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Agency Secretary

California Regional Water Quality Control Board

Central Coast Region

Arnold Schwarzenegger
Governor

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August 21, 2008

Mr. Ken Anderson
City of Scotts Valley
One Civic Center Drive
Scotts Valley, CA 95066

Dear Mr. Anderson:

WATER BOARD STAFF COMMENTS ON DRAFT STORM WATER MANAGEMENT PLAN, CITY OF SCOTTS VALLEY, SANTA CRUZ COUNTY

On August 1, 2008, the Central Coast Water Quality Control Board (Water Board) received the City of Scotts Valley (City) Draft Storm Water Management Plan (SWMP). Water Board staff has reviewed the August 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 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 four 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.

Current Practices
The SWMP focuses on future implementation, without giving significant discussion to the current best management practices (BMPs) that are being implemented to manage stormwater and reduce pollutant discharges. Include BMPs that are currently being implemented in the SWMP, in addition to the BMPs that will be implemented in the future. Since they are already being implemented, current BMPs should be described in detail in the SWMP. This will provide a complete picture of the City's efforts to manage stormwater.

Level of Detail
The level of detail used in the SWMP to describe the BMPs that are being implemented or will be implemented is often insufficient. While lengthy discussions of background information are not necessary, detailed information about BMPs is a vital part of the SWMP. The SWMP identifies BMP programs, but often does not provide specifics regarding the BMPs or their implementation. For each of the various BMP programs currently implemented, the specific BMPs used in those situations must be identified and described. Likewise, for BMP programs that will be developed, provide steps you will take to develop those BMP programs need to be provided.

Measurable Goals
The SWMP's measurable goals and effectiveness measurements must be improved. At times, the measurable goals are inadequate, only providing detail to the BMPs that will be

implemented, rather than identifying the scope and/or magnitude of BMP implementation. Other times, adequate measurable goals are identified, but they are categorized as effectiveness measurements. "Measurable goals" that only describe BMPs should be moved under the BMP discussion. "Effectiveness measurements" that identify the scope and/or magnitude of BMP implementation should be moved under the discussion for measurable goals. Once these modifications to the SWMP are made, new measurements of effectiveness will need to be developed (see below).

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 discussions in the SWMP often identify measurable goals, rather than specifying how effectiveness will be measured.

It is important to assess BMP and program effectiveness so that your program evolves and improves over time. For SWMPs to adequately assess effectiveness, we expect them to 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 that 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. 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 is as 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 that will be taken 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."

In addition, we included numerous comments regarding effectiveness assessment in the attached Draft Table of Required Revisions. We expect the City to address these comments in the forthcoming SWMP to the extent practicable, with the understanding that the City may need to address a segment of the comments during the development of the effectiveness assessment strategy. We expect those effectiveness measurements included in the forthcoming SWMP to be used for the first annual report's effectiveness assessment.

Conclusion

In addition to the above items, we expect the City to make the modifications listed in the attached 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 Scotts Valley 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., or Matt Thompson at (805) 549-3159 or mthompson@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 City of Scotts Valley Storm Water Management Plan

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

Item Number	SWMP Section	Subject	Issue	Required Revisions
1	Public Education and Outreach	Level of detail	The SWMP discusses education related to the household hazardous waste program, lawn and gardening activities, and school children. However, more information is needed regarding the educational content of these efforts. A description of the type of information that will be conveyed is needed. For example, educational efforts should convey the potential stormwater quality problems associated with the targeted audience or activity, as well as the appropriate actions that can be taken to avoid the water quality problems.	Include a description of the type of information that will be conveyed with each educational effort.
2	Public Education and Outreach	Classroom Education	The SWMP states the classroom education BMP is reliant upon the City being invited into the classroom by the schools. It is not clear that the City will initiate contact with the schools to facilitate invitation. A proactive approach to classroom education is needed.	Include a description of the steps that will be taken by the City to facilitate invitation into the classroom for stormwater education of schoolchildren.

Item Number	SWMP Section	Subject	Issue	Required Revisions
3	Public Education and Outreach	Interested Party List	The SWMP does not discuss development and use of an interested party list by the stormwater program. Such a list can be managed electronically to send out email messages addressing stormwater issues. Using an interested party email list is a simple means of educating interested parties on the stormwater program's latest developments.	Include a BMP for developing and using an interested party email list to notify interested parties of stormwater program developments.
4	Public Education and Outreach	Education BMP Progression	The SWMP includes several educational approaches that have traditionally been used by stormwater programs. However, 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 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-	Include a BMP to assess community-based social marketing strategies and incorporate them into your program where appropriate.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			based social marketing is available at: http://www.cbsm.com/. The techniques of community-based social marketing should be considered when developing, implementing, and assessing your public education and outreach program.	
5	Public Education and Outreach	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.
6	Public Education and Outreach	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.
7	Public Education and Outreach	Website	The SWMP does not discuss use of the City's website to convey stormwater information to the public. Websites are relatively simple education tools that are increasingly used by the public.	Include a BMP for development and implementation of a stormwater website.
8	Public Education and Outreach / Public Participation	Interaction with the Public	The SWMP does not discuss use of public presentations, workshops, or other events as means of educating the public on stormwater issues and getting them involved in the program. These events provide the opportunity for direct interaction with the general public.	Include a BMP for development and implementation of educational public presentations, workshops, or other events.

Item Number	SWMP Section	Subject	Issue	Required Revisions
9	Public Education and Outreach	Newspaper	The SWMP does not discuss use of the local newspaper as a means of educating the public on stormwater issues. Local newspapers are an effective means to reach a large portion of the public.	Include a BMP for use of the local newspaper for stormwater education.
10	Public Education and Outreach	Education BMP Content	The public education BMPs do not address pet waste, trash, or pollutants from automotive activities. These pollutants are frequent sources of stormwater pollutants.	Include educational BMPs addressing pet waste, trash, and pollutants from automotive activities.
11	Public Education and Outreach	Pollutants of Concern	It is not clear how the education BMPs included in the SWMP target the primary pollutants of concern for the City (fecal indicator bacteria and sediment). The SWMP must be tailored to directly address the City's primary pollutants of concern.	Include information describing how the education BMPs directly address fecal indicator bacteria and sediment.
12	Public Education and Outreach	Regional Partnerships	The SWMP does not discuss participation in regional partnerships for the purpose of educating the public on stormwater issues.	Include a BMP for assessing opportunities for participating in regional partnerships.
13	Public Education and Outreach	Effectiveness Measurements	Many of the items identified as effectiveness measurements in this section are more accurately termed measurable goals. Measurable goals identify the scope and magnitude of BMP implementation. Effectiveness measurements identify the information that will be collected and measured to assess BMP effectiveness. Identification of appropriate effectiveness measurements is needed.	Identify effectiveness measurements for each BMP, such as conducting surveys, conducting pre- and post-education quizzes, tracking the amount of hazardous material collected, tracking the number of illicit discharges identified, tracking the number of violations identified, etc. Consider using the effectiveness assessments currently identified in the SWMP as measurable goals.

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14	Public Participation	Storm Drain Stenciling	The text for this BMP found in Table 2-1 states that 25% of the City's storm drains will be stenciled each year. However, the table also shows this BMP only being implemented in years 2 through 4. This would leave 25% of the storm drains not stenciled.	Stencil storm drains for years 2 through 5 to ensure all storm drains are stenciled.
15	Public Participation	Effectiveness Measurements	Many of the items identified as effectiveness measurements in this section are more accurately termed measurable goals. Measurable goals identify the scope and magnitude of BMP implementation. Effectiveness measurements identify the information that will be collected and measured to assess BMP effectiveness. Identification of appropriate effectiveness measurements is needed.	Identify effectiveness measurements for each BMP, such as tracking the number of illicit discharges detected, weighing the amount of trash collected, tracking the length of stream cleaned, tracking the number of complaints to the hotline, etc. Consider using the effectiveness assessments currently identified in the SWMP as measurable goals.
16	Public Participation	SWMP Development and Implementation	The SWMP does not discuss involving the public in SWMP development and implementation. Promotion of public participation in SWMP development and implementation, in accordance with public notification and hearing requirements, is needed.	Include a BMP to promote public participation in SWMP development and implementation, in accordance with public notification and hearing requirements.
17	Illicit Discharge Detection and Elimination	High Priority Areas	The SWMP does not discuss procedures for identifying priority areas likely to have illicit discharges. Identification of such areas can help guide efforts to eliminate illicit discharges.	Include procedures to identify priority areas that are likely to have illicit discharges.

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18	Illicit Discharge Detection and Elimination	Illicit Discharge tracking	Procedures to trace the sources of illicit discharges, once detected, are not discussed. Such procedures are important tools in the elimination of illicit discharges.	Include procedures to trace the sources of illicit discharges.
19	Illicit Discharge Detection and Elimination	Enforcement	The SWMP does not include a description of the procedures that will be used to eliminate identified sources of illicit discharges. This information is necessary to ensure that City staff are aware of the procedures to eliminate illicit discharges effectively.	Include a description of the specific procedures and corrective actions that will be used to eliminate various sources of illicit discharges.
20	Illicit Discharge Detection and Elimination	Pollutants of Concern	It is unclear how this section of the SWMP directly targets the City's primary pollutants of concern (fecal indicator bacteria and sediment). BMPs do not appear to be tailored to address primary pollutants of concern within the City.	Include new BMPs or tailor existing BMPs to target illicit discharges from potential sources of the primary pollutants of concern.
21	Illicit Discharge Detection and Elimination	Non-stormwater Discharges	The SWMP does not include a complete analysis of allowable non-stormwater discharges to determine if the discharges are significant sources of pollutants. While some of the discharges are identified as being insignificant within the City, others are not analyzed.	Include an analysis of allowable non-stormwater discharges to determine if any are significant sources of pollutants. For those discharges that are determined to be a significant source of pollutants, prohibit the discharges or identify the BMPs that will be required for the discharges. For those discharges that are determined to not be a significant source of pollutants, provide the rationale for this determination.
22	Illicit Discharge Detection and Elimination	MS4 Map	The SWMP does not address updating of the MS4 map. As the MS4 grows or is changed, the map of the MS4 must be updated	Include a BMP for regular updating of the completed sections of the MS4 map, such as on an annual basis.

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			regularly.	
23	Illicit Discharge Detection and Elimination	MS4 Maintenance	The SWMP does not discuss inspection for illicit connections/discharges during standard MS4 inspection and maintenance. MS4 inspection and maintenance is an important opportunity for identification of illicit connections/discharges.	Include a BMP to inspect for illicit connections/discharges during standard MS4 inspection and maintenance.
24	Illicit Discharge Detection and Elimination	Illicit Discharge Elimination	The SWMP does not clearly state that all detected illicit discharges from all sources will be eliminated.	Clearly state that all detected illicit discharges from all sources will be eliminated.
25	Illicit Discharge Detection and Elimination	Stormwater Ordinance	The SWMP states that an ordinance will address failing septic systems and sewer laterals, illicit connections, and illegal disposal activities. It is unclear if this list is intended to address all illicit discharges. An ordinance must be developed that prohibits all illicit discharges.	Include development of an ordinance that prohibits all illicit discharges.
26	Illicit Discharge Detection and Elimination	Illicit Connections and Discharges	The SWMP discusses conducting inspections of businesses to identify and eliminate illicit connections. The inspections should also be used for identifying potential illicit discharges and inadequate BMP implementation.	Modify the business inspections to include inspection for potential illicit discharges and inadequate BMP implementation.
27	Illicit Discharge Detection and Elimination	Field Screening	The SWMP does not include a dry weather screening program to identify illicit discharges. Field screening involves investigating priority MS4 locations for evidence of illicit discharges, conducting	Include a BMP for development and implementation of a dry weather screening program. Identify the locations of the MS4 to be screened. Describe the general steps that will be taken to screen outfalls, including consideration of field test kits to identify illicit

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			source tracking if evidence of illicit discharges is found, and eliminating identified sources of illicit discharges. Since illicit discharges are not always visible, use of field test kits during screening should be considered.	discharges.
28	Illicit Discharge Detection and Elimination	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.
29	Illicit Discharge Detection and Elimination	Training	The SWMP does not discuss training of municipal staff regarding illicit discharge detection and elimination. Since municipal staff are often in the field, they can be useful in identifying illicit discharges.	Include a BMP for training municipal staff on illicit discharge identification, control, and elimination. Include training of spill response staff.
30	Illicit Discharge Detection and Elimination	Effectiveness Measurements	Many of the items identified as effectiveness measurements in this section are more accurately termed measurable goals. Measurable goals identify the scope and magnitude of BMP implementation. Effectiveness measurements identify the information that will be collected and measured to assess BMP effectiveness. Identification of appropriate effectiveness measurements is needed.	Identify effectiveness measurements for each BMP, such as tracking the number of illicit discharges detected and eliminated and tracking the percentage of businesses in compliance. Consider using the effectiveness assessments currently identified in the SWMP as measurable goals.
31	Construction Site Stormwater Runoff Control	Enforcement	The SWMP does not describe the escalating enforcement process that will be used for non-compliant construction sites.	Describe the escalating enforcement process that will be used for non-compliant construction sites. Identify the different enforcement mechanisms available,

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				including penalty provisions, and the conditions under which each mechanism will be used.
32	Construction Site Stormwater Runoff Control	Construction Site Tracking	The SWMP does not discuss a system to track construction sites. Such a system is necessary to ensure that BMPs are implemented and inspections are conducted as needed.	Include a BMP to develop and implement a construction site and inspection tracking system.
33	Construction Site Stormwater Runoff Control	Inspections	The SWMP does not provide information regarding what will be included in the construction site inspection program. Confirmation is needed that the program will identify the types of construction sites to be inspected and the frequency at which inspections will be conducted. Development of checklists to be used by inspectors during inspections is also needed.	Include a description of the information that will be developed as part of the construction inspection program. Confirm that the types of construction sites to be inspected will be identified, as well as the corresponding inspection frequencies. Confirm that checklists for use during inspections will be developed.
34	Construction Site Stormwater Runoff Control	Training and Education	The SWMP does not address training and education regarding construction stormwater issues. Municipal plan review and inspection staff must be trained on construction issues and requirements. Likewise, contractors, developers, etc. must be educated on the City's construction BMP requirements.	Include a BMP for training and education of municipal staff and the development community regarding construction stormwater issues and requirements.
35	Construction Site Stormwater Runoff Control	Effectiveness Measurements	Many of the items identified as effectiveness measurements in this section are more accurately termed measurable goals. Measurable	Identify effectiveness measurements for each BMP, such as tracking the number of construction sites in compliance with requirements and tracking the number of

Item Number	SWMP Section	Subject	Issue	Required Revisions
			goals identify the scope and magnitude of BMP implementation. Effectiveness measurements identify the information that will be collected and measured to assess BMP effectiveness. Identification of appropriate effectiveness measurements is needed.	construction-related complaints received. Consider using the effectiveness assessments currently identified in the SWMP as measurable goals. Expand on the measurable goals to better represent the scope and magnitude of BMP implementation. For example, identify the percentage of construction sites to which plan review processes will be applied and identify inspection frequencies for various types of construction sites.
36	Post Construction Stormwater Management	Post Construction BMPs	The SWMP does not state that structural and non-structural BMP implementation will be required at new development and redevelopment projects.	Include a BMP to require structural and non-structural BMP implementation by new development and redevelopment projects.
37	Post Construction Stormwater Management	Alternative Interim Hydro-modification Criteria	The SWMP states that alternative interim hydromodification criteria will be developed in Year 2. As indicated in our July 10, 2008 letter, development of alternative interim hydromodification criteria must be developed and implemented within one year of SWMP adoption.	Modify the alternative interim hydromodification criteria schedule so that the criteria is developed and implemented within one year of SWMP adoption.
38	Post Construction Stormwater Management	Alternative Interim Hydro-modification 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 so that the alternative criteria will be	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. Also include a statement that if adequate alternative interim hydromodification criteria are not developed, that the interim criteria included in the Water Board's February 15, 2008 letter will be used.

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			sufficient to protect and attain healthy watersheds.	
39	Post Construction Stormwater Management	Long-term Hydro-modification Criteria	As part of the Hydromodification Management Plan BMP, the SWMP references the Santa Cruz County municipalities' effort to develop alternative interim hydromodification criteria, but does not discuss development of long-term watershed-based hydromodification criteria. Alternative interim hydromodification criteria are only expected to be used until long-term hydromodification criteria, based on watershed conditions, are developed and incorporated into the Hydromodification Management Plan. If the alternative interim hydromodification criteria are expected to be used over the long-term as part of the Hydromodification Management Plan, the appropriateness of the criteria for the watersheds to which they will be applied must be assessed.	Include a BMP and schedule for development of long-term watershed-based hydromodification criteria to be incorporated into the Hydromodification Management Plan. If alternative interim hydromodification criteria are anticipated to eventually be used as long-term watershed-based hydromodification criteria in the Hydromodification Management Plan, include a BMP and schedule for determining the appropriateness of the interim criteria for use in the City's watersheds. The City should base this determination on the technical assessment of the impacts of urbanization on the subject watersheds and the effectiveness of the alternative interim hydromodification criteria in controlling those impacts. An adequate technical assessment will evaluate the following: (1) downstream affects (stream stability); (2) adequacy of buffer zone requirements; (3) extent of application of interim criteria (e.g., number of projects to which criteria were applied); and (4) specific performance and monitoring data for installed hydromodification control infrastructure.
40	Post Construction Stormwater Management	Hydro-modification Management Plan	The SWMP discusses development of a watershed-based Hydromodification Management Plan, but does not provide sufficient detail regarding the information and requirements that will be developed	Identify the information and requirements that will be incorporated into the long-term watershed-based Hydromodification Management Plan, including: numeric criteria for controlling runoff volume and rates, numeric criteria for stream stability, applicability criteria

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			as part of the plan. As discussed in the Water Board's February 15, 2008 letter, long-term control standards for hydromodification must include numeric criteria for controlling runoff volume and rates, numeric criteria for stream stability, applicability criteria (with land disturbance acreage thresholds and exemptions), performance criteria for control BMPs, an inspection program for maintenance of control BMPs, and hydromodification and LID education for municipal staff. Likewise, the SWMP does not provide detail regarding the steps that will be taken to develop the Hydromodification Management Plan. The SWMP must identify the process that will be followed to develop the plan to ensure an adequate plan will be developed.	(with land disturbance acreage thresholds and exemptions), performance criteria for control BMPs, an inspection program for maintenance of control BMPs, and hydromodification and LID education for municipal staff. Identify the key steps in the process that will be used to develop the Hydromodification Management Plan. Examples of steps that should be considered include: (1) development of problem statement and objectives; (2) review of literature and data availability; (3) characterization of watershed and future development patterns; (4) determination of assessment methodology; (5) development of criteria and guidance; and (6) development of an implementation strategy.
41	Post Construction Stormwater Management	Long-term Watershed Protection	The SWMP contains a commitment for development of a watershed-based hydromodification management plan. However, the SWMP does not discuss an important aspect of long-term watershed protection. For healthy watersheds to ultimately be attained, the City must integrate all stormwater management control measures into all aspects of its land	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. Working with other municipalities within shared watersheds to pool resources should also be a component of the plan. In addition, the plan

Item Number	SWMP Section	Subject	Issue	Required Revisions
			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.	must commit to identifying quantifiable measures that achieve desired conditions of healthy watersheds. Refer to the framework included in our July 10, 2008 letter for guidance.
42	Post Construction Stormwater Management	Buffer Zones	The SWMP does not include a strategy to adopt and implement measures to protect riparian areas and wetlands.	Include a BMP for adoption and implementation of measures to protect riparian areas and wetlands. Include establishment of a 30-foot buffer zone for riparian areas and wetlands, as well as establishment of more substantial buffers where necessary, based on habitat degradation, water quality, and land management practices.
43	Post Construction Stormwater Management	Current Standards	The SWMP does not discuss the current standards applied to development and redevelopment projects to protect water quality and beneficial uses.	Include a BMP describing the current standards applied to development and redevelopment projects to protect water quality and beneficial uses. Confirm that these standards will continue to be applied to development and redevelopment projects until the standards are updated to incorporate alternative interim hydromodification criteria, LID requirements, and other standards.

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44	Post Construction Stormwater Management	Pollutant Discharge Reductions	The SWMP does not discuss requirements you will apply to development projects to reduce pollutant discharges and protect beneficial uses, such as: (1) requirements for implementation of structural and non-structural BMPs to treat runoff and reduce pollutant discharges from development projects; (2) requirements to maintain pre-development runoff conditions; (3) numeric volume- and flow-based treatment BMP sizing criteria; (4) requirements ensuring treatment BMPs are effective at removing pollutants of concern; (5) requirements for site design measures such as development clustering, maximization of trees and vegetation, minimization of vegetation clearing, and vegetating parking islands; (6) requirements for protection of slopes and channels from eroding; (7) requirements for storm drain signage or stenciling at new inlets; (8) requirements for properly designed outdoor material and trash storage areas; and (9) other specific requirements applicable to various categories of development.	Incorporate the required BMPs into the SWMP.
45	Post Construction Stormwater	Low Impact Development	The SWMP briefly mentions LID, but does not provide information regarding the expected scale of LID	Specify that requirements for new development will maximize implementation of LID techniques.

Item Number	SWMP Section	Subject	Issue	Required Revisions
	Management		implementation. The SWMP must make clear that requirements for new development will maximize implementation of LID techniques.	
46	Post Construction Stormwater Management	Runoff treatment and control	The SWMP does not discuss inspecting runoff treatment and control BMPs during construction to verify that they are built according to plans. This is needed to ensure that BMP will be as effective as planned.	Include inspections of BMPs during construction to verify they are built according to plans.
47	Post Construction Stormwater Management	Tracking BMPs	The SWMP does not include a tracking system for approved structural BMPs. Such a system is needed to prioritize and inspect the structural BMPs.	Include a tracking system for approved structural BMPs.
48	Post Construction Stormwater Management	CEQA Checklist	The SWMP does not discuss review and revision of the CEQA initial study checklist to ensure runoff quality and quantity are considered.	Include review and revision (if necessary) of the CEQA initial study checklist to ensure t runoff quality and quantity are considered by the list, or, through other means ensure that CEQA analysis is based on complete information on stormwater BMPs, including the types, sizes, and locations of structural BMPs.
49	Post Construction Stormwater Management	General Plan	The SWMP does not discuss review and revision of the General Plan to ensure that runoff quality and quantity are addressed in the plan.	Include review and revision (if necessary) of the General Plan to ensure runoff quality and quantity are addressed by the plan.
50	Post Construction Stormwater Management	Education	The SWMP does not discuss education regarding post construction stormwater requirements. Both city staff (engineers and planners) and the development community (designers, contractors, developers, etc.) must	Include a BMP for education on post construction BMP requirements.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			be educated. Educational topics must include hydromodification, LID, and other development requirements.	
51	Post Construction Stormwater Management	Inspection	The SWMP discusses inspecting post construction BMPs once within three years of construction to ensure adequate maintenance. However, it is unclear if post construction BMPs will ever be inspected again following this initial inspection. BMPs must continue to be periodically inspected to ensure proper maintenance.	Expand periodic inspections of post construction BMPs beyond the initial three year period.
52	Post Construction Stormwater Management	Effectiveness Measurements	Many of the items identified as effectiveness measurements in this section are more accurately termed measurable goals. Measurable goals identify the scope and magnitude of BMP implementation. Effectiveness measurements identify the information that will be collected and measured to assess BMP effectiveness. Identification of appropriate effectiveness measurements is needed.	Identify effectiveness measurements for each BMP, such as tracking the percentage of BMPs adequately maintained and tracking the number of projects implementing LID and hydromodification controls. Consider using the effectiveness assessments currently identified in the SWMP as measurable goals.
53	Post Construction Stormwater Management	Application of Standards	The SWMP does not identify the types or categories of projects to which treatment BMP and hydromodification requirements will be applied. This information is needed to ensure pollutants and runoff are controlled from all appropriate projects.	Identify the types or categories of projects to which treatment BMP and hydromodification requirements will be applied.

Item Number	SWMP Section	Subject	Issue	Required Revisions
54	Post Construction Stormwater Management	LID Guidelines Language	Some of the language of this BMP is vague and ambiguous. Use of words such as *applicable* and *as appropriate* lead to uncertainty regarding when the requirements will be applied. Identification of the specific conditions when LID provisions will be required is needed.	Identify the specific conditions when LID provisions will be required. Minimize the use of words such as *applicable* and *as appropriate.*
55	Post Construction Stormwater Management	TMDLs	The SWMP does not discuss how the Camp Evers Creek/Carbonera Creek pathogens TMDL will be addressed. Likewise, the sediment TMDL for the San Lorenzo River and tributaries is only briefly mentioned. To adequately address these TMDLs, Wasteload Allocation Attainment Plans are needed. 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. In its July 2, 2008 letter the Central Coast Water Board requested the Wasteload Allocation Attainment Plans under the authority	Include a BMP committing to develop, submit, and implement Wasteload Allocation Attainment Plans, as requested by the Central Coast Water Board in its July 2, 2008 letter.

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			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.	
57	Municipal Operations	Effectiveness Measurements	Many of the items identified as effectiveness measurements in this section are more accurately termed measurable goals. Measurable goals identify the scope and magnitude of BMP implementation. Effectiveness measurements identify the information that will be collected and measured to assess BMP effectiveness. Identification of appropriate effectiveness measurements is needed.	Identify effectiveness measurements for each BMP, such as tracking the amount of debris collected from catch basins, tracking the number of deficiencies noted during inspections, and conducting pre- and post-training quizzes. Consider using the effectiveness assessments currently identified in the SWMP as measurable goals. Expand on the measurable goals to better represent the scope and magnitude of BMP implementation. For example, identify minimum street sweeping frequencies and the percentage of personnel that will be trained.
58	Municipal Operations	Inspections	The SWMP discusses inspections of facilities that store hazardous materials, but does not address inspection of other municipal facilities. A regular inspection schedule of pollutant generating municipal facilities and activities is needed. Inspections can be a useful tool in determining if required BMPs are being implemented.	Include an inspection schedule for all municipal operations and facilities and have potential to generate significant levels of pollutants.
59	Municipal Operations	Maintenance	The SWMP discusses developing BMPs for use during street maintenance, but does not discuss	Include a BMP in the SWMP to develop specific BMPs for use during municipal maintenance activities, such as building,

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			development of BMPs for other maintenance activities, such as building, park, bridge, MS4, and fleet maintenance. BMPs need to be identified for all activities that have potential to discharge pollutants.	park, bridge, MS4, and fleet maintenance.
60	Municipal Operations	Municipal BMPs	The SWMP does not discuss the BMPs that will be implemented at various municipal locations, such as the municipal yard, parks, city hall, etc. BMPs need to be identified for all locations that have the potential to discharge pollutants. For example, BMPs for municipal yards should include designated areas for vehicle and equipment washing and covered areas for material and waste storage.	Include a BMP in the SWMP to develop specific BMPs for use at various municipal locations, such as the municipal yard, parks, and city hall.
61	Municipal Operations	Municipal Parking Lot Sweeping	The SWMP does not discuss sweeping of municipal parking lots. Parking lots can be significant sources of pollutants and must be swept regularly.	Include a sweeping schedule for all municipal parking lots.

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62	Municipal Operations	Municipal Training	The SWMP discusses training of municipal personnel, but only in general terms. More information is needed regarding the personnel that will be trained and the specific topics of the training. Municipal personnel should receive general information regarding stormwater, as well as activity specific training related directly to their duties. Examples of the types of personnel that need activity specific training include personnel that conduct building, park, bridge, MS4, and fleet maintenance.	Identify groups of personnel who will be trained and the specific topics of the training.
63	Municipal Operations	Grounds Maintenance	The SWMP does not discuss pollution prevention and other BMPs to be used during landscaping, lawn care, and other grounds maintenance. Pollution prevention and other BMPs, such as integrated pest management and postponement of pesticide/herbicide application prior to predicted rain, need to be included in the SWMP.	Identify pollution prevention and other BMPs to be used during landscaping, lawn car, and other grounds maintenance. Include integrated pest management and postponement of pesticide/herbicide application prior to predicted rain as BMPs.
64	Municipal Operations	MS4 Inspection and Maintenance	The SWMP does not discuss inspection and maintenance of the MS4. High priority sections of the MS4 must be inspected and maintained regularly, particularly where debris accumulates during the wet season.	Include a BMP describing the steps that will be taken to inspect and maintain the MS4. Identify high priority areas that accumulate debris during the wet season for regular inspection and maintenance.
65	Municipal Operations	Spill Response	The SWMP does not discuss BMPs to be implemented for spill	Include a description of the BMPs that will be implemented for spill response.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			response.	
66	Municipal Operations	Chlorinated and Brominated Water Discharges	The SWMP does not discuss the BMPs that will be used to address the discharge of chlorinated and/or brominated water.	Include a description of the BMPs that will be implemented for the discharge of chlorinated and/or brominated water.