



Linda S. Adams
Agency Secretary

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzenegger
Governor

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November 23, 2009

Charlie Ebeling
Public Works Director
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, CA 93013

Dear Mr. Ebeling

NOTICE OF ENROLLMENT – NPDES SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS GENERAL PERMIT; CITY OF CARPINTERIA, SANTA BARBARA COUNTY, WDID # 3 42MS03021

The Central Coast Regional Water Quality Control Board (Water Board) received a Notice of Intent, Storm Water Management Plan (SWMP), map, and fee for the City of Carpinteria's (City) 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 the City'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 the maximum extent practicable (MEP) standard established in the General Permit. The City's SWMP was available to the public for a 60-day comment period, and we received comments from stakeholders. The comments are contained in Attachment 2. Water Board staff responses to these comments are contained in Attachment 3.

The public originally requested a hearing for the Water Board to consider approval of the SWMP and enrollment of the City under the General Permit. However, the hearing requests were withdrawn by all parties. 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 the City's SWMP with the following condition:

Pursuant to Water Code Section 13383, the City of Carpinteria is required to amend the SWMP no later than **January 31, 2010**, to include all the changes shown in the "Final Table of Required Revisions," Attachment 1 to this letter. Per Water Code Section 13385, failure to make these revisions may subject the City of Carpinteria to Administrative Civil Liability for up to \$10,000 for each day of violation. The City of

California Environmental Protection Agency



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Carpinteria must provide a copy of the revised pages of the SWMP to the Water Board no later than **January 31, 2010** (70 days from General Permit authorization).

As of **November 23, 2009**, discharges from the City's MS4 are authorized by the General Permit. The City is required to implement the SWMP and comply with the General Permit. The City's first annual reporting period ends **November 30, 2010**. The City's first annual report is due to the Water Board on **February 28, 2010** (approximately 90 days after the reporting period).

Thank you for your cooperation and efforts to enroll the City of Carpinteria under the General Permit. If you have questions regarding this matter, please contact **Brandon Sanderson at (805) 549-3868** or bsanderson@waterboards.ca.gov, or Phil Hammer at (805) 549-3882 or phammer@waterboards.ca.gov.

Sincerely,



Roger W. Briggs
Executive Officer

cc: (by electronic mail)
Charlie Ebeling, City of Carpinteria
Erin Maker, City of Carpinteria
Jane Gray, DUDEK Engineering
Brandon Steets, Geosyntec Inc.
Kira Redmond, Santa Barbara Channelkeeper
Hilary Hauser, Heal the Ocean

Attachment 1: Final Table of Required Revisions
Attachment 2: Comment Letters Received during 60-day Public Comment Period
Attachment 3: Response to Comments

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**ATTACHMENT 1
FINAL TABLE of REQUIRED REVISIONS
City of Carpinteria SWMP November 2009 – November 2014**

Acronyms:

- BMP - Best Management Practice
- CASQA - California Stormwater Quality Association
- CEQA - California Environmental Quality Act
- IDDE - Illicit Discharge Detection and Elimination
- MCM - Minimum Control Measure
- MG - Measurable Goal
- SWMP - Storm Water Management Plan
- SWPPP - Storm Water Pollution Prevention Plan
- TMDL - Total Maximum Daily Load
- POCs - Pollutants of Concern

* Denotes addition of or change to Required Revision since last review

() Denotes previous draft Required Revisions Item Number

Item Number	SWMP Section	Subject	Problem	Required Revisions
1*	General	TMDLs	The SWMP does not address future development of TMDLs.	Revise the section under TMDLs to include a statement that the SWMP may have to be modified pursuant to TMDLs that are developed in the future.
2*	All	Effectiveness Assessment	The City's BMPs and/or MGs do not always have adequate measures of effectiveness to assess the appropriateness and effectiveness of individual BMPs and the SWMP as a whole. Effectiveness assessment discussions in the SWMP are often excluded or do not provide appropriate detail to be evaluated effectively.	Include a BMP that provides a statement similar to the following: "The City will develop an effectiveness assessment strategy during the first full implementation year and submit it as an update to the SWMP with the first annual report. The effectiveness assessment strategy will be used to conduct effectiveness assessments included in the

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			<p>The City MGs often do not provide adequate measures of success in the implementation of associated BMPs. For further assistance please see EPA's "Measurable Goals Guidance" at: http://cfpub1.epa.gov/npdes/stormwater/measurablegoals/index.cfm</p> <p>and</p> <p>"Evaluating Effectiveness" guidance at: http://www.epa.gov/npdes/pubs/region3factsheet_swmp.pdf</p>	<p>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."</p>
3 (1)	1.0 Public Education	BMP Development	<p>This section does not identify the link between BMP development and implementation and primary POCs.</p> <p>This section also does not discuss the audiences the City will target and the content of outreach efforts.</p>	<p>Revise BMPs 1.1.1, 1.1.3, 1.1.5, and 1.1.9 to emphasize primary POCs in education and outreach materials and efforts. For example outreach should focus on proper handling of trash (especially plastic debris), pet waste management, septic system maintenance, fertilizer use, hydromodification, automotive activities, etc.</p> <p>Revise BMPs 1.1.1, 1.1.5, and 1.1.9 to discuss the target audience and content of outreach.</p>

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4 (2)	1.0 Public Education	BMP Selection Community-based Social Marketing	<p>The Public Education and Outreach BMPs rely heavily on information campaigns that utilize education and advertising to encourage behavior change. While these efforts can be effective in creating public awareness and in changing attitudes, numerous studies show that behavior change rarely occurs as a result of simply providing information.</p> <p>One particularly promising approach to public education is community-based social marketing. Community-based social marketing is based upon research in the social sciences that demonstrates that behavior change is most effectively achieved through initiatives delivered at the community level which focus on removing barriers to an activity while simultaneously enhancing the activities' benefits. More information on community-based social marketing is available at: http://www.cbsm.com/. The techniques of community-based social marketing should be considered when developing and implementing your public education and outreach program.</p>	Include a BMP that commits to assessing community-based social marketing strategies, and incorporating them into your program where appropriate.
5 (3)	1.0 Public Education BMP 1.1.10	Stormwater Hotline	The BMP lacks detail, specificity, and effectiveness assessment.	Revise the BMP and MGs to include tracking of calls including the location, nature, and time of day of incidents reported. Include follow-through procedures

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				including response time. Provide assessment parameters for evaluating the effectiveness of the BMP.
6*	1.0 Public Participation BMP 1.1.11	Media Campaign	The BMP does not include proper quantifiable MGs. See measurable goal guidance for additional resources: http://cfpub1.epa.gov/npdes/stormwater/measurablegoals/index.cfm	Remove the current MG a. and revise with the number of radio ads the City will run annually (similar to MG b.). Include a MG that states when and how often the City will run radio ads. Identify the percentage of the target population (including demographics) that the City will reach with printed articles and the TV program.
7*	1.0 Public Participation BMP 1.1.12	Public Opinion Survey	The BMP does not include the proper MG to evaluate educational outreach efforts.	Revise the MG to include a statement that the City will use the public opinion survey to improve future public education and outreach efforts.
8*	1.0 Public Participation	BMP Development Business Education	The SWMP does not properly identify and prioritize education efforts targeting the business community.	<p>Include a BMP to develop a program to educate the business community.</p> <p>Include a MG to develop a business inventory list categorized by business type.</p> <p>Include a MG to distribute education materials by specific business type.</p> <p>Include a MG to prioritize businesses by their potential to discharge pollutants and state that the City will inspect the higher priority businesses first. <i>(This BMP may be included in the IDDE MCM as an alternative and referred to here in the PPO MCM.)</i></p>

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9* (4)	2.0 Public Participation BMP 2.1.2	Community Interest Group	<p>The BMP does not provide explicit details regarding public participation.</p> <p>The BMP also does not contain assessment parameters.</p>	<p>Revise the BMP to explicitly explain how the City will incorporate public involvement and participation in SWMP implementation efforts. Include a statement that the City will engage in discussion centered on components of the SWMP including new policy or program development, annual report analysis, etc.</p> <p>The description of the Watershed Coalition must explain that activities are not solely directed at Carpinteria Creek, but all of the watersheds that are part of the City's jurisdiction.</p> <p>Include a MG that states the City will hold a specific number of meetings (e.g., quarterly) specifically directed at areas of SWMP development.</p> <p>Include a MG that states how the City will solicit public involvement in the interest group.</p> <p>Include a MG to increase participation by certain % each year.</p> <p>Revise the BMP to include proper assessment parameters, such as documenting participation and evaluating meeting content and presentation.</p>

Item Number	SWMP Section	Subject	Problem	Required Revisions
10 (5)	2.0 Public Participation BMP 2.1.7	Community Clean-ups BMP Effectiveness Assessment	The BMP does not contain appropriate assessment parameters.	Revise the BMP to include tracking the amount of trash collected as an assessment parameter along with tracking participation as currently stated.
11 (6)	2.0 Public Participation	BMP Development	The SWMP does not state the City will involve the public in review and commenting on draft SWMP revisions and ordinances. The MCM does not ensure diverse public involvement.	Add a BMP equivalent to the following: The City will solicit public comments on draft SWMP revisions and ordinances, provide sufficient time for the public to comment, and respond to comments by incorporating revisions into draft SWMP revisions and ordinances as appropriate. Ensure that the City includes a diverse cross-section of people during public participation to identify a wide range of concerns, ideas, etc.
12* (7)	3.0 IDDE	BMP Development	This section does not identify the link between BMP development/implementation and primary POCs.	Revise the BMPs to ensure they control primary POCs (e.g., pathogens, nutrients, trash, and sediment). Include a BMP that states the City will develop a program to determine sources of bacteria and nutrients that enter the City's MS4 (<i>This may be a coordinated effort with the County of Santa Barbara</i>).
13 (8)	3.0 IDDE BMP 3.1.1	Storm Drain Map	The BMP does not include regular updates.	Include a MG that states the City will update the storm drain map annually.
14 (9)	3.0 IDDE BMP 3.1.3	Spill and Complaint Response	The BMP lacks detail about complaint investigation, identification, and follow-up procedures.	Revise the BMP to provide more detail regarding complaint investigation, identification, and response procedures.

Item Number	SWMP Section	Subject	Problem	Required Revisions
			<p>The BMP does not ensure tracking and follow-up occurs, specifically with forwarded complaints.</p> <p>The BMP does not include response procedures for emergency discharges during off hours and weekends.</p> <p>The BMP is not clear in its enforcement strategies and procedures.</p>	<p>Include a MG that ensures the City will track and follow up on forwarded and other complaints.</p> <p>Include complaint response procedures for off hour and weekend complaint calls.</p> <p>Provide clarity for an escalating enforcement strategy (e.g., 1st offence - provide education and written notice to discharger with cleanup and abatement deadlines. 2nd offence – NOV with minimum daily penalties. 3rd offence – administrative civil liability penalties [fines] or referral to district attorney's office). Include re-inspection of key abated discharges to eliminate reoccurrence.</p>
15* (10)	3.0 IDDE BMP 3.1.3	Field Investigations and Abatement	The BMP lacks detail about investigation and abatement procedures. The BMP must include a systematic approach to the development of a Field Investigations and Abatement program.	<p>Revise the BMP to provide detail on field investigation procedures, including the number of field personnel assigned to inspections, when and how often the City will conduct inspections, and how the City will conduct inspections (e.g., drive by, on foot, etc.).</p> <p>Include a MG that states the City will investigate and abate 100% of identified illicit discharges.</p> <p>Include a MG to develop a schedule for</p>

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				<p>conducting field investigations for priority areas of concern.</p> <p>Include a MG that states the City will conduct follow-up inspections and take enforcement when necessary to eliminate illicit discharges identified.</p>
16* (11)	3.0 IDDE BMP 3.1.4	Coordination with Jurisdictional Agencies	<p>The BMP continues to lack detail regarding stormwater permit requirements and agency coordination.</p> <p>Hazardous Spill Response is not clearly addressed in the SWMP.</p>	<p>Revise the BMP to include the development of educational resources, stormwater training, and inspection tools (checklists) to provide cooperative agencies with knowledge of stormwater pollution provisions and issues to assist in the identification of illicit discharges.</p> <p>Revise the MG a. to state the City will meet with other agencies annually, rather than biannually.</p> <p>Add a BMP to review and update the hazardous spill response program and training to address potential discharges to the MS4. Include hazardous spill response procedures.</p>
17 (12)	3.0 IDDE BMP 3.1.8	Municipal Stormwater Code	<p>This BMP lacks detail on the code approval process. The BMP states that new language will be developed and adopted by end of year 2. The City must have a general sense of the development and approval process.</p>	<p>Revise the BMP to include detail on the development and adoption of the municipal code, including a tentative schedule that includes at least one widely advertised public meeting to solicit input on the content of the code before it is presented to the City Council.</p>

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18 (13)	3.0 IDDE BMP 3.1.8	Municipal Stormwater Code	Procedures for enforcement must be included in the SWMP.	Include a description of potential enforcement procedures to be included in the code for use as part of an escalating enforcement strategy.
19* (14)	3.0 IDDE BMP 3.1.8	Municipal Stormwater Code	The scope of the code is not described clearly.	<p>The BMP must include current regulations applicable to illicit discharges. The BMP must indicate that pet waste, including horse waste restrictions, are included in the code.</p> <p>Revise the BMP to indicate that the code includes a prohibition on non-stormwater discharges to the MS4.</p>
20 (15)	3.0 IDDE BMP 3.1.6	Exempt Non-Storm Water Discharges	This section does not provide adequate detail (no BMPs or MGs included) for the City's proposed evaluation of exempt non-storm water discharges to determine if they have the potential to be significant sources of pollutants.	Add BMPs and MGs, including a schedule, for the evaluation of non-stormwater discharges identified as exempt under the General Permit to determine their potential to be significant sources of pollutants. For those non-stormwater discharges identified as having the potential to be significant sources of pollutants, confirm that the City will prohibit such non-stormwater discharges from entering the MS4, or describe the BMPs the City will require in order to control the pollutants in the non-stormwater discharges.
21 (16)	3.0 IDDE BMP 3.1.7	Geographical Assessment	The BMP lacks detail regarding action items developed from the assessment.	Revise the BMP to include MGs with action items resulting from the assessment and illicit discharge map (e.g., prioritize business and industrial facility inspections, prioritize creeks for dry weather inspections, prioritize POCs, and develop new BMPs).

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22* (17)	3.0 IDDE BMP 3.1.9	Stormwater Monitoring	The current scope of this BMP is limited.	<p>Revise the BMP to include a description of the current monitoring efforts being conducted by local coalitions within the City's MS4 area (e.g., where monitoring is taking place, when and how often samples are taken, what constituents are sampled for, who is conducting the sampling, etc.).</p> <p>Include a description of the City's coordination with local coalitions for these monitoring efforts.</p> <p>Include a MG that states the City will coordinate with local coalitions regarding monitoring efforts.</p> <p>Include a MG that states the City will use monitoring data to determine effectiveness of SWMP efforts and improve program components.</p>
23 (18)	3.0 IDDE	IDDE Training	The SWMP lacks IDDE training for municipal staff. The City does not commit to making the detection and elimination of illicit discharges a priority.	<p>Include a BMP to train City staff (especially field staff) on IDDE requirements, inspection, and enforcement procedures.</p>
24* (19)	4.0 Construction Runoff Control	Inadequate MCM Details for Construction Runoff Controls	The current scope of this MCM is limited. The BMPs do not fully address permit requirements.	<p>Revise the SWMP to acknowledge that the City is required to establish construction site controls for sites greater than one acre and for sites less than an acre that are part of a larger common plan of development.</p> <p>Add BMPs and corresponding MGs demonstrating that the City will comply with</p>

Item Number	SWMP Section	Subject	Problem	Required Revisions
			<p>Currently there is not a BMP for the development of an ordinance or the review and revision of an existing ordinance(s) that require erosion and sediment controls, including enforcement procedures for non-compliance. Existing requirements and procedures for erosion and sediment controls are not included in SWMP.</p> <p>Currently there is not a BMP that includes requirements for control of other construction related wastes (e.g., paint, cement, trash, etc.).</p> <p>Currently there is not a BMP that discusses the development and implementation of procedures the City has/will develop to address public input.</p>	<p>General Permit requirements to:</p> <p>(1) Develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, including implementation by site operators, as well as sanctions, or other effective mechanisms to ensure compliance. Include a BMP that requires the City to review and update existing ordinances and standard conditions regarding construction site controls if this is the City's preferred process. City must include discussion of current erosion and sediment control requirements, and standard procedures regarding construction sites in SWMP.</p> <p>(2) Develop requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.</p> <p>(3) Develop procedures for receipt and consideration of information submitted by the public. <i>(This may be referenced in another section of the SWMP. The City should consider development of informational signs at constructions sites that include permit requirements and a hotline number for the public to call.)</i></p>

Item Number	SWMP Section	Subject	Problem	Required Revisions
25* (20)	4.0 Construction Runoff Control BMP 4.1.1	Construction Site Operator Education & Training	This BMP does not include a description of procedures for how the City will educate construction site personnel and what topics will be covered regarding stormwater pollution prevention.	Include a BMP that describes how the City will educate and train construction personnel working on projects within the City's jurisdiction on the proper implementation of stormwater runoff controls (e.g., through City sponsored trainings and distribution fact sheets). Include information on the proper installation and maintenance of erosion and sediment controls, including site planning, minimization of soil movement, capture of sediment, and good housekeeping. Reference to widely used BMP manuals must be provided.
26* (21)	4.0 Construction Runoff Control BMP 4.1.2	Discretionary Project Review	<p>This BMP lacks the proper scope of activity to be implemented. Statements regarding policies and procedures are vague and incomplete.</p> <p>The BMP lacks appropriate MGs.</p>	<p>The BMP must be revised to state the City will develop new discretionary project review procedures or revise existing procedures (details regarding existing procedures and Standard Conditions of Approval must be included in SWMP) to include consideration of potential water quality impacts. The SWMP must specify who is responsible for tracking and monitoring construction activities for compliance and how this effort will be conducted.</p> <p>Include a MG to develop a guidance document for the City's Standard Conditions and a BMP procedures and policy manual.</p> <p>Include a MG stating that the City will review and update the Standard Conditions as appropriate (annually, biennially, etc.).</p>

Item Number	SWMP Section	Subject	Problem	Required Revisions
				<p>Include a MG that states construction site BMP requirements will be included in the construction approval process.</p> <p>Include a MG that states City staff will review site plans prior to ground breaking on site.</p> <p>Include a MG that states Waste Discharge Identification (WDID) numbers from the State Water Board will be required for permit approval on all discretionary projects one acre or greater.</p> <p>Include a MG that states the City will develop a method to track new construction activities and make the information available to the public.</p>
27* (22)	4.0 Construction Runoff Control BMP 4.1.3	Construction Site Inspection and Enforcement	The BMP fails to provide information on how the City will evaluate the effectiveness of review procedures, inspections, and City follow-up actions based on inspections (e.g., enforcement).	<p>Revise the BMP and MGs to demonstrate that the City will track construction site information, including: owner, contractor, start and completion dates, size in acres, inspection dates, findings from inspections, complaints received, and the City's response to complaints. This information can inform the City's assessment of the effectiveness of its review, inspection, and follow-up procedures.</p> <p>Include a MG stating the City will review and update the existing ordinance in year 1.</p> <p>Include a MG identifying the frequency of</p>

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				inspections on construction sites one acre or greater, as well as sites less than an acre.
28* (23)	4.0 Construction Runoff Control BMP 4.1.3	Construction Site Enforcement	The BMP lacks detail regarding standard City procedures and enforcement. Statements are vague and incomplete.	<p>Revise the BMP to provide a summary of the standard City procedures and escalating enforcement strategy steps the City will use for construction site non-compliance.</p> <p>Include a MG stating the City will take enforcement on 100% of non-compliance issues discovered.</p>
29* (24)	4.0 Construction Runoff Control BMP 4.1.4	Staff Training	<p>The scope of training is not clearly indicated.</p> <p>The BMP lacks an appropriate MG.</p>	<p>Revise the BMP to state the City will train staff on proper installation, operation, and maintenance of construction site BMPs, as well as inspection methods and enforcement strategies.</p> <p>Include MG to develop an erosion and sediment control BMP inspection checklist to assist inspectors in properly identifying appropriate BMPs in the field. See the RWQCB example stormwater inspection checklist at: http://www.waterboards.ca.gov/centralcoast/water_issues/programs/stormwater/docs/c_onstruction/construction_inspection_form.pdf</p>
30*	5.0 Post- Construction Runoff Controls	Land Use Policies	References to current land use policies are incomplete regarding implementation and enforcement procedures.	<p>Revise the BMP to include discussion of current land use implementation processes, including enforcement of policies.</p> <p>Include a MG that states the City will review</p>

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	BMP 5.1.1			and revise existing land use policies (within specified time frame) to ensure they achieve desired watershed conditions.
31* (25)	5.0 Post-Construction Runoff Controls BMP 5.1.2	Interim Hydromodification Criteria	<p>While the City discusses its position to participate in the joint regional effort to develop hydromodification and LID criteria, it is not appropriate to include the language at this time. Implementation of the joint effort has not yet begun. The City may state that it supports the joint effort and will participate when implementation commences. However, we currently provide three options for the development of the interim criteria that must be included in the City's SWMP.</p>	<p>Modify the SWMP to include the development of interim hydromodification criteria using one of the options listed below:</p> <p>Option 1: The proposed criteria may include the following types of requirements which provide a high degree of assurance of effective hydromodification control without regard to the nuances of individual watersheds:</p> <ol style="list-style-type: none"> 1. For new and re-development projects, Effective Impervious Area¹ shall be maintained at less than five percent (5%) of total project area. 2. For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent (1%) the pre-development² runoff hydrographs, for a range of events with return periods from 1-year to 10-years.

¹ Effective Impervious Area is that portion of the impervious area that drains directly to a receiving surface waterbody via a hardened storm drain conveyance without first draining to a pervious area. In other words, impervious surfaces tributary to pervious areas are not considered Effective Impervious Area.

² Pre-development condition is defined as the native vegetation and soil conditions that exist prior to human influence (e.g., urbanization, agriculture, grazing, timber harvest).

Item Number	SWMP Section	Subject	Problem	Required Revisions
				<p>3. For projects whose disturbed project area exceeds two acres, preserve the pre-development drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream³ or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration.</p> <p>Other acceptable approaches to develop interim criteria that are as effective as Option 1 include:</p> <p>Option 2: Adopt and implement hydromodification criteria developed by another local municipality and approved by the Water Board, such as the criteria the Water Board adopted for the City of Salinas, as interim criteria.</p> <p>OR</p> <p>Option 3: The City shall use the following methodology to develop interim flow control and infiltration criteria:</p> <p>1. Identify a range of runoff flow rates for which post-project runoff flow rates and durations shall not exceed pre-project</p>

³ A first order stream is defined as a stream with no tributaries.

Item Number	SWMP Section	Subject	Problem	Required Revisions
				<p>runoff rates and durations, where the increased discharge rates and durations will result in off-site erosion or other significant adverse impacts to beneficial uses. Pre-project refers to the condition immediately prior to the proposed project. The condition includes, but is not limited to, soil type, vegetation, and amount of impervious surface.</p> <ol style="list-style-type: none"> <li data-bbox="1352 618 1885 846">2. Establish numeric criteria for development projects to maximize infiltration on-site and approximate natural infiltration levels to the maximum extent practicable and to effectively implement applicable low-impact development strategies. <li data-bbox="1352 886 1892 1146">3. Identify the projects, including project type, size and location, to which the City will apply the interim criteria. The projects to which the City will apply the interim criteria will include all those projects that will cause off-site erosion or other significant adverse impacts to beneficial uses. <li data-bbox="1352 1187 1898 1349">4. Identify methods to be used by project proponents to demonstrate compliance with the interim discharge rate and duration criteria, including continuous simulation of the entire rainfall record.

Item Number	SWMP Section	Subject	Problem	Required Revisions
				<p>5. Identify methods to be used by project proponents to demonstrate compliance with the interim infiltration criteria, including analysis of site imperviousness.</p>
32 (26)	5.0 Post-Construction Runoff Controls BMP 5.1.3	Long-Term Watershed Protection	<p>The City must commit to providing long-term watershed protection. The City has provided examples of its efforts of watershed protection through land use policies, plans, ordinances, guidance manuals, and BMPs. However, the City must provide more detail and evidence that these will achieve desired watershed conditions.</p>	<p>Include a BMP stating how and when the City will 1) develop quantifiable measures that indicate how the City's watershed protection efforts achieve desired watershed conditions, 2) evaluate the existing watershed protection efforts (the referenced land use policies, plans, ordinances, guidance manuals, and BMPs), and 3) adapt or change the existing efforts if necessary.</p>
33 (27)	5.0 Post-Construction Runoff Controls BMP 5.1.5	Policy Reviews & Updates	<p>Many of the BMPs described under this MCM, which discuss "project development review procedures," lack appropriate detail concerning the development and review/update of those policies and procedures. The City many programs and resources (e.g., CEQA Guidelines & Checklist, interpretive and implementation guidelines, conditions of approval, mitigation measures) that will be used under this MCM, some of which the City states will be developed or reviewed and updated.</p>	<p>Add individual BMPs or MGs within the MCM to state when updates and revisions to cited guidelines, conditions, and measures will occur. Also explain the revision and approval procedures. For example: Identify when the City will review and revise the that CEQA guidelines will be revised to include consideration of urban water quality impacts.</p> <p>Include a statement that the City will apply standard conditions of approval to all projects.</p> <p>During all requested planner consultation meetings and Development Review Committee meetings, state the City will</p>

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				educate applicants on the need for stormwater control. Include a statement that the City will implement interpretive and implementation guidelines and include them in application packages.
34 (28)	5.0 Post-Construction Runoff Controls BMP 5.1.5	Project Design Approval	The City's review process for new and re-development projects as described lacks adequate detail to know whether the process could allow project environmental analysis to conclude without evaluation of specific stormwater management BMPs proposed.	<p>Modify the section in the BMP that describes the "Application Submittal" so it is consistent with the following, or add a BMP equivalent to the following:</p> <p>The City will insure that applications are only deemed complete if they identify the types of post-construction BMPs to be implemented and their locations.</p> <p>In addition, identify in the SWMP the particular stage(s) in the City's development project review/approval process that will be used to apply all specific hydromodification control/LID criteria and standards to development projects.</p>
35*	5.0 Post-Construction Runoff Controls BMP 5.1.8	Incentive Program for Innovative Site Design	The BMP does not contain proper MGs.	<p>Include a MG that states the City will advertise the incentive program widely to the development community.</p> <p>Include a MG that states the City will showcase the innovative projects to raise awareness of LID.</p>
36* (29)	5.0 Post-Construction	Inspection Procedures	This BMP lacks specificity regarding inspection protocol and the tracking system.	Add to or revise the BMP to indicate when and how often inspections will occur to ensure correct BMP installation,

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	Runoff Controls BMP 5.1.9			<p>maintenance, and functionality.</p> <p>Include a MG that states the City will develop an agreement mechanism between the property owner and the City to ensure long-term operation and maintenance of post-construction BMPs.</p> <p>Revise the MG to state that 20 percent of post-construction BMP related projects will be inspected annually for proper operation and maintenance.</p> <p>Include measures to ensure that inspectors are informed of the conditions, measures, and control BMPs they must track.</p>
37 (30)	5.0 Post-Construction Runoff Controls BMP 5.1.10	Enforcement	The BMP does not have a description of penalty provisions or tracking for non-compliance with standards or conditions of approval.	Add a BMP identifying specific enforcement procedures and the range of penalties for non-compliance. Include a statement that the City will track enforcement of post-construction storm water controls that are required as conditions of approval in Years 2 through 5.
38 (31)	5.0 Post-Construction Runoff Controls	General Permit Attachment 4 Design Standards	The City does not address Attachment 4 provisions in the SWMP as required to achieve the maximum extent practicable standard and to protect water quality.	Include BMPs and MGs to implement Attachment 4 Design Standards as outlined in the General Permit.

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39 (32)	6.0 Pollution Prevention for Municipal Operations	Inadequate MCM Details	The Pollution Prevention and Good Housekeeping for Municipal Operations control measure lacks adequate detail and specificity. (See the City of Santa Barbara and Santa Maria SWMPs for examples of adequate content).	Revise the SWMP to provide more detailed discussion of program elements. The discussion must include who, what, where, why, how, and when statements.
40* (33)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.1	Municipal Facility and Operations Individual SWMPs	The BMP does not discuss which facilities or operations could adversely impact stormwater and require a site or activity specific SWMP.	<p>Revise the BMP to include MGs to develop a facility and operation inventory to determine potential to create and/or release pollutants. This should include Public Works maintenance yards, fleet yards, water and waste water treatment plants, and public facilities (i.e., golf courses, parks, etc.), as well as maintenance and construction activities.</p> <p>Include a MG to conduct evaluation of facilities and operations to determine their impacts to stormwater. Prioritize facilities based on their potential to discharge pollutants to the MS4. Provide a schedule and time table for the evaluations.</p> <p>Include a MG to inspect facilities and operations annually for compliance with individual SWMPs.</p> <p>Include a MG to revise individual SWMPs periodically (include a timeframe for revision).</p>

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41 (34)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.2	Purchasing and Contract Regulation	This BMP lacks clarification and detail about how contracts containing stormwater pollution prevention specifications will be regulated and enforced.	<p>Revise the BMP to add procedures for evaluating compliance and taking enforcement action if contracts are violated.</p> <p>Include language in the existing MG stating that the City will revise contract language to contain stormwater pollution prevention provisions.</p> <p>Add a MG stating that contractors will be periodically (include timeframe) audited for compliance.</p> <p>Add a MG that states contract language will be enforced for 100% of projects. Include enforcement procedures.</p> <p>Add a MG stating contract language will be periodically reviewed (include timeframe) for effectiveness.</p>
42 (35)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.3	Integrated Pest Management Strategies	This BMP lacks sufficient detail to ensure the progressive development of Integrated Pest Management strategies.	<p>Include a MG that states the City will reduce the use of pesticides by a particular percentage annually.</p> <p>Include a MG that states the City will periodically (include timeframe) evaluate current procedures and explore new procedures to improve effectiveness of Integrated Pest Management strategies over time.</p>

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43 (36)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.4	Street Sweeping	The BMP lacks sufficient detail to evaluate the effectiveness of the program. The BMP seems to have had its description left out of the narrative (see sentence #3, pg 71).	<p>Revise the BMP to include a complete description of activities. Include in the description the approximate miles of roadway swept, and percentage of the City's jurisdictional roadways swept.</p> <p>Include a MG to track the amount of trash collected to evaluate BMP effectiveness.</p>
44* (37)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.5	Catch Basin and CDS Unit Cleaning	The BMP lacks sufficient detail and effectiveness assessment information. Staff questions whether the cleaning of catch basins once a year is suitable.	<p>Include a MG that states an inspection schedule will be developed for all catch basins in Year 1.</p> <p>Include a MG that states cleaning efforts will be evaluated annually to determine the effectiveness of the proposed cleaning frequency.</p> <p>Include a MG that states the City will document the amount of trash collected from CDS units.</p>
45* (38)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.6	Mutt-Mitt Program	The BMP lacks sufficient detail and effectiveness assessment information for prevention of pet waste discharges.	<p>Include a MG that states dispensers will be refilled more frequently as needed.</p> <p>Include a MG that states all dispensers will include signage addressing the pet waste ordinance and associated enforcement provisions as developed in the municipal code.</p> <p>Include a MG that states the City will enforce the pet waste ordinance for 100% of identified violations. Describe the</p>

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				<p>enforcement procedures in SWMP.</p> <p>Include a MG to annually evaluate the pet waste ordinance and enforcement procedures to assess the effectiveness of the program.</p>
46 (39)	6.0 Pollution Prevention for Municipal Operations BMP 6.1.7	Municipal Staff and Contractor Training	The BMPs lack detail on the scope of training and evaluation of its effectiveness.	<p>Revise the BMP to include training for contract employees. Explain the contract employee training schedule.</p> <p>Revise the BMP to include the scope of training the City will conduct. Training topics should include proper vehicle washing and maintenance, park and open space maintenance, fleet and building maintenance, new construction and land disturbance activities, stormwater system maintenance, hydromodification and LID requirements, etc.</p> <p>Include a MG that states all training sessions will be evaluated for effectiveness. Pre/post training quizzes could be used as part of these evaluations.</p>
47 (40)	6.0 Pollution Prevention for Municipal Operations	MS4 Maintenance Operations	The BMP lacks a description of the maintenance activities and procedures implemented to prevent pollutant discharges to the MS4.	Include a BMP to develop a schedule for maintenance of City facilities (e.g., public roads, bridges, sidewalks, and building facades) to prevent pollutants from entering the MS4 (e.g. paving and painting materials, street and sidewalk washwater, dredge spoil, accumulated sediments, floatables, debris, etc.). Identify procedures for proper removal of collected waste.

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48 (41)	6.0 Pollution Prevention for Municipal Operations	Hazardous Spill Response	This issue is not addressed.	Revise the BMP to state the City will update its hazardous spill response and training to address potential discharges to the MS4.