9</b>	<b>ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>							
<i>E.9.a</i>	<i>Outfall Mapping</i>							
E.9.a	Create and maintain accurate outfall map including a site visit to each outfall	x	x	x	x	x	Stormwater, IT	Create and maintain an up-to-date and accurate map of outfalls owned by the City. The map will include alphanumeric IDs, priority areas, water bodies receiving direct discharges, and the permit boundary.

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(a)	Map to show all outfalls owned by the City.		x			Stormwater, IT Streets Dept.	The City's map shows all outfalls operated by the City. The drainage areas and land use(s) contributing to those outfalls will be added. Each outfall shall be mapped with GPS, alphanumeric identifier. Use photographs or electronic database to provide baseline information and track operation and maintenance needs over time.	
(b)	Include location, name, of all water bodies receiving direct discharges from outfalls.		x			IT	Location, name, of all water bodies receiving direct discharges from outfalls to be included on the map.	
(c)	Include priority areas		x			IT stormwater	Include priority areas: older infrastructure, industrial, commercial, or mixed use areas, areas with a history of illicit discharges, illegal dumping, onsite sewage disposal systems, or that are likely to have illicit discharges.	
(d)	Field sampling locations		x				Include field sampling locations if applicable.	
(e)	Permit boundry		x				The current stormwater system includes the City limits which is our permit boundry.	
<i>E. 9.b</i>	<i>Illicit Discharge Source/Facility Inventory</i>							
(a)	Create inventory of all industrial/commercial facilities and update annually		x	x	x	x	Stormwater	Maintain an inventory of all industrial/commercial facilities/sources that could discharge pollutants. Update annually with minimum information listed in the section.
(b)	Types of facilities.		x	x	x	x	Stormwater	The inventory must include: metal and other recycled material centers, vehicle repair, maintenace or cleaning, building trade central facilities or yards, corporation yards, building material retailers and storage and other facilities designated by the City or Regional Boards to have reasonable potential to contribute to polluted runoff.
(c)	Industrial General Permit.		x	x	x	x		Determine if facilities have coverage under Industrial General Permit. Notify the RWQCB if not covered.
(d)	Update inventory annually.		x	x	x	x		Update the inventory annually by contacts with commercial and industrial facility operators and owners, or through City databases such as business licenses, industrial waste inspections, and sewer connections.

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(e)	Develop and implement procedures to identify illicit discharges from priority areas.				x			Develop and implement procedures to proactively identify illicit discharges from priority areas shown on the stormwater map at least once over the length of the permit term. The procedures must include field observations, field screening, inspections, and other appropriate and effective survey methods. OR the City may establish a self-certification program in which authorized parties can demonstrate the prevention and elimination of illicit discharges at their facilities at least once during the permit term.
<i>E.9.c</i>	<i>Field Sampling to Detect Illicit Discharges</i>							
E.9.c	Sample ANY flowing outfalls identified in E.9.a		x				Stormwater	Sample all City owned outfalls that are flowing or ponding 72 hours after the last rain event during outfall mapping.
E.9.c	Annually sample priority area outfalls determined in E.9.a		x	x	x	x		Conduct annual dry weather sampling of outfalls identified in priority areas on the stormwater map.
(a)	Conduct annual sampling for parameters on Table 1.		x	x	x	x	Stormwater	Test samples taken during the annual dry weather sampling for the following parameters to help determine the source of the discharge: Ammonia, color, conductivity, detergents, fluoride, hardness, pH, potassium and turbidity.
(b)	Determine if sample results exceed the action limits.		x	x	x	x	Stormwater	Determine if sample results exceed the action levels listed on Table 2 for the parameters listed in (b).
(c)	Conduct follow up investigation within 72 hours if action levels exceeded		x				Stormwater	Conduct follow up investigations within 72 hours of becoming aware of the suspected illicit discharge to identify and locate the source of the illicit discharge.
<i>E.9.d</i>	<i>Illicit Discharge Detection and Elimination Source Investigations and Corrective Actions</i>							
E.9.d	Develop written procedures for investigations and corrective actions		x				Stormwater	Develop written procedures for conducting investigation into the source of all non-stormwater discharges suspected to be illicit discharges. These procedures shall be part of the Illicit Discharge Detection and Elimination Program.

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E.9.d	Conduct investigations within 72 hours.	x	x	x	x	x	Stormwater	Conduct follow up investigations with 48 - 72 hours to identify and locate the source of a suspected illicit discharge. If the investigation requires longer than 72 hours, the actions being taken to identify and locate the source of the suspected illicit discharge.
(a)	Non-stormwater discharges suspected of being sewage and/or significantly contaminated shall be investigated within 24 hours.	x	x	x	x	x	Wastewater	The City complies with the State Waste Discharge Requirements for Sanitary Sewer Systems. Any discharges suspected of being sewage are immediately responded to during working hours and by standby staff after hours. The City has procedures for receiving, responding to, and reporting sewer discharges. Any significantly contaminated discharges shall be investigated within 24 hours.
(b)	Prioritize investigations suspected to be sewage and/or significantly contaminated over other discharges.	x	x	x	x	x	Stormwater	Discharges suspected to be sewage and/or significantly contaminated will be prioritized over investigations of non-stormwater discharges.
(c)	Report any flows believed to be an immediate threat to human health or the environment to the Health Department.	x	x	x	x	x	Wastewater Stormwater	The City has written procedures for reporting sewage spills to Health Dept. and the Office of Emergency Services. The City will immediately report any flows believed to be an immediate threat to human health or the environment to the local Health Department.
(d)	Determine and document the source of non-stormwater discharges.	x	x	x	x	x	Stormwater	Determine and document the source of non-stormwater discharges. If the source is authorized under the permit no further action is required.
(e)	Require the responsible party to conduct corrective actions. Conduct follow up investigation.	x	x	x	x	x	Stormwater	Immediately notify the responsible party of an illicit discharge and require corrective actions be taken within 72 hours to eliminate the discharge. Conduct follow-up investigation and field screening to verify discharge was eliminated.
E.9.e	<i>Spill Response Plan</i>							
E.9.e	Develop and implement a spill response plan.	x	x	x	x	x	Stormwater	Develop and implement a spill response plan which includes Agency roles and responsibilities, procedures for responding to complaints, conducting investigations and clean up, and reporting.
E.10	<b>CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM</b>							

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E.10.a	Construction Site Inventory	x	x	x	x	x	Stormwater	Create and maintain an inventory of all projects subject to the City's stormwater ordinance. Inventory shall include: contact and site information, location in respect to all waterbodies, threat to water quality, current construction phase, inspection frequency, project start and completion dates, and date the erosion and sediment control plan approved by the City.
E.10.b	Construction Plan Review and Approval Procedures							
E.10.b	Develop procedures.	x					Community Development, Bldg. Dept. & Stormwater	Develop procedures to review and approve relevant construction plan documents.
(a)	Require the submittal of an Erosion and Sediment Control Plan (ESCP) for City approval prior to issuing a grading or building permit.	x	x	x	x	x	Stormwater Engineering	Require the submittal of a site-specific Erosion and Sediment Control Plan (ESCP). The City must review and written approval prior to issuing a grading or building permit.
(b)	Require ESCP include rationale for selecting BMPs.	x	x	x	x	x	Stormwater Engineering	Require the ESCP include rationale for selecting BMPs including supporting soil loss calculations, if necessary.
(c)	Require ESCPs list all applicable permits and submit evidence that permits have been obtained prior to soil disturbing activities.	x	x	x	x	x	Stormwater Engineering	Require ESCPs list all applicable permits directly associated with the grading activity and include a condition of the the grading permit that evidence will be submitted to the City that permits have been obtained prior to soil disturbing activities authorized by the grading permit.
(d)	Develop a checklist or similar process to review ESCPs.	x	x	x	x	x	Stormwater Engineering	Conduct and document the review of each ESCP using a checklist or similar process.
E.10.c	Construction Site Inspection and Enforcement							
E.10.c	Construction Site Inspection and Enforcement.	x	x	x	x	x	Stormwater Building Dept.	Implement procedures to verify compliance with the City's Water Quality Ordinance. Inspections to be conducted at priority sites prior to land disturbances (during the rainy season), during active construction and following active construction. Require all temporary ESC measures that are no longer needed have been removed.
E.11	Pollution Prevention/Good Housekeeping for Permittee Operations Program							
E.11.a	Inventory of Permittee-Owned and Operated Facilities							

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E.11.a	Develop and maintain an inventory of City owned or operated facilities.		x	x	x	x	Stormwater	Develop and maintain an inventory of City owned or operated facilities that are a threat to water quality.
E.11.b	Map of Permittee-Owned or Operated Facilities							
E.11.b	Submit a map of inventoried City-owned or operated facilities		x				Stormwater GIS	Submit a map of the City showing all City-owned facilities inventoried in E.11.a. Include for each site: stormwater system, receiving waters which the facilities drain to, manager of each facility and contact information.
E.11.c	Facility Assessment							
E.11.c	Conduct Facility Assessments	x	x	x	x	x	Stormwater	Conduct comprehensive annual assessments at all facilities inventoried in E.11.a. and identify pollutant hotspots.
(a)	Identification of hotspots.	x	x	x	x	x	Stormwater	Based on the annual assessment, identify facilities with a high potential to generate stormwater and non-stormwater pollutants as pollutant hotspots and assign them high priority. Hotspots shall include at a minimum maintenance yards, airports, hazardous waste facilities.
(b)	Documentation of the comprehensive assessment.	x	x	x	x	x	Stormwater	Document comprehensive assessment procedures and results.
E.11.d	<i>Stormwater Pollution Prevention Plans (SWPPPs).</i>							
E.11.d	Develop and implement SWPPPs for hotspot facilities.	x	x	x	x	x	Stormwater	Develop and implement site-specific SWPPPs for hotspot facilities that do not have existing Hazardous Materials Plan, Spill Prevention Plan or other equivalent document. SWPPPs should include purpose of document, site map with drainage identified, significant materials handled and stored that are exposed to stormwater, potential pollutant sources, facility BMPs, Spill response and cleanup, inspection schedule, inspection procedures and checklist for inspections conducted to ensure proper selection, implementation and maintenance of BMPs.
E.11.e	Inspection, Visual Monitoring and Remedial Action							
(a)	Quarterly visual "hotspot" inspections	x	x	x	x	x	Stormwater	Develop inspection checklist. Conduct quarterly visual hotspot inspections. Note deficiencies and corrective actions taken to correct deficiencies. Track inspections in a log at each facility and keep records with the facility SWPPP.

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(b)	Annual comprehensive "hotspot" inspections	x	x	x	x	x		Conduct annual Hotspot comprehensive inspections. The inspection should cover all stormwater BMPs and include any identified deficiencies. Document each inspection and any corrective actions taken to correct deficiencies. The records will be kept with the SWPPP.
(c)	Quarterly visual "hotspot" observation of stormwater & non-stormwater discharges.	x	x	x	x	x		Observe discharge locations from hotspot facilities. If a discharge is observed, identify any problems associated with pollutant sources or BMPs shall be remedied as soon as possible or before next storm event. Document each inspection and any corrective actions taken to correct deficiencies. The records will be kept with the SWPPP.
(d)	Inspection of non-hotspot facilities	x	x	x	x	x	Stormwater	Inspections of non-hotspot facilities are conducted once per permit term.
<i>E.11.f</i>	<i>Storm Drain System Assessment and Prioritization</i>							
E.11.f	Storm drain System Assessment & Prioritization		x	x	x	x	Streets Dept.	Implement procedures to assess and prioritize storm drain system maintenance, including but not limited to, catch basins, pipe and pump infrastructure, above-ground conveyances, including receiving water bodies with the City's boundry and detention basins.
E.11.f	Assign high priority to catch basins.	x	x	x	x	x	Streets Dept.	Assign high priority to catch basins meeting any of the following Criteria: 1: accumulates a significant amount of sediment, trash, and/or debris; 2) collecting large volumes of runoff; 3) collecting runoff from areas that do not receive street sweeping; 4) collects runoff from drainage area with exposed or disturbed soil; 5) receive citizen complaints/reports.
<i>E.11.g</i>	<i>Maintenance of storm drain system</i>							
E.11.g	Maintenance of storm dain system		x	x	x	x	Wastewater Dept.	Begin maintenance of all high priority storm drain systems annually according to the procedures and priorities developed .
(a)	Inspect storm drain systems.		x	x	x	x	Streets Dept. Stormwater	Based on the priorities assigned E.11.f develop and implement a strategy to inspect strom drain systems. Inspect all high priority catch basins and systems annually.

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(c)	Labeling catch basins.	x	x	x	x	x	Public Works all Depts.	Ensure that each catch basin in high foot traffic areas includes a legible storm drain marker. Catch basins that are reported missing markers by the public or City staff shall be recorded and relabeled within one month of inspection.
(d)	Maintain surface drainage structures.			x	x	x	Streets Dept.	High priority facilities, such as those with recurrent illegal dumping, shall be reviewed and maintained annually as needed. Non-priority facilities shall be reviewed as needed. Removal of trash and debris from high priority areas shall occur annually prior to the rainy season.
(e)	Dispose of waste materials			x	x	x	Wastewater Dept.	Develop and implement a procedure to dewater and dispose of materials extracted from catch basins. The procedure shall ensure that water removed during the catch basin cleaning process and waste material will not reenter the MS4.
<i>E.11.h</i>	<i>Operations and Maintenance Activities (O&amp;M)</i>							
E.11.h	Assessment of O&M activities			x	x	x	Stormwater Public Works Depts.	Assess O&M activities for potential to discharge pollutants in stormwater and inspect all O&M BMPs on a quarterly basis.
(a)	Develop and implement a program to assess O&M activities.			x	x	x	Stormwater Public Works Depts.	Develop and implement a program to assess O&M activities and develop applicable BMPs. Include the following O&M activities shall be included: 1) Road & parking lot maintenance including repair of sidewalks, potholes, curb and gutters; pavement marking, sealing and repaving; 2) Bridge maintenance including re-chipping, grinding, saw cutting and painting; 3) Right-of-way maintenance including mowing, herbicide & pesticide application, and planting vegetation; 4) Stormwater relevant City sponsored or sanctioned events; 5) Graffiti removal.
(b)	Identify all materials that could be discharged from each O&M activities.			x	x	x	Stormwater Public Works Depts.	Identify all materials that could be discharged from each O&M activities, and which materials contain pollutants. (Metals, chlorides, hydrocarbons, sediment, green waste, herbicide dried paint, and trash.
(c)	Develop and implement a set of BMPs that will reduce pollutants during O&M activities.			x	x	x	Stormwater Public Works Depts.	Develop and implement a set of BMPs that will reduce pollutants in stormwater and non-stormwater discharges during O&M activities using the CASQA Municipal Handbook or equivalent.

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(d)	Evaluate BMPs quarterly.			x	x	x	Stormwater Public Works Depts.	Evaluate all BMPs implemented during O&M activities quarterly.
<i>E.11.i</i>	<i>Incorporate Water Quality &amp; Habitat Features in Flood Management facilities.</i>							
E.11.i	Develop and implement a process to incorporate water quality and habitat enhancement features.			x	x	x	Public Works CIP Engineer. Engineering	Develop and implement a process to incorporate water quality and habitat enhancement features in the design of all new and rehabilitated flood management projects.
<i>E.11.j</i>	<i>Landscape Design &amp; Maintenance</i>							
E.11.j	Landscape Design & Maintenance		x				Streets & Parks Depts.	Implement a landscape design and maintenance program to reduce the amount of water, pesticides, herbicides and fertilizers used during City operations and activities.
(a)	Evaluate Pesticide, Herbicide, Fertilizer (PHF) Use		x				Streets, Parks & Bldg., Water, wastewater Depts.	Evaluate PHF used and application activities performed and identify pollution prevention and source control opportunities.
(b)	Pesticide, Fertilizer Use BMPs		x				Streets, Parks & Bldg., Water, wastewater Depts.	Implement practices that reduce the discharge of PHFs. At a minimum include items listed below.
(b)(1)	Implement educational activities for City applicators and distributors		x	x	x	x	Streets, Parks & Bldg., Water, wastewater Depts.	City staff that apply herbicides attend 3 hours of training annually.

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(b)(2)	Implement landscape management measures that rely on non-chemical solutions.		x				Streets & Parks Depts.	Implement landscape management measures that rely on non-chemical solutions including: a) amend soils with compost to create drought-resistant soils. b) Create soil microbial community through the use of compost, compost tea, or inoculation, c) Use native and/or climate appropriate plant to reduce the amount of water, PHFs used. d) Practice grass recycling on decorative turf landscape. e) Keep grass clipping and leaves away from waterways by mulching, composting, or landfilling. f) Prevent application of PHFs during irrigation or within 48 hours of a 50% chance of rainfall. g) Limit or replace herbicide and pesticide use. h) Prohibit application of PHFs as required by Dept. of Pesticide. i) Reduce mowing of grass to allow for greater pollutant removal.
(2)(b)(3)	Collect and properly dispose of PHFs.		x	x	x	x	Streets, Parks & Bldg., Water, wastewater Depts.	Collect and properly dispose of PHFs.
(2)(b)(4)	Minimize irrigation run-off by using evapotranspiration-based irrigation schedule and rain sensors.		x	x	x	x	Streets & Parks Depts.	Minimize irrigation run-off by using evapotranspiration-based irrigation schedule and rain sensors.
(2)(c)	Record the types and amounts PHFs used.		x	x	x	x	Streets, Parks & Bldg., Water, wastewater Depts.	The City records the type and amounts of fertilizer and herbicides used. The City contracts pesticide work.
E.12.a	Post Construction Storm Water Management Program							
The City is participating in the Central Coast Joint Effort for Post Construction Requirements which falls under E.12.k and is only								
E.12.d	<i>Source Controls Measures</i>							
E.12.d	Source Controls Measures		x	x	x	x	Community Development	Regulated projects are required to implement source control measures for the listed pollutant generating activities a - r of this section.
E.12.j	<i>Planning &amp; Development Review Process</i>							
E.12.j	Planning & Development Review	x					Community Development Stormwater	Revised codes

Section	Permit Element	Implementation Year					Responsible Department	New BMP Measurable Goal
E.12.k	<i>Post Construction Stormwater Management Requirements Based on Assessment and Maintenance of Watershed Processes.</i>							
E.12.k	Post Construction Storm Water Management Requirements Based on Assessment and Maintenance of Watershed Processes.	x	x	x	x	x	Community Development Stormwater	See BMPs listed below.
E.12.k	Implementation Strategy for LID and Hydromodification Control.	x						Apply interim criteria to new and redevelopment projects until September 6, 2013.
		x	x	x	x	x		
		x						
		x						
		x	x	x				Continue to reference LID manuals.
E.12.k	PC Watershed - Enforceable Mechanisms	x	x	x	x	x	Community Development Stormwater	New regulations are applied to applicable development and redevelopment projects
E.12.k	PC Watershed - Hydromodification Criteria							Criteria is developed
E.12.k	PC Watershed - Applicability Thresholds							Thresholds have been established
<b>E.13</b>	<b>WATER QUALITY MONITORING</b>							
E.13	<i>Water Quality Monitoring</i>							
E.13(c)	Water Quality Monitoring - 303(d) monitoring	x					Stormwater	The City's stormwater system discharges to the Salinas River which is listed on the 303(d) list as being impaired by Chloride, Sodium and pH with urban runoff as one of the sources. The City shall meet with the RWQCB within the first year to assess whether monitoring is necessary and if so, determine the monitoring study design and implementation schedule. The City may choose to participate in a regional monitoring program to create a more comprehensive picture of water quality conditions within the watershed. The regional program must be reviewed and approved by the Executive Officer of the Regional Board.
<b>E.14</b>	<b>PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT</b>							

Section	Permit Element	Implementation Year				Responsible Department	New BMP Measurable Goal	
E.14.a	<i>Program Effectiveness Assessment and Improvement Plan</i>							
E.14.a	Program Effectiveness Assessment and Improvement Plan (PEAIP)		x	x	x	x	Stormwater	Develop and implement a PEAIP that tracks annual and long-term effectiveness of the storm water program. The plan shall identify the strategy used to gauge the effectiveness of prioritized BMPs and program implementation as a whole. Prioritized BMPs include those based on pollutants of concern.
(a)	The Program Effectiveness Assessment and Improvement Plan shall include certain elements.		x	x	x	x	Stormwater	The PEAIP shall include: 1) Overall goal including pollutants of concern and prioritized BMPs. 2) Documentation of the level of implementation of the program elements. 3) Identification and targeting of target audiences. 4) Assessment of BMP performance at achieving outcome levels. 5) Assessment of pollutant source reductions achieved by individual BMPs. 6) Quantification of pollutant loads and pollutant load reductions achieved by the program as a whole. 7) Discharge quality, where available, including analysis of the data. 8) Receiving water quality data, including analysis of the data. 9) Identifiacation of long-term effectiveness assessment, to be implemented beyond the permit term.
(b)	The PEAIP shall assess BMP and program effectiveness in terms of outcome levels.		x	x	x	x	Stormwater	The PEAIP shall assess BMP and program effectiveness in terms of outcome levels: 1) Stormwater program activities. 2)Awareness. 3) Behavior. 4) Pollutant load reductions 5) Discharge Quality. 6) Receiving water conditions.
(c)	The PEAIP shall identify assessment methods for privately owned BMPs		x	x	x	x	Stormwater	The PEAIP shall identify assessment methods for privately owned BMPs

Section	Permit Element	Implementation Year				Responsible Department	New BMP Measurable Goal	
(d)	The PEaip shall identify assessment methods used to quantitatively assess BMP performance at reducing pollutant loads:		x	x	x	x	Stormwater	The PEaip shall identify assessment methods used to quantitatively assess BMP performance at reducing pollutant loads: 1) Direct quantitative measurement of pollutant load removal. 2) Science-based estimates of pollutant load removal for BMPs where direct measurement of pollutant removal is overly challenging. 3) Direct quantitative measurement of behaviors that serve as proxies of pollutant removal or reduction. 4) Visual comparison.
(e)	The PEaip shall ask and answer the following management questions for prioritized BMPs for which answers can be based on quantitative data.		x	x	x	x	Stormwater	The PEaip shall ask and answer the following management questions for prioritized BMPs for which answers to management questions can be based on quantitative data. 1) Were prioritized BMPs implemented in accordance with the permit requirements? Develop quantitative data using confirmation and tabulation. 2) To what extent did prioritized BMPs change the target audience's behavior? Use: a) Surveys or interviews to discern knowledge, attitudes, awareness, behavior of specific population, etc. b) Interviews of site personnel to discern awareness and behavior. c) Inspections or site visits to observe or assess a practice. 3) To what extent did prioritized BMPs reduce pollutant loads from their sources to the storm drain system.
(f)	The PEaip shall include water quality monitoring data.		x	x	x	x		The PEaip shall include water quality monitoring data where available to answer the following long-term management questions, effectiveness of BMPs and overall stormwater program will be assessed in future permit terms.
E.14.b	StormWater Program Modifications							
E.14.b	StormWater Program Modifications					x	Stormwater	
E.15	<b>TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS</b>							
<b>The City does not currently have any TMDLs.</b>								
E.15.a	Comply with all approved TMDLs (Attachment G)							

Section	Permit Element	Implementation Year					Responsible Department	New BMP Measurable Goal
E.15.b	Wasteload allocations are incorporated herein by reference as enforceable parts of this Order							
E.15.c	Regional Board reviews TMDLs within one year of effective date and may propose modifications to requirements							
E.15.d	Report status of implementation via SMARTS							
E.15.e	Comply with Clean Water Act Sections 303d, 306B, and 314							
<b>E.16</b>	<b>ANNUAL REPORTING PROGRAM</b>							
E.16.a	Annual reporting on SMARTS	x	x	x	x	x	Stormwater	The State Water Board SMARTS shall be used to submit a summary of the past year activities for each program element and certify compliance with all requirements of the Permit.
E.16.b	The City shall complete and retain all annual report information on the previous year beginning July 1, and ending June 30.	x	x	x	x	x	Stormwater	The City shall complete and retain all annual report information on the previous year beginning July 1, and ending June 30. All documentation to support the annual report shall be retained and be available for review during normal business hours.
E.16.c	Submit a detailed written online annual report or in-person presentation of the annual report when requested.	x	x	x	x	x	Stormwater	Submit a detailed written online annual report or in-person presentation of the annual report when requested. The detailed annual report must clearly refer to the permit requirements and describe in quantifiable terms, the status of activities undertaken to comply with each requirement.
E.16.d	Permittees involved in regional programs may coordinate with the members to identify reporting responsibility. One report to be submitted.	x	x	x	x	x	Stormwater	Permittees involved in regional programs may coordinate with the members to identify reporting responsibility. The one report to be submitted must include a summary of requirements of the permit for each of the MS4s in the regional program.