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California Regional Water Quality Control Board

Central Coast Region

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August 21, 2008

Ms. Suzanne Healy
City of Santa Cruz
809 Center Street, Room 201
Santa Cruz, CA 95060

Dear Ms. Healy:

WATER BOARD STAFF COMMENTS ON DRAFT STORM WATER MANAGEMENT PROGRAM DATED JULY 25, 2008

On July 25, 2008, the Central Coast Water Quality Control Board (Water Board) received the City of Santa Cruz (City) Draft Storm Water Management Program (SWMP). Water Board staff has reviewed the July 2008 draft SWMP and we find the City has been responsive to much of our previous communication regarding water quality issues.

This letter identifies draft revisions that we require in order to recommend approval of the SWMP. In addition to specific issues identified in the attached Draft Table of Required Revisions, we have three overarching concerns with the SWMP, discussed below. At this point in the process, all of our comments are draft, and will be finalized during the next review of the SWMP.

Update Language

Significant portions of the SWMP focus on describing past actions implemented by the City to manage stormwater. Oftentimes it is unclear if these past efforts are currently being implemented. Rather than include extensive discussions on past actions, the SWMP should clearly identify what is currently being implemented and what will be implemented in the near future.

Effectiveness Assessment

Municipal separate storm sewer systems (MS4s) are required to annually assess the appropriateness and effectiveness of their Best Management Practices (BMPs). The City's BMPs do not have adequate measures of effectiveness to meet this requirement. Effectiveness assessment (program evaluation) discussions in the SWMP are brief and vague, lacking any detail regarding the steps that will be taken to assess the effectiveness of the program.

It is important to assess BMP and program effectiveness so that your program evolves and improves over time. For SWMPs to adequately assess effectiveness, they must include the following components:

1. Assessment of program effectiveness in achieving permit requirements and measurable goals.

2. Assessment of program effectiveness in protecting and restoring water quality and beneficial uses.
3. Identification of quantifiable effectiveness measurements for each BMP, including measurements that link BMP implementation with improvement of water quality and beneficial use conditions.
4. Emphasis on assessment of BMPs specifically targeting primary pollutants of concern.
5. Incorporation of an effectiveness assessment process comparable to that outlined in CASQA's *Municipal Stormwater Program Effectiveness Assessment Guide*.
6. Identification of a range of quantifiable effectiveness measurements that collectively assess effectiveness in terms of regulatory compliance, changes in knowledge and awareness, changes in behavior, and pollutant load reductions, to be used during annual effectiveness assessments. The *Municipal Stormwater Program Effectiveness Assessment Guide* includes useful examples and guidance for assessing effectiveness using these parameters.
7. Identification of quantifiable effectiveness measurements that collectively assess effectiveness in terms of runoff and receiving water quality, to be used during long-term effectiveness assessments (e.g., every three to five years). The *Municipal Stormwater Program Effectiveness Assessment Guide* includes useful examples and guidance for assessing effectiveness using these parameters.
8. Identification of the steps the City will take to revise the SWMP and optimize BMP effectiveness, when effectiveness assessments identify BMPs or programs that are ineffective or need improvement.

To the extent these components are already included in your SWMP or are readily available for inclusion, we expect you to keep them in the SWMP or incorporate them. We expect those effectiveness assessment components included in the forthcoming SWMP to be used in the first annual report's effectiveness assessment. However, we do not expect the forthcoming SWMPs to fully address each of the above components prior to approval. As an alternative, you must include in your SWMP a BMP for development and implementation of an effectiveness assessment strategy. We expect the effectiveness assessment strategy to address each of the items identified above.

An example of the type of language you should include in the SWMP for such a BMP follows:

> "The City will develop an effectiveness assessment strategy during the first full implementation year and submitted as an update to the SWMP with the first annual report. The City will use the effectiveness assessment strategy to conduct effectiveness assessments included in the annual reports, starting with the second annual report. Overall, the strategy will describe the actions the City will take to assess the effectiveness of the SWMP in meeting regulatory requirements and improving water quality and beneficial use conditions. The strategy will specifically address: identification of the processes to be used to conduct effectiveness assessments and improve BMP implementation; identification of quantifiable BMP and program effectiveness measurements; establishment of links between BMP implementation and improvement in water quality and beneficial use conditions; and assessment of BMP implementation in terms of regulatory compliance, changing awareness, changing behavior, pollutant load reductions, and runoff and receiving water quality."

<u>Measurable Goals</u>

The measurable goals included in the SWMP are frequently inadequate, since they simply discuss information that will be tracked or reiterate the BMPs that will be implemented.

Whenever possible, measurable goals that identify the scope and/or magnitude of BMP implementation must be developed and included in the SWMP.

Conclusion

In addition to the above items, we expect the City to make the modifications listed in the following Draft Table of Required Revisions. Please address all revisions (where appropriate) and submit a copy of your amended SWMP no later than **October 3, 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 October 3 draft SWMP from October 6 to October 31 and develop a second draft Table of Required Revisions, which we will make available to you on approximately November 3. We will then post the draft SWMP and Table of Required Revisions on approximately November 3 for a period of 60 days, during which any member of the public, including City staff and officials, can make comments or request a hearing before the Water Board. At the conclusion of the 60-day public comment period, on approximately January 2, Water Board staff will commence final preparation of a recommended action to approve the City of Santa Cruz SWMP, including development of a Response to Comments document and, if necessary, all preparations for a Water Board hearing in late March 2009.

Thank you for your continued efforts to protect water quality and beneficial uses. If you have any questions regarding this matter, please contact **Phil Hammer at (805) 549-3882**, or phammer@waterboards.ca.gov.

Sincerely,

Lisa H McCann

for Roger W. Briggs
Executive Officer

cc: Steve Shimek, Monterey CoastKeeper (by electronic mail)

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DRAFT TABLE of REQUIRED REVISIONS
Draft SWMP Dated July 25, 2008

Acronyms:
BMP - Best Management Practice
SWMP - Storm Water Management Plan
MS4 - Municipal Separate Storm Sewer System

Item Number	SWMP Section	Subject	Problem	Required Revisions
1	BMP # MO-1	Street Sweeping	The SWMP discusses sweeping of primary commercial and beach area streets, as well as residential streets. However, it does not discuss sweeping of other types of streets, such as non-primary streets in industrial or commercial areas. These types of streets can be significant sources of pollutants.	Include a description of street sweeping frequencies for all types of streets. If some streets will not be swept, provide the rationale for not sweeping those streets.
2	BMP # MO-2	Catch Basin Cleaning	The SWMP only discusses inspection and cleaning of catch basins in the downtown and beach flats areas. Inspection and cleaning of catch basins in other areas of the City must also be considered, particularly those areas of the city within the San Lorenzo River watershed.	Include a description of catch basin inspection and cleaning for all areas of the City. If some catch basins are not inspected or cleaned, provide the rationale for not inspecting and cleaning those catch basins.
			The SWMP only discusses cleaning of catch basins on an annual basis. Catch basins that accumulate large amounts of debris should be cleaned more frequently, particularly during the wet season.	Include a description of more frequent cleaning of catch basins that accumulate large amounts of debris.

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3	BMPs # MO-3 and 4	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals that can be used to measure the scope and magnitude of BMP implementation, such as identifying the frequency of cleaning or expected amount of debris that will be collected. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned. Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
4	BMP # MO-5	BMP Maintenance	The SWMP states that the CDS unit will be cleaned at least once per year. This appears to be inadequate. CDS Technologies recommends inspecting and cleaning units every 30 days.	Update the CDS unit maintenance frequency to be in line with recommended maintenance frequencies.
5	BMP # MO-7	Sidewalk and Plaza Cleaning	The SWMP states that the City washes down sidewalks and plazas with a garden hose, allowing washwater to enter the MS4. This activity is in violation of Order No. 2003-0005-DWQ section B.3, which prohibits discharges of non-storm water.	Modify this BMP so that all washwater is captured and appropriately disposed.
6	BMP # MO-8	Sanitary Sewer Maintenance	The SWMP discusses numerous activities conducted by the City in the past to address leaking sanitary sewer lines. However, the SWMP does not discuss future maintenance of the sanitary sewer system, except for development of the lateral inspection program.	Include a discussion of sanitary sewer maintenance that will be conducted.

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7	BMPs # MO-10, 11, 12, and 13	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals that can be used to measure the scope and magnitude of BMP implementation, such as identifying the percentage of dry weather flows that will be diverted. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned. Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
8	Municipal Facilities and Site Specific Operations	Wharf Cleaning	The SWMP states that bird droppings are power washed from wharf structures, but does not discuss capture of washwater. Since birds can be sources of fecal indicator bacteria, the washwater from power washing of bird droppings at the wharf should be minimized and captured wherever possible.	Include a description of BMPs you will implement at the wharf to capture runoff from power washing of bird droppings, wherever possible.
9	BMPs # MO-15, 16, 17, and 18	Measurable Goals	The measurable goals for these BMPs do not identify the scope or magnitude of BMP implementation.	Include quantifiable goals you will use to measure the scope and magnitude of BMP implementation, such as number of training materials that will be distributed, percentage of employees that will be trained, number of meetings that will be held annually, and percentage of contracts that will include boilerplate language. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned.
10	Municipal Operations Program	Municipal Inspections	In many cases, the SWMP does not discuss inspections of municipal operations and facilities. Inspections	Include an inspection schedule for all municipal operations and facilities that have the potential to generate significant levels of

Item Number	SWMP Section	Subject	Problem	Required Revisions
			can be a useful tool in determining if required BMPs are being implemented.	pollutants. Indicate prioritization of facility inspections relative to potential to discharge pollutants to storm drains.
11	Illicit Discharge Detection and Elimination Program	Non-storm Water Discharges	The SWMP states that the City has not identified any authorized non-storm water discharges as being significant contributors of pollutants to the City's MS4. To assure that each type of non-storm water discharge was adequately assessed, a description of the basis for this determination is needed.	Include a description of the assessment conducted for each category of non-storm water discharge to determine that it is not a significant contributor of pollutants to the MS4. If adequate assessments have not been conducted, identify the BMPs that will be implemented for each category of non-storm water discharge that has not been adequately assessed.
12	Illicit Discharge Detection and Elimination Program	Field Screening	The SWMP includes an inspection program that will address illicit discharges from numerous sources, but potential illicit discharges from sources that are not inspected are not addressed. For example, the SWMP does not address illicit discharges from residential areas or many commercial facilities.	Include development and implementation of a citywide field screening program, used to screen representative outfalls for evidence of illicit discharges. Field screening programs should include general steps taken to screen outfalls, procedures to be followed to trace the sources of illicit discharges, and use of field test kits where applicable.
13	Corrective Measures and Enforcement Procedures	Measurable Goals	The measurable goal for this BMP does not identify the scope or magnitude of BMP implementation.	Include a quantifiable goal that can be used to measure the scope and magnitude of BMP implementation, such as the percentage of identified illicit discharges that will be eliminated. Without this kind of measurable goal, you cannot know whether the BMP is as effective as planned.
14	Illicit Discharge Detection and Elimination Program	Stormwater Hotline	The SWMP does not discuss development and implementation of a public stormwater hotline to receive complaints and disseminate stormwater information. A well-publicized hotline can be an effective	Include a BMP for development and implementation of a public stormwater hotline. The BMP must include advertisement of the hotline, tracking of types of complaints received, and tracking of responses.

Item Number	SWMP Section	Subject	Problem	Required Revisions
			means for increasing public participation and eliminating illicit discharges.	
15	Illicit Discharge Detection and Elimination Program	Pet Waste Ordinance	The SWMP does not discuss development and implementation of a pet waste ordinance. Pet waste can be a significant source of fecal indicator bacteria.	Include a BMP for development and implementation of a pet waste ordinance, if one does not already exist.
16	Illicit Discharge Detection and Elimination Program	Household Hazardous Waste Collection	The SWMP does not discuss development and implementation of a household hazardous waste collection program. Collection of household hazardous waste can decrease the likelihood of illicit discharges from residential areas.	Include a BMP for development and implementation of a household hazardous waste program, if one does not already exist.
17	BMP # PP-1	Measurable Goals	The SWMP discusses three kinds of public meetings that will be used to facilitate public participation in the development and implementation of the SWMP. However, the measurable goal for this BMP only states that annual meetings will be conducted. It is unclear if annual meetings will be held for each type of public meeting discussed, or if only one of these three types of public meetings will be held annually.	Identify the number and type of public meetings the City will hold annually and describe how the meetings will be advertised.
18	BMPs # PP-2, 3 and 4	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation. Without these kinds of measurable goals, you cannot know whether the BMPs are	Include quantifiable goals you can use to measure the scope and magnitude of BMP implementation, such as the number of meetings that will be conducted, number of attendees or volunteers expected, number of contacts that will be made, and number of articles, memos, and letters that will be written.

Item Number	SWMP Section	Subject	Problem	Required Revisions
			as effective as planned.	Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
19	Public Participation Program	Plan Development	The discussions included in this section of the SWMP focus heavily on what has been done in the past, reaching all the way back to the late 1990s. Instead, this section should specifically identify what the City is currently doing and will be doing in the future to facilitate public participation.	Describe the City's plan to facilitate public participation. Identify the different categories of the public that will be contacted for participation. For each category, specify the different activities that will be conducted by the City to facilitate public participation. Identify the frequency at which each activity will be conducted.
20	BMPs # PE-1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, and 13.	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals you can use to measure the scope and magnitude of BMP implementation, such as the number or percentage of stencils that will be replaced, number of public events the storm water program will participate in, number of educational materials that will be distributed, frequency that clean ocean businesses will be recognized, number of businesses that will be sent green business program information, number of classes that will be sponsored, dollars that will be contributed, number of volunteers expected, length of coastline that will be cleaned, number of films that will be shown, etc. Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
21	Public Education	Education BMPs	Most of the BMPs listed under the Public Education Program were	Include a BMP to assess community-based social marketing strategies and incorporate

Item Number	SWMP Section	Subject	Problem	Required Revisions
	Program		developed years ago. The Public Education Program must continually assess new public education methods in order to improve the program's effectiveness. One particularly promising approach to public education is community-based social marketing. Community-based social marketing is based upon research in the social sciences that demonstrates that behavior change is most effectively achieved through initiatives delivered at the community level which focus on removing barriers to an activity while simultaneously enhancing the activities benefits. More information on community-based social marketing is available at: http://www.cbsm.com/. Consider the techniques of community-based social marketing when developing, implementing, and assessing your public education and outreach program.	them into your program where appropriate.
22	BMP # PE-11, 12, 13	SWMP Language	The SWMP only states that the City "anticipates" or "intends" to implement these BMPs. The SWMP must include language committing to BMP implementation.	Include language that commits to implementation of these BMPs.
23	Public Education Program	Plan Development	The discussions included in this section of the SWMP focus heavily on what has been done in the past,	Describe the City's plan to implement its public education program now and in the future.

Item Number	SWMP Section	Subject	Problem	Required Revisions
			reaching all the way back to the late 1990s. Instead, this section must specifically identify what the City is currently doing and will be doing in the future to implement its public education program. The City must assess methods to improve and expand its public education program, rather than relying on approaches and materials developed years ago.	
24	Public Education Program and Public Participation Program	Interested Party List	The SWMP does not discuss development and use of an interested party list by the stormwater program. Such a list could be managed electronically to send out email messages addressing storm water issues. Using an interested party email list is a simple means of educating the public on the stormwater program's latest developments.	Include a BMP for developing and using an interested party email list to notify the public of stormwater program developments.
25	Public Education Program	Riparian Restoration and Protection	The SWMP does not educate the public regarding opportunities and activities for riparian restoration and protection. Riparian restoration and protection are important aspects of achieving healthy functioning watersheds.	Include an education component addressing restoration and protection of riparian areas.
26	Public Education Program	Surveys	The SWMP does not discuss conducting surveys to assess the effectiveness of its education efforts. The effectiveness of education efforts must be assessed.	Include surveys in the Public Education Program in order to assess the effectiveness of education efforts.

Item Number	SWMP Section	Subject	Problem	Required Revisions
27	BMP # CON-1	Inspections	The SWMP does not identify the types of construction sites that will be inspected for compliance with the mandatory BMP requirements. In addition, the SWMP does not identify the frequency that various types of construction sites will be inspected.	Identify the types of construction sites that will be inspected for compliance with the mandatory BMP requirements and identify the frequency of inspections for each type.
28	BMP # CON-1, 2, 3, 4, 5, and 6	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals that can be used to measure the scope and magnitude of BMP implementation, such as the percentage of applicable sites that will be inspected, the percentage of violations that will be corrected, the percentage of complaints that will be responded to, the percentage of violations reported, the percentage of applicable employees that will be trained, the number of classes that will be conducted, etc. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned. Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
29	Construction Program	Construction Site Tracking	The SWMP does not discuss a system to track construction sites. Such a system is necessary to ensure that inspections are conducted as needed.	Include a BMP to develop and implement a construction site and inspection tracking system.
30	Construction Program	Inspection Checklist	The SWMP does not discuss development of a construction site inspection checklist to be used by inspectors. An inspection checklist is an important tool to ensure that all	Include a BMP to develop and use a construction site inspection checklist.

Item Number	SWMP Section	Subject	Problem	Required Revisions
			required BMPs are implemented.	
31	Construction Program	Training of Plan Reviewers	The SWMP discusses training of field inspectors, but does not discuss training of plan reviewers regarding construction site BMP requirements.	Include a BMP to train plan reviewers on construction site BMP requirements.
32	BMP # PC-3	Alternative Interim Hydromod-ifcation Criteria	The SWMP discusses development of alternative interim hydromodification criteria, but does not ensure that the alternative criteria will be as protective of beneficial uses as the Central Coast Water Board's criteria presented in our February 15, 2008 letter. Such assurances are necessary to ensure that the alternative criteria will be sufficient to protect and attain healthy watersheds.	Include a statement that the alternative interim hydromodification criteria to be developed will be as protective of beneficial uses as the criteria included in our February 15, 2008 letter. Include a statement that if adequate alternative interim hydromodification criteria are not developed, that the interim criteria included in our February 15, 2008 letter will be used.
33	BMP # PC-3	Low Impact Development	The SWMP briefly mentions Low Impact Development, but does not provide information regarding the expected scale of Low Impact Development implementation. The SWMP must make clear that requirements for new development will maximize implementation of Low Impact Development techniques.	Specify that requirements for new development will maximize implementation of Low Impact Development techniques.
34	BMPs # PC-5 and 6	Long-Term Watershed Protection	The SWMP contains a significant commitment for development of a strategy for long-term watershed protection. However, the SWMP does not discuss an important aspect of protection of watersheds on a long-term basis. For healthy watersheds to ultimately be attained,	Include a plan and schedule to integrate all storm water management control measures into all aspects of land use planning and development (municipal plans, policies, ordinance, codes, conditions of approval, etc.). The plan must serve to define future growth, including infrastructure and redevelopment, in the context of long-term watershed protection.

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			the City must integrate all storm water management control measures into all aspects of its land use planning and development (municipal plans, policies, ordinance, codes, conditions of approval, etc.). Similarly, the City must plan comprehensively to define future growth, including infrastructure and redevelopment, in the context of long-term watershed protection. This should be achieved by working with other municipalities within shared watersheds to pool resources in order to assess watersheds and identify watershed issues.	Working with other municipalities within shared watersheds to pool resources should also be a component of the plan. In addition, the plan must commit to identifying quantifiable measures that achieve desired conditions of healthy watersheds. The SWMP cites a quantifiable measure of 3-10% watershed imperviousness; however, this quantifiable measure should be reevaluated consistent with the framework included in our July 10, 2008 letter.
35	BMP # PC-8	Long-term BMP Maintenance and Monitoring	The process for ensuring long-term BMP maintenance relies solely upon self inspection and certification by the BMP owner. To provide incentive to BMP owners to report BMP maintenance conditions correctly, the City must augment this program with spot inspections of its own. Such inspections will help the City assess if inspection and certification by BMP owners is effective.	Include a spot inspection program for maintenance of post-construction BMPs.
			The SWMP does not discuss development and implementation of a tracking system for approved structural or treatment BMPs. A tracking system is necessary so that	Include a tracking system for structural or treatment BMPs.

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			the City is aware of BMP locations and can assess maintenance conditions.	
36	BMPs # PC-7, 8, and 9	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals that can be used to measure the scope and magnitude of BMP implementation, such as the percentage of applicable sites that will be inspected, the percentage of sites required to submit maintenance agreements, and the percentage of violations corrected. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned. Use the measurable goals currently identified in the SWMP as effectiveness measurements.
37	BMPs # PC-10 and 12	Measurable Goals	The measurable goals for these BMPs do not identify the scope or magnitude of BMP implementation.	Include quantifiable goals you can use to measure the scope and magnitude of BMP implementation, such as the number of brochures that will be distributed or the number of training classes that will be held. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned.
38	Post Construction Storm Water Management Program	CEQA Checklist	The SWMP does not discuss review and revision of the CEQA initial study checklist to ensure that runoff quality and quantity are considered.	Include review and revision (if necessary) of the CEQA initial study checklist to ensure that runoff quality and quantity are considered by the list, or, through other means insure that CEQA analysis is based on complete information on stormwater BMPs, including the types, sizes, and locations of structural BMPs.
39	Attachment 15	Properly Design Parking Lot	The manual requires infiltration and treatment of parking lot runoff by oil	Require use of effective treatment BMPs that infiltrate runoff, rather than oil and sediment

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		Areas	and sediment traps. These BMPs do not infiltrate runoff. Moreover, they are typically not the most effective BMPs at reducing pollutant discharges. More effective treatment BMPs that infiltrate runoff, such as bioswales, must be required to treat parking lot runoff.	traps.
40	Attachment 15	Structural and Treatment Control BMPs	The manual states that structural or treatment control BMPs "may" be required "where applicable and appropriate." Use of such language leads to uncertainty regarding when the requirements will be applied. Structural or treatment control BMPs must be required for all projects falling into one of the applicability categories listed on page 2 of the Development and Remodeling Projects manual.	Require structural or treatment BMPs for all projects that fall into one of the project categories listed on page 2 of the Development and Remodeling Projects manual.
41	Attachment 15	Structural and Treatment Control BMPs	The manual does not include a process for project proponents to follow to identify structural or treatment control BMPs that will be effective in removing development projects' pollutants of concern. Without such a process, ineffective BMPs will be proposed and may be constructed as part of development projects. The SWMP must include a process to clearly identify structural or treatment BMPs that will be effective at reducing discharges of development projects' pollutants of	Include a process to clearly identify structural or treatment BMPs that will be effective at reducing discharges of development projects' pollutants of concern.

Item Number	SWMP Section	Subject	Problem	Required Revisions
			concern.	
42	BMPs # IF-1, 2, and 3	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals that can be used to measure the scope and magnitude of BMP implementation, such as frequency of inspections or number of sites that will be inspected annually. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned. Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
43	BMP # CF-5	Mobile Businesses	The BMP to "follow-up on mobile cleaning issues as needed" is too vague. The SWMP must include specific activities the City will implement to address discharges from mobile businesses.	Identify the specific activities the City will implement to address discharges from mobile businesses.
44	BMPs # CF-1, 2, 3, 4, and 5	Measurable Goals	The measurable goals for these BMPs only discuss the information that will be tracked, rather than identifying the scope and magnitude of BMP implementation.	Include quantifiable goals you can use to measure the scope and magnitude of BMP implementation, such as frequency of inspections that will be conducted, number of sites that will be inspected annually, percentage of violations that will be corrected, frequency that clean ocean businesses will be recognized, etc. Without these kinds of measurable goals, you cannot know whether the BMPs are as effective as planned. Consider using the measurable goals currently identified in the SWMP as effectiveness measurements.
45	BMP # TMDL-3	Wasteload Allocation	The SWMP states that Wasteload Allocation Attainment Plans will be	Include a BMP committing to develop, submit, and implement Wasteload Allocation

Item Number	SWMP Section	Subject	Problem	Required Revisions
		Attainment Plans	developed "budget dependent." Development and inclusion of Wasteload Allocation Attainment Plans in the SWMPs are necessary to meet the provisions of adopted TMDLs, which specify that measures to achieve wasteload allocations be included in the SWMPs. Due to the significant challenge of meeting wasteload allocations, the comprehensive planning approach represented by the Wasteload Allocation Attainment Plans is needed. As such, the Central Coast Water Board requested the Wasteload Allocation Attainment Plans under the authority of California Water Code section 13267. Failure to develop and submit adequate Wasteload Allocation Attainment Plans may subject the City to the enforcement provisions of California Water Code section 13268.	Attainment Plans, as requested by the Central Coast Water Board in its July 2, 2008 letter.
46	BMP # TMDL-3	Wasteload Allocation Attainment Plans	The SWMP does not specify the types of information that will be included in the Wasteload Allocation Attainment Plans. Such detail is needed to ensure the Wasteload Allocation Attainment Plans will be adequate to attain the City's wasteload allocations and restore the water quality and beneficial uses of the subject impaired waters.	Include a basic description of the information that will be included in the Wasteload Allocation Attainment Plans. The information to be included in the Wasteload Allocation Attainment Plans must be consistent with the expected contents of the Wasteload Allocation Attainment Plans, as identified in the Water Board's July 2, 2008 letter.

Item Number	SWMP Section	Subject	Problem	Required Revisions
47	Table 9-1	Pollutants of Concern	Table 9-1 does not identify which primary pollutants of concern the BMPs listed in the table are targeting. To exhibit that the SWMP is targeting the City's primary pollutants of concern, the BMPs in Table 9-1 must clearly be linked to the primary pollutants of concern they are expected to address.	Identify the primary pollutants of concern that are specifically addressed by each of the BMPs listed in Table 9-1.
48	Table 9-1	Previous Comments on BMPs	We have commented on many of the BMPs listed in Table 9-1 in previous sections of this letter. Table 9-1 should be updated accordingly.	Modify Table 9-1 consistent with comments in other sections of this letter.