



Linda S. Adams
Agency Secretary

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzenegger
Governor

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April 17, 2009

BY ELECTRONIC AND REGULAR MAIL

Jeff Hodge.
JHodge@templetoncsd.org
Templeton Community Services District
P.O. Box 780,
Templeton, CA 93465.

Dear Mr. Hodge:

NOTICE OF ENROLLMENT – NPDES SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS GENERAL PERMIT; TEMPLETON COMMUNITY SERVICES DISTRICT, SAN LUIS OBISPO COUNTY, W DID # 3 40MS05107

The Central Coast Regional Water Quality Control Board (Water Board) received a Notice of Intent, Storm Water Management Program (SWMP), map, and fee for the Templeton Community Services District (TCSD) Municipal Separate Storm Sewer System (MS4). These items are required to enroll in the National Pollutant Discharge Elimination System General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer Systems, Order No. 2003-0005-DWQ (General Permit).

Water Board staff reviewed TCSD's SWMP and found it, combined with a number of specific revisions described in Attachment 1, to be in compliance with the General Permit and to meet the maximum extent practicable (MEP) standard set forth in the General Permit. TCSD's SWMP was available to the public for a 60-day comment period, and we received comments from stakeholders. The comment letters are contained in Attachment 2, Water Board staff responses to these comments are contained in Attachment 3.

The public did not request a hearing for the Water Board to consider approval of the SWMP and enrollment of TCSD under the General Permit. The General Permit states that if no hearing is requested, the Regional Water Board Executive Officer will notify the regulated MS4 that it has obtained permit coverage only after Water Board staff has reviewed the SWMP and has determined that the SWMP meets the MEP standard established in the General Permit.

I am hereby approving TCSD's SWMP with the following condition:
Pursuant to Water Code Section 13383, the Templeton Community Services District is required to amend the SWMP no later than **June 17, 2009**, to include all the changes shown in the "Final Table of Required Revisions," Attachment 1 to this letter. Per Water

California Environmental Protection Agency



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Code Section 13385, failure to make these revisions may subject the Templeton Community Services District to Administrative Civil Liability for up to \$10,000 for each day of violation. The Templeton Community Services District must provide a copy of the SWMP to the Water Board no later than **June 17, 2009**.

As of the date of this letter, stormwater discharges from TCSD are authorized by the General Permit. TCSD is required to implement the SWMP and comply with the General Permit. TCSD's first annual reporting period ends April 30, 2010. TCSD's first annual report is due to the Water Board on July 17, 2010 (75-days after the reporting period ends).

Thank you for your cooperation and efforts to enroll the Templeton Community Services District under the General Permit. If you have questions regarding this matter, please contact **David Innis** at (805) 549-3150, or dbinnis@waterboards.ca.gov.

Sincerely,



Roger W. Briggs
Executive Officer

Attachment 1: Final Table of Required Revisions

Attachment 2: Comment Letters Received during 60-day Public Comment Period

Attachment 3: Response to Comments

cc: (by electronic mail)

Tina Mayer	tjm@templetoncsd.org
Jay Short	utilities@templetoncsd.org
Gordon Hensley:	coastkeeper@epicenteronline.org
Jill Falcone:	jfalcone@co.slo.ca.us

S:\Stormwater\Stormwater Facilities\San Luis Obispo Co\Municipal\Templeton\Templeton 60-d public comments\TCSD EO Approval\TCSD SWMP Approval - includes Attachment 1.doc

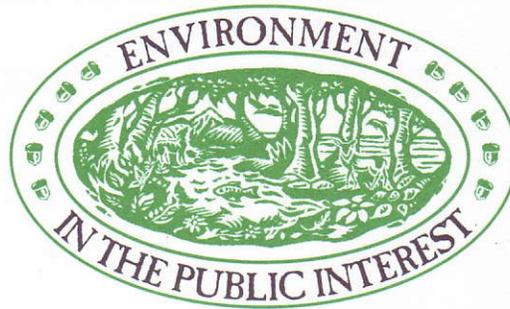


FINAL TABLE of REQUIRED REVISIONS
Templeton Community Services District November 2008 Draft Storm Water Management Program

Acronyms/Abbreviations:

- BMP - Best Management Practice
- General Permit - Phase II Small Municipal Separate Storm Sewer Systems General Permit
- SWMP - Storm Water Management Program
- TCSD - Templeton Community Services District

Item Number	SWMP Section	Subject	Problem	Required Revisions
1	Public Education and Outreach	Collaborative partnerships to share resources and distribute materials throughout the community.	TCSD does not indicate the topics it will address in brochures (or other educational materials) or the approximate numbers it plans to distribute to the community.	As part of BMP PE-1, TCSD must estimate a minimum number of brochures and their topics ready for use upon approval of the SWMP, and those to be developed during the 5-year permit cycle.
2	Public Participation and Involvement	Compliance with all State and local public notice requirements.	TCSD must comply with all state and local public notice requirements regarding program and distribution materials.	Revise language to BMP PP-1 to highlight TCSD's requirements to notify the public.
3	Pollution Prevention/ Good Housekeeping	Stormwater pollution prevention education and outreach to municipal departments and personnel.	TCSD does not commit to training specific categories of employees and provide mechanisms for commitment during the permit term.	TCSD must modify BMP MO-8 to specify the municipal staff training program will include training for wastewater and water service personnel.



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San Luis Obispo **COASTKEEPER**[®]

Central Coast Regional Water Quality Control Board
 ATTN: Tamara Presser
 895 Aerovista Place, Suite 101
 San Luis Obispo, CA 93401

February 3, 2008

Via: Email (tpresser@waterboards.ca.gov)

Subject: Templeton Community Services District Stormwater Management Plan

Dear Ms Presser,

Thank you for the opportunity to review and comment on the proposed Stormwater Management Plan of the Oceano Community Services District.

San Luis Obispo **COASTKEEPER**[®], a program of Environment in the Public Interest, is organized for the purpose of ensuring that the public has a voice with agencies and official responsible for enforcing water quality, watershed and coastal planning regulations on the California Central Coast. As such, the SLO Coastkeeper and our 800 central coast supporters are concerned that the proposed SWMP:

- Is impermissibly vague for many components.
- Does not clearly identify the financial resources available to implement the proposed program.
- Fails to provide RWQCB with measurable conditions to support enforcement of the proposed permit should that become necessary.

Specific comments, included in the table below, outline SLO Coastkeeper concerns. I urge the Regional Board to direct additional modification of the proposal to meet federally mandated MEP standards prior to final approval.

Respectfully Submitted,

Gordon Hensley, San Luis Obispo **COASTKEEPER**[®]



MINIMUM CONTROL MEASURE #1 PUBLIC EDUCATION AND OUTREACH

MCM	What is required	What it Does Plan Name:	Coastkeeper Comments
Intent	1. Develop and implement BMPs, measurable goals and timetables for implementation of the Public Education and Outreach Minimum Control Measure	Objective: To implement a public education program to distribute educational materials to the community and/or conduct outreach activities about the impacts of stormwater discharges on waterbodies and the steps that the public can take to reduce pollutants in stormwater runoff	<ul style="list-style-type: none"> • While we applaud the effort to partner with other regional agencies, this MCM is impermissibly vague: <ul style="list-style-type: none"> - Must revise program intent to demonstrate what TCSD will do as part of the Public Education & Outreach component of the SLO Co SWMP. - Must clarify details of what TCSD will do and what measurable outcomes will be used to demonstrate that the proposed E&O program is MEP - Must Clarify what budget and staff support is proposed to support this MCM
	2. Increase community awareness about urban runoff pollution and its impacts on the community's water resources 3. Must educate the public in its permitted jurisdiction about the importance of the stormwater program and the public's role in the program	<p>BMP PE-1– Use collaborative regional partnerships to leverage shared resources to distribute stormwater pollution prevention public education and outreach information, materials, and activities throughout the Community</p> <p><u>Intent</u> – To reduce the source of stormwater pollutants by reaching out to the public and providing educational information, materials, and activities about what each individual can do to reduce pollutants in stormwater runoff</p> <p><u>Goal – PE-1A</u> – Participate in SLO County Partners for Water Quality Meetings. Track the number of meetings attended</p> <ul style="list-style-type: none"> - Number of activities promoted <p><u>Goal – PE-1B</u> – Provide stormwater pollution prevention public education and outreach materials to District water and wastewater customers. Make printed material available at the District office. Record the number of brochures distributed</p> <ul style="list-style-type: none"> - Amount of material distributed <p><u>Goal – PE-1C</u> – Provide stormwater topic in one newsletter per year providing information to the residents and business owners about stormwater community activities and educational material</p> <ul style="list-style-type: none"> - Number of articles in Quarterly Newsletters with stormwater topics 	<ul style="list-style-type: none"> • Must clarify whether if the TCSD will modify the general County Materials to target their local Templeton Community. • Must clarify what target audiences TCSD will reach and what strategies will be used to reach them • Must indicate how many brochures (or other educational materials) will be used and what topics will be covered • Must clarify what measurable outcomes will be used to demonstrate that this strategy meets MEP requirements
	4. Distribute educational materials and perform outreach to inform citizens about the impacts polluted storm water can have on water quality 5. Must target a number of audiences and must be designed to focus on why stormwater pollution prevention is important, the benefits	<p>BMP PE-2–Distribute stormwater pollution prevention educational materials using the Templeton Community Services District Website</p> <p><u>Intent</u>–To reduce pollutants in stormwater runoff by educating the public about the importance of stormwater pollution prevention and the public's role using the internet to distribute stormwater</p>	<ul style="list-style-type: none"> • Must clarify who the target audience is and what education and/or outreach objective is to be reached • Must clarify what topics will be covered and what will be measured. • Must clarify how the information regarding available website will be distributed to the

	<p>of stormwater pollution prevention, and how each individual plays a role</p> <p>6. Understand the public perceptions and attitudes towards the problem of urban runoff</p>	<p>pollution prevention information</p> <p>Goal –PE-2A Provide stormwater education materials and program information on the District website. Maintain and update Stormwater Pollution Prevention information at least once a year</p> <ul style="list-style-type: none"> - Website updates on schedule (Yes/No) <p>Goal – PE-2B Provide link to County Stormwater website</p> <ul style="list-style-type: none"> - Provide/update link to County Stormwater website (Yes/No) - Provide and monitor contact page on website 	<p>community</p>
	<p>7. Implement public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on local water bodies and the steps that can be taken to reduce stormwater pollution</p>	<p>BMP PE-3 Partner with the County to provide public displays, presentations, workshops, and/or events about the importance of stormwater pollution prevention and what the public can do</p> <p>Intent - To reduce pollutants in stormwater runoff by providing water quality information for the public</p> <p>Goal – PE-3A Target at least one public presentation, workshop, or event in Templeton per year</p> <ul style="list-style-type: none"> - Number of events and displays per year - Number of people in attendance - Amount of printed materials and giveaways distributed 	<ul style="list-style-type: none"> • Must clarify what type of participation TCSD will participate with the County and identify what type of workshop is needed for the Community. • Must identify measurable goals for workshop and specify when the workshops/presentation/public participation will be held • Must determine how effectiveness of public display be measured to determine success.
	<p>8. To teach the public the importance of protecting storm water quality, both for the benefit of the environment and human health</p> <p>9. Foster participation through community-based projects or volunteer activities focused on pollution prevention</p>	<p>BMP PE-4 Provide Anti-Litter/Trash Public Education and Outreach seminar titles, “A Night of Talking Trash” discussing recycling, proper ways to recycle, saving money by recycling and properly disposal of trash and hazardous waste</p> <p>Intent –To reduce the amount of trash and litter introduced into waterbodies by educating the public about the problem and what they can do to help</p> <p>Goal – PE-4A Conduct an annual “Night of Talking Trash.” Track number of participants.</p> <p>Goal – PE-4B Promote Creek Clean Up Day and other community clean-up and educational events on the District Website. Track number of participants</p> <ul style="list-style-type: none"> - - Number of events with anti-litter/trash displays and number of people attending 	<p>Must specify when these events will be held and how many times per year it will be held.</p>
	<p>10. Educate the community about specific pollutant sources and what individuals can do to reduce urban runoff pollutions</p>	<p>BMP PE-5 –Provide Pesticide and Household cleaner seminar discussing the health risks associated with household cleaning products and pesticides including how to minimize your</p>	<p>Must specify when the seminar will be held and how the community will hear about the seminar</p>

		<p>risk to exposure and the use of alternative products.</p> <p><u>Intent</u> –To educate the public about pesticides and household cleaners by educating the public about the health risks and what they can do to help.</p> <p><u>Goal –PE-5A</u>Conduct an annual Pesticide and Household cleaner seminar. Track number of participants</p> <ul style="list-style-type: none">- Number of participants attending seminar each year	
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MINIMUM CONTROL MEASURE #2 PUBLIC PARTICIPATION AND INVOLVEMENT

MCM	What is required	What it Does Plan Name:	Coastkeeper Comments
Intent	11. Implement appropriate BMPs and develop achievable and measurable goals in order to assess the success of community participation and involvement in the program 12. Include the public to develop, implement and review the SWMP	Objective: To comply with all state and local notice requirements and include the public in developing, implementing, and reviewing the stormwater management program including efforts to reach out and engage the communities within the permit coverage area	<ul style="list-style-type: none"> • The objective of the proposed Public Participation & Involvement Program must be reoriented toward program development and implementation, rather than education • Clearly distinguish this MCM from the Public Education and Outreach component • Include a detailed Public Participation and Involvement program details what program development and implementation TCSD will conduct, in addition to, or separate from, the actions required of SLO County in their SWMP
	13. Comply with all State, and local public notice requirements	<p>BMP PP-1–Templeton Community Services District Facilities Committee Meetings including stormwater topics <u>Intent</u> – To ensure compliance with applicable public notice requirements <u>Goal – PP-1A</u> – Hold bi-monthly Facilities Committee meeting open to the public. Track number of meetings with stormwater topics on the agenda and public participation</p> <ul style="list-style-type: none"> - Number of meetings with stormwater topics, and number of participants <p><u>Goal – PP-1B</u> – Place the stormwater annual report on the Facilities Committee agenda</p> <ul style="list-style-type: none"> - Annual Report on Agenda and number of public participants - Record Board Action & Follow-up 	<ul style="list-style-type: none"> • Must indicate BMPs that indicates that TCSD will comply with all Date and local public notice requirements regarding program and distribution materials •
	14. Promote community support for the SWMP and to ensure that the community has opportunities to provide input and direction regarding SWMP implementation 15. Engage the community, instill a sense of personal ownership for water quality issues, and encourage behavioral changes that can lead to water quality improvement. 16. Allow the community to review the permit and the Stormwater management Program	<p>BMP PP-2 – Partner with the County on Public Involvement Stakeholder Meetings/Workshops including volunteer educators and speakers. See County SWMP PP2 <u>Intent</u> – To promote community support for the SWMP and to ensure the community has opportunities to provide input and direction regarding SWMP development, implementation, and review <u>Goal – PP-2A</u> Partner with the County and participate in at least one (1) stormwater stakeholder Meeting, Workshop, or Presentation per year.</p> <ul style="list-style-type: none"> - Number of public involvement stakeholder events held per year <p><u>Goal – PP-2B</u> Place the stormwater annual report</p>	<ul style="list-style-type: none"> • Must provide opportunity for the public to provide input on the status of the program and the effectiveness of BMPs through workshops and meetings. The draft must state when the meetings and workshops will be held during the year. The purpose of these workshops should be to gather public input regarding the status of the program and effectiveness of BMPs, Such workshops should be formatted as roundtable discussions and opportunities for the gathering of measurable information by the City for use in the annual report to RWQCB • Recommend to conduct at least two meetings annually. One informational and other comments. Need to specify when these

		on the District website for public review - Number of people in attendance	meetings will be conducted.
17. Ensure program reflects community values and priorities and has the greatest potential for success	<p>BMP PP-3 Promote public participation in Annual Cleanup Day and Creek Cleanup Day</p> <p><u>Intent</u> – To promote community support for the SWMP and to reduce pollution from litter, trash, and illegal dumping</p> <p><u>Goal</u> – PP-3A Promote trash and creek cleanup opportunities on an annual basis. Work with community groups, SLO County Partners for Water Quality, and nonprofit organizations to promote and support these programs.</p> <ul style="list-style-type: none"> - Number of clean up events - Number of participants - Amount and types of trash and debris removed 	<ul style="list-style-type: none"> • Must clarify what mechanisms TCSD will use to engage citizens from the CSD in these activities • Provide details on what TCSD will do to engage all economic and ethnic groups within the jurisdiction of the CSD • Clarify what measurable goals TCSD will use to demonstrate that the proposed action fully addresses the requirements and intent of this MCM • Must include mechanisms for engaging the general public in activities by providing advertising and incentives for public participation to increase public participation. 	
18. Foster active community support for the storm water management program and recommendations for its implementation	<p>BMP PP-4 Storm Drain Marking Program</p> <p><u>Intent</u> – To promote community support for the SWMP and to reduce pollution from litter and illegal dumping</p> <p><u>Goal</u> – PP-4A In coordination with the County, recruit and organize community volunteers for storm drain marking events</p> <p><u>Goal</u> – PP-4B Maintain storm drain markings on an ongoing basis</p> <ul style="list-style-type: none"> - Storm drain markings maintained (Yes/No) 	<ul style="list-style-type: none"> • Program lacks to specify how the program is conducted and, its measurable goals • Clarify how this program will be carried out during the entire term of the permit • 	
19. Increase community awareness about urban runoff pollutions	<p>BMP PP-5 – Adopt-a-Park – Continue to sponsor, coordinate, and administer an Adopt-a-Park program for Tom Germaine Park and Evers Sport Park</p> <p><u>Intent</u> – To promote community support for the SWMP and to reduce pollution from litter and illegal dumping</p> <p><u>Goal</u> – PP-5A The District will receive applications from residents within the community. Upon approval, the District will place a sign, with the resident's name, at the designated area. The resident will clean the designated area on a quarterly basis. Measure and record participation in the program</p> <ul style="list-style-type: none"> - Number of participants - Track frequency of trash and litter clean up required 	<ul style="list-style-type: none"> • Must specify how this program will be carried out during the entire term of the permit. • Recommend an ordinance or regulation mandating clean up of designated are. 	

MINIMUM CONTROL MEASURE #3 ILLCIT DISCHARGE DETECTION AND ELIMINATION

MCM	What is required	What it Does Plan Name:	Coastkeeper Comments
Intent	21. Adopt and enforce ordinances or take equivalent measures that prohibit illicit discharges	Objective: To adopt and enforce ordinances or take equivalent measures that prohibit illicit discharges and to implement a program to detect and eliminate illicit discharges	<ul style="list-style-type: none"> • The minimum requirement of a regulated small MS2 is to develop, implement, and enforce an illicit discharge detection and elimination program. TCSD must <ul style="list-style-type: none"> - Adopt and enforce an IDDE ordinance to prohibit illicit discharges from TCSD facilities to the County Stormwater system - Create a storm water system map showing the location of all outfalls from TCSD facilities and identifying the waters that receive discharges from those outfalls - Provide a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community - As the wastewater service provider in Templeton, the CSD should implement a regular system management program to detect and eliminate illicit discharges from the waste water collection system - Conduct IDDE education and training for TCSD emergency and water service personnel • MCM lacks in providing how plans or programs will eliminate discharges. It provides that it will detect illicit discharge and who will detect the discharges however lacks to specify how it will be eliminated
	22. Develop, implement, and enforce a program to detect and eliminate illicit discharges into the regulated Small MS4 23. To reduce pollutants in storm water runoff to receiving waters 24. Contain and clean-up accidental spills using proper clean-up disposal materials and methods	BMP IL-1 –Sanitary Sewer Overflow Prevention and Spill Response Program <u>Intent</u> – To reduce pollutants in storm water runoff from sanitary sewer overflows and spills from District operated wastewater systems <u>Goal – IL-1A</u> – Review the adequacy of the operations and maintenance programs for District-operated wastewater treatment systems to ensure that these systems are properly operated and maintained to prevent sanitary sewer overflows and spills. Incorporate the SSO program into the more comprehensive District Sanitary Sewer Management Plan <ul style="list-style-type: none"> - Review of procedures conducted (Yes/No) <u>Goal – IL-1B</u> – Track and trend sanitary sewer overflow events and implement corrective and preventive measures. Report performance annually <ul style="list-style-type: none"> - Sanitary sewer overflow trends and number of corrective and preventive actions taken 	<ul style="list-style-type: none"> • Must report all in annual report • Must supplement its educational effort with mechanisms to facilitate proper disposal to meet MEP and water quality standards
	25. Detect and eliminate sources of illicit discharge and illegal dumping	BMP IL-2 – Illegal Dumping Program <u>Intent</u> – To reduce pollutants in storm water	<ul style="list-style-type: none"> • Must respond to 100% of all reports of illegal dumping.

<p>26. Control illicit discharges by conducting field surveys/investigations of the storm sewer system to identify and eliminate improper connections and discharges</p> <p>27. Prevent improper disposal of waste through public education and providing appropriate waste material disposal options and incentives</p> <p>28. Develop and implement a plan to detect and address non-stormwater discharges, including illegal dumping to the system that are not authorized</p> <p>29. Address the following categories of non-stormwater discharges or flows only where they are identified as significant contributors or pollutants to the Small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltrations to separate storm sewers, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, and dechlorinated swimming pool discharges</p>	<p>runoff by providing a mechanism to detect and eliminate illicit discharges, illegal dumping, construction site runoff violations and other stormwater pollution problems through citizen reporting</p> <p>Goal – IL-2A Partner with the County to advertise the availability of the County Stormwater Pollution Prevention hotline for citizens to report illicit discharges, illegal dumping, construction site runoff violations, and other stormwater pollution problems. Refer to the County SWMP</p> <ul style="list-style-type: none"> - Number of brochures advertising County Stormwater Pollution Prevention Hotline distributed <p>Goal – IL-2B Post signage at District Basins with the County's stormwater phone hotline for citizen reports of illicit discharges, coordinate with the County on enforcement proceedings for illicit discharge to basins, and develop cleanup procedures in the event of an illicit discharge to basin</p> <ul style="list-style-type: none"> - Signage at basins posted (Yes/No) <p>Goal – IL-2C Record the number of stormwater reports that are tracked back to the District owned stormwater facilities and document follow up actions and problem resolution. Track and report results in annual report</p> <ul style="list-style-type: none"> - Number and types of complaints regarding District owned and maintained storm drain facilities reported. - Document follow-up action and resolution 	<ul style="list-style-type: none"> • Must explicitly provide for follow-up investigation of any monitoring that suggests that presence of illicit discharges or connections • Must contain commitments by the CSD to respond to all spills from all sources, and prevent the entry of in County storm water system • Must include the requirement that CSD report on the use of the hotline in their annual report • The document is vague and unclear regarding how enforcement will be carried out given current staffing levels and budget allocations.
<p>30. Develop a storm sewer map that shows the location of all outfalls and the names and locations of all waters that receive discharges from the outfalls</p>	<p>BMP IL-3 Map the storm sewer system showing the location of District owned and maintained storm sewer features and all outfalls and the names and locations of all waters of the US that receive discharges from those outfalls</p> <p>Intent -To reduce pollutants in storm water runoff by mapping the storm sewer system to facilitate tracking the source of stormwater pollutants</p> <p>Goal – IL-3A Map complete storm sewer system, detention basins and outfall owned and operated by the District</p> <ul style="list-style-type: none"> - Storm sewer maps completed on schedule (Yes/No) <p>Goal – IL-3B Update maps on an annual basis to include new and modified storm sewer facilities</p> <ul style="list-style-type: none"> - Map updates completed on schedule (Yes/No) 	<ul style="list-style-type: none"> • Must require the completion of the map of the storm sewer system showing the location of District owned and maintained storm sewer features and all outfalls and the names and all of the above within year 1.

MINIMUM CONTROL MEASURE #4 CONSTRUCTION SITE RUNOFF CONTROL

MCM	What is required	What it Does Plan Name:	Coastkeeper Comments
Intent	<p>31. The Phase II Final Rule Requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in storm water runoff to their MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. The small MS4 operator is required to:</p> <ul style="list-style-type: none"> - Have an ordinance or other regulatory mechanism requiring the implementation of proper erosion and sediment controls, and controls for other wastes, on applicable construction sites - Have procedures for site plan review of construction plans that consider potential water quality impacts - Have procedures for site inspection and enforcement of control measures - Have sanctions to ensure compliance (established in the ordinance or other regulatory mechanisms) - Establish procedures for the receipt and consideration of information submitted by the public - Determine the appropriate best management (BMPs) and measurable goals for this minimum control measure 	<p>These functions are performed by the County of San Luis Obispo: The minimum requirements of construction Site Runoff Control are to develop, implement, and enforce an erosion and sediment control program for construction activities that disturb one or more acres of land.</p> <p>Templeton CSD does not issue or enforce construction permits. The District must submit permit applications to the County for District construction projects. Therefore, the District has not included any new BMPs in the SWMP.</p>	<ul style="list-style-type: none"> • An appropriate roll for TCSD would be to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges from construction projects in the community. • Recommend a program or a monitoring system within the community

MINIMUM CONTROL MEASURE #5 POST-CONSTRUCTION SITE RUNOFF CONTROL

MCM	What is required	What it Does Plan Name:	Coastkeeper Comments
Intent	<p>32. The Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in storm water runoff to their MS4 from post-construction activities that result in a land disturbance of greater than or equal to one acre. The small MS4 operator is required to:</p> <ul style="list-style-type: none"> - Develop and implement strategies which include a combination of structural and/or nonstructural best management practices (BMPs) - Have an ordinance or other regulatory mechanism requiring the implementation of post construction runoff controls to the extent allowable under State or local law - Ensure adequate long-term operation and maintenance of controls - Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure 	<p>These functions are performed by the County of San Luis Obispo: The minimum requirements of Post-construction Site Runoff Control are to develop, implement, and enforce programs to address discharges of post-construction storm water runoff from new development and redevelopment areas. Applicable controls could include preventative actions such as protecting sensitive areas (e.g. wetlands) or the use of structural BMP such as grassed swales or porous pavement.</p> <p>Templeton CSD does not issue or enforce construction permits. The District must submit permit applications to the County for District construction projects. Therefore, the District has not included any new BMPs in the SWMP.</p>	<ul style="list-style-type: none"> • As suggested for MCM 4, it would be for TCSD to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community

MINIMUM CONTROL MEASURE #6 GOOD HOUSEKEEPING & POLLUTION PREVENTION FOR MUNICIPAL OPERATIONS

MCM	What is required	What it Does Plan Name:	Coastkeeper Comments
Intent	33. Determine the appropriate best management practices and measurable goals for the pollution prevention/good housekeeping minimum control measure	Objective: To examine the County's activities and develop a program to prevent the discharge from these activities. At a minimum, the program must educate staff in pollution prevention and minimize pollutants sources.	<ul style="list-style-type: none"> The intent of this control measure is to ensure that TCSD operations are performed in a manner that minimizes contamination of storm water discharges. To enhance the effectiveness of the proposed list of BMP's should explicitly include Low Impact Development Standards (LID) in any facility improvements and landscaping.
	34. Develop and implement an operation and maintenance program that includes a training component and has the ultimate goals of preventing or reducing pollutant runoff from municipal operations 35. Develop and implement an operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system	BMP MO-1 —Prepare an Effectiveness Assessment Plan <u>Intent</u> – To assess the effectiveness of the Stormwater Management Program <u>Goal – MO-1A</u> – Prepare a SWMP Quantifiable Effectiveness Assessment Plan. The plan will describe the actions the CSD takes to assess the effectiveness of the SWMP in meeting regulatory requirements and improving water quality. The plan will include: a process to conduct effectiveness assessments; quantifiable measures of BMP and program effectiveness links between BMP implementation in terms of regulatory compliance, changing awareness, changing behavior, pollutant load reductions, and runoff and receiving water quality - Effectiveness Assessment Plan developed and implemented (Yes/No) <u>Goal – MO-1B</u> – Implement Effectiveness Assessment Plan per MO-1A	
	36. To assure that the delivery of public services occur in a manor protective of storm water quality	BMP MO-2 – Conduct District Facility Stormwater Pollution Prevention inspections including, but not limited to, District Parks, Operational Facilities and Buildings, and District water and wastewater facilities <u>Intent</u> –To reduce pollutants in stormwater runoff from District facilities <u>Goal – MO-2A</u> Develop and a self-inspection checklist to inspect District facilities for stormwater pollution prevention practices and procedures - Self-Inspection Checklist developed (Yes/No) <u>Goal – MO-2B</u> Inspect facilities annually at a minimum to ensure ongoing compliance. Respond to 100% of noncompliance conditions	

		<p>and track all noncompliance's, corrective, or preventive actions</p> <ul style="list-style-type: none"> - Number of inspections conducted - Number of nonconformance's and preventive/corrective actions taken - Report 'hot-spots' to County 	
	37. Permittee examines its own activities and develop a program to prevent the discharge of pollutants from these activities	<p>BMP MO-3 Implement Storm Sewer Inspection and Maintenance Procedures and Schedules <u>Intent</u> – To reduce the amount of pollutants in stormwater runoff by inspecting and properly maintaining the storm sewer system <u>Goal</u> – MO-3A Implement routine inspection and cleaning procedures and schedules for storm drain catch basins and other components of the storm sewer system that require cleaning at least twice per year on an ongoing basis. Additional cleaning may be needed based on historical need in specific locations</p> <ul style="list-style-type: none"> - Number of storm drains inspected and maintained - Inspections and maintenance activities on schedule (Yes/No) 	Must be more specific of inspection schedule and procedures to assure commitment of meeting BMP.
		<p>BMP MO-4 Implement procedures to prevent waterline and hydrant flushing from causing non-stormwater pollution <u>Intent</u> – To prevent non-stormwater pollution from District maintenance activities related to waterline and hydrant flushing <u>Goal</u> – MO-4A Develop procedures to prevent waterline and hydrant flushing that might impact non-stormwater runoff</p> <ul style="list-style-type: none"> - Procedures developed and implemented (Yes/No) 	Must include mechanisms to monitor and effectiveness measure
		<p>BMP MO-5 Monitor hazardous materials storage (chlorine storage at well sites) and spill prevention and control procedures for stormwater pollution prevention in District facilities <u>Intent</u> – To reduce the possibility of pollutants entering the District storm sewer system from hazardous material storage or spills from District facilities <u>Goal</u> – MO-5A Audit existing hazardous materials storage and spill prevention and control practices for stormwater pollution prevention requirements</p> <ul style="list-style-type: none"> - Audit performed (Yes/No) <p><u>Goal</u> – MO-5B Include checks for proper hazardous materials storage and spill prevention on the self-inspection checklist used for the District facility inspections</p>	

		<ul style="list-style-type: none"> - Chlorine checks added to inspection checklists (Yes/No) <p>Goal – MO-5C Report the number of non-compliances and preventative and corrective actions implemented</p> <ul style="list-style-type: none"> - Number of nonconformance's and preventive and corrective actions taken 	
	<p>38.Reduce the amount and type of pollutants that are discharged from streets, parking lots, material storage areas and vehicle maintenance yards into the storm sewer system</p>	<p>BMP MO-6 Implement procedures to prevent non-stormwater runoff pollution from District vehicle and equipment storage and washing</p> <p><u>Intent –</u> To prevent non-stormwater runoff pollution from District vehicle and equipment leaks and spills, and when washing</p> <p>Goal – MO-6A Store vehicles and equipment in a designated area that protects the stormwater system from vehicle and equipment leaks and spills. Inspect for compliance during facility inspections</p> <ul style="list-style-type: none"> - Vehicles and Equipment storage in designated area inspected (Yes/No) <p>Goal – MO-6B Wash District vehicles and equipment on site in a manner that retains washwater on site and does not direct runoff into the storm drain system. Inspect for compliance during facility inspections</p> <ul style="list-style-type: none"> - Vehicles and Equipment washwater retained on site in an appropriate manner (Yes/No) 	
		<p>BMP MO-7 District landscaping and lawn care non-stormwater pollution prevention procedures for District facilities including, but not limited to: parks, other recreational facilities, government buildings, operational facilities, and parking lots</p> <p><u>Intent –</u> To prevent non-stormwater runoff pollution from District facility landscaping and lawn care operations</p> <p>Goal – MO-7A Audit existing District landscape and lawn care procedures and practices for stormwater pollution prevention</p> <p>Goal – MO-7B Facilitate annual training for landscape and lawn care procedures and practices for stormwater pollution prevention including the proper use of less toxic alternative products for pesticide and herbicide use, proper use of fertilizers, proper green waste disposal, proper irrigation practices, proper trash management and recycling practices, and proper storage and maintenance of equipment</p> <ul style="list-style-type: none"> - Proper use of less toxic alternative products for 	

		pesticide and herbicide use maintained (Yes/No) Annual training completed (Yes/No)	
	<p>39. Provide employee training on how to incorporate pollution prevention and good housekeeping into all municipal operations such as park and open space maintenance, fleet and building maintenance, roads maintenance and storm drain maintenance</p> <p>40. Program must educate staff on pollution prevention and minimize pollutant sources</p>	<p>BMP MO-8 Provide stormwater pollution prevention education and outreach to Municipal Departments and Personnel <u>Intent</u> – To reduce pollutants in stormwater runoff by educating municipal departments and personnel that perform activities that can contribute to stormwater pollution <u>Goal</u> – MO-3A Implement an annual employee-training program for District Employees covering how to detect and report illicit discharge to the County and to incorporate pollution prevention and good housekeeping into municipal operations. Self inspection Facility Checklists will help evaluate the effectiveness of the training</p> <ul style="list-style-type: none"> - Number of employees trained - Conduct training survey/quiz - Review results of Facilities inspection checklists and identify areas needing additional training 	<p>Must commit to training specific categories of employees and provide mechanisms for commitment during permit term</p>

**ATTACHMENT 3
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION****Response to Comments****Templeton Community Services District Stormwater Management Program – November 2008****Introduction**

This document includes the Central Coast Regional Water Quality Control Board (Water Board) staff responses to the comments received during the Water Board's 60-day public comment period (December 4, 2008 – February 3, 2009) for the Templeton Community Services District's (TCSD) Stormwater Management Program (SWMP). Water Board staff received comments from the San Luis Obispo Coastkeeper on February 3, 2009.

Comments from San Luis Obispo Coastkeeper

Comment: Thank you for the opportunity to review and comment on the proposed Stormwater Management Plan of the [Templeton] Community Services District.

San Luis Obispo COASTKEEPER®, a program of Environment in the Public Interest, is organized for the purpose of ensuring that the public has a voice with agencies and official responsible for enforcing water quality, watershed and coastal planning regulations on the California Central Coast. As such Coastkeeper and our 800 central coast supporters are concerned that the proposed SWMP:

1. Is impermissibly vague for many components.
2. Does not clearly identify the financial resources available to implement the proposed program.
3. Fails to provide RWQCB with measureable conditions to support enforcement of the proposed permit should that become necessary.

Specific comments included in the table below, outline SLO Coastkeeper concerns. I urge the Regional Board to direct additional modification of the proposal to meet federally mandated MEP standards prior to final approval.

Response: 1) TCSD's SWMP is meant to establish a framework to outline how TCSD will manage stormwater runoff. It contains a suite of minimum control measures that complement San Luis Obispo County's (County) minimum control measures to protect water quality from urban runoff. TCSD's program provides adequate and appropriate detail and focus with the specified required revisions. SWMPs must evolve over the permit life and respond to new information and evolving conditions on the ground. The annual reports will convey programmatic details and allow the Water Board to determine if additional detail or additional control measures are necessary to achieve water quality protection to the maximum extent practicable. 2) The Phase II General Permit requires TCSD to submit a SWMP that meets the maximum extent practicable (MEP) standard and therefore include BMPs that are within TCSD's fiscal means. The permit contains no explicit requirement to demonstrate ability to pay. 3) As part of the Draft SWMP review process, Water Board staff required TCSD revise the SWMP to develop an effectiveness assessment program. As part of BMP MO-1, this program shall contain measures to assess the effectiveness of the overall program and individual BMPs.

Water Board staff will use the effectiveness assessment results during SWMP annual report reviews and TCSD audits to help assess the effectiveness of TCSD's SWMP.

MINIMUM CONTROL MEASURE (MCM) #1: PUBLIC EDUCATION AND OUTREACH

Comment: While we applaud the effort to partner with other regional agencies, this MCM is impermissibly vague:

- Must revise program intent to demonstrate what TCSD will do as part of the Public Education & Outreach component of the SLO Co SWMP.
- Must clarify details of what TCSD will do and what measurable outcomes will be used to demonstrate that the proposed E&O program is MEP.
- Must clarify what budget and staff support is proposed to support this MCM.

Response: TCSD has sufficiently described the roles of both the County and TCSD for managing stormwater and educating the public in Templeton. We anticipate once TCSD's program is established, the roles of both entities will become clearer. We expect both the County and TCSD to update their SWMPs accordingly and to notify us of updates in their annual reports. TCSD's SWMP includes BMP MO-1, "Prepare an Effectiveness Assessment Plan," that will be completed in one year (see Section 4 page 15). TCSD recently hired a Utilities Conservation Coordinator to coordinate and implement the SWMP.

Comment: BMP PE-1 (Use collaborative partnerships to share resources and distribute materials throughout the community, and Goals PE-1A (Number of activities promoted), PE-1B (Amount of material distributed), and PE-1C (Number of articles in Quarterly Newsletters with stormwater topics). Coastkeeper requests the following for this BMP and Goals:

- Must clarify whether if the TCSD will modify the general County Materials to target their local Templeton Community.
- Must clarify what target audiences TCSD will reach and what strategies will be used to reach them.
- Must indicate how many brochures (or other educational materials) will be used and what topics will be covered.
- Must clarify what measurable outcomes will be used to demonstrate that this strategy meets MEP requirements.

Response: 1) TCSD's Public Education & Outreach program meets MEP and clearly explains the education programs TCSD plans to continue implementing and plans to institute. The annual reports will convey programmatic details and allow the Water Board to determine if additional detail is necessary to differentiate County and TCSD duties for public education. Prior to distributing educational and outreach materials, the County evaluated the appropriateness of these materials for the Templeton Community. 2) TCSD's residents and business owners are the target audiences. Strategies to reach them will be addressed in BMPs/Measurable Goals PE-1B, PE-1C, PE-2, and/or PE-3. 3) In response to this comment, staff added required revision Item Number 1, TSCD must estimate a minimum number of brochures and their topics ready for use upon approval of the SWMP and those to be developed during the 5-year permit cycle. 4) See the Water Board's response to the Coastkeeper's first comment on measureable outcomes.

Comment: BMP PE-2 "Distribute educational materials using TCSD website", has two Goals 1) website updates on schedule (PE-2A) and 2) provide/update links to County Stormwater website (PE-2B). Coastkeeper requests the following for this BMP and Goals:

- Must clarify who the target audience is and what education and/or outreach objective is to be reached
- Must clarify what topics will be covered and what will be measured.
- Must clarify how the information regarding available website will be distributed to the community

Response: 1) TCSD's residents and business owners are the target audiences. 2) Topics covered will be chosen based on materials available from the County and other sources (refer to our response to BMP PE-1). 3) TCSD's SWMP includes BMP MO-1, "Prepare an Effectiveness Assessment Plan," that will be completed during year one.

Comment: BMP PE-3 Partner with the County to provide public displays, presentations, workshops and/or events, and Goal PE-3A (Target at least on public event in Templeton per year; Number of events/displays, Attendance; Amount of materials distributed). Coastkeeper requests the following for this BMP and Goal:

- Must clarify what type of participation TCSD will participate with the County and identify what type of workshop is needed for the Community.
- Must identify measurable goals for workshop and specify when the workshops/presentation/public participation will be held
- Must determine how effectiveness of public display be measured to determine success.

Response: 1) TCSD has conducted regular workshops and presentations concerning pollutants potentially contaminating stormwater over the past several years. As part of the SWMP implementation, TCSD will evaluate County materials for appropriateness for the Templeton Community and distribute them accordingly. TCSD's new Utilities Conservation Coordinator will work with the County and San Luis Obispo Partners for Water Quality to develop public displays, presentations, and at least one workshop pertinent to the community. 3) Measures and assessments of the effectiveness of TCSD's participation in public events will be addressed as part of BMP MO-1.

Comment: BMP PE-4 "Provide Anti-Litter/Trash Public Education and Outreach seminar has two Goals – PE-4A (Conduct an annual "Night of Talking Trash") and PE-4B (Promote Creek Clean Up Day). Coastkeeper requests the following for this BMP and Goals:

- Must specify when these events will be held and how many times per year it will be held.

Response: The SWMP need not specify the date of an annual event in order to meet the Maximum Extent Practical (MEP) standard addressed by this BMP and Measurable Goals.

Comment: BMP PE-5 "Provide Pesticide and Household cleaner seminar" is intended to educate the public about pesticides and household cleaners by educating the public about the health risks and what they can do to help. The BMP has a single Goal PE-5A to conduct an annual Pesticide and Household cleaner seminar. Coastkeeper requests the following for this BMP and Goal:

- Must specify when the seminar will be held and how the community will hear about the seminar.

Response: The SWMP need not specify the date of an annual event in order to meet the MEP standard addressed by this BMP and Measurable Goal. TCSD's seminars will be advertised as required in BMPs/Measurable Goals PE -1B, PE -1C, PE-2, and/or PE-3.

MINIMUM CONTROL MEASURE #2: PUBLIC PARTICIPATION AND INVOLVEMENT

Comment: Coastkeeper states the MCM's "Objective: To comply with all state and local notice requirements and include the public in developing, implementing, and reviewing the stormwater management program including efforts to reach out and engage the communities within the permit coverage area." Coastkeeper requests the following for this MCM:

- The objective of the proposed Public Participation & Involvement Program must be reoriented toward program development and implementation, rather than education.
- Clearly distinguish this MCM from the Public Education and Outreach component.
- Include a detailed Public Participation and Involvement program details what program development and implementation TCSD will conduct, in addition to, or separate from, the actions required of SLO County in their SWMP.

Response: 1) TCSD has a sufficiently addressed public participation and involvement. 2) Water Board staff expects some overlap between the Public Education and Outreach BMPs and the Public Participation and Involvement BMPs. 3) BMPs PP-1 and PP-2 include provisions to involve the public in program development and implementation via public meetings. TCSD has committed to facilitating local input for their SWMP via the TCSD Facilities Committee Meetings, and staff participation with San Luis Obispo County Partners for Water Quality meetings to stay involved with countywide stormwater-related issues.

Comment: The intent of BMP PP-1 is to ensure compliance with applicable public notice requirements to announce Templeton Community Services District Facilities Committee Meetings including stormwater topics. The BMP has two Goals that require TCSD 1) hold bi-monthly Facilities Committee meeting open to the public (PP-1A) and 2) place the stormwater annual report on the Facilities Committee agenda (PP-1B). Coastkeeper requests the following for this BMP and Goal:

- Must indicate BMPs that indicates that TCSD will comply with all [state] and local public notice requirements regarding program and distribution materials.

Response: TCSD Facility Committee Meetings are on-going on a bi-monthly basis and comply with all public notice requirements. In response to this comment, staff added required revision Item Number 2, such that TCSD must add language to BMP PP-1 to highlight their requirements to notify the public.

Comment: To promote community support for the SWMP and to ensure the community has opportunities to provide input and direction regarding SWMP development, implementation, and review BMP PP-2 "Partner with the County on Public Involvement Stakeholder Meetings/Workshops including volunteer educators and speakers" has two Goals, 1) Partner with the County and participate in at least one (1) stormwater stakeholder Meeting, Workshop, or Presentation per year (PP-2A) and 2) Place the stormwater annual report on TCSD's website for public review (PP-2B). Coastkeeper requests the following for this BMP and Goals:

- Must provide opportunity for the public to provide input on the status of the program and the effectiveness of BMPs through workshops and meetings. The draft must state when the meetings and workshops will be held during the year. The purpose of these workshops should be to gather public input regarding the status of the program and effectiveness of BMPs, Such workshops should be formatted as roundtable discussions and opportunities for the gathering of measurable information by [TCSD] for use in the annual report to RWQCB.

- Recommend to conduct at least two meetings annually. One informational and [an]other [for] comments. Need to specify when these meetings will be conducted.

Response: Opportunities for public to input are provided by BMPs PP-1 and PP-2. TCSD's Utility Conservation Coordinator will be available for additional public input and coordination with County stormwater management staff.

Comment: The intent of BMP PP-3 "Promote public participation in Annual Cleanup Day and Creek Cleanup Day" is to promote community support for the SWMP and to reduce pollution from litter, trash, and illegal dumping. Goal PP-3A promotes trash and creek cleanup opportunities on an annual basis. Coastkeeper requests the following for this BMP and Goal:

- Must clarify what mechanisms TCSD will use to engage citizens from the CSD in these activities.
- Provide details on what TCSD will do to engage all economic and ethnic groups within the jurisdiction of the CSD.
- Clarify what measurable goals TCSD will use to demonstrate that the proposed action fully addresses the requirements and intent of this MCM.
- Must include mechanisms for engaging the general public in activities by providing advertising and incentives for public participation to increase public participation.

Response: 1) TCSD has committed to facilitating local input for their SWMP by attending local water quality meetings (e.g., SLO County Partners for Water Quality, Water Resources Advisory Committee) to stay involved with countywide stormwater-related issues. 2) The SWMP includes BMP MO-1, "Prepare an Effectiveness Assessment Plan," which will further refine TCSD's Measurable Goals in the first year. 3) TCSD's involvement with SLO County Partners for Water Quality provides advertising and incentives for all citizens served by TCSD to participate in activities to maintain water quality in Templeton's creeks and streams.

Comment: BMP PP-4 "Storm Drain Marking Program" is intended to promote community support for the SWMP and to reduce pollution from litter and illegal dumping. Goal PP-4A recruits and organizes community volunteers for storm drain marking events and Goal PP-4B maintains storm drain markings on an ongoing basis. Coastkeeper requests the following for this BMP and Goals:

- Program lacks to specify how the program is conducted and, its measurable goals.
- Clarify how this program will be carried out during the entire term of the permit.

Response: TCSD operates and maintains only about six storm drain inlets within its jurisdiction. San Luis Obispo County maintains other storm drains in Templeton. TCSD and San Luis Obispo County have marked these drains and many more within the County's jurisdiction though collaborative volunteer efforts. TCSD and County will report on these activities in their annual reports.

Comment: BMP PP-5 "Adopt-a-Park" – The BMP sponsors, coordinates, and administers an Adopt-a-Park program for two local parks and promotes community support to reduce pollution from litter and illegal dumping. To fulfill Goal – PP-5A, TCSD will receive applications from residents within the community. Coastkeeper requests the following for this BMP and Goals:

- Must specify how this program will be carried out during the entire term of the permit.
- Recommend an ordinance or regulation mandating clean up of designated [areas].

Response: The Goal is self-explanatory. As required in BMP MO-1, TCSD will refine this BMP in year one.

MINIMUM CONTROL MEASURE #3 ILLICIT DISCHARGE DETECTION AND ELIMINATION:

Comment: The minimum requirement of a regulated small MS4 is to develop, implement, and enforce an illicit discharge detection and elimination program. The Coastkeeper provides comments that TCSD must:

- Adopt and enforce an illicit discharge detection and elimination ordinance to prohibit illicit discharges from the CSD facilities to the County stormwater system.
- Create a stormwater system map showing the location of all outfalls from the CSD facilities and identifying the waters that receive discharges from those outfalls.
- Provide a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community.
- As the wastewater service provider in Templeton, the CSD should implement a regular system management program to detect and eliminate illicit discharges from the waste water collection system.
- Conduct illicit discharge detection and elimination education and training for the CSD emergency and water service personnel.

Response: 1) TCSD does not have the authority to regulate this activity. However, the County Illicit Discharge Detection and Elimination (IDDE) Ordinance prohibits all illicit discharges in Templeton (refer to SLO County Code Title 8.68.010 referenced in TCSD's SWMP Section 3, page 3). San Luis Obispo County utilizes the same regulatory mechanisms to enforce illegal discharge violations from TCSD facilities to the County's MS4 as they would impose against any other discharger in County jurisdiction. 2) TCSD's Facilities Map (SWMP Figure A-1), in Appendix A, shows the location of all TCSD-owned facilities. As part of BMP PP-4, TCSD will provide locations of outfalls and receiving waterbodies for all TCSD facilities with a discharge. 3) TCSD is responsible for illicit discharges on their facilities, and the County is responsible for managing all other illicit discharges in Templeton. At this stage in the program, we find it sufficient for the County to receive all illicit discharge reports. The County can re-direct these reports to TCSD when appropriate. TCSD and County have existing programs for reporting failed wastewater systems to the County Environmental Health Department. BMP/Measurable Goal IL-2B advertises the County's stormwater phone hotline. 4) TCSD's Sanitary Sewer Maintenance Plan, described in the SWMP, is sufficient for maintaining the TCSD managed wastewater systems. TCSD's wastewater systems are covered under Waste Discharge Requirements issued by the Water Board. This activity is addressed in the Sanitary Sewer Management Plan referred to in BMP IL-1. 5) TCSD staff training is addressed in BMP MO-8. Training will include illicit discharge detection and elimination procedures for wastewater and water service personnel. The Employee Training program already includes an education component for pollution prevention. 6) Additionally, the SWMP includes BMP MO-1, "Prepare an Effectiveness Assessment Plan," which TCSD's will use to further refine the IDDE Measurable Goals in the first year.

Comment: BMP IL-1 "Sanitary Sewer Overflow Prevention and Spill Response Program." TCSD's intent "To reduce pollutants in storm water runoff from sanitary sewer overflows and spills from District operated wastewater systems," includes Goal IL-1A that requires TCSD Conservation Coordinator and Utilities Supervisor to review the adequacy of the operations and maintenance programs for District-operated wastewater treatment systems to ensure that these systems are properly operated and maintained to prevent sanitary sewer overflows (SSO) and

spills. Goal IL-1A will also incorporate the SSO program into the more comprehensive TSCD Sanitary Sewer Management Plan. A second Goal, IL-1B, is designed to track and trend sanitary sewer overflow events and implement corrective and preventive measures. Coastkeeper requests the following for this BMP and Goals:

- Must report all in annual report.
- Must supplement its educational effort with mechanisms to facilitate proper disposal to meet MEP and water quality standards.

Response: 1) The General Permit requires TCSD to prepare a thorough annual report. 2) TCSD's wastewater systems are regulated under separate Waste Discharge Requirements, not TCSD's Stormwater Management Program. The Sanitary Sewer Overflow Prevention and Spill Response Program is part of TCSD's Sanitary Sewer Management plan referred to in BMP IL-1. Additionally, BMP MO-1, "Prepare an Effectiveness Assessment Plan," requires TCSD to refine the effectiveness of these BMPs and Goals within the first year of the plan.

Comment: BMP IL-2 "Illegal Dumping Program" provides TCSD a means to reduce pollutants in storm water runoff by providing a mechanism to detect and eliminate illicit discharges, illegal dumping, construction site runoff violations and other stormwater pollution problems through citizen reporting. The BMP is backed up by three Goals – IL-2A requires TCSD to partner with the County to advertise the availability of the County Stormwater Pollution Prevention hotline for citizens to report illicit discharges, illegal dumping, construction site runoff violations, and other stormwater pollution problems. A second Goal IL-2B mandates TCSD post signage at TCSD Basins with the County's stormwater phone hotline for citizen reports of illicit discharges, coordinate with the County on enforcement proceedings for illicit discharge to basins, and develop cleanup procedures in the event of an illicit discharge to basin. Goal IL-2C directs TCSD to record the number of stormwater reports that are tracked back to TCSD owned stormwater facilities, and document follow up actions and problem resolution. Coastkeeper requests the following for this BMP and Goals:

- Must respond to 100% of all reports of illegal dumping.
- Must explicitly provide for follow-up investigation of any monitoring that suggests that presence of illicit discharges or connections.
- Must contain commitments by the CSD to respond to all spills from all sources, and prevent the entry of in County storm water system.
- Must include the requirement that CSD report on the use of the hotline in their annual report.
- The document is vague and unclear regarding how enforcement will be carried out given current staffing levels and budget allocations.

Response: 1) TCSD does not have the legal authority to regulate or enforce this activity. However, as detailed in our response to comments about BMP IL-1, TCSD staff are responsible for response and follow up on sewage spills, potable water pipe leaks, and other illicit discharges from TCSD facilities. The BMP and Measurable Goals require TCSD to advertise the County's Hotline and refer violations to the County for enforcement. 2) Additionally, TCSD's SWMP includes BMP MO-1, "Prepare an Effectiveness Assessment Plan," which requires TCSD to refine its BMPs and Measurable Goals in year one.

Comment: BMP IL-3 "Map the storm sewer system," is designed to reduce pollutants in storm water runoff by mapping the storm sewer system to facilitate tracking the source of stormwater pollutants. Two Goals support the BMP– IL-3A requires TCSD to create a complete storm sewer system map, including detention basins and outfalls owned and operated by TCSD. A second

Goal, IL-3B, requires TCSD update maps on an annual basis to include new and modified storm sewer facilities. Coastkeeper requests the following for this BMP and Goals:

- Must require the completion of the map of the storm sewer system showing the location of District owned and maintained storm sewer features and all outfalls and the names and all of the above within year 1.

Response: TCSD indicates stormwater mapping is complete and will be reported in the first year annual report.

MINIMUM CONTROL MEASURE #4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Comment: The Phase II Final Rule Requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in storm water runoff to their MS4 from construction activities. Within the CSD, these functions are performed by the County of San Luis Obispo: The minimum requirements of construction Site Runoff Control are to develop, implement, and enforce an erosion and sediment control program for construction activities that disturb one or more acres of land. Templeton CSD does not issue or enforce construction permits. TCSD must submit permit applications to the County for TCSD construction projects. Therefore, TCSD has not included any new BMPs in the SWMP. Coastkeeper requests the following for this MCM:

- An appropriate [role] for the CSD would be to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges from construction projects in the community.
- Recommend a program or a monitoring system within the community.

Response: The County has a stormwater pollution prevention hotline reporting program. The County is responsible for illicit discharges on all construction sites in Templeton; therefore, Water Board staff finds it most logical for reporters to call the County hotline.

TCSD does not have the authority to regulate this activity. TCSD does not issue or enforce construction permits. Under BMP IL-2, TCSD will advertise the County Hotline and refer violations to the County for enforcement.

MINIMUM CONTROL MEASURE #5 POST-CONSTRUCTION STORMWATER MANAGEMENT

Comment: Phase II Final Rule requires MS4s to develop, implement, and enforce a program to reduce pollutants in storm water runoff to their MS4 from post-construction activities. In Templeton these functions are performed by the County of San Luis Obispo. Templeton CSD does not issue or enforce construction permits. TCSD must submit permit applications to the County for District construction projects. Coastkeeper requests the following for this MCM:

- As suggested for MCM 4, it would be [appropriate] for TCSD to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community.

Response: Please see our previous response.

MINIMUM CONTROL MEASURE #6 POLLUTION PREVENTION / GOOD HOUSEKEEPING

Comment: The intent of this control measure should be to ensure that the TCSD operations are performed in a manner that minimizes contamination of stormwater discharges. To enhance the effectiveness of the proposed list of BMPs [TCSD] should explicitly include Low Impact Development Standards (LID) in any facility improvements and landscaping.

Response: Water Board staff has directed the County to adopt interim hydromodification control criteria, which should lead to LID. Any new development or re-development projects at TCSD-owned facilities that meet the County's applicability criteria for hydromodification control criteria will be required to control hydromodification through application of LID.

Comment: The General Permit requires each MS4 to examine its own activities and develop a program to prevent the discharge of pollutants from these activities. TCSD's BMP MO-3 "Implement Storm Sewer Inspection and Maintenance Procedures and Schedules" requires TCSD to reduce the amount of pollutants in stormwater runoff by inspecting and properly maintaining the storm sewer system. TCSD's Goal – MO-3A will implement routine inspection and cleaning procedures and schedules for storm drain catch basins and other components of the storm sewer system cleaning at least twice per year; plus high frequencies at specific locations. Coastkeeper requests the following for this BMP and Goal:

- Must be more specific of inspection schedule and procedures to assure commitment of meeting BMP.

Response: TCSD's Utilities Division cleans debris from TCSD's detention basins and storm drains prior to rain events, during rain events, and on an as-needed basis (see SWMP Section 3.2 #6). The timing of some cleaning efforts depends on weather conditions and sources of debris. BMP MO-3A requires TCSD to continue these efforts and document the procedure, frequency, and sources of debris in each annual report.

Comment: BMP MO-4 requires TCSD to implement procedures to prevent non-stormwater pollution potentially caused by waterline and hydrant flushing. TCSD's Goal – MO-4A directs TCSD to develop procedures to minimize impacts from non-stormwater runoff such as waterline and hydrant flushing. Coastkeeper requests the following for this BMP and Goal:

- Must include mechanisms to monitor and effectiveness measure.

Response: TCSD's SWMP includes BMP MO-1 to prepare an effectiveness assessment plan in year one.

Comment: BMP MO-8 "Provide stormwater pollution prevention education and outreach to Municipal Departments and Personnel" is intended to reduce pollutants in stormwater runoff by educating municipal departments and personnel that perform activities that can contribute to stormwater pollution. The BMPs Goal – MO-3A requires the TCSD implement an annual employee-training program for District Employees covering how to detect and report illicit discharge to the County and to incorporate pollution prevention and good housekeeping into municipal operations. Coastkeeper requests the following for this BMP and Goal:

- Must commit to training specific categories of employees and provide mechanisms for commitment during permit term.

Response: Staff agrees, therefore we added required revision Item Number 3, so that TCSD must modify BMP MO-8 to specify the municipal staff training program will include training for wastewater and water service personnel.