

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

SUPPLEMENTAL SHEET FOR REGULAR MEETING OF FEBRUARY 2, 2012

Prepared on January 27, 2012

ITEM NUMBER: 21

SUBJECT: Revision of Waste Discharge Requirements, Reissuance of National Pollutant Discharge Elimination System Permit No. CA0049981 for the City of Salinas Municipal Storm Water Discharges, Monterey County, Order No. R3-2012-0005

STAFF PERSON: Jennifer Epp 805/594-6181 or jepp@waterboards.ca.gov

This Supplemental Sheet provides supplemental information for the Staff Report for the Central Coast Water Board staff recommendation to adopt the Salinas Municipal Stormwater Permit (Draft Order No. R3-2012-0005). This supplemental information includes:

- 1) Changes to Draft Order No. R3-2012-0005 and the Fact Sheet to correct inaccurate Wasteload Allocation information;
- 2) Information identifying which Draft Order No. R3-2012-0005 tasks are new, modified, or existing requirements;
- 3) Information on where to find active web links provided by the City of Salinas in its comments on Draft Order No. R3-2012-0005; and
- 4) January 25, 2012 comments received from the City of Salinas.

Changes to Draft Order No. R3-2012-0005 and the Fact Sheet to correct inaccurate Wasteload Allocation information

Both Draft Order No. R3-2012-0005 and the Fact Sheet incorrectly identify the wasteload allocation assigned to the City of Salinas in the Lower Salinas River Watershed Fecal Coliform Total Maximum Daily Load. These documents inaccurately identify one component of the fecal coliform wasteload allocation as 40 MPN/100mL. The correct allocation is 400MPN/100mL.

This Supplemental Sheet makes the following changes (shown in underline/strikeout format):

1. The table located in Finding 67, on page 13 of Draft Order No. R3-2012-0005 (Attachment 6 of the Staff Report for Item 21) is changed to read:

Lower Salinas River Watershed Fecal Coliform TMDL – Wasteload Allocation for the City of Salinas

<i>Waterbody</i>	<i>Receiving Water Fecal Coliform (MPN/100mL)</i>
<i>Gabilan Creek, Santa Rita Creek, Reclamation Ditch, Natividad Creek, and Lower Salinas River</i>	<i>Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN/100mL, nor shall more than ten percent of total samples during any 30-day period exceed 400 MPN/100mL.</i>

2. The final sentence on page 145 of the Fact Sheet for Order No. R3-2012-0005 (Attachment 7 of the Staff Report for Item 21) is changed to read:

The wasteload allocation for the Permittee is a fecal coliform concentration that, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN/100mL, nor shall more than ten percent of total samples during any 30-day period exceed 400 MPN/100mL.

Information on which Draft Order No. R3-2012-0005 tasks are new, modified, or existing requirements

Central Coast Water Board staff has identified which tasks in Draft Order No. R3-2012-0005 are new, modified, or already existing, when compared to the tasks the City is required to implement under its current Order, Stormwater Management Plan, and Stormwater Development Standards. To convey this information, Central Coast Water Board staff has created a new table using much of the information originally provided in the table titled, Summary of Milestones/Deadlines, in Attachment K of Draft Order No. R3-2012-0005 (found in Attachment 6 to the Staff Report). In the new table, Central Coast Water Board staff has added columns that identify whether each task is new, modified, or existing. The new table is found as Attachment 1 to this Supplemental Sheet, and is called, Draft Order No. R3-2012-0005 Task Information.

Tasks identified in the new table as “existing” are those tasks that are predominantly the same as tasks required under the current Order No. R3-2004-0135. “Modification” tasks are those tasks for which a component of the task is required under the existing Order No. R3-2004-0135, but the task has been modified to some extent in Draft Order No. R3-2012-0005. “New” tasks are those tasks that were not previously found in the existing Order No. R3-2004-0135. When a new task is similar to a requirement found in another stormwater permit, the new table includes an endnote that provides information about the stormwater permit where the similar requirement can be found. New tasks that do not include an endnote were developed by Central Coast Water Board staff. Justification and rationale for such new tasks are provided in the Fact Sheet for Order No. R3-2012-0005 (Attachment 7 of the Staff Report for Item 21).

Information on where to find active web links provided by the City of Salinas in its comments on Draft Order No. R3-2012-0005

When Central Coast Water Board staff originally posted its responses to the City’s comments on the Central Coast Water Board website, the web links the City included in its comments were inactive in the posted document titled, City of Salinas Supplemental Comments Received on Draft Order No. R3-2012-0005 and Staff Response (Attachment 2.d to the Staff Report). Staff has updated this posted document so that the web links are active. The active web links are now highlighted in grey and include web addresses in places where the web links previously did not work.

Go to the following website to obtain the revised City of Salinas Supplemental Comments Received on Draft Order No. R3-2012-0005 and Staff Response (Attachment 2.d to the Staff Report):

http://www.waterboards.ca.gov/centralcoast/board_info/agendas/2012/feb/Item_21/index.shtml

January 25, 2012 Comments Received from the City of Salinas

Attachment 2 to this Supplemental Sheet includes comments submitted by the City of Salinas on January 25, 2012. The City of Salinas' comments are similar to the comments they already submitted and to which staff has responded to in the Staff Report. See Staff Report Attachment 2 for the City's comments and staff's response to comments.

ATTACHMENTS:

Attachment 1: Draft Order No. R3-2012-0005 Task Information

Attachment 2: January 25, 2012 Comments Received from City of Salinas



CITY OF SALINAS

Public Works Department • 200 Lincoln Avenue • Salinas, California 93901 • (831) 758-7241

January 25, 2012

Via Electronic Mail and U.S. Mail

Jeffrey S. Young, Chair
Roger Briggs, Executive Officer
Central Coast Regional Water Quality Control Board
805 Aerovista Place, Suite 101
San Luis Obispo, California 93401-7906

Re: City of Salinas Municipal Storm Water Permit CA 0049981; Draft Order No. R3-2012-0005

Dear Mr. Young and Mr. Briggs:

The City of Salinas appreciates the opportunity to submit comments on the Central Coast Regional Water Quality Control Board ("Regional Board") Staff's Report on the Draft Municipal Storm Water Order No. R3-2012-0005 ("Draft Permit"). We recognize that the Draft permit represents over a year's worth of significant and ambitious effort by Regional Board staff. We appreciate the regular dialogue that has occurred between City staff and Regional Board staff which has occurred over the past several weeks, including the regular telephone conferences and the public workshops held in Salinas, and are pleased with the Regional Board staff's decision to schedule the Draft Permit for consideration in the city of Salinas. Given the significant impact we expect the Draft Permit to have on the City of Salinas and its residents and businesses, it is important that matters such as this be considered in a forum which affords the greatest possible opportunity for those affected by the Draft Permit to participate in the Regional Board's consideration of the Draft Permit. To that end, we understand that the Regional Board staff is recommending that the Draft Permit be adopted as presented in its Staff Report; however, the City continues to have concerns with the content of the Draft Permit and the practicability of implementation of certain provisions of the Draft Permit.

The City received the Regional Board Staff Report—which consists of a total of 907 pages, including attachments—via email on January 10, 2012, at 8:00 P.M. Most of the Staff Report is a repeat of material which the City had previously received and reviewed; however, some of the material is entirely new. The City notes that the time period it was given to review and to comment on the Staff Report was insufficient given the breadth, length, and significance of the material. It is unfortunate that more time was not allotted given the significance of this document to the City and its residents and businesses. Nonetheless, the City has done its best to review the materials within the time allotted and submits the following comments on the Staff Report and the revised Draft Permit. The City requests that the Regional Board take these comments into consideration as it deliberates the adoption of the Draft Permit.

As the City has pointed out in previous correspondence to Regional Board staff¹, the original Draft Permit contained numerous provisions which are vague and subject to various interpretations. Some of such Draft Permit provisions have been rewritten in the revised Draft Permit to address the City's concerns, however, through our review of the Staff Report and the revised Draft Permit it is clear that

¹ The City submitted written comments on the Draft Permit to Regional Board staff on October 31, 2011.

some provisions remain vague and subject to various interpretations. Before the Regional Board adopts a permit and exposes the City to liability and enforcement action, it must be certain that the City has a full and accurate understanding of the permit's provisions so that that may be effectively implemented and enforced by the City to ensure the intent of the permit is met. The City understands that the dialogue between the City staff and Regional Board staff will continue following the Regional Board's adoption of a permit, however, if the goal of the permit is indeed as the Regional Board staff has stated—"to reduce the discharge of pollutants in stormwater discharges to the MEP and to protect water quality and beneficial uses, including achievement of water quality standards"—the Regional Board should be sure that the permit is clear and unambiguous so that it may be effectively implemented. Unfortunately, the City finds that not all the provisions of the revised Draft Permit are clearly enough written to be implemented with certainty.

Of primary concern to the City is the economic feasibility of implementing the revised Draft Permit provisions and the practicability of implementing the revised Draft Permit provisions in an effective way. The City is concerned that it will be unable to afford to comply with the permit's provisions and that the permit's provisions will have a chilling effect on economic development within the city. Further, the lack of resources at the City and the continuing decline in available resources, coupled with an unclear and ambiguous revised Draft Permit, the City will be hard-pressed to (1) meet the ambitious deadlines for compliance set out in the revised Draft Permit and (2) implement the revised Draft Permit in an effective way. City staff have estimated that the cost to comply with the Draft Permit provisions will be a substantial increase from the cost already incurred by the City in complying with its existing NPDES Permit. The additional cost to the City results from Draft Permit provisions which City staff understands to contain new programs or higher levels of services from what is required under the City's existing NPDES Permit.

In its Staff Report, Regional Board staff state that they have "considered the best stormwater cost information available" in their preparation of the revised Draft Permit and also state that "[i]t is very difficult to ascertain the true cost of implementing stormwater management programs because of highly variable factors among different municipalities and inconsistencies in reporting by Permittees. Reported costs of compliance for the same program element can vary widely from Permittee to Permittee, often by a wide margin that is not easily explained." The studies cited in the Staff Report, however, were published in 1998 to 2003 and cite information from localities other than Salinas. The City is concerned that these studies may be outdated, in particular because they were prepared and published prior to the economic recession which continues to affect the nation, and are not reflective of the conditions which exist in Salinas.

With respect to the hydromodification criteria set out in the revised Draft Permit, there may be unintended consequences which operate counter to what the City understands to be the intent of the stormwater regulations. The standards have been changed so that the net effect of development and redevelopment is not the determining factor as in the net increase in impervious surfaces. The language has been changed so that creating and/or replacing impervious surfaces and/or turf are now the triggers. With the threshold language changed to include create and/or replace impervious surfaces, redevelopment projects which used to mitigate only the net impacts of additional impervious surfaces will now be required to follow the same requirements as an undeveloped project site. Therefore the cost for redevelopment is increased by the cost of demolition of the existing improvements. This makes undeveloped sites more attractive to develop than redevelopment sites.

Jeffrey S. Young, Chair
Roger Briggs, Executive Officer
January 25, 2012
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We appreciate your consideration of the comments in this letter and those which the City submitted on the original Draft Permit. The City has been and remains fully committed to meeting its stormwater obligations; however, we are concerned that the City not be unintentionally put into a position of non-compliance with permit provisions due to an overly-aggressive timeline and due to an unclear and ambiguous permit. We look forward to our continued discussions with Regional Board staff as a final permit gets adopted and ultimately implemented by the City.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Petersen", with a stylized flourish at the end.

Gary E. Petersen
Public Works Director

cc: Mayor and City Council
Interim City Manager
City Attorney
City Engineer

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
			3 Months			
	X		J.5	AR	X	Develop and maintain an information management system
	X		L.1	AR	X	Require Specific Plans or other master planning documents to meet requirements specified in Order
	X		S.2	AR	X	Enforcement information management system that tracks instances of violations
		X ¹	S.2	AR	X	Identify chronic violators
	X		Attach. D.2	3 months		Submit QAPP
			18 Weeks			
		X ²	J.2	96 days	X	Revise SWDS to separate the document into SWDS Requirements and SWDS Guidance
	X		J.4	96 days		Revise SWDS to include Priority Development Project interim applicability thresholds
	X		J.4	96 days		Revise SWDS to include requirement for Priority Development Project applicants to submit a Stormwater Control Plan
	X		J.4	96 days		Revise SWDS to include requirement for Priority Development Project applicants to adhere to site layout requirements
	X		J.4	96 days		Revise SWDS to include requirement for Priority Development Project applicants to implement source control measures
	X		J.4	96 days		Revise SWDS to include requirement for Priority Development Projects to use decentralized controls
	X		J.4	96 days		Revise SWDS to include Priority Development Project interim flow control criteria
			6 Months			
	X		H.3	6 months		Submit alternative to minimum of 20 percent of Permit coverage area designated as High Priority IDDE areas (optional task)
	X		K.10	AR	X	Develop and maintain information management system for construction sites

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
			46 Weeks			
	X		O.2	46 weeks	X	Submit a Wasteload Allocation Attainment Plan to document how the Permittee will achieve its wasteload allocation for the Lower Salinas River Watershed Fecal Coliform TMDL. Start implementing the Wasteload Allocation Attainment Plan for the Lower Salinas River Watershed Fecal Coliform within 60 days of submitting the plan.
			Year 1			
X			D.3	AR		Develop all components of Stormwater Management Plan
	X		E.5	AR		Inspect all catch basins and clean as required
	X		E.5	AR	X	Measure and record the depth of sediment and debris in catch basins and the total volume of sediment and debris removed from catch basins
	X		E.6	AR	X	Develop and keep current sweeping map
	X		E.6	AR	X	Sweep streets and parking lots
		X ³	E.6	AR	X	Track the number of route miles swept for each sweeping event for each route
		X ⁴	E.6	AR	X	Track the volume of solids collected for each sweeping event during the dry season for each route
		X ⁵	E.6	AR	X	Track the total volume of solids collected for all sweeping events during the dry season for each route
	X		E.6	AR	X	Track the total volume of solids collected for all sweeping events during the dry season for all routes
		X ⁶	E.6	AR	X	Track the percentage of curb miles covered by sweeping routes that are actually swept during sweeping operations
		X ⁷	E.6	AR	X	Develop a strategy designed to increase over time the percentage of curb miles covered by sweeping routes that are actually swept during sweeping operations
X			E.6	AR	X	Develop and implement procedure to dispose of street sweeper waste material
	X		E.7	AR	X	Verification of the maintenance of structural BMPs
		X ⁸	E.9	AR	X	Develop and implement assessment and reduction of water quality impacts in new flood management projects
	X		E.10	AR	X	Develop and maintain information management system
		X	E.12	AR		Develop plan for Salinas River Outfall
	X		E.13	AR	X	Staff training and assessment
		X ⁹	F.5	AR	X	Obtain, track and analyze monitoring data collected by enrollees in the General Industrial Permit

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
	X		F.6	AR	X	Develop and maintain information management system
	X		F.9	AR	X	Staff training and assessment
		X	G.3	AR	X	Staff training and assessment
		X ¹⁰	H.4	AR		Assess the percentage of residents who are not fluent in English and determine if the promotion and publicity of the reporting system must be bilingual to be effective
	X		H.4	AR	X	Develop, implement, promote and publicize illicit discharge reporting system.
	X		H.4	AR	X	Develop information management system to track reports of illicit discharges
	X		H.4	AR	X	Develop and maintain written response procedure
	X		H.4	AR	X	Develop mechanism for sewage spill notification
		X	H.4	AR	X	Test reporting system
	X		H.4	AR	X	Include illicit discharge reporting procedure in fleet vehicles
	X		H.8	AR	X	Facilitate disposal of household hazardous waste
X			H.9	AR		Identify storm drains to be labeled and dumping signs to be installed
		X ¹¹	H.9	AR		Assess the percentage of residents who are not fluent in English and determine if signage and storm drain messages must be bilingual to be effective
	X		H.11	AR	X	Enforcement of illicit discharges
	X		H.12	AR	X	Staff training and assessment
	X		J.3	11 months		Revise SWDS to include Non-Priority Development Project requirements
	X		J.3	AR		Establish legal authority to implement Non-Priority Development Project requirements
		X ¹²	J.3	AR	X	Develop guidance for long-term BMP maintenance and provide to Non-Priority Development Project owners
	X		J.4	11 months		Revise SWDS to include Priority Development Project final flow control criteria (includes: applicability criteria, numeric flow control criteria, modeling requirements)
	X		J.4	11 months		Revise SWDS to include Priority Development Project final treatment criteria (includes: applicability criteria, pollutant identification and reduction criteria, numeric treatment criteria)
		X ¹³	J.4	AR		Model biotreatment soil media specifications report
	X		J.4	11 months		Revise SWDS to include Priority Development Project requirements for operation and maintenance plans

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
	X		J.6	AR	X	Staff training
	X		K.7	AR	X	Inspect structural BMP installation
	X		K.9	AR	X	Enforcement of construction site management
	X		K.11	AR	X	Staff training and assessment
	X		L.1	AR		Revise planning and building requirements related to new development and redevelopment projects subject to parcel-scale development requirements
	X		L.1	AR	X	Modify and implement riparian setback requirements
	X		L.1	AR		CEQA process updates
		X	L.3	AR	X	Participate in the Salinas Valley Integrated Regional Water Management process
		X ¹⁴	L.3	AR	X	Upon next revision of General Plan Housing Element, identify areas to address stormwater in flood management decisions
	X		M.8	AR	X	Implement education for new development and redevelopment projects
	X		N.2.a	AR	X	Identify and implement trash control BMPs
X			N.2.b	AR	X	Inspect surface drainage structures
		X ¹⁵	P.1.b	AR	X	Track pesticide, herbicide, and fertilizer usage data
	X		P.1.b	AR	X	Record and track all exceptions, exemptions, and variances from Riparian Protection Policies and Requirements
		X	P.1.b	AR	X	Determine the total amount of riparian encroachment and mitigation/creation
		X ¹⁶	P.2.a	AR		Quantify annual Urban Subwatershed pollutant loads
		X	P.2.c	AR		Quantify Pre-developed, Developed, and 24-Hour 85th Percentile Storm Event runoff volume
	X		P.4.c	AR	X	Conduct Stormwater Discharge Trend Monitoring
	X		P.5	AR	X	Conduct Receiving Water Monitoring
	X		Q.2	AR	X	Delineate existing and future urban subwatersheds
	X		Q.2	AR	X	Create and maintain a MS4 system map
		X ¹⁷	Q.3	AR	X	Identify and map all ephemeral, intermittent, and perennial water bodies

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
		X ¹⁸	Q.4	AR		Submit the dominant watershed processes for each urban subwatershed
X			R.2	AR	X	Annual Budget Summary for the current reporting year
X			R.2	AR	X	Annual Fiscal Analysis for the upcoming reporting year
	X		S.1	AR	X	Review and revise the existing municipal codes, ordinances, statutes, standards, specifications, permits, contracts, and other regulations in order to implement and enforce all of the requirements of this Order
	X		S.2	AR		Enforcement Response Plan
	X		S.3	AR		Statement certified by the Permittee's chief legal council
	X		S.4	AR	X	Staff training
			Year 2			
	X		E.1	AR	X	Municipal maintenance inventory
	X		E.2	AR	X	Municipal facilities, maintenance operations, and events assessment
	X		E.3	AR	X	Develop and implement minimum BMPs for municipal facilities, maintenance operations, and events
	X		E.4	AR	X	Develop, update, and implement a stormwater pollution prevention plan for High Priority Municipal Facilities and Events
	X		E.4	AR	X	Develop, update, and implement standard operating procedures for High Priority Maintenance Operations
	X		E.5	AR	X	Develop and implement a tiered catch basin inspection and cleaning schedule
		X ¹⁹	E.6	AR	X	Identify modifications to the sweeping schedule for the 24 routes the Permittee currently sweeps biweekly to optimize total sediment removal
		X ²⁰	E.6	AR	X	Implement strategy designed to increase over time the percentage of curb miles covered by sweeping routes that are actually swept during sweeping operations
		X	E.6	AR	X	Develop and implement BMPs to reduce the tracking of dirt and other debris onto streets.
		X	E.6	AR	X	Develop and utilize legal authority for tracking of dirt and other debris onto streets
	X		E.8	AR		Develop inspections of Municipal Facilities, Maintenance Operations, and Events
	X		E.11	AR	X	Coordinate with Monterey County Water Resources Agency
	X		F.1	AR	X	Commercial and industrial inventory
	X		F.2	AR	X	Designate and require implementation of minimum BMPs

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
	X		F.3	AR	X	Notify commercial and industrial owners and operators of stormwater requirements
	X		F.4	AR		Develop inspection procedures including Inspection Ratings
		X ²¹	G.1	AR	X	Prioritize residential areas and activities
		X ²²	G.5	AR		Establish criteria for new private residential development
	X		H.2	AR	X	Update MS4 System Map
	X		H.3	AR	X	High Priority IDDE areas: develop and implement procedures, identify and map.
	X		H.5	AR	X	Develop and implement procedures for illicit discharge identification
	X		H.5	AR	X	Conduct drive-by inspections
	X		H.5	AR	X	Develop and maintain information management system for drive-by inspections
	X		H.5	AR	X	Review results of drive-by inspections
	X		H.6	AR	X	Develop dry weather screening procedures, parameters, stations, and information management system
	X		H.6	AR	X	Identify dry weather screening stations and include the station location on the MS4 System Map
X			H.9	AR	X	Label storm drains
X			H.9	AR		Post signs discouraging illegal dumping
	X		H.10	AR	X	Prohibit excessive water application
		X ²³	H.10	AR	X	Develop and implement an effective plan to reduce Incidental Runoff
X			K.1	AR	X	Develop and maintain a construction site inventory to track all construction sites the Permittee has jurisdictional authority over in the Permit coverage area
	X		K.2	AR		Establish criteria for High Priority Construction Sites
	X		K.3	AR	X	Require minimum BMPs for all construction sites
	X		K.4	AR	X	Implement minimum requirements for High Priority Construction Sites
	X		K.5	AR	X	Review construction plans
		X ²⁴	L.2	AR	X	Derive a list of a minimum of 5 candidate retrofit projects
		X	L.3	AR	X	Identify stormwater management opportunities consistent with the Integrated Regional Water Management Functionally Equivalent Plan Update
		X	L.3	AR	X	Participate in development of salt and nutrient management plan(s) for all applicable groundwater basins per State Water Board Recycled Water Policy (State Water Board Resolution No. 2009-0011)
	X		M.3	AR		Identify Highest Priority Stormwater Issues

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
	X		M.4	AR		Identify target audiences for each identified Priority Stormwater Issue
	X		M.9	AR	X	Implement public advisory group
	X		M.10	AR	X	Keep website up-to-date
	X		N.2.c	AR		Identify sources of trash; evaluate and modify trash control BMPs
	X		N.3	AR	X	Prioritize areas for trash reduction
	X		N.3	AR	X	Develop and implement Trash Reduction Plan
	X		P.1.a	AR		Develop plan for assessing effectiveness of public education and municipal staff training BMPs
	X		P.1.b	AR	X	Evaluate and modify structural BMP maintenance efforts
		X ²⁵	P.1.b	AR	X	Compare the total volume of solids collected each dry season for the 24 routes identified in Section E.6.c with the total volume of solids collected in Year 1 to determine if the total volume of solids collected increased
	X		P.1.b	AR		Compare pesticide, herbicide, and fertilizer usage over time; evaluate and modify BMPs to reduce usage prior to rain events
		X ²⁶	P.1.b	AR		Analyze industrial stormwater data submitted under the General Industrial Permit; identify Target Pollutant
		X ²⁷	P.4.b	AR	X	Conduct Urban Catchment Action Level Pilot Projects Monitoring
		X ²⁸	P.3.b	AR	X	Conduct Trash Assessments
	X		Q.2	AR	X	Map existing connections
		X	Q.3	AR	X	Identify and map zones that infiltrate stormwater
		X ²⁹	Q.4	AR	X	Conduct a rapid assessment for Gabilan and Natividad Creeks
		X	Q.4	AR	X	Identify and map riparian vegetation and habitat for Gabilan and Natividad Creeks
		X	Q.4	AR	X	Acquire and map impervious cover data
		X	Q.5	AR	X	Maintain meteorological data
Year 3						
	X		E.5	AR		Implement modified catch basin inspection and cleaning program

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
	X		E.6	AR	X	Implement modifications to the sweeping schedule for the 24 routes the Permittee currently sweeps biweekly to optimize total sediment removal
	X		E.8	AR	X	Implement inspections of Municipal Facilities, Maintenance Operations, and Events
		X	L.1	AR	X	Urban subwatershed-scale planning for specified land use actions
	X		F.4	AR	X	Implement inspections of commercial and industrial facilities or operations
	X		G.2	AR	X	Designate and require implementation of minimum BMPs
		X ³⁰	G.5	AR	X	Implement or require implementation of minimum BMPs for High Priority Private Development
		X	G.5	AR	X	Keep updated list of residential areas where stormwater conveyance system components are not owned or operated by the Permittee and designation of which areas are High Priority Private Development
	X		H.6	AR	X	Conduct dry weather screening
X			H.6	AR	X	Develop and maintain an effective information management system to track dry weather screening
X			H.7	AR	X	Develop and implement illicit discharge source investigation
	X		K.6	AR	X	Develop and implement inspections of construction sites and information management system to track inspections
		X ³¹	M.7	AR	X	Pilot projects implemented for Priority Stormwater Issues
	X		N.2.c	AR		Implement modifications to trash and litter control BMPs
	X		N.2.d	AR	X	Adopt and implement Trash Reduction Ordinance
	X		P.1.a	AR		Assess effectiveness of public education and municipal staff training BMPs; modify BMPs to increase effectiveness
	X		P.1.b	AR	X	Evaluate effectiveness of BMPs at achieving target Inspection Ratings during inspections of High Priority Municipal Facilities and Operations, Commercial and Industrial Facilities and Operations, and High Priority Construction Sites
	X		P.1.b	AR	X	Evaluate effectiveness of follow-up efforts at increasing Inspection Ratings through reinspections of low-performing High Priority Municipal Facilities and Operations and Commercial and Industrial Facilities and Operations

Draft Order No. R3-2012-0005 Task Information

Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
	X		P.1.b	AR		Evaluate effectiveness of BMPs and modify to reduce discharges of the Target Pollutant
		X ³²	P.3.a	AR	X	Implement actions in response to Stormwater Discharge Action Level exceedances, as required
		X ³³	P.3.b	AR	X	Implement actions in response to Trash Assessment Scores, as required
		X ³⁴	Q.4	AR	X	Conduct a rapid assessment (except for Gabilan and Natividad Creeks)
		X	Q.4	AR	X	Identify and map riparian vegetation and habitat (except for Gabilan and Natividad Creeks)
			Year 4			
		X	L.1	AR	X	Review and update riparian protection policies and requirements based on existing riparian vegetation and habitat and growth potential
		X	L.3	AR		Submit language from salt and nutrient management plan(s) identifying stormwater recharge/use goals and objectives
	X		M.6	AR		Assessments of knowledge increase in target audiences for each Priority Stormwater Issue
		X ³⁵	M.7	AR	X	Pilot projects expanded throughout the Permit coverage area.
		X ³⁶	M.7	AR	X	Replacement pilot projects shall be implemented
		X ³⁷	N.4	AR	X	Develop and implement Trash Reduction Tracking Methodology
	X		P.1.b	AR	X	Evaluate effectiveness of BMPs and modify to achieve increasing Inspection Ratings at High Priority Municipal Facilities and Operations, Commercial and Industrial Facilities and Operations, and High Priority Construction Sites
	X		P.1.b	AR	X	Evaluate effectiveness of BMPs and modify to achieve an increasing trend in Inspection Rating improvement achieved through reinspection of low-performing low-performing High Priority Municipal Facilities and Operations and Commercial and Industrial Facilities and Operations
	X		P.1.b	AR	X	Evaluate effectiveness of BMPs and modify to increase percentage of High Priority Construction Sites ready for rain events
		X	P.1.b	AR		Identify two Urban Subwatersheds for sediment source analysis
		X ³⁸	P.2.b	AR		Determine Baseline Trash Load and annual Trash Load Reduction

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Existing	Modification	New	Provision Section	Submittal Date	Continuous Task	Task
Year 5						
	X		E.6	AR		Integrate sweeping routes into the watershed characterization map
	X		H.6	AR		Label all MS4 system inlets in areas with foot traffic
		X ³⁹	L.2	AR		Submit long-term retrofit plan
		X ⁴⁰	L.2	AR		Complete 60% design of at least one qualifying retrofit project
	X		P.1.a	ROWD		Re-assess effectiveness of public education and municipal staff training BMPs
		X	P.1.b	ROWD		Analyze and identify sources of sediment to identified Urban Subwatersheds; evaluate and modify sediment control BMPs
		X ⁴¹	P.1.b	ROWD		Identify modifications to the sweeping schedule to optimize the total volume of solids collected
		X	P.1.b	ROWD		Evaluate effectiveness of modifications made to reduce discharges of the Target Pollutant
	X		P.1.b	ROWD		Evaluate exceptions, exemptions, and variances permitted; inspect each riparian area created, enhanced, or restored; evaluate the effectiveness of its development planning and review process at protecting riparian areas
		X	P.2.a	ROWD		Re-quantify annual Urban Subwatershed pollutant loads
		X ⁴²	P.2.b	ROWD		Evaluate and modify Trash Load Reduction Program
		X	P.2.c	ROWD		Re-quantify Pre-developed, Developed, and 24-Hour 85th Percentile Storm Event runoff volume
	X		P.4.c	ROWD		Analyze Stormwater Discharge Trend Monitoring data for stormwater discharge quality trends
	X		P.5	ROWD		Analyze Receiving Water Monitoring data for receiving water quality trends
		X	P.6	ROWD		Determine Urban Subwatershed Program Effectiveness Ratings
		X	P.7	ROWD		Identify Urban Subwatershed Stormwater Management Program improvements needed
	X		U.1	ROWD		Report of Waste Discharge application for renewal of waste discharge requirements.
To Be Determined						
	X		O.2	TBD		Within one year of TMDL approval by the Office of Administrative Law, submit a plan for meeting the Permittee's wasteload allocation for every TMDL where the Permittee is listed as a responsible party
	X		O.2	AR	X	Within 60 days of submitting a Wasteload Allocation Attainment Plan start implementing the plan. Submit a summary of Wasteload Allocation Attainment Plan implementation.

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Notes:

AR = Due with the Permittee's Annual Report

ROWD = Due with the Report of Waste Discharge on August 6, 2016

In the Submittal Date column, dates that are listed in terms of months (e.g., 3 months) are due the specified months after the adoption of this Order
Items with an "X" in the Continuous Task column, have additional submittal dates and/or implementation requirements in subsequent years.

¹ State Water Resources Control Board. *Draft Phase II Small MS4 General Permit*. 7 June 2011. P.23.

² San Diego County municipalities are required to develop guidance materials for achieving the hydromodification control requirements and San Diego County municipalities are required to complete a hydromodification management plan to include the requirements for new development and redevelopment. See California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 64.

³ San Diego County municipalities are required to track curb miles swept and amount of material collected. See California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 68.

⁴ *ibid*

⁵ *ibid*

⁶ Orange County and San Francisco Bay Region municipalities are required to enhance and optimize street sweeping effectiveness. In addition, San Francisco Bay Region municipalities are required to evaluate curb clearing restrictions as a means of optimizing street sweeping effectiveness. See the following: 1) California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. p. 55. 2) California Regional Water Quality Control Board, San Francisco Bay Region. *Order No. R2-2009-0074*. 14 October 2009. P. 98. Central Coast Water Board staff developed this requirement to provide focus and direction for the Permittee's enhancement and optimization efforts.

⁷ *ibid*

⁸ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 33.

⁹ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 37.

¹⁰ San Diego County municipalities are required to be able to receive complaints in both English and Spanish. See California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 43.

¹¹ *ibid*

¹² Ventura County municipalities are required to develop guidance for BMP maintenance and educate stakeholders on the guidance. See California Regional Water Quality Control Board, Los Angeles Region. *Order R4-2010-0108*. 8 July 2010. P. 66-67.

¹³ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 27.

¹⁴ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 17.

¹⁵ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 80.

¹⁶ Orange County, San Diego County, and San Francisco Bay Region municipalities are required to quantify pollutant loads through rigorous monitoring programs. See 1) California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. Attachment E, p. 4. 2) California

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Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. 3) California Regional Water Quality Control Board, San Francisco Bay Region. *Order No. R2-2009-0074*. 14 October 2009. P. 73. The requirements of this Order are less rigorous.

¹⁷ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 47.

¹⁸ All Central Coast municipalities will be identifying dominant watershed processes during implementation of the Joint Effort for Hydromodification Control.

¹⁹ Orange County and San Francisco Bay Region municipalities are required to enhance and optimize street sweeping effectiveness. In addition, San Francisco Bay Region municipalities are required to evaluate curb clearing restrictions as a means of optimizing street sweeping effectiveness. See the following: 1) California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. p. 55. 2) California Regional Water Quality Control Board, San Francisco Bay Region. *Order No. R2-2009-0074*. 14 October 2009. P. 98.

²⁰ Orange County and San Francisco Bay Region municipalities are required to enhance and optimize street sweeping effectiveness. In addition, San Francisco Bay Region municipalities are required to evaluate curb clearing restrictions as a means of optimizing street sweeping effectiveness. See the following: 1) California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. p. 55. 2) California Regional Water Quality Control Board, San Francisco Bay Region. *Order No. R2-2009-0074*. 14 October 2009. P. 98. Central Coast Water Board staff developed this requirement to provide focus and direction for the Permittee's enhancement and optimization efforts.

²¹ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 40.

²² California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2010-0016*. 24 January 2007. P. 65-66.

²³ State Water Resources Control Board. *Draft Phase II Small MS4 General Permit*. 7 June 2011. P.16.

²⁴ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2010-0016*. 24 January 2007. P. 65-66.

²⁵ Orange County and San Francisco Bay Region municipalities are required to enhance and optimize street sweeping effectiveness. In addition, San Francisco Bay Region municipalities are required to evaluate curb clearing restrictions as a means of optimizing street sweeping effectiveness. See the following: 1) California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. p. 55. 2) California Regional Water Quality Control Board, San Francisco Bay Region. *Order No. R2-2009-0074*. 14 October 2009. P. 98. Central Coast Water Board staff developed this requirement to provide focus and direction for the Permittee's enhancement and optimization efforts.

²⁶ San Diego County municipalities are required to review industrial monitoring data during inspections. See California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2007-0001*. 24 January 2007. P. 37.

²⁷ Orange County municipalities are required to conduct Action Level monitoring of stormwater discharges. See California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. P. 25.

²⁸ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 86.

²⁹ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 69.

³⁰ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 19 December 2009. P. 66-67.

³¹ The City of San Diego is implementing pilot projects as part of their public education component of their stormwater management program.

³² California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 19 December 2009. P. 25.

³³ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 84-87.

³⁴ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 69.

³⁵ The City of San Diego is implementing pilot projects as part of their public education component of their stormwater management program.

³⁶ *ibid*

³⁷ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 84-87.

³⁸ The trash quantification methods in this Order are based on methods developed and implemented by the County of Los Angeles.

³⁹ California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 19 December 2009. P. 67-69.

⁴⁰ California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 90.

⁴¹ Orange County and San Francisco Bay Region municipalities are required to enhance and optimize street sweeping effectiveness. In addition, San Francisco Bay Region municipalities are required to evaluate curb clearing restrictions as a means of optimizing street sweeping effectiveness. See the following: 1) California Regional Water Quality Control Board, San Diego Region. *Order No. R9-2009-0002*. 16 December 2009. p. 55. 2) California Regional Water Quality Control Board, San Francisco Bay Region. *Order No. R2-2009-0074*. 14 October 2009. P. 98. Central Coast Water Board staff developed this requirement to provide focus and direction for the Permittee's enhancement and optimization efforts.

⁴² California Regional Water Quality Control Board, San Francisco Bay Region. *Municipal Regional Stormwater NPDES Permit*. 14 October 2009. P. 84-87.