

Draft Permit Attachment D:

Co-Permittees' Proposed Storm Water Management Plan Summary

“At a Glance” Storm Water Management Plan – Term 3

Protecting and Enhancing Water Quality by Reducing Storm Water Pollutants to the Maximum Extent Practicable

City of Santa Rosa, County of Sonoma, and Sonoma County Water Agency

June 2008

<u>Proposed Storm Water Management Plan</u>	Measurable Goals and Implementation Schedule Assuming Permit Adoption by July 2008 and Program Implementation on July 1, 2008		
	City	County	Water Agency
Program Management Goal: Facilitate communication and coordination between the copermittees, Regional Board and other appropriate entities. Ensure the SWMP elements are implemented on schedule and that all requirements of the Permit are met.			
Co-permittee Monthly Coordination Meetings	Schedule and conduct monthly coordination meetings <i>Continue through Permit term</i>		
Annual Work Plan	a. Develop preliminary work plan, review with Regional Water Board staff <i>at April Coordination Meeting, Annually</i> b. <i>Final Work Plan submitted with each Annual Report</i>		
Annual Report	Submit to Regional Water Board on time <i>October 1, Annually for Years 1, 2, 3 and 5</i> <i>March 31 (of Year 5) for Year 4</i>		
Cooperative Agreement	Enter into Cooperative Agreement with Copermittees for Term 3 <i>anticipated within 6 months of Program implementation</i>		
Coordination with Phase II Communities, Caltrans, and the Santa Rosa Junior College	Invite representatives from Phase II communities within the permit boundary, Caltrans, and the Santa Rosa Junior College to monthly coordination meetings <i>Continue through Term 3</i>		

<p>Legal Authority Goal: Effectively prohibit non storm water discharges into the storm drain system and receiving waters.</p>			
<p>Review existing codes and propose amendments as required</p>	<p>Review existing Storm Water Ordinance for any needed revisions/updates <i>within 12 months of Permit implementation</i></p>	<p>a. Provide a statement from County Counsel demonstrating adequate enforcement authority/In Year one.</p> <p>b. Consult with Regional Board Counsel/12 months of permit implementation</p>	<p>Water Agency relies on enforcement authority of City and County, and has no plans to seek additional authority.</p> <p>The Water Agency will use its existing legal authority as appropriate.</p>
<p>Private Construction Element Goal: Reduce or eliminate the potential for private construction site generated pollutants to enter the City storm drain system, especially sediment, to the Maximum Extent Practicable.</p>			
<p>Grading Permit Issuance</p>	<p>Continue to implement current approval process.</p> <p>Submit list of active grading permits to RWQCB <i>in each Annual Report.</i></p>	<p>a. Continue to require Erosion Control Plans for grading-permit/Ongoing</p> <p>b. Continue to use local ECP guidelines/Ongoing.</p> <p>c. Report number of grading permits issued in Annual Report/Annually.</p> <p>d. Review General Plan Resource Conservation Element to support policy changes/During Permit Term</p>	<p>Under California planning and zoning law, land use is regulated by the City and County, rather than the Water Agency. The Water Agency will continue to review construction plans referred to the Agency by the City and County to ensure adequate downstream channel capacity for site runoff so long as contracts with the Cities remain in effect.</p>
<p>Vineyard Planting/Replanting Compliance</p>	<p>N/A</p>	<p>a. All optional: Continue to require Notifications be filed for Level I, II, and III vineyard sites/Ongoing.</p> <p>b. Continue to require ECPs for Level II and III vineyard sites/Ongoing.</p>	<p>N/A</p>

		<p>c. Continue to use local ECP guidelines/Ongoing.</p> <p>d. Continue to post vineyard development information to the County website/Monthly.</p>	
<p>Private Construction Element Goal: Reduce or eliminate the potential for private construction site generated pollutants to enter the City storm drain system, especially sediment, to the Maximum Extent Practicable.</p>			
Private Construction on Public Land	<p>Continue to issue Encroachment Permits that require compliance with California Standard Specifications, Section 7-1.01G "Water Pollution" and the City Storm Water Ordinance</p> <p>Send pre-rainy season letter to applicable parties regarding key points and responsibilities. <i>Annually</i></p>	See Section 2.3 of SWMP.	<p>Incorporate appropriate BMP measures as part of the provisions contained in Revocable Licenses for private construction which occurs on Water Agency flood control channels. Request that cities and County refer project managers to Agency when project includes work on flood control channel.</p>
Inspection of Construction and Vineyard Sites	<p>Inspect sites with active grading permits every two weeks and after major storm events <i>Ongoing</i></p> <p>Submit list of site inspections performed for each grading permit and for each building permit that includes grading to Regional Water Board <i>in each Annual Report.</i></p>	<p>a. Hold pre-construction meetings on grading projects/Once per project.</p> <p>b. Conduct BMP inspections on grading projects of one acre or more prior to October 15 /Once per project per year.</p> <p>c. Conduct BMP verification inspections on grading projects (within permit boundary) during the winter season /Once per project per year.</p>	<p>Provide at least one inspection for construction projects on agency flood control channels which have been issued a revocable license to ensure compliance with license.</p>

		<p>d. Continue final grading inspections on all grading projects/ Ongoing</p> <p>e. Inspect Level II & III vineyard sites prior to commencement of any work/Once per project.</p> <p>f. Inspect Level II & III vineyard sites in autumn/Once per year</p> <p>g. Inspect Level I vineyard sites as required/Until construction is completed.</p> <p>h. Report number of vineyard inspections conducted, for Annual Report/Annually.</p> <p>i. Re-draft the PRMD policy entitled, "Pre-construction Meeting Requirements for PRMD Storm Water Inspectors" to include the use of and guidance on using telephone pre-construction discussions./June 2009.</p> <p>j. Draft, approve and implement a policy and procedure regarding photographic documentation /June 2009.</p>	
<p>Private Construction Element Goal: Reduce or eliminate the potential for private construction site generated pollutants to enter the City storm drain system, especially sediment, to the Maximum Extent Practicable.</p>			
<p>Enforcement of Non-Compliant Sites</p>	<p>Follow existing protocol and document verbal and written enforcement notices-</p>	<p>a. Continue enforcement protocol/Ongoing as needed</p>	<p>Use the Water Agency's existing program and the enforcement authority of regulatory agencies to</p>

	<p><i>Ongoing</i></p> <p>Submit list of sites requiring Third and Fourth Level enforcement actions to Regional Water Board <i>in each Annual Report</i></p>	<p>b. PRMD Engineering will notify the RWB on the third enforcement action or upon issuance of a Notice of Violation./Ongoing as needed</p> <p>c. Report the number of non-compliant sites, enforcement actions, and length of time to gain compliance in the Annual Report/ Annually</p>	<p>ensure projects comply with the conditions stated in the Water Agency-issued revocable licenses.</p>
Reporting of Non-Compliant Sites	<p>Notify Regional Water Board verbally within 24 hours and in writing of Third and Fourth Level enforcement actions.</p> <p>Submit list of sites requiring Third and Fourth Level enforcement actions to Regional Water Board <i>in each Annual Report</i></p>	<p>See "Enforcement of Non-Compliant Sites" above.</p>	<p>If Water agency becomes aware of non-filer status, agency will refer non-filers to the RWQCB within 48 hrs.</p>
Formal BMP Standards	<p>Establish formal BMP standards for erosion and sediment control. <i>By end of Year 2.</i></p>		
Training of Targeted Staff	<p>Submit list of staff that attend and/or participate in erosion and sediment control training to Regional Water Board <i>in each Annual Report</i></p>	<p>a. Continue to invite RWB staff to ride along with inspectors/Annually</p> <p>b. Continue "Code Corner" meetings/Ongoing.</p> <p>c. Provide formal training to Engineering inspectors and technicians/Once per employee,/Annually</p> <p>d. Create a training database to</p>	<p>Provide a training session or training materials to the appropriate personnel on the components of the SWMP and new NPDES storm water permit within one year of permit implementation.</p>

		track and ensure key personnel identified above meet the training goals/June 2009.	
Industrial/Commercial Element Goal: Reduce the potential for pollutants to contact storm water to MEP			
Inventory of Facilities	Maintain database of businesses within City that may be required to file NOI and comply with the terms of State General Industrial Permit. <i>Submit in each Annual Report</i>	Maintain data base of food facilities and closed landfills (EH), and businesses regulated by DES/Annually	N/A
Food Facility Inspections	Inspections are performed for wastewater discharge compliance. There are no measurable goals associated with this activity for the municipal storm water permit.	Inspect twice during the 5-year permit term/Ongoing.	N/A
Retail Gasoline Outlet and Auto Repair/Auto Body Service Facilities Inspections	RGOs will be inspected annually through the Fire Department annual hazardous materials inspections. Outreach materials will be distributed during annual inspections. No measurable goals associated with the Auto Repair/Auto Body Service Facilities Inspections.	a. Inspect RGOs annually and ASFs on routine basis/Ongoing. b. Enhance inspections to include stormwater BMPs at RGOs and ASF's/ Ongoing. c. Increase inspection frequency/Once every 2.5 years.	N/A
Industrial/Commercial Outreach	Current outreach materials for contractors, landscapers & painters will be evaluated & updated in Year 2.		

	<p>Meeting with industry/trade representatives to identify an effective outreach strategy for contractors, landscapers & painters in Year 3.</p> <p>Outreach plan will be implemented in Year 4.</p>		
Industrial/Commercial Enforcement	<p>1. Follow enforcement protocol for industrial/commercial facilities without industrial waste permits, for Waste Water Ordinance and for Recycled Water User's Guide.</p> <p>2. Report on enforcement activities in each Annual Report view and submit findings to Regional Water Board.</p>	<p>a. Use progressive enforcement/Ongoing.</p> <p>b. Adopt CalEPA expanded Administrative Enforcement Order process/Ongoing</p> <p>c. Report referrals to RWB/Ongoing</p>	N/A
Interagency Coordination for Industrial/Commercial Facilities Program	<p>Continue to conduct monthly Environmental Crimes meetings with pertinent City staff.</p> <p>Continue to participate in SEQAC meetings during which compliance staff participate in roundtable discussions.</p>	<p>a. Participate in monthly permit Coordination meetings/Ongoing.</p> <p>b. Notify RWB staff of violations/Within 60 days.</p> <p>c. Participate in SEQAC discussions.</p>	N/A
Training of Targeted Staff	<p>A description of the training provided and a list of participants will be included in each Annual Report.</p>	<p>a. Train Environmental Health inspectors/Annually.</p> <p>b. Continue food team meetings and discussions/Ongoing.</p>	N/A

		c. Train Emergency Services inspectors on storm water BMPs/ Ongoing.	
Municipal Operations Element Goal: Reduce or prevent pollution in storm water runoff from all municipal land uses areas, facilities, and activities			
Public Construction Activities Management: Incorporate effective Best Management Practices to reduce the discharge of pollutants in storm water run-off, especially sediment, from public construction sites.			
Contract Documents	<p>Continue to include Special Provisions as part of City construction contract documents for all public improvement projects.</p> <p>Revise Special Provisions Section 7-1.01 to reflect formal BMP standards for erosion and sediment control measures. <i>By end of Year 3.</i></p>	<p>a. Continue to reference appropriate BMPs in construction documents/Ongoing.</p> <p>b. Review and update construction standard documents to ensure they include the most recent BMPs/Once during Permit term.</p> <p>c. Continue to integrate appropriate Low Impact Development technologies into project planning and design phases (Regional Parks)/Ongoing.</p> <p>d. Continue post construction monitoring to ensure the proper installation, maintenance, and/or removal of BMPs (Regional Parks).</p>	Review Special Provisions and General Specifications for existing BMPs to determine if they are adequate. Submit needed changes, if any, in Annual Report No. 2.
Compliance with State General Construction Permit	The City will file and NOI for applicable projects and maintain compliance with applicable terms of the State General Construction Permit.	Continue to submit NOIs for projects subject to the State General Construction requirement/Ongoing.	File NOI for applicable projects, as required

	Each Annual Report to the Regional Water Board includes a list of City projects that have complied with the terms of the State General Permit		
Inspection	Continue to inspect public construction sites during construction activities and document in a construction diary. <i>Ongoing</i>	a. Continue to inspect public construction sites during construction activities/Ongoing. b. Continue post construction monitoring to ensure the proper installation, maintenance, and/or removal of BMPs (Regional Parks)/Ongoing.	Continue to inspect active construction sites.
Enforcement	Continue to implement progressive enforcement procedures. <i>Continue through Term 3</i>	Continue to enforce construction documents regarding failure to carry out orders or contract provisions/Ongoing.	Take action for non-compliance based on contract specifications.
Training of Targeted Staff	Continue to discuss storm water quality requirements during pre-construction conferences for public improvement projects. <i>Ongoing</i>	a. Continue to provide training to all applicable employees/Ongoing. b. Provide annual training to key personnel, to enhance BMP knowledge/Annually.	Assess current education and training practices for construction practices. <i>Permit Year 1</i> Update, if necessary. <i>18 months from permit implementation.</i>
Training of City Staff for General Storm Water Awareness	Create a general storm water awareness and pollution prevention educational outreach brochure for all new City employees. <i>By end of Year 1.</i> Perform voluntary survey of existing City employees to determine level of storm		

	<p>water awareness among staff <i>by end of Year 2.</i></p> <p>Develop and implement outreach to existing City staff <i>by end of Year 3.</i></p> <p>Resurvey existing City employees to determine effectiveness of outreach <i>by end of Year 4.</i></p> <p>Document results of training Measurable Goals in each Annual Report.</p>		
<p>Municipal Services Center (Corporation Yard)</p>	<p>Continue compliance with General Storm Water Permit for Discharges Associated with Industrial Activities and the Municipal Services Center's SWPPP. <i>Continue through Term 3.</i></p>		
<p>Landscape and Recreational Facilities Management: Incorporate effective Best Management Practices to reduce or eliminate pollutants resulting from maintenance activities of landscaped areas and recreational facilities.</p>			
<p>Pesticide management</p>	<p>Keep pesticide use below the levels used prior to the implementation of the Integrated Pest Management Program. <i>Continue through Term 3.</i></p> <p>Seek less toxic materials and new methods/techniques to reduce pesticide use. <i>Continue through Term 3.</i></p>	<p>a. Continue to follow chemical use, storage, disposal and reduction practices/Ongoing.</p> <p>b. Continue native vegetation and water conservation practices/Ongoing.</p> <p>c. Continue to maintain and updatedatabase for staff training certification regarding these practices/Annually.</p>	<p>Utilize low-impact pesticide management.</p>

	Develop detailed pesticide and fertilizer plan for Bennett Valley Golf Course. <i>By end of Year 3.</i>	d. Maintain and update written guidelines regarding these practices/ During Permit term.	
Fertilizer management	Continue to implement standard procedures of Fertilizer Management Plan and provide training in proper fertilizer application and storage to appropriate staff as needed. <i>Continue through Term 3</i> Develop detailed pesticide and fertilizer plan for Bennett Valley Golf Course. <i>By end of Year 3.</i>	See "Pesticide Management".	Utilize recycled water for irrigation which offsets the need for fertilizer at the Water Agency's West College facility.
Planting and Retention of Native Vegetation	Support recommendations contained in Citywide Creek Master Plan to promote use of native vegetation along local creeks & riparian areas. <i>Continue through Term 3.</i>	See "Pesticide Management".	Incorporate retention and planting of native vegetation in design projects on flood control facilities. (See also, Public Outreach)
Procedures to Reduce Water, Fertilizer and Pesticides Needs	Implement current procedures to reduce water, fertilizer and pesticide needs within City park grounds and landscaped areas. <i>Continue through Term 3.</i>		
Disposal of landscape waste	Continue to grind and reuse waste materials as compost and mulch <i>Continue through Term 3.</i>	a. Continue to follow practices as noted in Plan/Ongoing. b. Continue to maintain and update guidance documents for practices/ During Permit term.	Use chipped brush and weeds as mulch around existing vegetation at Water Agency Channels.

<p>Recreational water bodies</p>	<p>Implement existing activities. <i>Continue through Term 3.</i></p>	<p>a. Continue to follow practices as noted in Plan/Ongoing. b. Maintain and update written guidelines and practices for management of water bodies/During Permit term.</p>	<p>County manages Spring Lake Park for agency. Continue to limit equipment and material storage in Water Agency's flood control channel right-of-way.</p>
<p>Swimming pool discharge</p>	<p>Continue to implement existing activities</p>	<p>See "Recreational Water Bodies"</p>	<p>N/A</p>
<p>Procedures to Minimize Incidental Runoff</p>	<p>Continue to implement existing activities and implement new activities with 2007 water rate structure. Inspect new landscapes in accordance with WELF and SRFLP. Provide Recycled Water User's Guide to all new sites using Recycled Water. <i>Ongoing</i></p> <p>Develop tracking system for reported locations of incidental runoff. <i>By end of Year 1.</i></p> <p>Draft and submit to Regional Water Board dechloration procedures and measures to manage/reduce flow volume and volume/velocity impacts on downstream waterways in <i>Year 1. Finalize in Year 2.</i></p> <p>Address summer discharges from specific types of nuisance flows in resident outreach strategy. <i>Complete outreach to residents by end of Year 5.</i></p>		

Park Construction and/or Rehabilitation Projects	Comply with General Construction Permit. <i>Continue through Term 3.</i>		
Storm Drain System Operation and Management			
Storm Drainage System Mapping	Update storm drain mapping on City GIS site. <i>Continue through Term 3.</i> Complete mapping of storm drain systems in City parks and the Bennett Valley Golf Course. <i>By end of Year 3.</i>	a. Develop GIS database for inventory of storm drain systems (Parks)/During Permit term. b . Inventory and map other Public Works' systems in urban areas.	Review existing mapping. <i>Permit Year 3</i> Modify maps, as needed, by the end of Permit Year 5.
Clean and inspect storm drain pipe and inlet structures	Continue to clean and inspect 130,000 feet of storm drain pipe and 1200 structures <i>Annually</i> Monitor summertime flows in storm drain sections being cleaned to assist in identifying summertime flows or non-storm discharges. <i>Continue through Term 3.</i> Begin to input storm drain cleaning data into electronic database in <i>Year 1.</i> Graphically display storm drain cleaning history <i>by end of Year 5.</i> Prioritize catch basin cleaning. <i>By end of Year 1.</i> Analyze catch basin cleaning and re-evaluate	a. Continue cleaning and inspection of problem inlets/Annually. b. Develop and maintain a database for problem inlets and storm drain systems by year three of the permit term. (Parks) c. Develop a priority system to address problematic drain inlets for remediation by year four of the permit term. (Parks)	Pipes through City treated as open channel, see below.

	<p>catch basin priorities as needed. <i>By end of Year 3.</i></p> <p>Implemented prioritized catch basin inspection and cleaning schedule. <i>By end of Year 4.</i></p>		
Flood control channel or road side ditch inspection and maintenance	<p>Continue to inspect and remove debris for flood control purposes <i>Annually</i></p>	<p>a. Continue to inspect and remove debris for flood control purposes/<i>Annually.</i></p>	<p>Continue to provide trash cleanup in Water Agency channels, coordinate with local law enforcement when possible. <i>Annually, as needed</i></p>
Storm drain labeling	<p>Continue storm drain labeling program to replace damaged, worn or missing decals as needed. <i>Ongoing</i></p> <p>Identify inlets not yet labeled and develop and implement a plan to label, as possible. <i>By the end of Term 3.</i></p>	<p>b. Maintain and update written guidelines and procedures (Parks)/<i>During Permit term.</i></p> <p>c. Inspect storm drain inlets to ensure labels are installed (Parks)/<i>Annually.</i></p> <p>e. Install labels on all new inlets in urban areas/<i>Ongoing.</i></p>	<p>Label and maintain labels at storm drains within the West College Facility. <i>Six months of permit implementation.</i></p>
Trash Management	<p>Require management of trash and litter generated from public events for which City issues a Special Event Permit. <i>Continue through Term 3.</i></p>		
Streets and Roads Maintenance			
Street sweeping frequency	<p>Continue to sweep streets as prioritized below: Priority A <i>three times per week.</i> Priority B <i>twice a week</i></p>	<p>a. Industrial and Commercial Areas in the permit boundary six (6) times a year/<i>Annually.</i></p> <p>b. Urbanized residential areas in boundary-<i>3x/year/Start date</i></p>	<p>Water Agency does not maintain public roads. No sweeping planned. Maintain shale layer on Water Agency-owned roads. Continue to require reshaling of road in revocable licenses, where</p>

	<p>Priority C <i>once a week</i> Priority D <i>monthly</i> <i>Ongoing</i></p>	<p>2010. c. Various streets, intersections, and other including Regional Parks parking lots-upon request/Ongoing.</p>	<p>appropriate. Continue to limit vehicular access to Water Agency roads.</p>
<p>Material management – Road Construction, Sweeping, Pipe/Ditch Cleaning</p>	<p>Continue to properly recycle or dispose of materials. <i>Ongoing</i></p>	<p>a. Continue good housekeeping practices/Ongoing.</p>	<p>Continue to limit equipment and material storage in Water Agency's ROW. <i>Ongoing</i></p>
<p>Training of targeted staff</p>	<p>Continue to provide training to staff as needed. <i>Annually</i></p>	<p>a. Continue meetings to discuss streets and road maintenance activities throughout the permit period./Ongoing (Parks) b. Provide training to applicable staff on water quality and fish protection outlined in the Road Maintenance Standards Manual./Ongoing (Parks). c. Routinely meet to discuss streets and road maintenance activities throughout the permit term./Ongoing d. Review current streets and road maintenance practices, including BMPs related to materials management, on an ongoing basis throughout the permit term./Ongoing</p>	<p>Provide informal road maintenance BMP training. <i>As-needed</i></p>
<p>Parking Facilities Management</p>			
<p>Sweeping</p>	<p>Continue to sweep City Transit and Parking sites (5 garages and 9 lots) <i>weekly</i>, pressure wash such garages <i>Annually</i></p>	<p>See "Streets and Road Maintenance, Street Sweeping Frequency" above</p>	<p>Sweep two employee and one visitor parking lot at West College facility. <i>Annually between August 15 and October 15</i></p>

Spill clean up	Respond <i>immediately</i> to priority reports/ <i>within one business day</i> for non urgent small spills	a. Continue to clean up and dispose of spills as required/Ongoing.	Respond in a timely manner. Use spill response protocol for hazardous or unmanageable spills.
Emergency Procedures			
Emergency Procedures and Hazardous Material Response Plan	Continue to implement the Emergency Operations and Hazardous Materials Response Plan. <i>Ongoing</i>	<p>a. Continue to implement Emergency Operations Plan/Ongoing</p> <p>b. Review and update Area Plan in August 2010/One Time</p> <p>c. Review and update Emergency Operations Plan as necessary./Ongoing</p> <p>d. Review and update Spill Plan as necessary./Ongoing</p> <p>e. Report Plan updates in Annual Report/Annually.</p> <p>f. Continue interagency emergency coordination/Ongoing.</p>	Review existing Water Agency emergency operations plan for appropriate changes. <i>Permit Year 3</i>
Public Events on City Property	<p>Require management of trash and litter generated from public events for which City issues a Special Event Permit. <i>Continue through Term 3.</i></p> <p>Develop educational materials for food vendors and attach to all City park reservation permits. <i>Complete by end of Year 1. Continue through Term 3.</i></p>		

Illicit Discharge Detection and Elimination Element Goal: Detect and minimize illegal non storm water discharges

<p>Spill Response</p>	<p>Continue existing illicit discharge detection and elimination activities. <i>Ongoing</i></p> <p>Maintain records of spill response actions and summarize in each Annual Report. <i>Ongoing</i></p>	<p>a. Continue existing illicit discharge detection and elimination activities/Ongoing.</p> <p>b. Report activities in Annual Report/Annually.</p>	<p>Implement current program.</p>
<p>Private sanitary septic systems</p>	<p>Follow up on reported problems until resolved <i>Ongoing</i></p> <p>Conduct infrared imagery flight over Santa Rosa Creek and all tributaries upstream of downtown Santa Rosa in Year 1. Investigate and analyze "hotspots" in Year 2. Outreach/ enforcement in Year 3. Progress reports will be provided in applicable Annual Reports.</p>	<p>a. Follow up on reported problems until resolved/Ongoing</p> <p>b. Continue to investigate illicit septic system discharges and report the number of spills in the annual report./Annually</p>	<p>Notify City, County or RWQCB if a problem with a private sanitary septic system is discovered and not immediately corrected by land owners. <i>Ongoing</i></p>
<p>Enforcement Procedures</p>	<p>Follow written enforcement procedures as needed. <i>Ongoing</i></p>	<p>a. County agencies will continue to pursue current enforcement actions to obtain compliance for illicit discharge detection and elimination.</p> <p>b. Report the number of storm water pollution enforcement actions in the annual report./Annually</p> <p>c. County agencies will continue to implement existing</p>	<p>Water Agency works with responsible party, City, County, and other regulatory agencies to correct the problem. <i>Continue with existing program.</i></p>

		<p>enforcement procedures in the NPDES permit boundary.</p> <p>d. County agencies will develop/revise policies and procedures, as necessary, during the permit term./Ongoing</p> <p>e. County agencies will notify the Regional Water Board in writing on the third enforcement action or Notice of Violation./Ongoing</p>	
<p>Record Keeping and Documentation</p>	<p>Continue to update database as complaint response and inspections are completed. <i>Ongoing</i></p> <p>Document illicit discharge detection and elimination activities and summarize in each Annual Report. <i>Annually</i></p> <p>Provide special illicit discharge summary reports with GIS tracking. <i>Annually</i></p>	<p>a. Continue to practice recordkeeping by Public Works, Environmental Health, Emergency Services, PRMD/Ongoing.</p> <p>b. Report number of illicit discharges in the annual report/Annually.</p>	<p>Develop tracking system for illegal discharges.</p> <p>List reported spills in annual report.</p>
<p>Illicit Connection Investigation & Termination</p>	<p>Document field inspection results from storm drain cleaning crew <i>Ongoing</i></p> <p>Describe any identified illicit connections to the storm drain system and steps taken to eliminate. <i>Annually</i></p>	<p>a. Continue illicit connection investigation and enforcement protocol/Ongoing.</p>	<p>Investigate the sources of illicit discharges within flood control channels. Notify and provide support to appropriate municipality for discharges originating outside of channels.</p>

<p>Disposal of used oil and toxic materials</p>	<p>Integrated Waste Management</p>	<p>a. Continue to implement existing used oil and toxic materials programs/Ongoing.</p> <p>b. Report amounts collected by Public Works programs in the annual report/Annually.</p>	<p>Rely on existing programs by others. Provide outreach material developed by others where appropriate.</p>
<p>Training of targeted staff</p>	<p>Training provided annually, documented, and summarized in each Annual Report.</p> <p><i>Ongoing</i></p>	<p>a. Continue to provide training to key staff/Ongoing.</p>	<p>Review and update training for spill response personnel. <i>1 yr of permit implementation</i></p> <p>Provide annual review of contact information.</p>
<p>Inspection of Incidental Runoff</p>	<p>See Municipal Operations section for details.</p> <p>Develop tracking system for reported locations of incidental runoff.</p> <p><i>By end of Year 1.</i></p> <p>Address summer discharges from specific types of nuisance flows in resident outreach strategy. <i>Complete outreach to residents by end of Year 5.</i></p>	<p>a. During May through October, conduct monthly incidental runoff inspections of urban clusters. July 2008/Ongoing</p> <p>b. Meet with water utilities to discuss regulation of incidental runoff. July 2009/</p> <p>c. Develop handout on incidental runoff for the public. June 2009/</p> <p>d. Review legal authority on incidental runoff. June 2009</p> <p>e. Propose and draft legal authority to regulate discharges from irrigation runoff. June 2010.</p> <p>f. Draft and adopt policy for enforcement of incidental runoff. June 2010.</p> <p>g. Report the number of inspections and enforcement actions./Annually</p>	

Public Education and Outreach Element Goal: Increase the community’s knowledge of the storm drain system and the impacts of urban storm water run off, encourage behavioral changes thereby reducing pollutant release to the receiving waters to the Maximum Extent Practicable.

General Public/Residents

Residential Outreach	Evaluate results of Term 2 Community Survey and develop strategy for implementation <i>in Year 1</i> . Outreach to residents to be completed by <i>end of Year 5</i> . Perform Term 3 Community Survey to assist in developing Term 4 outreach strategy. <i>Complete in Year 4. Provide copy in Year 5 Annual Report.</i>		
Storm drain inlet decal program	Continue to provide decal kits to volunteer groups <i>Ongoing</i>	See “Municipal Operations, Storm Drain System Operation and Management Section - Storm Drain Labeling”.	Evaluate efficacy of incorporating storm drain labeling program into creek stewardship program. <i>Permit Year 1</i>
Environmental column in local newspapers	Reference RRWA Environmental Columns <i>in each Annual Report</i> . Issue a minimum of two media releases regarding storm water program items of interest or about storm water pollution prevention. Provide copies of media releases & describe follow-up media coverage <i>in each Annual Report</i> .	Continue working with the local newspapers to publish environmentally based articles and report on status in Annual Report/Annually.	Continue working with the local newspapers to publish environmentally based articles and report on status in Annual Report/Annually
Website	Continue to keep Storm Water and Creeks Website current. Track number of	Continue to fund and update the Sonoma County website and “sonomacountystormwater.org”	Include info on creek stewardship program.

	<p>visitors to each storm water page and report numbers of significance in <i>each Annual Report</i>.</p>	<p>URL./During permit term.</p>	<p><i>Permit Year 3.</i></p>
<p>Creek Stewardship Program</p>	<p>Each year a minimum of 3 creek walks, 3 creek presentations and six volunteer creek clean-ups will be coordinated. <i>Annually</i></p> <p>Promote Creek Stewardship activities in City Adventure Guide. Include copies of promotions in <i>each Annual Report</i>.</p> <p>Send email reminder to Creek Stewards each spring about reporting outfalls with summer flows. Copy of email to be included in <i>Annual Report</i>.</p>	<p>a. Conduct survey of horse facilities adjacent to major creeks within boundary/2011</p> <p>b. Provide horse facility owners with prepared materials as part of (a) above/2011.</p>	<p>Work with groups to develop Creek stewardship program and signs.</p> <p>Provide half of funding required for project coordinator.</p>
<p>Pet waste signs</p>	<p>Quantify & describe informational, pet waste and creek crossings signs installed or replaced in <i>each Annual Report</i>.</p> <p>Provide list of locations with pet waste signs, pet waste dispensers and trash receptacles in <i>each Annual Report</i>.</p> <p>Install 10 new trash receptacles and 5 pet waste bag dispensers <i>by end of permit term</i>.</p>	<p>a. Continue to install pet waste signs at Regional Parks facilities and maintain inventory/Ongoing.</p>	<p>Signs will be posted at major access points to creeks, subject to approval by the Water Agency and City's Waterways Advisory Committee. <i>Within the first year of the permit term.</i></p> <p>Post signs yearly thereafter as needed</p>

<p>Public Events</p>	<p>Participate in a minimum of 6 public events each year. Summarize in <i>each Annual Report</i>.</p>	<p>See "Hazardous Waste Disposal" below.</p>	<p>Participate each year in Sonoma County Fair. Distribute outreach materials at fair. Ongoing, <i>annually</i></p>
<p>Hazardous Waste Disposal</p>	<p>Continue to pass out recycle guide at PW-Storm Water outreach events. <i>Ongoing</i></p> <p>Continue to provide recycling guide or information on the Household Toxics Facility to responsible parties of illicit discharges. <i>Ongoing</i></p> <p>Continue to work directly or indirectly (such as through the RRWA) with SCWMA on toxics collection and recycling programs. <i>Ongoing</i></p> <p>Provide tally of number of Recycling Guides distributed in <i>each Annual Report</i>.</p>	<p>All Optional:</p> <ul style="list-style-type: none"> a. Publish and distribute Sonoma County Recycling Guide/Annually. b. Operate Eco-Desk hotline/Ongoing. c. Maintain Sonoma County Waste Management Agency website/Ongoing. d. Encourage oil and filter recycling via annual campaign/Ongoing. e. Continue campaign for curbside oil and filter recycling/Ongoing f. Continue Household Toxics collection publicity/Ongoing. g. Continue to provide "No Toxics" garbage can stickers/Ongoing. h. Provide Integrated Pest Management workshop for county employees/Ongoing. i. Provide booth at Sonoma County Fair and the Harvest Fair re: Household Hazardous Waste Management/Ongoing. 	<p>County Waste Management Agency</p>

<p>Illicit discharge</p>	<p>Material distribution numbers will be reported <i>each year in Annual Report.</i></p> <p>Evaluate past year tallies of spill sources and spill locations from illicit discharge database to determine immediate needs for increased outreach. <i>Annually</i></p> <p>Include special illicit discharge summary reports which use GIS tracking in <i>each Annual Report.</i></p>	<p>a. Conduct public outreach on alternative options for the disposal of swimming pool water containing chlorine and biocides./Within 36 months of permit adoption.</p> <p>b. Continue to distribute materials during normal inspections and while investigating complaints /Ongoing.</p>	<p>N/A</p>
<p>Private septic systems</p>	<p>Conduct infrared imagery flight over Santa Rosa Creek and all tributaries upstream of downtown Santa Rosa in <i>Year 1.</i> Investigate and analyze "hotspots" in <i>Year 2.</i> Outreach/ enforcement in <i>Year 3.</i> Progress reports will be provided in applicable Annual Reports.</p>	<p>a. Continue to distribute BMP information to non-standard septic system owners, annually, and to all others upon request/2008.</p> <p>b. review and revise, if necessary, the storm water quality BMP brochure/June 2009.</p>	<p>N/A</p>
<p>Industrial/Commercial</p>	<p>Current outreach materials for contractors, landscapers & painters will be evaluated & updated in Year 1.</p> <p>Meeting with industry/trade representatives to identify an effective outreach strategy for contractors, landscapers & painters in Year 3.</p>	<p>a. Continue to educate and assist food facility operators/owners to implement effective BMPs.</p> <p>b. Continue to distribute "Food Facilities Storm Water Pollution Quick Reference" pamphlets during routine inspections/Annually</p> <p>c. Make a presentation to the Food Industry Advisory Forum about the storm water</p>	<p>N/A</p>

	<p>Outreach to contractors, painters & landscapers implemented in Year 4.</p>	<p>management plan and changes for food facilities/Within 24 months of permit adoption.</p> <ul style="list-style-type: none"> a. Distribute additional materials./Ongoing b. Discuss compliance issues with owner/operators and provide materials to assist with questions. Include storm water pollution prevention BMPs/Ongoing c. Continue to encourage ASFs to receive Green Business certification/Ongoing 	
<p>Automotive Repair, Food Facility and Cleaning Industries & Retail Gasoline Outlets</p>	<p>Track and report number of educational materials distributed during inspections in <i>each Annual Report</i>.</p>		
<p>Gardening/Nurseries</p>	<p>Promote "Our Water, Our World" program through hiring a consultant to contact and work directly with local hardware/nursery businesses. Perform pollution prevention inspections to minimize nutrient pollutant loading in site run-off. Continue QWEL training.<i>Annually</i></p>	<ul style="list-style-type: none"> a. Continue to give information to pesticide users with permits and annual registration/Ongoing. b. Continue to offer junior college courses for state mandated continuing education for pesticide user licenses. 	<p>N/A</p>
<p>Landscape Irrigation and Maintenance</p>	<p>Continue to host workshops and distribute prepared outreach materials; provide irrigation audits on request with initiation of 2007 water rates. Inspect new irrigation</p>		

	<p>sites in accordance with WELP and SFRLP. Provide new customer packets to all new water customers.</p>		
<p>Building and Construction Industries including Landscaping Companies</p>	<p>Provide a copy of CD's pre-rainy season letter sent by Community Development Department to applicable parties regarding key points of interest based on past season observations and current concerns. <i>Annual Report</i></p> <p>Current outreach materials for contractors, landscapers & painters will be evaluated & updated in <i>Year 2</i>.</p> <p>Meeting with industry/trade representatives to identify an effective outreach strategy for contractors, landscapers & painters in <i>Year 3</i>.</p> <p>Outreach to contractors, painters & landscapers implemented in <i>Year 4</i>.</p> <p>LID training for staff as well as the local design community will be planned and conducted in <i>Year 1</i>.</p> <p>Develop an outreach strategy to educate property owners and home owners regarding SUSMP BMPs their property based on input from the development community and area realtors before end of <i>Year 3</i>, implemented in <i>Year 4</i>.</p>	<p>a. Develop combined City/County SUSMP site design guidelines or requirements for developers/Within 5 years of permit adoption.</p> <p>b. Provide workshop to the development community on planning procedures, policies, design guidelines and BMP for the remaining SUSMP aspects/Within 5 years of permit adoption.</p>	<p>N/A</p>

School Education			
Water Education Program	N/A	N/A	Although no measurable goal is included, as this program is independent of storm water funding, it is anticipated that the current program will continue.
High School Aquatic Macroinvertebrate Bioassessment Program	<p>Continue to solicit program participation from the six public high schools in the City. Report on number of students and total teaching hours in each Annual Report. <i>Ongoing</i></p> <p>Measure the change in high school student awareness/understanding of basic storm water pollution prevention concepts. Report in Annual Report.</p>	N/A	N/A
Spring Lake Environmental Discovery Center	<p>Continue to sponsor and participate in storm water related displays. Report on attendance in each Annual Report. <i>Annually</i></p>	<p>a. Continue to operate and manage EDC/Ongoing.</p> <p>b. Continue to seek sponsorship of EDC/Ongoing.</p> <p>c. Continue to contribute funding to EDC to promote public education on pollution prevention/Ongoing.</p>	Provide financial support through fiscal year 2007/08
Santa Rosa Junior College	<p>Refine outreach partnership with SRJC. Contact/offer outreach materials <i>in Year 1</i>.</p> <p>Aim to develop a minimum of two collaborative outreach</p>		

	<p>projects in Term 3. <i>Continue through Term 3.</i></p> <p>Invite SRJC representatives to monthly coordination meetings. <i>Through Term 3</i></p>		
<p>Corporate Outreach</p>	<p>Identify a minimum of three corporate business and development outreach strategies in Term 3. Report on status in Annual Reports. <i>Through Term 3.</i></p>		
<p>City Staff Awareness and Education</p>	<p>Create a general storm water awareness and pollution prevention educational outreach brochure for all new City employees. By end of Year 1.</p> <p>Perform voluntary survey of existing City employees to determine level of storm water awareness among staff by end of Year 2.</p> <p>Develop and implement outreach to existing City staff by end of Year 3.</p> <p>Resurvey existing City employees to determine effectiveness of outreach by end of Year 4.</p> <p>Provide two briefings about</p>		

	Storm Water Program activities in City Manager's weekly email. Provide copies in Annual Reports.		
Effectiveness Evaluation			
Formal Evaluation	Evaluations will be included in each Annual Report.	<p>a. Compare goals in SWMP to actual work; meet with Regional Water Board staff and Co-permittees on developing work plan elements/Annually.</p> <p>b. Document (a) in Annual Report/Annually.</p> <p>c. Continue to utilize the Stormwater Coordinator position to maintain or increase the level of coordination among County staff involved in completing SWMP activities/Ongoing.</p>	Continue to track program elements through direct and indirect indicators. <i>Annually</i> <i>Summary Report Permit Year 5</i>
Public Education and Outreach	Resurvey community awareness. <i>During Year 4.</i>	a. Based on Special Study (below), consider outreach to improve stream quality.	Voluntary include feedback mechanisms in water Education Program.
Monitoring Program	Evaluations will be included in each Annual Report.	a. See Special Study (below), related to sediment.	Review monitoring data for trends. <i>Permit Year 5</i>
Special Studies	Refer to Monitoring Report for Special Study description.	<p>a. Identify and evaluate 10-12 sub-watershed areas for initial evaluation/Year 1.</p> <p>b. Conduct ambient water quality monitoring (analytical and inspection)/Years 2-3.</p> <p>c. Evaluate data and determine BMP(s) to be studied. Install or implement BMP(s)/Year 3.</p>	None.

		<p>d. Continue water quality monitoring (analytical and inspection)/Years 4-5.</p> <p>e. Report findings and make recommendations/Year 5</p>	
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Fiscal Analysis

Financial Analysis of Program Activities	Continue to report on permit-related expenses and funding of lead agency work for each fiscal year in each <i>Annual Report</i> .	<p>a. Report program expenditures and funding sources in Annual Report</p> <p>b. Include discussion of fiscal resources in work plan meeting with Regional Water Board staff/Annually.</p> <p>c. Re-evaluate permit fee structure to ensure adequate funding for PRMD. Within 12 months of permit adoption</p> <p>d. Review the categories currently used for reporting fiscal resources/Within first 24 months of permit adoption.</p> <p>e. Seek new revenue sources for storm water program/During permit term.</p>	<p>Develop new reporting structure Permit Year 1.</p> <p>a. Include discussion of fiscal resources in work plan meetings/Annually</p> <p>b. Report program expenditures and funding sources in Annual Report.</p>
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Monitoring Plan Goal: Assess the receiving water quality to direct resources toward local pollutants of concern (Refer to Part V for details)

Chemical Monitoring of Outfalls	Continue outfall sampling at two outfalls during first flush and one representative storm events as well as two	See Part V, Monitoring of the Co-Permittee SWMP.	Collect samples for first flush and one representative storm, and collect two summer samples between the period May-September.
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	dry weather sampling events. Report results in each Annual Report.		<i>Annually</i> Include results and proposed changes to program in annual reports. Analyze data for trends. <i>Permit Year 5.</i>
Bioassays – Three Species Chronic Tests	See Part V, Monitoring of the Co-Permittee SWMP.	N/A	N/A
Aquatic Benthic Macroinvertebrate Sampling	See Part V, Monitoring of the Co-Permittee SWMP.	N/A	N/A
SUSMP Goals: Minimize storm water pollution, limit storm water peak flows, and conserve natural areas to MEP from new and redevelopment (Refer to Part VI for details)			
Develop details for the SUSMP treatment offset program	Develop details for the SUSMP treatment offset program. Treatment offset sites will be considered in the following order: same stream reach, same sub-watershed, same watershed, adjoining watershed, or nearby watershed. Regional mitigation banking will be considered as part of treatment offset program. Complete first draft for RB review by end of Year 2. Finish policy by end of Year 3.		
Channel-forming discharge (hydrograph modification).	Develop details for addressing channel-forming discharge. Evaluate recommendations and requirements pertaining to hydrograph modification included in the Regional Water Board's Stream and Wetlands Protection Policy and the San Francisco Bay Municipal Regional Urban Runoff NPDES Permit once finalized. This evaluation will be distilled into an outline on the approach that applicants should take when addressing channel-forming discharge. Complete first draft one-year after these documents are adopted. Finish policy within two-years after both of these documents are adopted.	N/A	

<p>Low impact development</p>	<p>Encourage low-impact development (LID) designs for all SUSMP projects. In addition, for all proposed development projects each Co-Permittee shall, during the planning process and prior to project approval and issuance of local permits, evaluate each project for the inclusion of LID BMPs, where applicable, which may minimize soil compaction, minimize disturbances to natural waterways, maximize infiltration and retention, provide detention, slow runoff, minimize impervious footprint, direct runoff from impervious areas into landscaping, and construct impervious surfaces to the minimum widths necessary.</p> <p>Continuous.</p> <p>LID training for Co-Permittees' staff as well as the local design community will be planned and conducted before the end of Year 1.</p>	<p>N/A</p>
<p>Retail Gasoline Outlets</p>	<p>Apply post-construction conditions that address water quality on proposed new and redeveloped retail gasoline outlets (RGO). (Redeveloped RGOs would include existing RGOs that propose underground storage tank modifications that involve pipe replacement and under dispenser containment replacement.) Example conditions are: 1) fuel dispensing areas shall be paved with Portland cement concrete (or, equivalent smooth impervious surface), with a 2% to 4% slope to prevent ponding, and must be separated from the rest of the site by a grade break that prevents run-on of storm water to the extent practicable, 2) the fuel dispensing area shall be covered with a roof canopy, and the roof canopy's minimum dimensions shall be equal to or greater than the area within the grade break or the fuel dispensing area, as defined above. The cover shall drain directly into the storm drain system and not drain onto the fuel dispensing area. The storm drain located under the roof canopy shall include an oil separator, or equivalent, to collect minor fuel and oil spills. An ongoing maintenance plan for the oil separator shall be submitted for review and approval by the Storm Water Section of PRMD prior to issuance of County grading and building permits or by the City's Fire Dept. prior to issuance of any City permits for new/redevelopment RGOs, and 3) the applicant shall prepare</p>	<p>N/A</p>

	<p>and implement a Storm Water Spill Prevention Control and Countermeasure (SW SPCC) Plan to be integrated into the grading and drainage plan. The SW SPCC Plan shall be designed to address minor fuel and oil spills.</p> <p>Existing City codes shall be reviewed and modified to include specific conditions and site requirements before the end of Year 2.</p> <p>Continuous implementation for County permits.</p>	
<p>Auto Repair/Auto Body Service Facilities</p>	<p>Apply post-construction conditions that address water quality on proposed new and redeveloped auto repair/auto body service facilities. Prohibit discharges of wash water from entering storm drain systems resulting from hosing or cleaning vehicles.</p> <p>Continuous (Rough draft only – City needs to evaluate with Utilities-Environmental Compliance section.)</p>	<p>N/A</p>
<p>Implementation of safety factors to ensure that treatment BMPs accommodate the minimum design storm (Provision 29 from the current MS4 permit).</p>	<p>The sizing of filtering treatment devices shall recognize potential clogging and loss of capacity during operations and shall be sized to provide full treatment of the design storm. The City and County will prepare safety factors for treatment BMPs during the next permit phase as we gain experience with the maintenance of BMPs and as we evaluate the final requirements of the San Francisco Bay Municipal Regional Urban Runoff NPDES Permit.</p> <p>Safety factors will be proposed by the end of Year 3.</p>	<p>N/A</p>
<p>Tracking SUSMP projects</p>	<p>The Co-Permittees use tracking databases to record SUSMP information for projects. PRMD added a SUSMP screen for projects within PermitsPlus: this screen has fields to record: disturbed area, impervious surface, number and types of source control BMPs, number and types of treatment control BMPs, total BMPs installed, waiver field, and mitigation APN. The Measurable Goal would be for both the County and the City to review and refine the tracking of SUSMP projects using their respective databases.</p> <p>Completion of the review and augmented tracking of SUSMP</p>	<p>N/A</p>

	projects is targeted to be completed by the end of Year 2.	
Ordinance constraints	The Co-Permittees shall review respective ordinances for conflicting requirements that would prevent or restrict the installation of post-construction BMPs. Complete review by the end of Year 4.	N/A
Conserve natural areas	This is already one of the three goals of the SUSMP program. However, the Co-Permittees will expand on this goal during the next permit term to complement LID concepts. This guidance will be included to supplement the SUSMP Guidelines. Complete guidance on conserving natural areas by end of Year 5.	N/A
Educating property owners and home owners regarding SUSMP BMPs on their property	The intent of educating property and home owners on SUSMP BMPs is to educate them on the proper functioning of the SUSMP BMP(s) on their property and to provide guidance on how to maintain the SUSMP BMP(s). One idea is to develop a generic template brochure onto which developers could then add their customized information via electronic cutting and pasting. An outreach strategy will be developed based on input from the development community and area realtors before the end of Year 3 and implemented in Year 4.	N/A
Long term maintenance program	The intent of further developing a long term maintenance program for SUSMP facilities is to have fees cover administrative/inspection and maintenance costs, as applicable, for public agencies. Complete analysis of SUSMP maintenance programs by end of Year 5.	N/A
Review and revise, if necessary, legal authority	Report findings in first Annual Report Amend ordinance, if needed, within 12 months of Permit adoption	N/A

Provide training to staff	Train targeted staff (planners, storm water inspectors, engineers, engineering technicians) within 24 months of Permit Implementation		
Implement SUSMP measures on City / County capital improvement projects	Design applicable projects with SUSMP measures <i>Upon Permit implementation</i>		Design applicable Zone 1A flood control projects with SUSMP measures.
Encourage applicants to implement SUSMP measures on projects	Require storm drain labeling on all projects <i>Upon Permit implementation</i>	Condition applicable project with SUSMP requirements. Upon Permit implementation	N/A
Supplement SUSMP Guidelines with additional BMP guidance/criteria based on site specific pollutants.	Reconvene SUSMP Technical Advisory Committee to supplement SUSMP Guidelines. <i>Complete in Year 3.</i>		
Storm Drain Decals	Draft requirements to decal all proposed storm drain inlet basins in <i>Year 1</i> . Present for adoption in <i>Year 2</i> .		