

**REVISED DRAFT**

**CITY OF REEDLEY  
STORM WATER MANAGEMENT  
IMPLEMENTATION PLAN**

**March, 2007**



Prepared by:  
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## **EXECUTIVE SUMMARY**

The following memorandum is a staff briefing for the City of Reedley City Council that addresses the Storm Water Quality Management Plan for the fiscal years 2007 through 2012. It summarizes the various elements of the plan; such as, the existing programs, storm water regulation Phase II requirements, roles and responsibilities of the various City Departments, and budgets. The memorandum serves as the Executive Summary for the plan.

The reader is directed to Section 1, Introduction, for a summary of the development and organization of the plan.

The City of Reedley Staff wishes to acknowledge the assistance and cooperation of the following agencies:

- Alta Irrigation District

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## **1.0 INTRODUCTION**

This document presents the Storm Water Quality Management Plan (plan) submitted as part of the application package for the National Pollutant Discharge Elimination System (NPDES) Municipal Storm Water (MS4) Permit in accordance with the Phase II Rule requirements. The plan represents the five-year management strategy for controlling the discharge of pollutants to the “maximum extent practicable” in storm water runoff from the City of Reedley metropolitan area during the first NPDES storm water permit term.

### **1.1 BACKGROUND**

The 1987 Federal Clean Water Act amendments created section 402(p) of the Act that mandated permits under the federal NPDES permitting system for discharges of storm water from specified activities. Final federal storm water regulations for Phase I Cities were promulgated in November 1990. On March 10, 2003 the NPDES Phase II Rule became effective and requires that Cities identified as eligible MS4s for regulation under the NPDES permitting process will be required to submit an application for an NPDES permit that covers the City’s Storm Water Management Program. The City of Reedley, in Fresno County, California, has been identified as a Phase II metropolitan area required to be covered by a storm water permit.

### **1.2 THE PERMIT AREA**

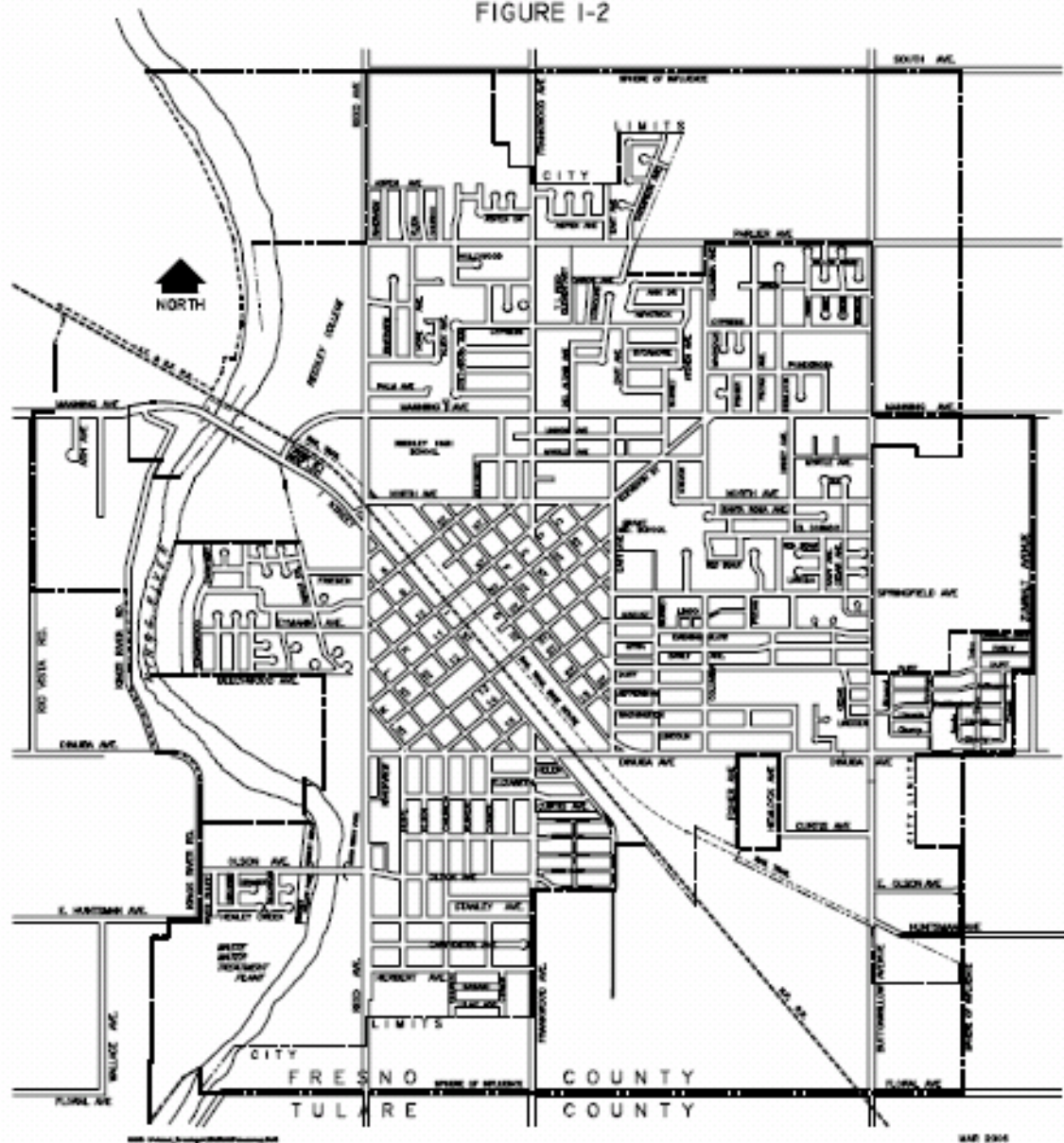
A Vicinity Map that generally illustrates the size and location of the City of Reedley, in Fresno County, California, is shown in Figure 1-1. The permit area is shown on Figure 1-2 and is defined by the City of Reedley’s Storm Drainage and Flood Control Master Plan urban drainage area boundaries. The permit area will be modified to include future urban drainage service areas established by new commercial and industrial developments within the City of Reedley’s sphere of





**FIGURE 1-1**  
LOCATION MAP  
NO SCALE

FIGURE I-2



VICINITY MAP  
CITY OF REEDLEY

influence.

### **1.3 PLAN ORGANIZATION**

The plan is organized into six sections (Figure 1-3):

Section 1.0 of the plan provides an introduction to the plan and provides background information relevant to the development of the plan.

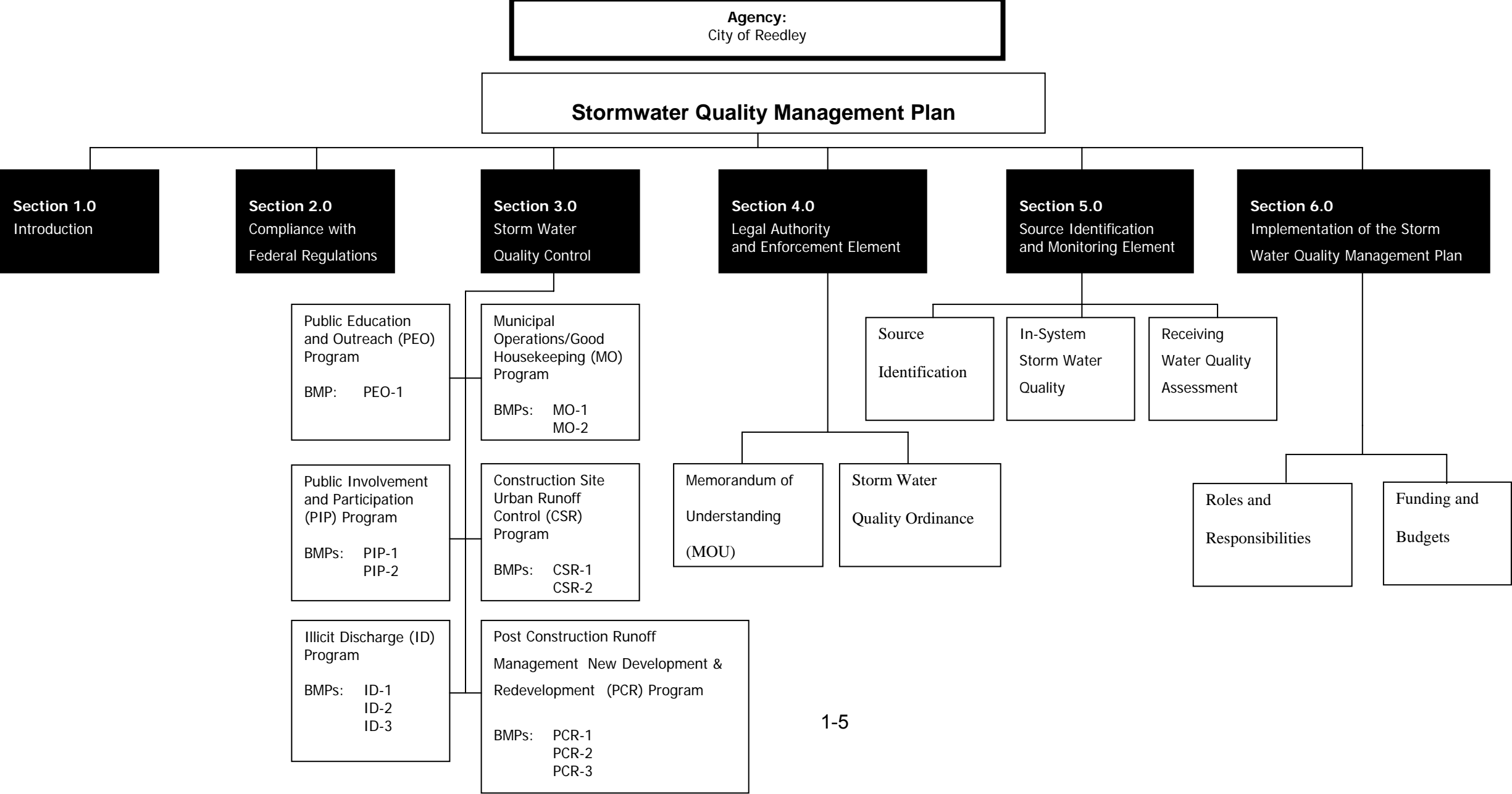
Section 2.0 provides a summary of how the plan complies with the storm water regulations.

Section 3.0 provides six best management practices (BMPs) control programs developed to address urban storm water pollution. The section is broken into ten subsections. The first four subsections provide an introduction and background to the BMP development process. Following the introduction are the BMP control programs. Within each BMP control program is an introduction followed by the BMPs, projected five-year implementation schedules, and budget estimates. Each BMP section lists the measurable goals and subtasks to be conducted to implement and assess the BMP.

Section 4.0 describes the legal authorities and enforcement capabilities of the City to develop, implement and enforce the plan. At the end of the program description are measurable goals to be conducted to ensure adequate legal authorities are maintained throughout the permit term.

Section 5.0 provides measurable goals for source identification and monitoring to be conducted by the City throughout the permit term. Included is a projected five-year implementation schedule and budget estimate.

Figure 1-3  
Storm Water Quality Management Plan Organization



Section 6.0 provides a summary of the roles and responsibilities of each of the Divisions of the City responsible for plan implementation, describes funding, and summarizes the plan budget.

[Three of the sections, Sections 3.0, 4.0 and 5.0, contain measurable goals and assessment tasks. Measurable goals are tasks that describe the activities to be conducted by the participating agencies to develop and implement the plan. Measurable goals may also describe more specific subtasks. Assessment tasks are tasks performed to assist in determining the status of plan implementation and effectiveness of the plan in reducing the discharge of pollutants in urban storm water runoff. A diagram of how these three elements were developed is provided in Figure 1-4].

#### **1.4 GOALS AND OBJECTIVES OF THE PLAN**

This initial plan establishes goals and objectives for storm water quality management.

##### **Goal of the Plan**

***To protect from degradation by urban runoff the resources and beneficial uses prioritized below:***

**Regional Groundwater Aquifer - municipal, industrial and agricultural water supply.**

**Kings River and Tributary Streams - wetland, riparian, and in -stream ecosystems; recreation; municipal, industrial, and agricultural water supply; and groundwater recharge.**

**City Retention Basins - storm drainage and flood control, recreation, groundwater recharge, and incidental wildlife habitat.**

**Alta & Consolidated Irrigation District Canals - fresh water conveyance for municipal, agricultural, and habitat uses, and storm drainage and flood control.**

**Artificial Lakes - aesthetics and recreation, aquatic resources, and storm drainage and flood control.**

### **Objectives of the Plan**

To meet the Goal of the plan, the following objectives were established.

1. To identify those pollutants in urban runoff that pose significant threat to these resources and beneficial uses.
2. To identify and control those sources of pollutants which pose the greatest threat to these resources and beneficial uses.
3. To comply with the federal NPDES mandate to eliminate or control, to the maximum extent practicable, the discharge of pollutants from urban runoff associated with the metropolitan storm drainage system.
4. To develop a cost-effective program that focuses on preventing the pollution of urban storm water.
5. To seek cost-effective alternative solutions where prevention is not a practical solution for a significant problem.

6. To cooperate with other local environmental regulatory programs to ensure a coordinated effort to control pollutants of common concern and to facilitate implementation of control measures.

### **Best Management Practice Objectives**

To ensure the goal and objectives of the plan are achieved, each BMP includes its own objectives, which are:

#### *Public Education and Outreach Program*

To increase public awareness about urban runoff pollution and develop an outreach program that targets the residential sector and children in the community.

#### *Public Involvement and Participation Program*

To educate the public to better understand and participate in the control of urban runoff pollution, and to solicit support for the program.

#### *Illicit Discharge Program*

To eliminate prohibited non-storm water discharges, including those associated with illicit connections and illegally dumped materials, to the municipal storm drain system.

### **MUNICIPAL OPERATIONS/GOOD HOUSEKEEPING PROGRAM**

To identify, develop, and implement BMPs/good housekeeping procedures to address urban runoff pollution associated with municipal operations.

#### *Construction and Development Program*

To control storm water pollution originating from land development, both during and after construction.

### *Post Construction Runoff Management Program*

To reduce the potential for discharge of pollutants into urban runoff from new development and redevelopment areas using a strategy that combines reducing/eliminating sources of pollutants, managing site runoff volumes and flow rates such that they are similar to preconstruction levels.

## **1.5 OTHER AGENCY INVOLVEMENT**

The following is a list of agencies that may, to one degree or another, have jurisdiction over water and wastewater within the City of Reedley's sphere of influence:

- Alta Irrigation District
- Consolidated Irrigation District
- County of Fresno
- City of Reedley Water Department
- City of Reedley Sanitary Sewer Collection & Waste Water Treatment Plant
- City of Reedley Solid Waste Collection Department

The City of Reedley owns and operates the storm water conveyance system and the waste water collection system within the City limits as well as the City's Waste Water Treatment Plant.

Alta Irrigation District and Consolidated Irrigation District operate the canals that bisect the City of Reedley. The City's storm water conveyance system discharges into the Kings River or into ponding basins in the City. The City's Waste Water Treatment Plant operates under its own RWQCB permit.

The City of Reedley owns and operates the domestic water conveyance system in the City of Reedley.



The County of Fresno manages the storm water runoff generated outside the City limits. The County of Fresno is a co-permittee under the Fresno Metropolitan Flood Control District's NPDES permit.

The City of Reedley operates its own solid waste collection system. The solid waste generated is disposed of at the solid waste transfer station located in the City of Fowler. The recycling program is operated by Sunset Recycling and is responsible for collection and disposal of recyclables within the City limits.

## **1.6 POLLUTANT AND SOURCE PRIORITIZATION**

During the first permit term, a study will be conducted to identify and prioritize storm water pollutant sources. The study will focus on commercial and industrial sources, and general categories of pollutants. The results will be used as a factor in selecting and prioritizing tasks identified in this plan.

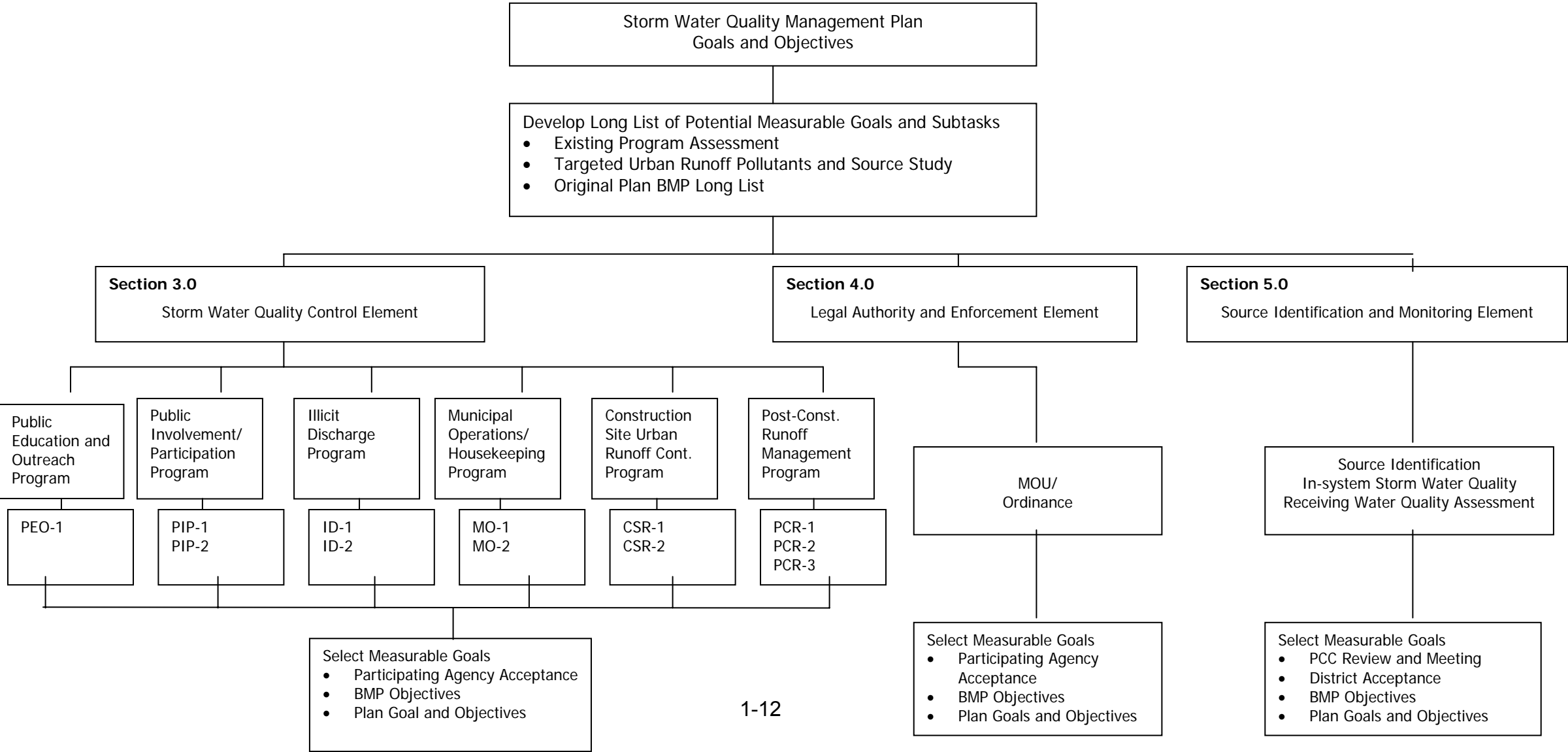
The following is a list of potential sources of pollution within the City's sphere of influence:

- Automobile related activities including tailpipe emissions, spills and leaks from automobile operation and maintenance activities, and service and maintenance activities.
- Mechanical products, such as machinery and equipment exposed to the environment.
- The manufacturing, handling, storage, use and disposal of organic chemicals.
- The manufacturing, handling, storage, use, and disposal of pesticides and fertilizers.

- The manufacturing and use of timber products.
- Discharges from cold storage and packing plants.
- Scrap metal industries.
- Emissions from the combustion of organic material and fossil fuels.
- Erosion from construction sites and natural sources.
- Use and disposal practices for paint.
- Laundromats and Dry Cleaners.
- Car Washes and Detail Shops.

Figure 1-4

Storm Water Quality Management Plan Element Development Process



## **2.0 COMPLIANCE WITH FEDERAL REGULATIONS**

In 1972 the Congress amended the Federal Water Pollution Control Act, also known as the Clean Water Act, to prohibit the discharge of any pollutant to waters of the United States from a point source unless the discharge is authorized by an NPDES permit.

The NPDES program is designed to track point sources and requires the implementation of the controls necessary to minimize the discharge of pollutants. Initial efforts to improve water quality under the NPDES program primarily focused on reducing pollutants in industrial process wastewater and municipal sewage.

In 1987, Congress again amended the Clean Water Act to require implementation, in two phases, of a comprehensive national program for addressing storm water discharges. The first phase of the program, commonly referred to as a “Phase I”, was promulgated on November 16, 1990 (55FR47990). Phase I requires NPDES permits for storm water discharge from a large number of priority sources including medium and large municipal separate storm sewer systems (MS4) generally serving populations of 100,000 or more and several categories of industrial activity, including construction activity that disturbs five or more acres of land.

The second phase of the storm water program, commonly referred to as “Phase II Rule”, requires permits for storm water discharges from certain small MS4s and for construction activity generally disturbing one acre or more.

## **2.1 COMPLIANCE WITH PHASE II REGULATIONS**

The City of Reedley has been identified by the California Water Resources Board as a Phase II MS4. The City complied with the Federal requirement that all Phase II Cities submit an application to the State Water Resources Board by March 10, 2003 for a

NPDES Phase II Rule Storm Water Management permit. This implementation plan is being prepared in compliance with those permit requirements and is designed to meet the six minimum control measures required under the Phase II rule.

The six minimum control measures addressed in this Implementation Plan include: 1) Public Education and Outreach; 2) Public Involvement and Participation; 3) Illicit Discharge Detection and Elimination; 4) Pollution Prevention and Good Housekeeping in Municipal Operations; 5) Construction Site Urban Runoff Control; and 6) Post-Construction Runoff Management in New Development and Redevelopment.

## **2.2 COMPLIANCE WITH STATE/LOCAL REQUIREMENTS**

The City of Reedley shall comply with all state/local requirements regarding noticing public meetings and hearings and publishing agendas for said public meetings and hearings relating to adoption of ordinances and resolutions relating to storm water quality and implementation of the City's Storm Water Management Plan.

## **2.3 FINANCIALLY CONSTRAINED PROGRAM**

The City of Reedley is committed to implementing the programs identified in this Implementation Plan to the extent budgeted in Table 3.4-A. Actual costs of the programs may exceed the amounts estimated to implement them. In addition, unforeseen costs or inflationary costs, beyond the control of the City, in excess of the 5% per year allotted in this Implementation Plan may require that programs are implemented only up to the costs budgeted for that year. As such, this Implementation Plan is financially constrained.

**Table 2A**  
**DEMONSTRATION OF COMPLIANCE**  
**WITH PROPOSED PHASE II REQUIREMENTS**

<b>Required Phase II BMP</b>	<b>Where Addressed in Plan</b>	<b>Discussion</b>	<b>Applicable BMPs</b>	<b>Changes necessary to comply with Phase II</b>
<p><b>Public Education and Outreach</b></p> <p>Public agencies are required to implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that can be taken to reduce storm water pollution.</p>	<b>PEO Control Program</b>	Through this BMP the City implements a comprehensive public education and outreach program that addresses the general population and specific special interests, such as construction. The PEO is coordinated with other control programs to develop and disseminate specific outreach and education material.	<p><b>Primary: PEO-1</b></p> <p><b>Supporting: ID-2, CSR-1, PCR-1</b></p>	N/A
<p><b>Public Involvement/Participation</b></p> <p>A municipal storm water program is required to include a public participation program that complies with applicable State and local public notice requirements. The public should be encouraged to participate in developing, implementing and reviewing the management plan.</p>	<b>PIP Control Program</b>	The City utilizes committees, work groups, and other public outreach methods to ensure public participation and involvement occur during the plan and BMP program development. Meeting notices are widely distributed and policy and planning decisions of the governing bodies are properly noticed.	<p><b>Primary: PIP-1</b></p> <p><b>Supporting: CSR-1, PCR-1</b></p>	N/A
<p><b>Illicit Discharge Detection and Elimination</b></p> <p>Municipalities are required to develop a map of the storm drainage conveyance system, implement a program to detect and eliminate illicit discharges, and provide outreach to businesses and public employees regarding illegal discharges and proper disposal of wastes.</p>	<b>ID Control Program</b>	Through this program the City implements a comprehensive illicit connection and illegal discharge detection, control and elimination program. Development of outreach material and other methods for addressing illicit connections and illegal discharges is coordinated with other program elements.	<p><b>Primary: ID-1 and ID-2</b></p> <p><b>Supporting: PEO-1, PIP-1, MO-1</b></p>	N/A

<b>Required Phase II BMP</b>	<b>Where Addressed in Plan</b>	<b>Discussion</b>	<b>Applicable BMPs</b>	<b>Changes necessary to comply with Phase II</b>
<p><b>Construction Site Storm Water Runoff Control</b></p> <p>Municipalities are required to develop a program to control pollutants in storm water runoff from construction sites that cause a land disturbance of one acre or greater. Advance plan review and inspections are required.</p>	<b>CSR Control Program</b>	Through this BMP, the City will implement a control program that addresses construction site activities that cause a land disturbance of one-acre or more.	<p><b>Primary: CSR-1</b></p> <p><b>Supporting: PIE-1, MO-1</b></p>	N/A
<p><b>Post-construction Storm Water Management in New Development and Redevelopment</b></p> <p>Municipalities are required to develop, implement and enforce a program to address storm water runoff from new development and redevelopment projects that result in land disturbance of greater than or equal to one acre.</p>	<b>PCR Control Program</b>	Through this BMP, the City will implement a post-construction control program for projects that cause a land disturbance of one-acre or more.	<p><b>Primary: PCR-1 and PCR-2</b></p> <p><b>Supporting: PIE-1, MO-1</b></p>	N/A
<p><b>Pollution Prevention/Good Housekeeping for Municipal Operations</b></p> <p>Municipalities are required to develop and implement a cost-effective operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations or facilities. Employee training is required.</p>	<b>MO Control Program</b>	Through this BMP, the City will address municipal activities that are found to be potentially significant sources of storm water pollutants, including roads and landscape maintenance. Guidelines and training will be provided during the first permit term.	<b>Primary: MO-1 and MO-2</b>	N/A

### **3.0 STORM WATER QUALITY CONTROL ELEMENT**

#### **3.1 INTRODUCTION**

This section of the plan presents the six storm water quality control programs and strategies that the City of Reedley has selected to reduce pollutants in urban storm water runoff. The six programs are:

- Public Education and Outreach (Section 3.5),
- Public Participation and Involvement (Section 3.6),
- Illicit Discharges (Section 3.7),
- Construction Activities (Section 3.8),
- Development (Section 3.9), and
- Municipal Operations and Maintenance (Section 3.10).

#### **3.2 BMP MEASURABLE GOAL AND SUBTASK SELECTION PROCESS**

During development of this plan, BMPs and tasks were selected and grouped into control programs developed to address specific sources of storm water pollution and NPDES requirements.

The measurable goals and sub-tasks were selected using a planning process designed to:

- Involve people who have knowledge of environmental regulation, public interests, community natural resources, and industrial/commercial concerns in the evaluation and selection of tasks and sub-tasks;
- Ensure conditions in the City of Reedley metropolitan area are taken into account;
- Ensure all applicable requirements of the NPDES federal storm water regulations are addressed;



- Ensure pollutants prevalent in urban storm water runoff and their sources are addressed to enhance the environmental benefits realized through plan implementation;
- Establish and follow a rational, formal, and well-documented decision-making process (use a decision tree or other method), and
- Demonstrate that full implementation of the plan will achieve reductions in the discharges of pollutants to storm waters to the maximum extent practicable.

### **3.2.1 Agency and Public Participation in the Planning Process**

To ensure the plan adopted for the permit term is appropriate and implementable, a series of meetings were held to define, select and prioritize BMP measurable goals and sub-tasks. The meeting included representatives from all the participating agencies, as well as representatives from the industrial, environmental, citizen activist, construction, development and regulatory communities.

### **3.2.2 BMP Measurable Goals and Sub-task Selection Process**

The following process was used to evaluate and select BMP measurable goals and sub-tasks (Figure 3-1).

#### *Step 1 - Review Problem Identification*

The City of Reedley reviewed local environmental concerns related to storm water quality.

### *Step 2 - Review Goals and Objectives of Plan and BMPs*

The City of Reedley reviewed the goals and objectives established and found them to be appropriate and adequate.

### *Step 3 - Compile a Comprehensive List of Candidate Measurable Goals and Sub-tasks*

A comprehensive list of candidate measurable goals and sub-tasks was developed as a result of the meetings the City organized between the various stakeholder entities having jurisdiction within the City's Sphere of Influence, City Department Heads, City Administration, and the public at large.

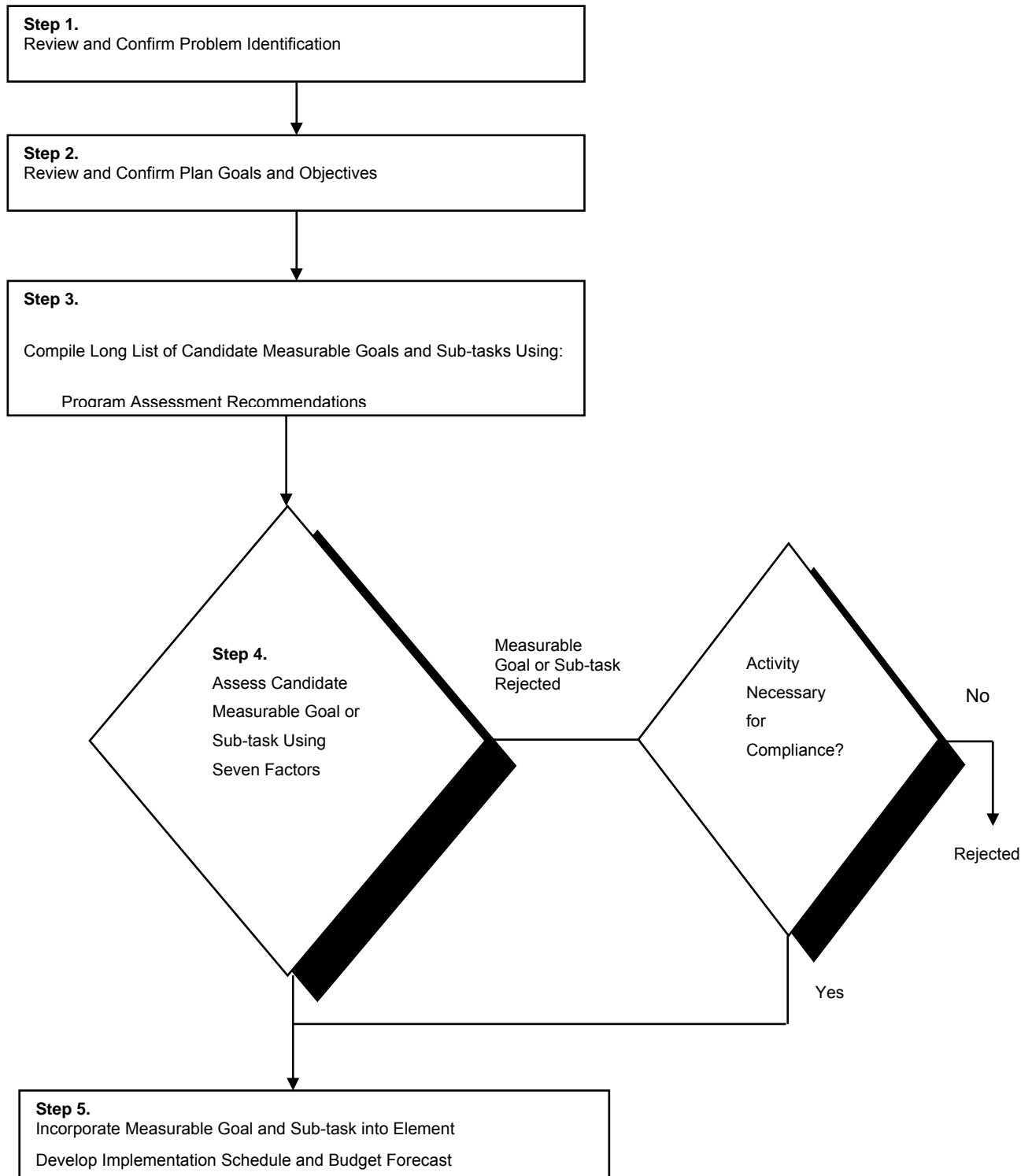
### *Step 4 - Assessing Candidate Measurable Goals and Sub-tasks*

The City of Reedley reviewed the list of candidate measurable goals and sub-tasks to eliminate some and to recommend others for implementation. The City of Reedley assessed the candidate measurable goals and sub-tasks using the seven factors listed below.

- Ability of the measurable goal and sub-task to meet Phase II storm water regulatory requirements,
- Ability of the measurable goal and sub-task to control general categories of storm water pollutants,
- Ability of the measurable goal and sub-task to address specific pollutants prevalent in urban storm water runoff,
- Magnitude of the measurable goal and sub-task's initial costs,

Figure 3-1

## BMP Measurable Goals and Sub-task Selection Process



Magnitude of the measurable goal and sub-task's continuing costs,

- Institutional constraints and/or acceptance of the measurable goal and sub-task, and
- Public acceptance of the measurable goal and sub-task.

#### *Step 5 - Final Measurable Goals and Sub-task Selection*

The assessment procedure described in Step 4 resulted in a list of recommended measurable goals and sub-tasks for the final plan. For each control program (Subsections 3.5 through 3.10, below), an implementation strategy consisting of measurable goal and sub-task implementation schedules and budgets was developed. The roles and responsibilities of each participating City Department for measurable goal and sub-task implementation were then assigned.

### **3.3 CONTROL PROGRAM AND BMP FACT SHEET FORMAT**

Each of the six control program subsections, 3.5 through 3.10, contains an introduction that describes the background and basic control strategy to be employed. After the introduction, BMP fact sheets provide:

1. The BMP definition and objectives,
2. A description of the existing programs,
3. A description of the measurable goals and sub-tasks necessary to develop and implement the BMP, and
4. A list of the assessment tasks.

Assessment tasks are performed on a regular basis to document progress and to assist in determining the effectiveness of the BMP in reducing storm water pollution. At the end of each control program section are two tables. The first table provides a projected five-year BMP implementation schedule and summarizes the roles and responsibilities of the City Departments implementing the BMPs. The second table provides projected five-year budgets to implement the BMPs.

Summary descriptions of the roles and responsibilities and how the program will be funded are included in Section 6.0, the chapter discussing the implementation and management of this plan. A description of how the budgets were estimated is provided below.

### **3.4 PROGRAM BUDGET**

The estimated costs identified in this plan (tables in Section 3) are specific to storm water quality management permit compliance. The budget does not include the costs of urban drainage management practices. The City's cost to construct, operate, and maintain retention and detention facilities to control the quantity of storm water runoff are not included in the budget tables, even though the basins significantly reduce storm water pollutant loadings to receiving waters.

In order to generate cost estimates, total program costs were projected based on baseline costs to maintain the existing program and incremental costs that will be incurred above and beyond the baseline costs to develop and implement tasks during the permit term. Baseline costs and incremental costs were estimated using the knowledge gained from other agencies that have developed and implemented a storm water management program, and best professional judgment. Incremental costs include both one-time costs to develop materials or programs, and projected recurring costs for new activities. Annual costs were increased 3.5 percent per year to account for possible inflation.

Budget tables estimating task and total program costs can be found at the end of each control program section. Table 3.4-A provides a summary of total program costs for the City of Reedley.

**Table 3.4-A**  
**Summary of Proposed Five-Year Budget**  
**Total Program Costs**

<b>PROGRAM ELEMENT</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	<b>2011/2012</b>
Public Education & Outreach Program	\$ 15,000.00	\$ 15,525.00	\$ 16,070.00	\$ 16,600.00	\$17,180.00
Public Participation & Involvement Program	\$ 7,500.00	\$ 7,760.00	\$ 7,600.00	\$ 7,950.00	\$ 8,300.00
Illicit Discharges Program	\$ 26,750.00	\$ 66,650.00	\$46,790.00	\$ 7,055.00	\$ 7,345.00
Construction Activities Program	\$ 13,000.00	\$ 8,000.00	\$ 8,280.00	\$ 8,570.00	\$ 8,870.00
Development Program	\$ 20,000.00	\$ 10,000.00	\$10,350.00	\$10,700.00	\$11,100.00
Municipal Operations & Maintenance Program	\$ 20,000.00	\$ 15,000.00	\$18,000.00	\$16,650.00	\$17,300.00
Source Identification And Monitoring Element	<u>\$ 3,250.00</u>	<u>\$ 2,625.00</u>	<u>\$ 2,875.00</u>	<u>\$ 2,875.00</u>	<u>\$ 3,000.00</u>
<b>Total Costs Per Fiscal Year</b>	<b>\$105,500.00</b>	<b>\$125,560.00</b>	<b>\$109,965.00</b>	<b>\$70,400.00</b>	<b>\$73,095.00</b>

## **3.5 PUBLIC EDUCATION AND OUTREACH (PEO) PROGRAM**

### **3.5.1 Introduction**

The approach to managing storm water pollution taken by the City of Reedley has a strong focus on source control (i.e., keeping pollutants out of the storm drain system). This approach is widely recognized as the most cost-effective and efficient means to meet the City's goal of reducing pollutants in storm water to the maximum extent practicable. Because source reduction means controlling human activity and encouraging behavioral change, educating the public about the effects of storm water is critical to the success of the Storm Water Quality Management Program.

Federal storm water regulations require municipalities to develop and implement public information to help reduce the discharge of pollutants in storm water runoff.

Municipalities are required to develop storm water management programs that include:

- A comprehensive planning process which involves public participation, and where necessary intergovernmental coordination, to reduce the discharge of pollutants to the maximum extent practicable;
- A program to reduce . . . pollutants . . . associated with the application of pesticides, herbicides, and fertilizer which will include, as appropriate, controls such as educational activities. . . for commercial applicators and distributors;
- A program to promote, publicize and facilitate public reporting of the presence of illicit discharges;
- Educational activities, public information activities, and other appropriate activities to facilitate the proper management and disposal of used oil and toxic materials; and



- Appropriate educational and training measures for construction site operators.

The BMP and associated measurable goals contained in this section have been selected to educate the public to better understand and participate in the control of urban runoff pollution.

### **3.5.2 Focus of the Next Five-Year Plan**

This plan and PEO program establishes a storm water quality management public education program that will require long-term implementation. During the five-year permit term, PEO program tasks will be implemented as proposed, or revised and enhanced, and new measurable goals or sub-tasks will be implemented, if necessary.

### **3.5.3 Phase II Federal Storm Water Regulations**

The Phase II (40 CFR 122.34 (b)(1) regulations contain a minimum requirement for a public information and education program to encourage public participation in pollution prevention practices and to deepen the public understanding of storm water quality management issues and concerns. Based on the regulations, this PEO program will meet the Phase II requirements.

### **3.5.4 Public Education and Outreach BMP**

The tasks identified in this PEO program will be implemented over the five-year term of the Permit. Additional measurable goals and sub-tasks will be developed to be consistent with the goals and objectives of the PEO program and the plan, and to focus the program on targeted pollutants and sources, as necessary.

**Control Program:** Public Education and Outreach

**BMP Description:** Educate the public to better understand and participate in the control of urban runoff pollution, and to solicit support for the program.

**Code of Federal Regulation Addressed:** 40 CFR 122.26, 122.34 122.41 & 122.42

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**BMP OBJECTIVES:**

- Inform the public about the City of Reedley's efforts to manage storm water quality and the costs associated with the Storm Water Quality Management Program.
- Educate the public about the sources of storm water pollution and pollutants' effects on water quality.
- Educate the public about the proper use and disposal of products and materials which contribute to storm water pollution (i.e. used motor oil, pesticides, herbicides, fertilizers and other toxic materials) and provide information about cost-effective and convenient alternatives.
- Coordinate with existing pollution prevention and environmental health public information programs and resources to enhance cost-effectiveness and avoid duplication of efforts.
- Encourage public participation in activities that reduce storm water pollution.

- Assess the effectiveness of PEO activities in communicating the storm water pollution control message and encouraging behavioral change.

## **EXISTING PROGRAMS**

- **Water Quality and Conservation Education** - The City of Reedley provides public education through an Annual Water Quality Report, which educates about critical water issues and reports monitoring information to the public as required by the Regional Water Quality Control Board and the California Department of Health Services. This program is administered by the City of Reedley Water Department as a requirement of their state permit, and the City has no control over the content, extent, or frequency of this activity.
- **Solid Waste and Recycling Education** - The City of Reedley promotes public education related to pollution prevention through participation in the City's Community Clean-up Program conducted twice a year. In addition, recycling is promoted through public education, which is developed and implemented in cooperation with the County of Fresno and the City's recycling contractor and includes used oil pick-up. The program requires that residents in Reedley bring refuse not collectable under normal collection services (such as furniture, lumber, appliances, hard to handle trash, e-waste, etc.) to a central collection spot where the refuse can be dumped at no charge to the resident. Hazardous materials are not allowed and there is a small charge for disposal of used tires. This is a volunteer program for the residents. Estimated tonnage of garbage collected: 5,550 tons of standard trash and 220 tons of hard to handle trash per year.
- **Fresno City and County Chamber of Commerce Candidates Forum and Environmental Issues Workshop** - The Water and Environmental Issues Committee of the Fresno Chamber of Commerce promotes water resource, environmental, and pollution prevention public education at two events each year. Political leaders and candidates are provided an opportunity to discuss regional

water resource management and water quality issues each fall at a Candidates Forum. Further, a workshop is held each year to educate businesses about environmental issues and regulatory compliance. This program is administered by the Fresno Chamber of Commerce and the City of Reedley has no control over the content, extent, agenda, or frequency of these events.

- **Central Valley Water Awareness Committee** - Public information officers from regional urban and rural agencies participate in a yearly water education effort during the month of May. Regional water resource management issues and water conservation practices are promoted through staging media events, involving agency elected officials, media relations, and outreach to schools. This program is not administered by the City of Reedley, and the City of Reedley has no control over the content, extent, agenda, or frequency of this education effort.
- **Landscaping and Tree Planting Programs** – The City of Reedley continues to be pro-active in the City’s tree planting efforts and conducts tree-planting activities, as funding becomes available. The City of Reedley Parks and Recreation Department coordinates with local tree-planting efforts conducted by neighborhood groups, and private interests groups for the benefit of the community..
- **“Spare the Air” Air Pollution Education** - The San Joaquin Unified Air Pollution Control District promotes trip-linking, car pooling, and other pollution prevention practices that reduce pollutants, dust and particulate matter in the air through its “Spare the Air” and “Smoking Vehicle” public education programs. These efforts include regional (Stockton to Bakersfield) mixed media campaigns, development of targeted public education materials, and financial incentives to get old, polluting vehicles off the road. This program is administered by the San Joaquin Unified Air Pollution Control District, and the City of Reedley has no control over the content, extent, or frequency of the events in this program.

- **Rideshare Program** - The Fresno County Rideshare program, established by the Council of Governments, promotes carpooling, vanpooling and related programs and activities to encourage alternative, non-polluting transportation options. Rideshare's community education efforts include public service announcements, newspaper articles and presentations to employers, business organizations and community groups. This program is administered by the Fresno County Council of Governments. Although the City of Reedley has input to the process, all decisions are made by the Council of Governments Board of Directors.
- **Central Valley Regional Water Resources Website** - Through the public education efforts of the Center for Irrigation Technology at California State University Fresno, regional water resources, water quality and water conservation information is available for public use and review through the Central Valley Regional Water Resources Web site. The web site is administered by California State University; Fresno (CSU;Fresno), and the City of Reedley has no control over the content of the web site.
- **Fresno County Household Hazardous Waste Program** – Fresno County conducts a Household Hazardous Waste Drop-off program held annually. The County usually provides three locations throughout the County for Fresno County residents to drop-off their household hazardous waste. This program is administered by the San Joaquin Unified Air Pollution Control District, and the City of Reedley has no control over the content, extent, or frequency of the events in this program.
- **Other** - Many other educational and outreach efforts are conducted by community organizations that relate to water resource management, water quality, pollution prevention and preservation of water resources and the environment. These include, but are not limited to the following: Sierra Club, Fresno Audubon Society,

American Institute of Architects, Building Industry Association, Associated General Contractors, Fresno Business Council, Reedley Chamber of Commerce, and local Rotary, Lions and Kiwanis Clubs.

## **MEASURABLE GOALS**

### **1. Establish Education and Outreach Program**

#### **a. Establish program materials and messages and refine if necessary**

Establish appropriate program materials and messages in the first year of the permit term. Prior to reproduction of major program materials, use focus groups to refine, redesign, and update the communication style and enhance cultural and linguistic appropriateness. Distribute information to residents through fliers available at City Hall.

#### **b. Distribute 2,000 copies per year of program materials and messages**

1,000 program messages (pamphlets, fliers, advertisements, etc.) will be distributed twice per year beginning in the second year of the permit term. The distribution will include placement of program materials at the public counters within City Hall, and, with the cooperation of the various business owners, at the public counters of targeted businesses within the City. Targeted businesses would include paint stores (to target paints, thinners, and solvents), landscape and nursery outlets (to target fertilizers, pesticides, and herbicides), and auto parts stores (to target oil, grease, solvents, paints, etc.). At the time of each distribution, 500 of the program messages will relate to water quality improvement practices identifying appropriate methods of use, storage, and disposal of controlled constituents in the storm water; the other 500 programs messages will relate to ongoing City and/or County water quality improvement programs.

c. Review materials and messages on a yearly basis

Review material and messages on a yearly basis and refine or update as public awareness and knowledge of water quality issues increases.

d. Reassess public attitudes

Reassess public attitudes, perceptions, and practices of storm water quality and related environmental issues at the end of the five-year permit term through Public Forums, discussions with Developers during the entitlement process regarding their understanding of the goals .

e. Revise program, as necessary, to address identified deficiencies

Review comments received from reassessment identified in Subsection 1 (d) above from the public, development community, businesses, etc. and determine best course of action to take to improve the public awareness of storm water quality issues during the next permit term.

## **2. Coordinate with Other Programs**

a. Coordinate with related pollution prevention and environmental education programs implemented within the City's boundaries.

i. *Storm Water Quality Management (SWQM) Advisory Committee*

Provide for regular meetings, every six months (twice per year), and input from the SWQM Advisory Committee. See BMP PIP-1.

ii. *Coordinate with other public outreach programs*

Meet with public information officers of related environmental programs, such

as recycling, household hazardous waste, air pollution control and rideshare to develop cooperative public outreach efforts that incorporate consistent storm water quality management and pollution prevention messages.

iii. *Coordinate an interagency event*

Determine interagency interest in developing and implementing of a co-sponsored, cooperative agency event to build public awareness of regional water resources, water resource management, storm water quality management practices, pollution prevention and the impact of urban infrastructure on the regional hydrological cycle.

iv. *Coordinate with other waste collection and recycling programs*

Coordinate with waste collection and recycling programs to develop common messages and materials that link waste and storm water quality management practices, particularly targeting the recycling and proper disposal of used motor oil.

v. *Develop public service information materials relative to wastewater disposal*

Communicate the difference between the sewer system and the storm drain system. Link the differences to their impact on storm water quality management and wastewater management practices.

b. Support and coordinate with other plan control elements.

Develop materials to communicate best management practices associated with the Illicit Discharges, Construction Activities, Development, and Municipal Operations and Maintenance Programs.



### 3. Conduct Outreach Activities

- a. Update and expand distribution networks; improve database.

Perform research to update database used for distribution.

- b. Present storm water quality programs to service groups, business associations, etc.

Send presentation packets to group organizers to solicit speaking engagements, and make presentations whenever possible (minimum one presentation per year). The presentations made during the five year permit term will focus on the SWMP and its implementation.

- c. Provide community relations.

Hold at least one briefing session for community leaders, educators and public servants to build awareness of storm water quality management issues per year. The session topics may include the SWMP program overview, concerns identified by attendees regarding implementation of the SWMP, and the roles the community leaders, educators, and public servants can play in improving storm water quality. The City Council to be briefed regarding progress of the City's Storm Water Management activities through submittal of progress reports from each department at regular City Council meetings two times per year.

Information submitted in the progress reports shall include: the department submitting the report; the name of the person responsible for preparing the report; a list of activities performed during the preceding six months; staff hours spent on the activity; cost of staff hours and materials purchased in connection with each activity; and problems identified by staff in implementing any of the activities identified in the SWMP.

d. Plan and implement storm water quality management events.

Stage events to introduce new projects, recognize “notable” individuals, neighborhood and community group pollution prevention efforts, etc. The City Council will recognize worthwhile projects designed to improve storm water quality and recognize the efforts of community based organizations and individuals whose efforts go to improve the quality of the City’s storm water two times per year at regular City Council meetings.

e. Develop information materials on storm water pollution prevention.

i. *Update material*

Prior to reproduction, update general awareness and other materials if needed to assure effective public outreach.

ii. *Develop a point-of-purchase program*

Develop “point of purchase” informational handouts for alternative practices, proper management and proper disposal practices related to pesticides, herbicides and fertilizers and supply these informational handouts to the material suppliers to give out to customers at the time the product is purchased.

f. Conduct media relations.

i. *Create a database*

Create a database of primary and secondary media sources for use in educating the community about storm water pollution prevention.

- ii. *Develop feature articles*  
Develop feature articles, display advertisements, general press releases and public service announcements to educate about proper use and disposal of substances that contribute to storm water pollution.
- iii. *Identify appropriate media sources*  
Identify appropriate media sources for use in communicating with non-English community members, especially Spanish speaking groups.
- g. Publicize and recruit volunteers for the storm drain stenciling program.  
Stenciling inlets is being implemented through the Illicit Discharge Program, ID-2 BMP.
- h. Expand promotion effort of the illegal dumping phone line.
  - i. *Promote storm water quality hotline*  
Incorporate promotion of the illegal dumping phone line into public service announcements.
  - ii. *Investigate alternative communication media*  
Explore possibilities of utilizing bus bench or billboard ads as a means to enhance awareness of the phone line.
- i. Enhance multi-cultural outreach. Communicate with non-English speaking members of the general public. 1,000 of the 2,000 program messages distributed each year shall be in Spanish.

i. *Produce pictorial, graphic information*

Create and produce pictorial, graphic information for non-English speaking groups to communicate and enhance participation in pollution prevention practices.

ii. *Provide non-English language education outreach*

Provide community relations and education outreach with non-English speaking groups to educate about storm water quality management issues.

iii. *Distribute materials*

Produce and distribute materials about storm water pollution prevention practices and City and County storm water programs for communicating with non-English speaking community members as part of Task 1(a) and (b) and Task 4(i) listed above. Five percent of the non-English speaking residents will be reached each year of the permit term beginning in the second year of the permit term.

**4. Maintain and Promote School Education Program.**

a. Develop clean storm water learning activities materials

Develop Clean Storm Water Learning Activities materials for primary age school children. A Storm Water Educational Material database will be established in the first year.

b. Provide teacher workshops

Provide teacher workshops and/or information materials to promote the program and educate school teachers in Kings Canyon Unified School District about storm water quality management issues. The second and third year of the permit term the City, in conjunction with the school district, will provide

one teacher workshop per year. During that workshop, teachers will be given a copy of the educational material database as a resource for classroom instruction.

c. Make presentations

Make presentations to support elementary, middle and high school education efforts. The City, in conjunction with the school district, will make at least one presentation per year to a classroom or assembly during the fourth and fifth year of the permit term.

## **ASSESSMENT TASKS**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- a. Determine the progress and status of implementation of the measurable goals and sub-tasks contained in this program element for the City of Reedley, and
- b. Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

1. Documenting procedures and preparing a summary report for the NPDES permit annual report.
2. Record the dates of distribution, places and/or persons distributed to, and number of Public Information materials (pamphlets, fliers, etc.) distributed each year.

3. Record the dates, minutes of meeting, and attendance sheets for each Storm Water Quality Management Advisory Committee meeting.
4. Record dates of Public Information advertisements relating to storm water management.
5. Record dates, attendee rosters, and information provided ,as well as informational material distributed to teachers in teacher workshops relating to storm water impacts on the environment.
6. Record dates, and materials covered in classroom presentations made to school age children.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.5-A at the end of the Public Education and Outreach Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.5-B summarizes the proposed five-year budget to implement this program element. A summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Table 3.5-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Public Education and Outreach Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>PEO-1</b> - Educate the public to better understand and participate in the control of urban runoff pollution, and to solicit support for the program.														
<b>1.</b> Establish Education and Outreach program														
	a. Establish Program materials and messages						<	■	<	<	»»	<	<	<
	b. Distribute Educational Material to Public								»»		»»	»»		
	c. Review material and messages on a yearly basis								<		<	<		
	d. Reassess public attitudes						»»	■	»»		»»	»»	<	<
	e. Revise program, as necessary to address identified deficiencies						<	■	»»	<	<	<	<	<
<b>2</b> Coordinate with other programs.														
	a. Coordinate with related pollution prevention and environmental education programs implemented within the City's boundaries						<	■	»»			»»		
	i) SWQM Advisory Committee.						<	■	»»	»»	»»	»»	»»	»»



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

	ii) Coordinate with other public outreach programs.						<	■	»			»		
	iii) Coordinate an interagency event						<	■	»			»		
	iv) Coordinate with waste collection and recycling programs.						<	■	<			»		
	v) Develop Public Service information materials relative to waste water disposal						<	■	»	<	»	»		
	d. Support and coordinate with other plan control elements.						<	■	»	<	»	»		
<b>3. Conduct outreach activities</b>														
	a. Update and expand distribution networks; improve database.						<	■	»	<	»	■		
	b. Present storm water quality programs to service groups, business associations, etc.						<	■	»		<	»		
	c. Provide community relations.						»	»	»	<	»	■	»	»
	d. Plan and implement storm water quality management events.						<	■	<			»		
	e. Develop information materials on storm water pollution prevention.						<	■	»	<	»	■	<	<
	i) Update materials.						<	■	»	<	»	■	<	<
	ii) Develop point of purchase program.						<	■	»	<	»	»	<	<
	f. Conduct media relations						»	■	»	»	»	■	<	<
	i) Create database.						<	■	»	»	»	■		
	ii) Develop feature articles.						<	■	»	»	»	■		
	iii) Identify appropriate media sources.						<	<	»	»	»	■		
	g. Publicize and recruit volunteers for the Storm Drain Stenciling Program.						<	■	»	»	»	»		
	h. Expand promotion effort of the illegal dumping phone line.						<	»	»	»	»	■	»	<



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.



	i) Promote storm water quality hotline.						<	»	»	»	»	■	<	<
	ii) Investigate alternative communication media.						<	»	<	<	<	■		
	I. Enhance multi-cultural outreach. Communicate with non-English speaking members of the general public.						<	»	<	<	»	■		
	i) Produce pictorial, graphic information.						<	»	<	<	»	■		
	ii) Provide non-English language education outreach.						<	»	<	<	<	■		
	iii) Distribute materials.						<	»	»	<	»	■		
4. Maintain and promote school education program														
	a. Develop Clean Storm Water Learning Activities materials.						<	»	»	<	»	■	<	<
	b. Provide teacher workshops.						<	»	<	<	»	■		
	c. Make presentations.						<	»	<	<	»	■		



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 3.5-B**  
**Summary of Proposed Five-Year Budget**  
**Public Education and Outreach Program**

<b>PROGRAM ELEMENT</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	<b>2011/2012</b>
Establish Education & Outreach Program	\$ 4,000.00	\$ 0	\$ 0	\$ 0	\$ 580.00
Create an Updated Strategic Implementation Plan	\$ 0	\$ 1,500.00	\$ 0	\$ 0	\$ 0
Coordinate with Other Programs	\$ 1,000.00	\$ 1,500.00	\$ 2,070.00	\$ 2,100.00	\$ 2,100.00
Conduct Outreach Activities	\$ 9,000.00	\$ 7,000.00	\$ 7,500.00	\$ 7,900.00	\$ 7,900.00
Maintain and Promote	<u>\$ 1,000.00</u>	<u>\$ 5,525.00</u>	<u>\$ 6,500.00</u>	<u>\$ 6,600.00</u>	<u>\$ 6,600.00</u>
<b>School Educational Program</b>					
<b>Total PEO Costs Per Fiscal Year</b>	<b>\$15,000.00</b>	<b>\$15,525.00</b>	<b>\$16,070.00</b>	<b>\$16,600.00</b>	<b>\$17,180.00</b>

## **3.6 PUBLIC PARTICIPATION AND INVOLVEMENT (PIP) PROGRAM**

### **3.6.1 Introduction**

The municipal storm water program is required to have a public participation element included in the overall program. Because source reduction means controlling human activity and encouraging behavioral change, it is important the public becomes involved in the process. By giving the public the opportunity to have input into the storm water management program and BMPs initiated to control storm water quality, the local population feels they have contributed to the solution and so have an interest in the solution being implemented. This element of the storm water management program supplements the Public Education and Outreach Program of this storm water management program by nature of the fact that to be involved in the decision making process, one must be educated on the general principles of storm water management.

Federal storm water regulations require municipalities to develop and implement a public participation element in the storm water management program to help reduce the discharge of pollutants in storm water runoff. Municipalities are required to develop storm water management programs that include:

- A comprehensive planning process which involves public participation, and where necessary intergovernmental coordination, to reduce the discharge of pollutants to the maximum extent practicable;
- A program to promote, publicize and facilitate public participation in the decision making process through committees, work groups, and public notice of meetings relating to storm water management;

- Involving the commercial, industrial, and construction companies in establishing program goals and objectives and establishment of BMPs so that true economic impacts are established to determine the economic feasibility of the program.

The BMP and associated measurable goals contained in this section have been selected to provide the opportunity for stakeholder entities and the general public to participate in developing, implementing and reviewing the City's plan and program for the control of urban runoff pollution.

### **3.6.2 Focus of the Next Five Year Plan**

This Plan and PIP Program establishes a storm water quality management public participation program that will require long-term implementation. During the five-year permit term, PIP program tasks will be implemented as proposed, or revised and enhanced, and new measurable goals or sub-tasks will be implemented, if necessary.

### **3.6.3 Phase II Federal Storm Water Regulations**

The Phase II regulations (40 CFR 122.34 (b)(2)) contain a minimum requirement for a public participation and involvement program to encourage public participation in pollution prevention practices and to deepen the public understanding of storm water quality management issues and concerns. Based on the regulations, this PIP program will meet the Phase II requirements.

### **3.5.4 Public Participation and Involvement BMP**

The tasks identified in this Plan will be implemented over the five-year term of the Permit. Additional measurable goals and sub-tasks will be developed to be consistent with the goals and objectives of the PIP Program and the plan, and to focus the program on targeted pollutants and sources, as necessary.

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**Control Program:** Public Participation and Involvement

**BMP Description:** Involve the public to better understand and participate in the control of urban runoff pollution, and to solicit support for the program. Establish and maintain of a list of stakeholders, interested individuals and groups regarding public meetings on Storm Water Quality issues.

**Code of Federal Regulation Addressed:** 40 CFR 122.26, 122.34 &122.41

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**BMP OBJECTIVES:**

- Involve the public, including all economic and ethnic segments, in the City of Reedley's efforts to manage storm water quality and the costs associated with the Storm Water Quality Management Program by establishing and conducting Storm Water Quality Management Advisory Committee meetings.
- Involve the public in developing, implementing and reviewing this plan and other City storm water management programs.
- Involve the public in eliminating the sources of storm water pollution and pollutants' effects on water quality.
- Involve the public in identifying illicit discharges through use of a telephone hotline.
- Encourage public participation in activities that reduce storm water pollution.
- Assess the effectiveness of PIP activities in communicating the storm water pollution control message and encouraging behavioral change through public involvement.

## EXISTING PROGRAMS

- **Landscaping and Tree Planting Programs** – The City of Reedley continues to be proactive in its tree planting efforts and conducts tree planting activities, as funding becomes available. The City of Reedley Parks and Recreation Department coordinates with local tree planting efforts conducted by neighborhood groups, and private interest groups for the benefit of the community. These activities are generally funded through public service organizations or state and federal grant funding programs, and the extent and frequency of these activities are dependent upon the availability of grants and the City being awarded those grants.

## MEASURABLE GOALS

### 5. Establish Public Participation and Involvement Program

a. Establish a data base of stakeholders and interested members of the public

Prior to establishment of the Storm Water Management Committee, a data base of agencies having jurisdiction within the permit area, local commercial, industrial, and construction companies, and members of the general public, including all economic and ethnic segments, that may have an interest is attending and giving testimony at the management committee meetings shall be established in the first year. The list shall be updated on a yearly basis.

b. Notice interested parties identified in the data base of Storm Water Management Committee meetings

Using the list developed from the data base, notice interested parties of meeting dates, time, and places along with meeting agendas.

c. Conduct Storm Water Quality Management Advisory Committee Meetings

Conduct at least two public Storm Water Quality Management Advisory

Committee meetings per year for each year of the permit term. Record the number of attendees and maintain records or agendas discussed at the Storm Water Quality Management Advisory Committee meetings.

d. Involve community organizations in the storm water management process

Enlist the volunteer efforts of community organizations such as the local scouting organizations, Boys and Girls Club, etc. for activities such as storm drain stenciling.

## **6. Coordinate with Other Programs**

a. Coordinate with related pollution prevention and environmental education programs implemented within the City's boundaries.

i. *Coordinate with other public outreach programs*

Meet with public information officers of related environmental programs, such as recycling, household hazardous waste, air pollution control and rideshare to develop cooperative public outreach efforts that incorporate consistent storm water quality management and pollution prevention messages.

ii. *Coordinate with other waste collection and recycling program*

Coordinate with waste collection and recycling programs to develop common messages and materials that link waste and storm water quality management practices, particularly targeting the recycling and proper disposal of used motor oil.

b. Support and coordinate with other plan control elements.

Develop materials to communicate best management practices associated with the Illicit Discharges, Construction Activities, Development, and Municipal Operations and Maintenance Programs through the Storm Water Management

Committee.

## **7. Conduct Outreach Activities**

a. Update and expand distribution networks; improve database.

Perform research to update database used for distribution.

b. Present storm water quality programs to service groups, business associations, etc.

Send presentation packets to group organizers to solicit speaking engagements, and make presentations whenever possible.

c. Provide community relations.

Hold briefing sessions for community leaders, educators and public servants to build awareness of storm water quality management issues.

d. Conduct media relations.

i. *Create a database*

Create a database of primary and secondary media sources for use in educating the community about storm water pollution prevention.

ii. *Develop feature articles*

Develop feature articles, display advertisements, general press releases and public service announcement to educate about proper use and disposal of substances that contribute to storm water pollution.

iii. *Identify appropriate media sources*

Identify appropriate media sources for use in communicating with non-English community members, especially Spanish speaking groups.



- e. Publicize and recruit volunteers for the storm drain stenciling program.  
Stenciling inlets is being implemented through the Illicit Discharge Program, ID-2 BMP.
- f. Expand promotion effort of the illegal dumping phone line.
  - i. *Promote storm water quality hotline*  
Incorporate promotion of the illegal dumping phone line into public service announcements, fliers, or other media as appropriate. The hotline phone number will be placed on all storm water quality information fliers and pamphlets distributed by the City. See BMP ID-2 for Measurable Goals for the Storm Water Hotline.
  - ii. *Investigate alternative communication media*  
Explore possibilities of utilizing bus bench or billboard ads as a means to enhance awareness of the Storm Water Hotline.
- g. Enhance multi-cultural involvement. Communicate with non-English speaking members of the general public.
  - i. *Produce pictorial, graphic information*  
Create and produce pictorial, graphic information for non-English speaking groups to communicate and enhance participation in pollution prevention practices.
  - ii. *Provide non-English language public involvement*  
Provide opportunities for non-English speaking groups to participate in the storm water quality management issues.

h. Community Clean-up Program

City shall record the number of participants, tons of trash collected, and the number of tires removed

**ASSESSMENT TASKS**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- c. Determine the progress and status of implementation of the measurable goals and sub-tasks contained in this program element for the City of Reedley, and
- d. Evaluate the effectiveness of the BMP to address public involvement and participation in reducing pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- 7. Documenting procedures and preparing a summary report for the NPDES permit annual report.
- 8. Update Stakeholder and public member database yearly and record who was notified of each Storm Water Quality Management Advisory Committee meeting.
- 9. Record the dates of distribution, places and/or persons distributed to, and number of Public Information materials (pamphlets, fliers, etc.) distributed, each year.
- 10. Record the dates, minutes of meeting, and attendance sheets for each Storm Water Quality Management Advisory Committee meeting .
- 11. Record dates, of Public Information advertisements relating to storm water management.

12. Record dates, attendee rosters, and information provided in teacher workshops of information material distributed to teachers relating to storm water impacts on the environment.
13. Record dates, organizations, number of persons participating, and activities completed relating to volunteer participation in the City's Storm Water Management activities.
14. Record number of phone complaints relating to illicit discharges or illegal dumping received on the City Storm Water Management Hotline. Record actions taken by the City relating to such complaints.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals, and the tentative implementation schedule for this BMP are included in Table 3.6-A at the end of the Public Participation and Involvement Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.6-B summarizes the proposed five-year budget to implement this program element. A summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Table 3.6-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Public Participation and Involvement Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>PIP-1 -</b> Involve the public to better understand and participate in the control of urban runoff pollution, and to solicit support for the program.														
<b>1.</b> Establish Public Participation and Involvement Program														
	a. Establish a data base of stakeholders and interested members of the public. Update database each year.						<	■	»»	<	»»	■	<	<
	b. Notice interested parties identified in the data base of Storm Water Management Committee meetings.						»»	»»	<		»»	■	<	<
	c. Conduct Storm Water Quality Management Advisory Committee Meetings						»»	■	»»	»»	»»	»»	»»	»»
	d. Involve community organizations in the storm water management process.						»»	»»	»»		»»	■	<	<
<b>2</b> Coordinate with other programs.	a. Coordinate with related pollution prevention and environmental education programs implemented within the City's boundaries						<	■	<		<	»»		
	i) Coordinate with other Public Outreach Programs						<	■	<		<	»»	<	<
	ii) Coordinate with other waste collection and recycling programs						<	■	<		<	»»		



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

	b. Support and coordinate with other plan control elements.						<	■	<	<	<	»	<	<
<b>3. Conduct outreach activities</b>														
	a. Update and expand distribution networks; improve database.						<	»	»	<	»	■	<	<
	b. Present storm water quality programs to service groups, business associations, etc.						<	»	»		<	■	<	<
	c. Provide community relations.						»	»	»	<	»	■	»	»
	d. Conduct media relations						»	»	»	<	»	■		
	i) Create database.						<	»	<	<	<	■		
	ii) Develop feature articles.						<	»	<	<	<	■		
	iii) Identify appropriate media sources.						<	<	<	<	<	■		
	e. Publicize and recruit volunteers for the Storm Drain Stenciling Program.						<	»	»	<	<	■		
	f. Expand promotion effort of the illegal dumping phone line.						<	»	»		■	»	»	»
	i) Promote storm water quality hotline.						<	»	»		■	»	»	»
	ii) Investigate alternative communication media.						<	»	»		<	■		
	g. Enhance multi-cultural involvement. Communicate with non-English speaking members of the general public.						<	»	»	<	<	■		
	i) Produce pictorial, graphic information.						<	»	»	<	<	■		
	ii) Provide non-English language public involvement						<	»	»	<	<	■		
	h. Community Clean-up Program						<	■	»	<		»		



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 3.6-B**  
**Summary of Proposed Five-Year Budget**  
**Public Participation and Involvement Program**

<b>PROGRAM ELEMENT 2011/2012</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	
Establish Public 800.00 Participation & Involvement Program	\$ 2,500.00	\$ 500.00	\$ 600.00	\$ 700.00	\$
Create an Updated 0 Strategic Implementation Plan	\$ 0	\$ 1,000.00	\$ 0	\$ 0	\$
Coordinate with Other 1,500.00 Programs	\$ 500.00	\$ 1,000.00	\$ 1,500.00	\$ 1,500.00	\$
Conduct Outreach <u>6,000.00</u> Activities	<u>\$ 4,500.00</u>	<u>\$ 5,260.00</u>	<u>\$ 5,500.00</u>	<u>\$ 5,750.00</u>	<u>\$</u>
<b>Total PIP Costs Per 8,300.00 Fiscal Year</b>	<b>\$ 7,500.00</b>	<b>\$ 7,760.00</b>	<b>\$ 7,600.00</b>	<b>\$ 7,950.00</b>	<b>\$</b>

## **3.7                    ILLICIT DISCHARGES (ID) PROGRAM**

### **3.7.1   Introduction**

Federal storm water regulations (40 CFR 122.34 (b)(3)) require municipal programs to *effectively* prohibit non-storm water discharges to the storm drain conveyance system. The regulations identify specific types of flows that do not need to be prohibited provided the municipality has determined the flows are not significant sources of pollutants. Any non-storm water flow that was not specified in the regulations must be prohibited regardless of its source or quality. The Illicit Discharge Program was developed to comply with these requirements. The City will develop a policy for non-storm water discharges that are permissible or conditionally allowable. All other non-storm water discharges will be prohibited. The City will be authorized to control non-storm water discharges through a storm water quality control ordinance.

Illicit discharges enter the storm drain system through illicit connections and illegal dumping. An illicit connection is a physical connection to a storm drain that has not been approved by an agency or conveys a prohibited non-storm water discharge. Illegal dumping is the intentional dumping of materials into the system conveyance system, streets, inlets or basins. Illegal dumping can also include improper disposal of material on land that is then discharged to the storm drain system when it rains.

In accordance with regulatory requirements, the Illicit Discharge Control Program consists of two BMPs (ID-1 and ID-2). The two BMPs address the investigation, detection, and elimination of illicit connections and illegal dumping to the storm drain system.

### **3.7.2 Focus of the Next Five Year Plan**

This Plan and Illicit Discharge (ID) Program establishes an illicit discharge detection program that will require long-term implementation. During the five-year permit term, the ID program tasks will be implemented as proposed, or revised and enhanced, and new measurable goals or sub-tasks will be implemented, if necessary.

### **3.7.3 Phase II Federal Storm Water Regulations**

The Phase II regulations (40 CFR 122.34 (b)(3) contain a minimum requirement for an illicit discharge detection program to detect and eliminate illicit discharges into the storm water conveyance system. Based on the regulations, this ID program will meet the Phase II requirements.

### **3.7.4 Illicit Discharge BMP**

The first BMP, ID-1, addresses the elimination of illicit connections to the storm drain system and the second BMP, ID-2, addresses illegal dumping. ID-1 consists of the City: 1) taking actions to eliminate illicit connections once detected; 2) implementing enforcement action if initial actions do not result in elimination of the illicit connection; 3) training employees to identify illicit connections during normal, daily activities; and 4) implementing inter-agency coordination and referrals to utilize all agency resources available to the City to identify and eliminate illicit connections.

ID-2 addresses the elimination of illegal dumping into the storm sewer system. It focuses on: 1) identifying alternative disposal options for storm water pollutants, 2) coordinating with and augmenting existing efforts to respond to incidents of



illegal dumping, and 3) working with the Public Education and Outreach (PEO) and the Public Participation and Involvement (PIP) Control Programs to develop mechanisms to discourage the public from illegal dumping and to promote the storm water quality telephone hot-line for the public to report incident.

**Control Program:** Illicit Discharges

**BMP Description:** Implement a program to identify and eliminate illicit connections to the storm drain system. Update the City's Storm Drain Master Plan. Establish permissible non-storm water discharges. Establish tracking system for inspections and violations.

**Code of Federal Regulation Addressed:** 40 CFR 122.26, 122.34 & 122.41

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### **BMP OBJECTIVES**

- Update existing Storm Drain Master Plan and digitize into electronic format.
- Establish permissible non-storm water discharges.
- Establish tracking system for inspections and violations.
- Coordinate with other inspection programs to ensure that the City of Reedley is notified when inspectors find evidence of illicit connections.
- Implement field activities to detect, control and report illicit connections, sanitary sewer leaks, and sanitary sewer surcharging and/or overflows.

### **EXISTING PROGRAMS**

- As owner and operator of the storm drain system and sanitary sewer system, the City of Reedley responds to complaints or evidence of illicit connections to the system. The City of Reedley in conjunction with the Alta Irrigation District, has established a procedure to notify violators that they are illegally connected to the storm drain system and request them to re-plumb their facility. In the event that the violator does not respond in a

timely manner, the City has the authority to plug the connection to eliminate discharge to the storm drain system.

## **MEASURABLE GOALS**

### **Update Storm Drain Master Plan**

a. Update existing Storm Drain Master Plan

The updated Master Plan will indicate locations of underground pipe, manholes, outfalls, and waters of the US that receive discharges from the City's storm drain system. The Storm Drain Master Plan will be updated every two years. Future updates may include locations of roadside ditches, canals, inlets, and culverts. The current Master Plan is in electronic format and the update will also be in electronic format. It is the City of Reedley's plan to have all underground utilities within the City's jurisdiction placed into a Geographical Information System (GIS) within the next ten years.

### **Implement Criteria for Permissible Non-Storm Water Discharges**

a. Establish a permissible non-storm water discharge list

Establish a permissible non-storm water discharge list during the first year of the permit term and revise the list as needed. To date, there are no known significant sources of pollutants within the City Limits.

b. Coordinate with water conservation programs

Coordinate with water conservation and other resource conservation programs to reduce discharges of irrigation waters to the storm drain system.

### **Inspection and Enforcement Procedures**

a. Review regulations and revise City requirements and procedures as necessary.

In the first year of the permit term, the City will review NPDES regulations and existing City requirements and procedures for inspection and illicit discharge detection, tracing to source and elimination and revise as necessary to be in compliance with the illicit

discharge detection and elimination requirements of the NPDES Phase II Regulations. The revised requirements and procedures will include an inspection checklist to be used by City inspection personnel, as well as tracing and enforcement procedures. The revised requirements and procedures will be implemented immediately after they are approved.

b. Record and report procedures

Record and report interagency referrals and activities. Establish a tracking system for inspections and violations by the end of the first year of the permit term and implement immediately thereafter.

### **Implement Inspector Training**

Implement at a minimum an annual employee training and refresher program for identifying and eliminating illicit connections, illicit dumping, inspection, and enforcement. The training program will also address various employee roles, i.e. management, field employees, etc.

Develop Training Material

Develop training material and identify appropriate personnel for training (code enforcement, public works field personnel, etc.) in the first year of the permit term.

Implement Training

Provide one training or refresher training for employees identified in 4(a) above each year of the remaining four years of the permit term.

### **ASSESSMENT TASKS**

#### **Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element for the City, and

Evaluate the effectiveness of the BMP to identify, address and eliminate or reduce pollutants in storm water runoff.

To assist in conducting compliance and assessment evaluation activities, the following records or documents will be maintained:

The date, time and location of training sessions, and a description of the material covered and distributed, and the names of the employees attending the training.

The dates, locations, and actions required as a result of inspections and responses to illicit discharge complaints.

The number of illicit connections eliminated, a characterization of the discharge being eliminated from the storm drain system, and data regarding follow-up and enforcement actions taken to eliminate illicit connections.

The dates and types of interagency referrals.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.7-A at the end of the Illicit Discharge Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.7-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Control Program:** Illicit Discharges

**BMP Description:** Implement activities to control and eliminate illegal dumping into the storm drain system. Prioritize areas of concern by visual screening, conducting inspections, and known sources of pollution. Implement inspections for illicit connections/discharges.

**NPDES Regulation Addressed:** 40 CFR 122.26, 122.34 & 122.41

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### **BMP OBJECTIVES**

- Collaborate with other agencies on illegal dumping problems to avoid duplication of effort and to reinforce the effectiveness of enforcement procedures.
- Implement inspections for illicit connections/discharges.
- Prioritize efforts of illicit discharges tracing and detection using visual screening, by conducting inspections, and identifying known sources of pollution.
- Build upon existing programs to establish consistent reporting and referral procedures for field inspectors and maintenance personnel.
- Enforce regulations and ordinances that provide agencies the legal authority

to control illegal dumping into storm drains or to areas where rainfall or storm water runoff could contact potential pollutants.

## **EXISTING PROGRAMS**

- The County Health Department responds to reports of illegal dumping of hazardous materials and solid and liquid waste, addresses environmental concerns, and implements enforcement actions.
- The County of Fresno sponsors household hazardous waste collection events that allow residents to properly dispose of household hazardous wastes.
- The City of Reedley implements curbside used oil recycling programs. This offers residents an alternative, safe, and easy way to properly dispose of used oil.
- The County implements a Used Oil Program by establishing certified recycling centers and distributing recycling containers. The County's program includes periodic mass media campaigns.

## **MEASURABLE GOALS**

### **1. Identify, Develop, or Support Alternative Disposal Options**

#### **a. Coordinate efforts with hazardous waste programs**

Support and coordinate with household hazardous waste and small quantity generator programs that provide convenient means for people to properly dispose of oil, antifreeze, pesticides, herbicides, paints,

solvents, other potentially harmful chemicals and other waste material.

All hazardous waste collection is performed by the County of Fresno. The City of Reedley has no authority to control the hazardous waste program of the County. The City will include the phone number, address, and hours of operation for the County's hazardous waste collection facility on the pamphlets and fliers it distributes in accordance with the Public Education and Outreach efforts outlined in this SWMP.

b. Support permanent household hazardous waste collection sites

Investigate and support opportunities to secure a permanent household hazardous waste collection site. All hazardous waste collection in the City is performed by the County of Fresno. The City will include the phone number and hours of operation for the County's hazardous waste collection site in the pamphlets and fliers that are to be distributed under the Public Education and Outreach activities as outlined elsewhere in this SWMP.

c. Establish point-of-purchase waste paint disposal program

Establish a point-of-purchase campaign for waste paint disposal. Revise the program as necessary. Continue to implement the program annually.

## **2. Label Storm Drain Inlets**

The City of Reedley has taken advantage of the County of Fresno Agreement with the California Conservation Corps to provide free storm drain stenciling service to City's in Fresno County. The City of Reedley has participated in this program for the past three years. Continue the City's program to stencil



and re-stencil storm drain inlets throughout the permit area. Promotion of the stenciling program will be done throughout the PIE program. The City will stencil twenty percent (20%) of the storm drain inlets in the City per year.

### **3. Train Response Personnel**

Implement employee training and refresher program for identifying and eliminating illegal discharges once per year. The training program will address various employees' roles, i.e. management, field employees, etc. Training sessions will include City employees who have responsibility for implementing the City's Storm Water Management Program (i.e., department heads and City employees).

The training session in the first year of the permit term will cover the six areas of activities in the SWMP: Public Education and Outreach, Public Participation and Involvement, Illicit Discharge Detection and Elimination, Construction Site Storm Water Controls, Post-Construction Activities, and Municipal Operations and Good Housekeeping.

The training sessions conducted in the remaining four years of the permit term will cover such subjects as: illicit discharge tracing, illicit connection detection, enforcement procedures, procedures developed to address complaints filed through the hotline, etc.

### **4. Implement Response and Enforcement Procedures**

Review and revise response and enforcement procedures as necessary.

### **5. Administer Illegal Dumping Phone Line**

Facilitate citizen reporting of illegal dumping through the Storm Water Hotline phone number implemented under the Public Education and Outreach

program. City shall maintain records relating to the number of calls, the nature of the complaint (including characterization of materials discharged and location of discharge), what notification was sent, when it was sent, who it was sent to, and the resolution of the complaint, including any follow-up actions required to be taken to resolve a confirmed violation. The Illegal Dumping Hotline phone number will be advertised on the City's pamphlets and fliers distributed in accordance with the Public Education and Outreach activities outlined in this SWMP.

## **6. Prioritize Efforts of Illicit Discharge Detection**

Review and determine the areas in which illicit discharge detection efforts should have the highest potential of discharging pollutants into the storm drain system. Prioritize inspection and detection efforts such that those areas determined to pose the greatest risk of illicit discharges shall be regularly inspected for compliance with the non-storm water discharge requirements of the NPDES Phase II regulations.

## **7. Implement Inspections for Illicit Connections/Discharges**

### **a. Identify and eliminate illicit connections and discharges**

Inspect, investigate and eliminate illicit connections/discharges upon agency or citizen complaints or referrals. Inspect four (4) targeted businesses/industries per year for illicit discharges and/or illegal dumping. Inspections will include documentation of visual observations of the nearest downstream storm drain manhole for illicit discharges, tracing any discovered illicit discharges to its point of origin, notification of the facility owner of the violation along with a demand to cease the violation, and re-inspection. Illicit connections may be removed by the City.

- b. Implement a Restaurant Grease Trap Permit/Inspection Program  
Implement a program to establish permitting guidelines and requirements for food service establishments in the City for grease trap installation and maintenance. Conduct annual inspections of food service establishment grease traps to determine if grease traps are being maintained in proper condition.

## **ASSESSMENT TASKS**

### **1. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- a. Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element for the City of Reedley, and
- b. Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- Recording the date, time and location of training sessions, a description of the material covered and distributed, and the names of the employees attending the training.
- Recording the dates, locations and responses to reports of illegal

dumping to the storm drain system, a characterization of the material being dumped or spilled, and how notification of the dumping occurred, e.g. referral or reporting by citizen, use of storm water quality hotline.

- Record number and locations of storm drain inlets stenciled.
- Soliciting feedback from individuals using the hotline to determine how the person knew to call the number, why the person was reporting the incident, and if there are any other incidents they are concerned about and would like to report.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.7-A at the end of the Illicit Discharge Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.7-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Control Program:** Illicit Discharges

**BMP Description:** Develop and implement procedures for spill response within the City Limits.

**Code of Federal Regulation Addressed:** 40 CFR 122.26, 122.34 & 122.41

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### **BMP OBJECTIVES**

- Establish protocols between the City's first responders, including the Police Department, the Fire Department, and Public Works Department to govern procedures to be implemented during a spill event.
- Train first responders in assessment, evaluation and implementation of Best Management Practices to be employed during a spill event.
- Review, revise and reinforce protocols for notification of appropriate County, State and Federal agencies regarding accidental discharges of potentially hazardous chemicals or material into the City's storm drain system.
- Enforce regulations and ordinances that provide agencies the legal authority to control hazardous materials being transported through the City of Reedley.

## **EXISTING PROGRAMS**

- The County Health Department responds to reports of illegal dumping of hazardous materials and solid and liquid waste, addresses environmental concerns, and implements enforcement actions.
- The County of Fresno sponsors household hazardous waste collection events that allow residents to properly dispose of household hazardous wastes.
- The City of Reedley implements curbside used oil recycling programs. This offers residents an alternative, safe, and easy way to properly dispose of used oil.
- The County implements a Used Oil Program by establishing certified recycling centers and distributing recycling containers. The County's program includes periodic mass media campaigns.
- The City of Reedley is required, by law, to notify the County Health Department and Regional Water Quality Control Board in the event of a hazardous material spill that enters the storm drain system or has the potential to enter waters of the United States.

## **MEASURABLE GOALS**

### **1. Establish Protocols between the City of Reedley's First Responders**

- a. Establish open communication between the City's First Responders  
Implement procedures for establishing open communication between the

City's Police Department, Fire Department and Public Works Department and establish protocols for notification of potentially hazardous materials spills.

b. Identify and adopt appropriate Best Management Practices for spill responses

Identify common hazardous materials that are transported through the City and adopt appropriate Best Management Practices for preventing or mitigating the hazardous materials from entering the storm drain system should a spill event occur.

## **2. Train First Responders**

Establish a program to train first responders in the assessment, evaluation, and implementation of appropriate Best Management Practices to contain potential hazardous materials from entering the storm drain system. Training will include implementation of mitigation Best Management Practices should the potentially hazardous materials enter the storm drain system prior to the first responders arriving on scene. A minimum of two training sessions per year will be held.

## **3. Review, Revise and Enforce Notification Protocols**

Review City's protocols for notification of appropriate County, State and Federal Agencies of potentially hazardous material discharges into the City's storm drain system or waters of the United States. Implement revised protocols that will improve the effectiveness of the notification process.

## **4. Enforce Regulations and Ordinances relating to the Transportation of Hazardous Materials within the City Limits**

Review and revise City regulations and ordinances as necessary in order to

establish the appropriate level of authority to adequately control the transportation of hazardous materials through the City of Reedley. Enforce the regulations and ordinances through the City's Transportation Permit process.

## **ASSESSMENT TASKS**

### **1. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- a. Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element for the City of Reedley, and
- b. Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- Adoption of protocols and Best Management Practices for spill response.
- Recording the dates, locations and responses to spill events.
- Record number and scope of first responder training sessions.
- Identify Best Management Practices for transportation of hazardous materials and require those practices be implemented by the transporter through the Transportation Permit process.



## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.7-A at the end of the Illicit Discharge Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.7-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Table 3.7-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Illicit Discharge Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>ID-1 – Implement a program to identify and eliminate illicit connections to the storm drain system.</b>														
<b>1. Update Storm Drain Master Plan</b>														
	a. Update existing Storm Drain Master Plan						<	■	■	<		»»		
<b>2. Implement criteria for permissible non-storm water discharges.</b>														
	a. Establish permissible non-storm water discharges						<	■	<	»»	<	<	»»	»»
	b. Coordinate with water conservation programs.						<	■	<		<	<	»»	<
<b>3. Inspection and enforcement procedures</b>														
	a. Review and revised procedures as necessary						<	■	»»		»»	»»		
	b. Record and report procedures						<	■	»»		»»	»»	»»	»»



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.



	a. Facilitate citizen reporting of illegal dumping through the Storm Water Hotline.						<	»	<	<	<	■		
<b>6. Prioritize Inspection and Detection Efforts</b>							<	<	<		<		<	<
	a. Conduct Inspections based upon Prioritized Areas						<	■	<	<	<	»	<	<
<b>7. Implement Inspections for illicit connections/discharges</b>							<	■	»	<	<	»		
	a. Identify and eliminate illicit connections and discharges.						<	■	»	<	<	»		
	b. Implement a Restaurant Grease Trap Permit/Inspection Program						<	■	»	<	■	»		
<b>ID-3 – Develop and implement procedures for spill response within the City limits</b>														
<b>1. Establish Protocols between the City' of Reedley's first responders</b>							<	■	»	<	<	<		
	a. Establish open communication between City's first responders						<	■	»	<	»	<	»	»
	b. Identify and adopt appropriate Best management Practices for spill response						<	■	»	<	»	<	»	»
<b>2. Train First Responders</b>							<	■	»	<	»		»	»
<b>3. Review, revise and Enforce Notification Protocols</b>							»	■	»	<	<	»	»	»
<b>4. Enforce regulations and ordinances relating to the transportation of Hazardous Materials within the City Limits</b>							»	■	»	<	<	»	»	»



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 3.7-B**  
**Summary of Proposed Five-Year Budget**  
**Illicit Discharge Program**

<b>PROGRAM ELEMENT</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	<b>2011/2012</b>
Update Storm Water Master Plan	\$ 20,000.00	\$ 60,000.00	\$ 40,000.00	\$ 0	\$ 0
Implement Criteria for 295.00 Permissible Non-Storm Water Discharges	\$ 750.00	\$ 250.00	\$ 265.00	\$ 280.00	\$
Inspection and 1,700.00 Enforcement Procedures	\$ 1,500.00	\$ 1,550.00	\$ 1,600.00	\$ 1,650.00	\$
Implement Inspector 1,200.00 Training	\$ 1,000.00	\$ 1,050.00	\$ 1,100.00	\$ 1,150.00	\$
Identify, Develop, or 600.00 Support Alternative Disposal Options	\$ 500.00	\$ 525.00	\$ 550.00	\$ 575.00	\$
Label Storm Drain 575.00 Inlets	\$ 500.00	\$ 500.00	\$ 525.00	\$ 550.00	\$
Train Response 1,200.00 Personnel	\$ 1,000.00	\$ 1,050.00	\$ 1,100.00	\$ 1,150.00	\$
Implement Response 600.00 and Enforcement Procedures	\$ 500.00	\$ 525.00	\$ 550.00	\$ 575.00	\$
Administer Illegal 600.00 Dumping Hotline	\$ 500.00	\$ 700.00	\$ 550.00	\$ 575.00	\$
Implement Inspections 575.00 for Illicit Connections	<u>\$ 500.00</u>	<u>\$ 500.00</u>	<u>\$ 550.00</u>	<u>\$ 550.00</u>	<u>\$</u>
<b>Total ID Costs Per 7,345.00 Fiscal Year</b>	<b>\$ 26,750.00</b>	<b>\$ 66,650.00</b>	<b>\$ 46,790.00</b>	<b>\$ 7,055.00</b>	<b>\$</b>

## **3.8 CONSTRUCTION ACTIVITIES (CSR) PROGRAM**

### **3.8.1 Introduction**

Construction and development contributes pollutants to storm water runoff during the construction phase, when sites are being disturbed. Construction phase storm water pollutants include sediment from grading activities and a variety of other pollutants associated with vehicles, construction materials, and construction waste (including petroleum hydrocarbons, paints, solvents, and concrete truck washout).

Municipalities are required to control storm water discharges from construction sites that result in a land disturbance of one acre or more. The initial plan includes one BMP in the Construction Activities (CSR) Program that will be implemented as scheduled to address this requirement. The BMP focuses on construction activities by determining the pollutants and practices of greatest concern related to construction activities, developing guidelines for the practices to reduce pollution, and implementing a plan review and site inspection process with enforcement capabilities.

In addition to requiring municipalities to control storm water discharges from construction sites, the federal storm water regulations require the owner or operator of a construction site that results in a land disturbance of one-acre or more to obtain an NPDES storm water permit. The owner or operator of the site must obtain coverage under the State's General Construction Activities Storm Water Permit adopted by the State Water Resources Control Board. To comply with the General Permit an owner or operator must file a Notice of Intent with the State Board, prepare and implement a Storm Water Pollution Prevention Plan and conduct visual inspections of the site before and after rain events. The CSR program compliments the federal program and provides compliance assistance to construction site operators.

### **3.8.2 Assessment**

The objectives of the Construction Activities Program (CSR Program) will be met in the first permit term through implementation of construction site storm water quality guidelines, inspection of construction site activities, and review of new development plans. Assessment of the CSR Program during the first permit term will be made at the end of the five-year permit term. The CSR Program will reduce storm water pollution by:

- Implementing storm water pollution prevention measures recommended in the Construction Site Storm Water Quality Guidelines.
- Reviewing development plans and inspecting construction sites to verify that the Construction Site Storm Water Quality Guidelines are being implemented.
- Enforcing program requirements when non-compliance is discovered.
- Developing and disseminating educational materials to public agencies and construction and development businesses.
- Providing the development community with a Model Storm Water Pollution Prevention Plan (SWPPP) that clarifies the State's general permit SWPPP requirements, facilitates SWPPP completion and implementation, and incorporates local guidelines.
- Developing implementation procedures to incorporate storm water pollution prevention into plan review, entitlements, and inspections.

- Training public agency employees and interested members of the development community.

Based on the measurable goal and subtask selection process described earlier in the introduction to Section 3.0, all of the recommendations summarized above have been incorporated in to the Implementation Plan.

### **3.8.3 Focus of the Next Five-Year Plan**

The focus of the CSR Program for the next five years will be to establish, as necessary, the tasks of the program. The CSR Program will develop education programs that target the construction and development community (e.g., construction contractors, engineers, and public works personnel) and focus on storm water pollution prevention. Copies of construction site Storm Water Pollution Prevention Plans (SWPPP) will be approved and accepted by the City and City inspectors will regularly inspect construction sites to determine if the Storm Water Pollution Prevention Plan is being implemented.

### **3.8.4 Phase II Federal Storm Water Regulations**

The U.S. Environmental Protection Agency (U.S. EPA) implements the storm water regulations in two phases. The CSR Program complies with the Phase II storm water regulations that were published in 1999.

### **3.8.5 Construction Activities BMPs**

The CSR Program BMP included in this plan will implement one BMP. The BMP, CSR-1, focuses on pollutants generated during the construction phase. The measurable goals of CSR-1 focus on implementing the Construction Site Storm



Water Quality Guidelines and Model SWPPP to address Phase II requirements and enhancing education materials targeted for construction site personnel. The following section describes the BMP and its objectives, existing related programs and practices, measurable goals and assessment tasks.

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**Control Program:** Construction Activities

**BMP Description:** Design and implement a comprehensive control program for storm water pollution related to construction site management. Develop site plan review and construction inspection procedures that are in compliance with the Phase II requirements.

**Code of Federal Regulation Addressed:** 40 CFR 122.26, 122.34(b)(4) & 122.41

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## **BMP OBJECTIVES**

- Identify those pollutants and sources related to construction site management that pose the greatest threat to the resources and beneficial uses identified in the Plan objectives.
- Implement tiered requirements (guidelines) (see Item 2 under MEASURABLE GOALS for this BMP) for construction site management and erosion and sedimentation control (including dust control) with baseline control requirements for typical site conditions (e.g., low relief areas that do not drain to the Kings River) and more stringent controls for sensitive areas (e.g., greater topographic relief or tributary to the Kings River).
- Implement and coordinate a phased inspection and enforcement program that is consistent with the State General Permit for Construction Activities and Phase II requirements, and that builds on existing inspections and enforcement programs.
- Educate architects, engineers, contractors, and public works and planning

personnel about techniques to minimize storm water pollution associated with erosion and sedimentation and construction site operations.

## **EXISTING PROGRAMS**

- The State General Permit for Construction Activities requires implementation of construction site management and erosion and sedimentation control measures as identified in a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must be retained on-site by the project developer.
- The San Joaquin Valley Unified Air Pollution Control District regulates dust generated by construction projects, including sediment tracking and street cleaning.
- The City of Reedley issues grading permits and require submittal of "as-graded" certifications from project design engineers. For certain projects involving large amounts of fill, the City of Reedley requires periodic street sweeping to collect spilled and tracked material.

## **MEASURABLE GOALS**

### **1. Establish Construction and Development Committee Meetings**

Establish meetings periodically with representatives from the building and planning departments of the City and the private sector. All major program policies will be coordinated and reviewed through this committee.

## **2. Implement Construction Site Policies and Procedures**

### **a. Revise construction site policies and procedures**

Review the Construction Site policies and procedures and revise them as needed for implementation under this SWMP. Determine the most effective methods to distribute information to construction site contractors regarding the City's adopted Construction Site Storm Water regulations, policies, procedures, and enforcement.

### **b. Adopt City resolution or ordinance implementing Storm Water Management requirements**

Prepare, notice public, hold public review and comment period, and adopt a citywide resolution or ordinance implementing Storm Water Management policies and procedures relating to Construction Site Discharges as required under the NPDES requirements, including sanctions for non-compliance such as monetary or non-monetary penalties, fines, bonding or permit denials. Incorporate by reference the State of California Water Resources Control Board's General Permit No. CAS00002 for Construction Site Discharges.

## **3. Review Plans, Inspect Sites, and Enforce Control Requirements**

### **a. Implement construction activity control policies**

Implement and enforce construction activity control policies and requirements through construction site inspections and implementing a tracking system for inspections and violations.

### **b. Develop inspection guidance materials**

Develop inspection guidance materials, including specialized storm water quality inspection checklists for each phase of construction.

c. Increase inspection activities

To address Phase II requirements, increase inspection activities to address sites that cause a land disturbance of one-acre or greater and to ensure that minimum municipal agency controls are met. All construction sites will be inspected for compliance with the projects SWPPP at least once before the beginning of the rainy season. Larger projects and projects with a history of non-compliance with the State's General Permit for Construction Site Discharges will be inspected one or more times during the rainy season for compliance with the projects SWPPP.

d. Review, revise and implement site plan review procedures

Review and revise, as necessary, the pre-construction site plan review procedures. Implement pre-construction site plan review procedures to address issues identified in the State's General Permit and the Phase II regulations, including local sediment and erosion control requirements.

**4. Coordinate Program with Other Public Agencies**

Coordinate sediment pollution prevention (e.g., materials track out) with local Air Pollution Control District.

**5. Develop, Update, and Distribute Model SWPPPs**

Develop and update, as necessary, the Model SWPPP to address new requirements in the State General Permit for Construction Activities and Phase II requirements in the last year of the permit term. Once developed, the Model SWPPP will be distributed to developers/contractors at the time of application for a grading permit.

**6. Train Agency Personnel and Development Community**

Develop focused education programs for construction site personnel (e.g., construction contractors and public works personnel). Training sessions will be

held once per year. All of the City's construction inspectors and planning personnel involved in the site plan review process will be trained on the Phase II Construction Site requirements each year.

**7. Legal Authority Review**

Review existing legal authorities and revise as needed to implement and enforce Phase II requirements (see Legal Authority Section).

**8. Develop and Implement a Recordkeeping System for Public Complaints**

Develop in the first year a recordkeeping system in the first year of the permit term to track public complaints and reports. Such records will include the nature of the complaint/report as well as the resolution of the complaint.

**ASSESSMENT TASKS**

**1. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- a) Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element, and
- b) Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- Tracking the number of construction site inspections conducted and the number of violations referred to the City of Reedley.

- Periodically requesting feedback from public agency personnel regarding the implementation and effectiveness of the Construction Site Storm Water Quality Guidelines. Maintain records of such feedback.
- Reporting on the number of training classes conducted , educational materials distributed and number and make-up of attendees.
- Periodically soliciting feedback through the City's Public Education and Outreach program from construction site managers, construction site inspectors and the general public regarding use and applicability of the Model SWPPP, outreach and education material, and implementation of the plan's construction site management program. Maintain records of such feedback.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.8-A at the end of the Construction Activities Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.8-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Table 3.8-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Construction Activities Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>CSR-1</b> Design and implement a comprehensive control program for storm water pollution related to construction site management														
1. Establish Construction and Development Committee Meetings							<	■	»»	<	»»	»»	<	<
2. Implement construction site policies and procedures							<	■	»»	<	»»	»»	<	<
	a) Revise construction site policies and procedures						<	■	»»		»»	<		
	b) Adopt City Resolution or ordinance implementing storm water management requirements						<	■	»»		■	»»		
3. Review plans, inspect sites, and enforce control requirements							<	■	■		»»	<		<
	a) Implement construction activity control policies						<	■	»»		»»	<		»»
	b) Develop inspection guidance materials.						<	■	»»	<	»»	<		<
	c) Increase inspection activities.						<	■	»»	<	»»	»»		»»



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.



BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
	d) Review, revise, and implement site plan review procedures						<	»	■		<			
4. Coordinate program with other public agencies							<	■	»			»		
5. Modify model SWPPPs							<	■	■	<	»	»		<
6. Train agency personnel and development community							<	■	»	<	»	»		
7. Legal authority review.							■	»	»	<	»	»	»	»
8. Develop and Implement a Recordkeeping system for Public Complaints.							<	■	»	<	»	»	<	»



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 3.8-B**  
**Summary of Proposed Five-Year Budget**  
**Construction Activities Program**

<b>PROGRAM ELEMENT</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	<b>2011/2012</b>
Establish Construction And Development Committee Meetings	\$ 1,000.00	\$ 1,000.00	\$ 1,150.00	\$ 1,200.00	\$ 1,250.00
Implement Construction Site policies and procedures	\$ 5,000.00	\$ 1,500.00	\$ 1,230.00	\$ 1,300.00	\$ 1,200.00
Review Plans, Inspect Sites, and Enforce Requirements	\$ 4,000.00	\$ 3,500.00	\$ 3,700.00	\$ 3,870.00	\$ 3,970.00
Coordinate Program With Other Public Agencies	\$ 800.00	\$ 1,000.00	\$ 1,150.00	\$ 1,150.00	\$ 1,150.00
Modify Model SWPPP	\$ 450.00	\$ 0	\$ 0	\$ 0	\$ 250.00
Train Agency Personnel And Development Community	\$ 1,000.00	\$ 750.00	\$ 800.00	\$ 800.00	\$ 800.00
Legal Authority Review	<u>\$ 750.00</u>	<u>\$ 250.00</u>	<u>\$ 250.00</u>	<u>\$ 250.00</u>	<u>\$ 250.00</u>
<b>Total CSR Costs Per Fiscal Year</b>	<b>\$ 13,000.00</b>	<b>\$ 8,000.00</b>	<b>\$ 8,280.00</b>	<b>\$ 8,570.00</b>	<b>\$ 8,870.00</b>

## **3.9 DEVELOPMENT (PCR) PROGRAM**

### **3.9.1 Introduction**

Development contributes pollutants to storm water runoff after construction is complete. Post-construction phase pollutants are typically those associated with human activity at the developed site and include particulates from vehicle emissions and brake and tire wear, nutrients from fertilizers, pesticides and herbicides, motor oil and other automobile fluids, and contaminants related to specific land use types and practices.

Municipalities are required to implement BMPs to control storm water discharges from developed sites and redevelopment projects (post-construction) that resulted in a land disturbance of one acre or more (which includes projects less than one acre that are part of a larger common plan of development or sale). The two BMPs in this Section (PCR-1 and PCR-2) focus on new development by developing criteria to determine when on-site treatment is necessary, developing guidance for operating and maintaining private retention/detention ponds, and implementing a plan review and site inspection process with enforcement capabilities.

### **3.9.2 Assessment**

The objectives of the Development Program (Post-Construction Runoff Program) will be met in the first permit term through implementation of post-construction storm water quality guidelines and review of new development plans. Assessment of the PCR Program during the first permit term will be undertaken in the fifth year of the permit term. The PCR Program is aimed at reducing storm water pollution by:

- Requiring new developments to ultimately drain to the City of Reedley's master planned storm drain system which provides retention/detention for urban runoff.
- Implementing storm water pollution prevention measures in accordance with the N.P.D.E.S. Post-Construction Storm Water Quality requirements.
- Reviewing development plans and inspecting construction sites to verify that the Post-Construction Storm Water Quality Guidelines are being implemented.
- Enforcing program requirements when non-compliance is discovered.
- Developing and disseminating educational materials to public agencies and construction and development businesses.
- Incorporating storm water pollution prevention into plan review, entitlements, and inspections.
- Training City of Reedley Code Enforcement and Inspection employees and interested members of the development community.

Based on the measurable goal and subtask selection process described earlier in the introduction to Section 3.0, all of the recommendations summarized above have been incorporated in to the Implementation Plan.

### **3.9.3 Focus of the Next Five-Year Plan**

The focus of the PCR Program for the next five years will be to implement the necessary

tasks of the program. The PCR Program will develop education programs that target the construction and development community (e.g., construction contractors, engineers, and City personnel) and focus on storm water pollution prevention. Perform yearly reviews with City inspection personnel to determine the effectiveness of the City's construction site storm water control program and revise policies and procedures in order to address deficiencies.

#### **3.9.4 Phase II Federal Storm Water Regulations**

The proposed Phase II regulations contain minimum requirements for Post-Construction storm water runoff controls. Based on the regulations, the PCR Program will meet the Phase II requirements.

#### **3.9.5 Development BMPs**

The First BMP (PCR-1) addresses source controls and treatment of pollutants in post-construction runoff. PCR-1 includes development and implementation of the Post-Construction Storm Water Quality Guidelines and efforts to develop and adopt standard requirements to improve water quality and reduce total runoff from new development. The second BMP (PCR-2) establishes guidelines for the operation and maintenance of private retention ponds being developed. These guidelines will be distributed to the owners of existing ponds, and will be provided to all land development projects that require private ponds.

The following section describes each of the two BMPs and their objectives, existing related programs and practices, measurable goals and assessment tasks.

---

**Control Program:** Development

**BMP Description:** Require site drainage designs and post-construction measures which prevent storm water pollution. Develop technical criteria for selected control strategies. Consider the need to develop and implement Standard Requirements

**NPDES Regulation Addressed:** 40 CFR 122.26, 122.34(b)(5) & 122.41

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### **BMP OBJECTIVES**

- Require retention/detention for all runoff from new development and re-development through implementation of the Storm Drainage and Flood Control Master Plan.
- Develop and adopt technical standards for design of storm drain inlets, drainage swales, retention/detention basins.

### **EXISTING PROGRAMS**

- The City of Reedley metropolitan area is served by the City of Reedley Storm Drain Master Plan. City wide retention and detention of storm water runoff is provided by the Master Plan system.
- The City of Reedley requires new developments to provide on-site detention when the Master Plan Storm Drain System does not have the hydraulic capacity to handle increased runoff volumes or peak flow rates caused by more intensive development than planned.

- For development areas that will process or handle potential pollutants, such as loading or fueling areas, the City requires on-site swales or other methods to avoid direct connection to the storm drain system.
- The State General Permit for Construction Activities requires a description of controls used to reduce pollutant loads in post-construction site runoff in a Storm Water Pollution Prevention Plan.
- In rural areas, the County of Fresno allows new developments to discharge storm water runoff to natural stream channels. However, to protect in-stream water quality, the County recommends that runoff be collected and treated in grassy swales prior to discharge. The County requires retention of the increase in runoff volume associated with the new development. The increased run-off volume is estimated based on the difference in runoff volume between the pre- and post-development 100-year, 6-day storm (roughly six inches of rainfall).
- For developments within the urban area that are not yet served by the City of Reedley's storm drain system, the City requires temporary on-site retention.

## **MEASURABLE GOALS**

### **1. Continue to Implement Storm Drainage and Flood Control Master Plan**

Require all new development and redevelopment in the City of Reedley's metropolitan area to ultimately drain all storm water runoff to the Master Plan storm drain system that provides retention or detention of the runoff. Require new development and redevelopment to provide on-site detention when not feasible to connect to the City-wide retention/detention system. Recommend new development

collect and treat runoff in grassy swales and/or storm water interceptors prior to discharge to storm drain system, when feasible. Recommend redevelopment projects incorporate storm water control measures that are reasonable for the type of redevelopment proposed.

a. Implement through land use entitlement process and enforce through On-site Inspections

Review Land Use Entitlement policy and process to determine consistency with NPDES Phase II requirements.

b. Update Post-Construction regulations, policies and procedures

Review City Post Construction regulations, policies and procedures on a yearly basis and revise as necessary to comply with any new NPDES Phase II Requirements.

## **2. Implement Post-Construction Regulations, Policies and Procedures**

a. Distribute City regulations, policies and procedures

Review the City post-construction regulations, policies and procedures and revise them as needed. Ensure distribution of regulations, policies and procedures to developers, contractors, and City plan reviewers. City plan reviewers, code enforcement officers, and construction site inspectors will be given materials and standards during the training sessions identified as part of the City's overall SWMP Training program. Developers and contractors will have access to the new Standards through the City's Public Works Improvement Standards Manual. Notification of new requirements under the City's SWMP may



be published in the local news media, mailings, on City web site, or Faxes. All local developers/contractors will be notified of the revised regulations, policies and procedures.

b. Assess effectiveness of post-construction controls

An assessment of the effectiveness of the implemented control measures will be performed each year of the permit term and included in the Yearly Report required by the NPDES Phase II requirements. The assessment will include the number of new development and redevelopment projects that were constructed, what post-construction control measures were required, and results of on-site inspections.

**3. Consider Standard Requirements**

Determine the need to develop and adopt specific design and pollution prevention standard requirements. Research and consider standards being implemented in other areas and develop applicable local standard requirements if appropriate.

**4. Identify Effective Post-Construction Controls**

a. Monitor technical studies prepared by professional organizations

Monitor technical studies relating to storm water run-off control and coordinate with City's monitoring program to evaluate effectiveness of BMPs to address high priority pollutants. Encourage the public and private sectors to utilize documented cost effective structural controls.

b. Conduct pilot studies

As specific problems may be identified and structural controls or devices proposed, evaluate the need to conduct pilot studies for candidate controls.

c. Develop Technical Standards

Develop standards, implement under the City's Storm Water Management Ordinance, and enforce through the planning review and approval process and on-site inspections of construction areas.

**5. Encourage Designs which Improve Storm Water Quality**

a. Identify opportunities to maximize infiltration

Identify opportunities and encourage public and private sector developments to incorporate design techniques that, where appropriate, maximize infiltration into the ground of storm water run-off prior to it entering the storm water collection system.

b. Educate engineers and development community

Develop a program to educate engineers and other members of the development community on structural practices and designs that reduce water quality impacts from developed sites. Include Phase II requirements when applicable. This activity is part of the material to be distributed in Section 2., "Implement Post-Construction Guidelines, Part (a) "Distribute regulations, policies and procedures", identified above.

**6. Review Plans, Inspect Sites, and Enforce Control Requirements**

Implement post-construction requirements and control policies through plan review, conditions, and verifications. Increase plan review and inspection activity to meet the requirements of Phase II minimum municipal control measures and to address sites equal to or greater than one acre.

a. Develop and implement plan review guidance

Develop and implement guidelines for plan reviews to ensure compliance with N.P.D.E.S. Phase II Post-Construction control requirements. Review all plans in compliance with new plan review guidelines.

b. Inspect sites for post-construction requirement compliance

Inspect all new and redevelopment projects once during construction and once upon completion of construction to determine compliance with post-construction control requirements.

c. Enforce post-construction control requirements through the plan review approval process and on-site inspections.

Condition approval of the project upon inclusion of the required post-construction control measures and enforce those requirements through the normal notification process identified in Section 4.2, "Storm Water Quality and Discharge Control Ordinance", upon identification of deficiencies noted during the construction site inspections for storm water control measures.

**7. Develop a Refresher Training Program**

Provide regularly scheduled training for all City personnel involved in plan checking, design review, construction site management, and construction site inspection.

**8. Develop a Post-Construction Control Maintenance Program**

The City will inspect, clean, and repair, as necessary, 20% of the storm drain inlets in the City storm drain system annually. The City will inspect 10% of the privately operated post-construction storm water control BPM facilities to determine if the facilities are being properly maintained and operated. Any deficiencies will be noted and the operator notified as described in Section 4.2, "Storm Water Quality and

Discharge Control Ordinance”.

## **ASSESSMENT TASKS**

### **1. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- a) Determine the progress and status of implementation of the measurable goals and sub-tasks contained in this program element, and
- b) Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- Periodically requesting feedback from public agency personnel and the development community regarding the implementation and effectiveness of the Post Construction Storm Water Quality regulations, policies and procedures. Maintain records of such feedback.
- Tracking the number of post construction inspections completed and the number of violations reported to the City.
- Periodically requesting feedback from personnel involved in plan checking, design review, and in CEQA review. Maintain records of such feedback.

- Periodically inspecting post-construction BMP storm water control facilities once constructed and operating to verify the adequacy of the design and construction, and the BMP facilities are being properly operated and maintained. Records shall be maintained of all inspections, including any follow-up activities conducted resulting from inspection findings.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.9-A at the end of the Development Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.9-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Control Program:** Development

**BMP Description:** Require site drainage designs and post-construction measures which provide storm water treatment, where local conditions warrant. Train staff involved with maintenance of storm water control measures and implement procedures for tracking maintenance activities.

**NPDES Regulation Addressed:** 40 CFR 122.26, 122.34(b)(5) & 122.41

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### **BMP OBJECTIVES**

- Develop and implement criteria that define when a development should be required to treat storm water runoff before discharge to the municipal storm drain system.
- Train maintenance personnel and implement a tracking system for maintenance activities.

### **EXISTING PROGRAMS**

- The City of Reedley metropolitan area is served by the City of Reedley Storm Drain Master Plan. City wide retention and detention of storm water runoff is provided by the Master Plan system.
- The City of Reedley requires new developments to provide on-site detention when the Master Plan Storm Drain System does not have the hydraulic capacity to handle increased runoff volumes or peak flow rates caused by more intensive development than planned.

- For development areas that will process or handle potential pollutants, such as loading or fueling areas, the City requires on-site swales or other methods to avoid direct connection to the Master Plan Storm Drain System.
- The State General Permit for Construction Activities requires a description of controls used to reduce pollutant loads in post-construction site runoff in a Storm Water Pollution Prevention Plan.
- In rural areas, the County allows new developments to discharge storm water runoff to natural stream channels. However, to protect in-stream water quality, the County recommends that runoff be collected and treated in grassy swales prior to discharge. The County requires retention of the increase in runoff volume associated with the new development. The increased run-off volume is estimated based on the difference in runoff volume between the pre- and post-development 100-year, 6-day storm (roughly six inches of rainfall).
- For developments within the urban area that are not yet served by the City of Reedley's storm drain system, the City requires temporary on-site retention.

## **MEASURABLE GOALS**

### **4. Develop and Implement Standards for Operation and Maintenance of Private Retention Basins**

Develop and implement guidelines and standards establishing practices for the

operation and maintenance of private retention basins. Standards may include storm water treatment in the form of vegetation in the basin to remove pollutant matter prior to infiltration or discharge into the City's storm drain system.

## **5. Distribute Regulations, Policies, Procedures and Standards**

Review the post-construction regulations, policies, procedures and standards and revise them as needed. Ensure distribution of regulations, policies, procedures and standards to developers, contractors, and local agency plan reviewers.

## **6. Review Plans, Inspect Sites, and Enforce Control Requirements**

Implement post-construction requirements and control policies through plan review, conditions, and verifications. Increase plan review and inspection activity to meet the requirements of Phase II minimum municipal control measures and to address sites equal to or greater than one acre.

## **7. Train Personnel in Proper Procedures for Maintenance of Storm Drain Systems**

The training program will be developed in the first year of the permit term. The City will hold one class in the second year of the permit term and train 100% of the maintenance personnel in charge of maintaining the City's storm drain system. A refresher course will be given in the fourth year of the permit term to the same personnel.

## **8. Implement Procedures for Tracking Maintenance Activities.**

Review existing tracking procedures and implement new ones as needed to provide



a tracking system for storm drain system maintenance activities.

## **ASSESSMENT TASKS**

### **1. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- c) Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element, and
- d) Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- Periodically requesting feedback from public agency personnel and the development community regarding the implementation and effectiveness of the City's Post Construction Storm Water Quality regulations, policies, procedures and standards.
- Tracking the number of post construction inspections completed and the number of violations reported to the City.
- Periodically requesting feedback from personnel involved in plan checking, design review, and in CEQA review.

- Periodically inspecting post-construction BMP storm water control facilities once constructed and operating to verify the adequacy of the design and construction, and the BMP facilities are being properly operated and maintained. Records shall be maintained of all inspections, including any follow-up activities conducted resulting from inspection findings.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.9-A at the end of the Development Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.9-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Table 3.9-A  
Proposed Implementation Schedule and Responsibilities  
Development Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>PCR-1</b> Require site drainage designs and post-construction measures which prevent storm water pollution.														
1. Continue to implement Storm Drainage and Flood Control Master Plan							<	■	■	<	»»	<		<
	a) Implement through land use entitlement process and enforce through on-site inspections						<	■	■		»»	»»		
	b) Update Post-Construction regulations, policies and procedures						<	■	»»		»»	<		<
2. Develop and implement post-construction site regulations, policies and procedures							<	■	»»	<	»»	»»		



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

.	a) Distribute regulations, policies and procedures						<	»	»		»	■		»
	b) Assess effectiveness of post-construction controls						<	■	»		»	»		<
3. Consider Standard Requirements							<	■	»	<	»	<		<
4. Identify effective post-construction controls.							<	■	»	<	»	»		<
	a) Monitor technical studies prepare by professional organizations						<	■	»		»	<		
	b) Conduct pilot studies.						<	■	»		»	<		
	c) Develop Technical Standards						<		»		»	<		<
5. Encourage designs which improve storm water quality.							<	■	■		»	»		<
	a) Identify opportunities to maximize infiltration						<	■	■		»			<
	b) Educate engineers and development community						<	■	■	<	»	»		<
6. Review plans, inspect sites, and enforce control requirements.							<	■	■	<	»			<
	a) Develop and Implement Plan Review Guidance						<	■	■	<	<			<
	b) Inspect sites for post-construction requirement compliance						<	■	■	<	»			<
	c) Enforce post-construction control requirements through the plan review approval process and on-site inspections						<	■	■	<	»	»		<
7. Develop a refresher training program.							<	■	»	<	»			<
8. Develop a Post-Construction Control Maintenance Program							<	■	»	<	»	»		<

Continuing activity, reviewed or revised as needed throughout implementation

■

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<b>PCR-2</b> Require site drainage designs and post-construction measures which provide storm water treatment, where local conditions warrant.															
1. Develop and implement standards for operation and maintenance of private retention basins.							<	■	<	»»	»»				<
2. Distribute regulations, policies, procedures and standards							<	■	:		»»	»»			<
3. Review plans, inspect sites, and enforce control requirements.							<	■	■	<	»»	»»			<
4. Train Maintenance Personnel							<	■	<	<	<				<
5. Implement Tracking System							<	■	<	<	»»				<



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.

■ Agency to take a lead role in development or implementation of the activity

»» Agency to provide a strong support in the development or implementation of the activity

< Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 3.9-B**  
**Summary of Proposed Five-Year Budget**  
**Development Program**

<b>PROGRAM ELEMENT</b> <b>2011/2012</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	
Continue to implement 875.00 Storm Drainage and Flood Control Master Plan	\$ 3,500.00	\$ 800.00	\$ 825.00	\$ 850.00	\$
Implement Post- 575.00 Construction Site regulations, policies and procedures	\$ 2,000.00	\$ 500.00	\$ 525.00	\$ 550.00	\$
Consider Standard 400.00 Requirements	\$ 500.00	\$ 400.00	\$ 400.00	\$ 400.00	\$
Identify effective Post- 575.00 Construction controls	\$ 500.00	\$ 500.00	\$ 525.00	\$ 550.00	\$
Encourage designs 500.00 which improve storm water quality	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$
Review plans, inspect 2,800.00 sites, and enforce control requirements	\$ 3,000.00	\$ 2,500.00	\$ 2,500.00	\$ 2,650.00	\$
Develop a refresher 975.00 Training program	\$ 3,000.00	\$ 800.00	\$ 850.00	\$ 900.00	\$
Develop a Post- 500.00 Construction Control Maintenance Program	\$ 1,500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$
Develop and 400.00 implement Standards for operation and maintenance of private Retention basins	\$ 2,500.00	\$ 400.00	\$ 425.00	\$ 400.00	\$

Distribute regulations, 600.00 policies, procedures and standards	\$ 500.00	\$ 525.00	\$ 550.00	\$ 575.00	\$
Review plans, 1,800.00 inspect sites and enforce control requirements	\$ 1,500.00	\$ 1,575.00	\$ 1,650.00	\$ 1,725.00	\$
Train personnel in 600.00 proper procedures for maintenance of storm drain system	\$ 500.00	\$ 500.00	\$ 600.00	\$ 600.00	\$
Implement procedures 500.00 for tracking maintenance activities	\$ <u>500.00</u>	\$ <u>500.00</u>	\$ <u>500.00</u>	\$ <u>500.00</u>	\$
<b>Total CSR Costs Per Fiscal Year</b>	<b>\$ 20,000.00</b>	<b>\$ 10,000.00</b>	<b>\$ 10,350.00</b>	<b>\$ 10,700.00</b>	
	<b>\$11,100.00</b>				

## **3.10 MUNICIPAL OPERATIONS AND MAINTENANCE (MO) PROGRAM**

### **3.10.1 Introduction**

Federal storm water regulations require municipalities to develop and implement storm water pollution control measures to reduce the discharge of pollutants in runoff from municipal operations. Municipal facilities include, but are not limited to corporation yards, streets, highways, parking lots, parks and open spaces, golf courses, public facilities, landfills, waste transfer stations and the storm drainage system. Activities at these facilities that could be sources of storm water pollution include maintenance of vehicles, equipment and facilities; operating practices; landscape practices; chemical use, application and storage practices; waste management practices; shipping and receiving practices; and material handling and storage practices. Pollutants associated with these activities are petroleum hydrocarbons, pesticides, fertilizers, toxic chemicals, trash and debris, sediment and oxygen-demanding substances. BMPs and associated measurable goals contained in this section have been selected to control and prevent the discharge of these pollutants.

### **3.10.2 Assessment**

The storm water regulations require that a municipality conduct an assessment of its storm water program to determine its effectiveness in reducing the discharge of pollutants in storm water runoff. The BMPs identified by the City of Reedley in this Section are designed to reduce pollutants being discharged into the storm drain system from City operations by:

- Review of current City operations to determine what additional measures may be



appropriate.

- Establish and implement guidelines for street cleaning, corporation yard, road maintenance and landscaping activities.
- The City implementing a “Hot Spot” storm sewer system cleaning program prior to the wet season to remove pollutants that accumulate in the storm drain system over the dry season.
- The City implementing an inspection program of municipal operations to verify BMPs and other measures are being implemented.
- The City providing training to employees regarding storm water quality and pollution prevention measures.
- The City eliminating non-storm water discharges from municipal operations and corporation yards.
- The City eliminating sources of pollutants by covering storage areas and constructing berms and other runoff diversion structures around chemical and material storage areas.

Based on the measurable goals and subtask selection process described earlier in the introduction to Section 3.0, not all of the recommendations summarized were selected to be included in the Implementation Plan.

### **3.10.3 Focus of the Next Five-Year Plan**

The focus of the Municipal Operations and Maintenance (MO) Program for the next five years will be to implement the necessary tasks of the program. The MO Program will be reviewed at the end of the five-year permit term.

### **3.10.4 Phase II Federal Storm Water Regulations**

The Phase II regulations contain a minimum required BMP program to address municipal operations. The MO Program meets the requirements of the Phase II regulations (see Section 2.0).

### **3.10.5 Operations and Maintenance BMPs**

The first BMP, MO-1, addresses maintenance of storm drain facilities and the second BMP, MO-2, addresses all other municipal operations. MO-1 consists of managing pollutants captured within the drainage system. MO-1 includes preventative maintenance of the storm drain system, gathering pollutant source information from maintenance activities, and employee training.

MO-2 addresses all other municipal operations including street and roadway maintenance, corporation yard operations, landscaping practices, and street sweeping practices. MO-2 includes review of current practices to ensure they continue to be effective, record keeping and reporting to track program implementation and effectiveness, employee training, and other public agency activities.

**Control Program:** Operations and Maintenance

**BMP Description:** Review and revise current storm drainage system maintenance practices to optimize removal of storm water pollutants

**NPDES Regulations Addressed:** 40CFR 122.26, 122.34(b)(6) & 122.41

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## **BMP OBJECTIVES**

- Implement preventative maintenance of the storm drainage system.
- Implement appropriate maintenance of storm water retention and detention basins to ensure pollutants do not accumulate to levels that would imperil the use of the basins for groundwater recharge and recreation.

## **EXISTING PROGRAMS**

### **Conveyance System Maintenance**

- The City of Reedley owns, operates, and maintains the Master Planned storm drainage system serving the permit area. The system is designed to operate by gravity with sufficient energy to self-clean the pipelines and convey debris and sediments to storm water basins where they are removed as necessary. The City performs preventative maintenance to clean debris from the storm water conveyance system and removes blockages in the system to prevent flooding. Upon discovery of debris accumulations through drainage complaints, debris is removed and properly disposed. Accumulated debris is removed from pump stations, and pumps are

serviced prior to each rain season.

### **Basin Maintenance**

- The City removes sediment deposits from retention basins to prevent pollutant accumulations to levels that would present risks to public health or the environment. The current practices are adequate and no change in cleaning frequency is recommended at this time.
- Basins used during dry weather for recreation have a depressed area in which nuisance flows are contained. These “low-flow” areas also trap the majority of storm water-borne pollutants. Accumulated sediments in low-flow areas and the areas within fifteen feet of each basin outfall are sampled and analyzed annually for total lead. Surface sediments are removed approximately once every three years from these areas to meet State regulations. Soils in the main recreational floor are also sampled and tested. It is estimated that sediments must be removed from the recreational floor every 15 to 20 years.
- Sediments are removed at least once every three years from basins used for recharge of imported surface water. Often sediments are removed more frequently to maintain higher percolation rates.
- The management of basins not used for recharge or developed for recreation is similar to the management of low-flow areas of recreational basins. Accumulated sediments are sampled and analyzed annually for total lead. Accumulated sediments are removed approximately once every three years from these basins to meet State regulations.

- Sediment from basins that are actively under construction are not tested or cleaned. If construction excavation activity ceases for more than three years, sediment in the area receiving storm water is tested and disposed accordingly.

## **MEASURABLE GOALS**

### **1. Enhance Maintenance of the Storm Drain System for Pollutant Removal**

#### **a) Record field observations**

Develop and implement a program that provides a means of recording the observations of maintenance personnel. Use these observations to characterize sediment and debris removed from the storm drain conveyance system to help target sources of pollutants.

### **2. Continue to Implement Basin Sediment Monitoring and Maintenance Program**

Review, revise and update, as necessary, the Storm Drainage Basin Sediment Management Plan. The City will inspect 20% of the City's storm drain retention/detention basins for accumulation of trash and indications of illegal discharges or increased levels of potential pollutants each year. The City will clean 30% of the City's retention/detention basins each year. When a pattern of high levels of trash, pollutants or illegal discharges is identified at specific sites, the City will implement an increased level of inspection and, if required, cleaning of the retention/detention basins.

### **3. Employee Training**

Implement a training program for City employees responsible for storm drain conveyance system and basin maintenance to review storm water quality

management guidelines and other storm water quality issues. Incorporate training into existing regularly scheduled training when possible. There will be a minimum of one training session per year for City staff relating to storm water management (100% of affected personnel will be trained each year).

## **ASSESSMENT TASKS**

### **2. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an annual basis to:

- a) Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element, and
- b) Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

To assist in conducting compliance and assessment evaluation activities, the following records will be maintained:

- Recording the dates and locations of cleaning of the storm drain conveyance system, estimating the quantity, and visually characterizing the material removed. The time since the last storm event prior to cleaning may also be recorded.
- Maintaining records of the disposal and handling of material removed from the storm drain system.
- Recording the date, time and location of training sessions, as well as

providing a description of the material covered and distributed, and the names of the employees attending the training.

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.10-A at the end of the Municipal Operations and Maintenance Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.10-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Control Program**      Operations and Maintenance Controls

**BMP Description:**      Review and revise street, road, and highway maintenance and operations practices as necessary to reduce pollutants in storm water runoff.

**NPDES Regulation Addressed:**      40 CFR 122.26, 122.34(b)(6) & 122.41

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### **BMP OBJECTIVES**

- Ensure that the City Staff address storm water quality impacts associated with public agency operations and maintenance practices.

### **EXISTING PROGRAMS**

- The City is currently implementing street sweeping practices.
- The City does have a program of cleaning blockages from the storm drain system to prevent flooding.
- The City is currently implementing practices for minimizing storm water pollution associated with corporation yard operations.



## MEASURABLE GOALS

### 1. Implement Requirements for Road Maintenance Activities

a) Review and revise and distribute requirements

Review and revise City requirements, as necessary, to accommodate changes in operations or activities, or address other storm water quality concerns. Distribute requirements to affected personnel.

b) Develop and implement requirements for concrete installation activities

Develop and implement requirements to further address all concrete installation activities, in addition to truck washout practices. Distribute requirements to affect personnel.

c) Develop and implement requirements for equipment use, rinsing and cleaning

Develop and implement requirements for agency and contractor equipment use, rinsing, and cleaning activities. Distribute requirements to affected personnel.

d) Implement employee training

Implement a training program to ensure employees remain knowledgeable in guidelines and storm water pollution prevention measures. Incorporate storm water quality training into regularly scheduled training sessions. 100% of the affected personnel will be trained in the second year of the permit term and retrained in year four of the permit term. Employee feedback will be provided for during training sessions to discuss problems and accomplishments.

e) Implement supervisory oversight

Develop and implement periodic supervisory inspections to verify guidelines are being implemented. Two supervisory inspections will be performed per year beginning in the second year of the permit term and continuing through the remainder of the permit term.

**2. Implement Street Cleaning Practices**

a) Investigate new technologies

Evaluate new developments in street sweeping equipment and technologies when new equipment is being purchased or new contracts are bid.

b) Street Cleaning

Clean 50% of the City streets per year. Prioritize street sweeping according to type of activity occurring in the City (i.e., construction areas, landscaping activities, residential, commercial, and industrial areas).

**3. Implement City Owned Facility Operation Requirements**

a) Review and revise requirements

Review and revise requirements as necessary to accommodate changes in operations or activities, or address other storm water quality concerns. Include guidance for pesticide, fertilizer and other chemical use, painting activities, waste management, and elimination of non-storm water discharges at City owned facilities. Inspect 20% of the City owned facilities per year.

b) Implement employee training

Implement training to ensure employees remain knowledgeable of pollution prevention practices for corporation yards. Incorporate storm water quality training into regularly scheduled training sessions.

Distribute requirements to 100% of corporation yard employees. Train 100% of the corporation yard employees in the second year of the permit term and refresher training for 50% of the corporation yard employees per year for each of the remaining three years of the permit term.

c) Implement supervisory oversight

Develop and implement periodic supervisory inspections at City owned facilities to verify guidelines are being implemented. Two supervisory inspections will be performed per year beginning in the second year of the permit term and continuing through the remainder of the permit term.

d) Review spill prevention and clean-up control measures

Review, revise and implement spill prevention and clean-up control measures to ensure storm drainage systems are adequately protected. Distribute revised spill prevention and clean up control measures to 100% of the corporation yard employees and emergency services (fire and police). Hold one training session per year beginning in the second year of the permit term and train 100% of the corporation yard employees and affected personnel in the Fire and Police Departments.

**4. Develop Requirements for Maintenance of Parks, Open Space and Other Public Areas Maintenance Activities**

Develop and implement guidelines for parks, cemetery, and landscape

maintenance personnel and contractors regarding proper use and disposal of fertilizers, pesticides, and herbicides, and alternative landscape maintenance practices.

- a) Develop and distribute requirements to all affected employees
- b) Implement training for all affected employees (see 3(b) above)
- c) Implement supervisory oversight (see 3(c) above)
- d) Prepare Storm Water Pollution Prevention Plan for 20% of City owned facilities per year.

## **5. Address General Public Agency Activities**

### **a) Implement litter control**

Provide, collect, and maintain litter receptacles in strategic public areas during major public events. Place trash receptacles at all new City owned facilities. Place additional trash receptacles at City owned facilities where trash is overflowing the existing receptacles prior to collection.

### **b) Investigate feasibility of alternative energy vehicles**

Coordinate with the Air Pollution Control District, purchasing agents, and other agencies and departments to identify opportunities to reduce the discharge of pollutants associated with vehicles through purchasing alternative energy vehicles and equipment.

## **ASSESSMENT TASKS**

### **2. Report on Measurable Goals and BMP Implementation and Effectiveness**

Compliance and assessment evaluation activities will be conducted on an

annual basis to:

- a) Determine the progress and status of implementation of the measurable goals and subtasks contained in this program element, and
- b) Evaluate the effectiveness of the BMP to address and reduce pollutants in storm water runoff.

Compliance and assessment evaluation activities will include:

- Recording the total number of miles of roadway swept. Identify sweeping frequencies, percentage of the total miles swept annually, or other effective measures.
- Recording changes made to operations or equipment to improve street sweeping efficiency.
- Recording the date, time and location of training sessions and including a description of the material covered and distributed, and the names of the employees attending the training.
- Recording date and findings of supervisory oversight activities to ensure guidelines are being implemented and developed for all measurable goals in MO-2 and are being adequately implemented. A description of any follow-up action required may also be recorded.
- Recording the number of brochures or guidelines distributed, and the date and location and attendance of workshops conducted to present the

- guidelines for the measurable goals in MO-2.
- Soliciting and recording feedback from personnel, contractors or operators receiving, distributing or implementing guidelines

## **PARTICIPATING AGENCY ROLES AND RESPONSIBILITIES**

A summary of the roles and responsibilities of the City Departments to implement the measurable goals and the tentative implementation schedule for this BMP are included in Table 3.10-A at the end of the Municipal Operations and Maintenance Section. Complete descriptions of the roles and responsibilities are included in Section 6.0.

Table 3.10-B summarizes the proposed five-year budget to implement this program element. A complete summary of the budget for the entire program for the City of Reedley is included in Table 3.4-A.

**Table 3.10-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Municipal Operations and Maintenance Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>MO-1</b> Review and revise current storm drainage system maintenance practices to optimize removal of storm water pollutants.														
1. Enhance maintenance of the storm drain system for pollutant removal							<	■	<	<	»»	»»		<
	a) Record field observations.						<	■			»»			<
2. Continue to implement basin sediment monitoring and maintenance program							<	■		<	»»	»»		<
3: Employee training program							<	■			»»	:		<
<b>MO-2</b> Review and revise street, road, and highway maintenance and operations practices as necessary to reduce pollutants in storm water runoff.														



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity



Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.

1. Implement requirements for Road Maintenance Activities							<	■	<	<	»			<
	a) Review and revise and distribute requirements.						<	■		<	»			<
	b) Develop and implement requirements for concrete installation activities.						<	■	<	<	»	»		<
	c) Develop and implement requirements for equipment use, rinsing, and cleaning.						<	■	<	<	»	»		<
	d) Implement employee-training.						<	■	»		:	»		<
	e) Implement supervisory oversight						<	■	<			»		»
2. Implement street cleaning practices							<	■		»				
	a) Investigate new technologies.						<	■		<				
	b) Street Cleaning						<	■		<		»		
3. Implement City owned facility operation requirements							»	■	<	<	<		<	<
	a) Review and revise requirements.						»	■	<	<	<			
	b) Implement employee-training.						<	■		<				
	c) Implement supervisory oversight.						<	■		<				
	d) Review spill prevention and clean-up control measures.						<	■	<	<				
4. Develop requirements for parks, open space and other public areas maintenance activities							»	■	»	<	»	»	<	<
	a) Develop and distribute requirements						<	■	»	<	»	»		
	b) Implement training						<	■	»	<	»			
	c) Implement supervisory oversight						<	■	»	<	»			
	d) Prepare SWPPP for 20% of City owned facilities						<	■	»	<				



Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.



Agency to take a lead role in development or implementation of the activity








Agency to provide a strong support in the development or implementation of the activity



Agency to review, provide comments and guidance during the development and/or implementation of the activity.



5. Address general public agency activities							»	■	»	<	»	»	»	»
	a) Implement litter control.						<	■	»	<	»	»	»	»
	b) Investigate feasibility of alternative energy vehicles.						<	■	»	<	»	»	»	»

-  Continuing activity, reviewed or revised as needed throughout implementation  
 One-time specific activity to develop or implement a measurable goal or subtask.  
 Agency to take a lead role in development or implementation of the activity  
 Agency to provide a strong support in the development or implementation of the activity  
 Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 3.10-B**  
**Summary of Proposed Five-Year Budget**  
**Municipal Operations and Maintenance Program**

<b>PROGRAM ELEMENT</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	<b>2011/2012</b>
Enhance maintenance of the storm drain system for pollutant removal	\$ 1,000.00	\$ 1,000.00	\$ 1,100.00	\$ 1,100.00	\$ 1,200.00
Continue to implement basin sediment monitoring and maintenance program	\$ 1,500.00	\$ 1,000.00	\$ 1,100.00	\$ 1,100.00	\$ 1,200.00
Employee training Program	\$ 2,000.00	\$ 800.00	\$ 900.00	\$ 900.00	\$ 1,000.00
Implement requirements for road maintenance activities	\$ 8,000.00	\$ 8,000.00	\$ 8,000.00	\$ 8,000.00	\$ 8,000.00
Implement street cleaning practices	\$ 1,500.00	\$ 1,600.00	\$ 1,650.00	\$ 1,650.00	\$ 1,700.00
Implement City owned facility operations requirements	\$ 4,500.00	\$ 1,000.00	\$ 1,100.00	\$ 1,200.00	\$ 1,400.00
Develop requirements for parks, open space, and other public areas maintenance	\$ 0	\$ 0	\$ 2,500.00	\$ 1,000.00	\$ 1,050.00
Address general public Agency activities	<u>\$ 1,500.00</u>	<u>\$ 1,600.00</u>	<u>\$ 1,650.00</u>	<u>\$ 1,700.00</u>	<u>\$ 1,750.00</u>
<b>Total PEO Costs Per Fiscal Year</b>	<b>\$20,000.00</b>	<b>\$15,000.00</b>	<b>\$18,000.00</b>	<b>\$16,650.00</b>	<b>\$17,300.00</b>

## **4.0 LEGAL AUTHORITY AND ENFORCEMENT ELEMENT**

### **4.1 INTRODUCTION**

The federal Clean Water Act and storm water regulations require municipalities covered by a NPDES storm water permit to possess adequate legal authority to:

- “Effectively prohibit” non-storm water discharges to the storm drain system, and
- Require controls to reduce the discharge of pollutants in storm water to the “maximum extent practicable.”

To comply with these requirements, a master Storm Water Quality and Discharge Control Ordinance (Ordinance) will be developed and adopted by the City of Reedley.

### **4.2 STORM WATER QUALITY AND DISCHARGE CONTROL ORDINANCE**

The City of Reedley will develop a master Ordinance that will be adopted by the City Council of the City of Reedley prior to the end of the second year of the permit term and implementation will follow immediately thereafter. It will be a uniform ordinance designed to provide fair, consistent enforcement of storm water quality controls throughout the permitted area. The City will seek Regional Water Quality Control Board involvement only when absolutely necessary to impose penalties or effect other remedies when efforts by the City of Reedley to correct violations to the Clean Water Act remain unresolved.

In accordance with federal requirements, the Ordinance will prohibit:

- *Illicit Discharges* Any direct or in-direct non-storm water discharge to the storm drain system, except those listed as conditionally authorized non-storm

water discharges, unless, as determined by the City, those conditionally authorized non-storm water discharges are found to present a risk to the water quality.

- *Illicit Connections* Any drain that conveys illicit discharges and undocumented drains that are connected to the storm drain system. This section of the Ordinance will supplement existing legal authorities provided in existing codes.
- *Waste Disposal in Streets, Gutters, Storm Drains and Ponding Basins* These provisions of the Ordinance will supplement existing code prohibitions against illegal dumping.
- *Discharges in Violation of the NPDES Municipal Permit* The Ordinance will provide for enforcement action to be taken against dischargers causing violations of the municipal NPDES permit.
- *Discharges in Violation of NPDES Industrial Permits* The Ordinance will establish an authority that is no less stringent than the State's General Permit requirements for controlling storm water discharges from industrial and construction activities. The Ordinance will provide for regulating sediment and erosion discharges from construction sites. The Ordinance will also include restrictions of non-sediment construction waste. Enforcement and compliance will be accomplished through inspections and citizen complaint responses.

The Ordinance will authorize the City of Reedley to:

- Enforce the Ordinance through a tiered system of enforcement. Once a violation is determined, a notice of violation and order to correct the violation will be sent to the property owner or other potentially responsible party. Should subsequent

inspections indicate the violation has not been adequately corrected, the City may impose a fine and notify the property owner or other potentially responsible party that the appropriate County and State authorities may be notified of the continuing violation for appropriate action;

- Adopt best management practice requirements;
- Require remediation for pollution of storm water, the storm drain system, or water of the United States; and
- Implementation of post-construction control measures.
- Require monitoring of discharges suspected of violating the Ordinance; and
- Require residents or businesses to take reasonable measures to contain and cleanup any spill that threatens to be discharged to the storm drain system, and to notify the City of Reedley if a spill affects or may affect the storm drain system.

The Ordinance will be enforced through the enforcement provisions of the Ordinance and the City of Reedley's codes. The Ordinance will address the following provisions: 1) enforcement officer, 2) administrative hearing and appeal process, 3) cost-recovery mechanism, and 4) penalties.

The Ordinance will require that the following corrective actions are taken when a violation is identified by the City of Reedley: 1) identify the required corrective action, establish a schedule for compliance on the inspection report, and re-inspect; 2) issue a notice of violation with required corrective action and schedule, and re-inspect; and 3) if progress toward compliance is inadequate, schedule and provide notice of an administrative hearing before the hearing officer. The individual or

business being issued a notice of violation may, upon written request, appeal the action to the hearing officer. The appeal is then considered at a noticed administrative hearing.

At the administrative hearing, the hearing officer will determine the required corrective action(s), establish a compliance schedule, and decide if the City should take corrective action, such as abatement and/or cleanup. The individual or business being issued the notice of violation will be liable for all corrective action costs incurred by the City.

An individual or business may appeal the hearing officer's decision to the decision-making body that will determine the appropriate remedy. Enforcement remedies available include filing suit, a lien, injunction, or other civil remedy; and referring the case to the Regional Board, District Attorney, or City or County legal counsels. The State and County may impose penalties, in addition to any penalties or enforcement mechanisms under the Ordinance.

#### **4.3 PHASE II REGULATIONS**

Phase II of the N.P.D.E.S. storm water regulations requires adequate legal authorities to develop, implement and enforce the plan. Currently, the City of Reedley does not have a Storm Water Quality Ordinance that is as stringent as the Phase II requirements. The Storm Water Quality Ordinance will be developed and established in the first year of the permit term.

#### **4.4 MEASURABLE GOALS**

##### **1. Adopt and Implement a Citywide Storm Water Management Ordinance**

The City of Reedley will develop, notice, hold a public hearing and public review and comment period, adopt and implement a citywide Storm Water Management Ordinance prior to the end of the second year of the permit term; the Ordinance

will be implemented immediately thereafter. As described in Section 4.2, the Ordinance will establish the City's authority and responsibilities in controlling non-storm water discharges into the City's storm drain system. The Ordinance will include provisions for sediment and erosion control.

## **2. Public Education Efforts**

The Public Education Element of this SWMP is covered under the Public Education and Outreach, Section 3.5 of this SWMP.

## **3. Employee Training Program**

The Employee Training Element of this SWMP is covered under the Illicit Discharges Program, Section 3.7; Construction Activities Program, Section 3.8; the Development Program, Section 3.9; and Municipal Operations and Maintenance Program, Section 3.10 of this SWMP.



## **4.5 ASSESSMENT TASKS**

Compliance and assessment evaluation will be conducted on an annual basis to determine the progress and status for the City in the implementation of measurable goals and subtasks contained in this section.

- Adopt a citywide Storm Water Management Ordinance for the City of Reedley by the end of the second year of the permit period.
- Record dates, times and locations of training sessions including a description of materials covered or distributed, and the names of the employees attending the training.
- Record dates and information materials distributed to the general public relating to the adopted Storm Water Management Ordinance.

**Table 4-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Legal Authority and Enforcement Element**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
Adopt and Implement a Citywide Storm Water Management Ordinance														
	1. Develop and adopt a Storm Water Management Ordinance						<	■	»»	<	»»	»»		
	2. Implement the Storm Water Management Ordinance													
Public Education Efforts														
	1. Public Education						<	■	»»	<	»»	»»		
Employee Training Program														
	1. Employee Training						<	■	»»	<	»»			

-  Continuing activity, reviewed or revised as needed throughout implementation  
 One-time specific activity to develop or implement a measurable goal or subtask.  
 ■ Agency to take a lead role in development or implementation of the activity  
 »» Agency to provide a strong support in the development or implementation of the activity  
 < Agency to review, provide comments and guidance during the development and/or implementation of the activity.



## **5.0 SOURCE IDENTIFICATION AND MONITORING ELEMENT**

### **5.1 INTRODUCTION**

This element of the plan describes the Source Identification and Monitoring activities for the permit term.

The tasks proposed in this section address the following overall Program objectives:

- Identify those pollutants present in urban runoff that pose a significant threat to the water resources and beneficial uses of the permit area.
- Identify and control those sources of pollutants which pose the greatest threat to these water resources and beneficial uses.

To meet these objectives, the Source Identification and Monitoring section contains three primary elements: Source Identification, In-System Water Quality Monitoring, and Assessment of Receiving Water Quality Monitoring in Sections 5.3, 5.4 and 5.5, respectively.

The Source Identification and Monitoring element adequately meets the requirements proposed in the Phase II storm water regulations.

### **5.2 SOURCE IDENTIFICATION AND MONITORING PROGRAM ASSESSMENT**

Although not directly reducing or eliminating pollutants, the Source Identification and Monitoring Program:

- Will adequately assess the potential impact to water quality caused by the Reedley area storm water discharges, and characterize canal water quality upstream and downstream of Reedley urban runoff discharges to receiving waters through the Alta Irrigation District water quality testing.
- Assist the Construction Activities and Development programs to address and eliminate significant sources of pollutants by conducting a Source Identification and Prioritization Study.
- Identify sources of pollutants through visual wet and dry weather inspections.
- Consider conducting studies to establish a list of pollutants that are prevalent in storm water runoff from the permitted area. Use the data to refine, prioritize and direct the future efforts of the plan.
- Consider the need to expand the source identification program to further investigate significant sources of storm water pollutants. Expand the scope beyond commercial and industrial sources to include all potential sources.
- Conduct wet and dry weather visual inspections through the Construction Activities, Development and Illicit Discharge Programs.

## **5.3 SOURCE IDENTIFICATION**

### **5.3.1 Objective**

The objective of the source identification program is to identify pollutants prevalent in storm water runoff and determine the significant sources of those pollutants to help focus and direct the Public Education and Outreach, Public

Involvement and Participation, Illicit Discharge, Construction Activities, Development and Municipal Operations and Maintenance programs.

### **5.3.2 Approach**

During this first permit term, the component will consist of three primary tasks: 1) maintain and update the business database, 2) conduct wet and dry weather visual inspections, and 3) conduct source identification investigations. Two of these tasks, the business database and wet/dry-weather inspections, are also addressed under the Illicit Discharges Program.

### **5.3.3 Measurable Goals**

#### **1. Conduct Source Identification Investigations**

When determined necessary by the City, refine the list of potential prevalent storm water pollutants and associated sources through assessing the Program's storm water quality monitoring data, and/or conducting additional literature search and special studies. Use data provided from facility inspections conducted under the Illicit Discharge Program to help update the pollutant and source study. Maintain a data base of prevalent potential storm water pollutants in the City of Reedley's City Limits.

## **5.4 IN-SYSTEM STORM WATER QUALITY**

### **5.4.1 Objective**

All of the City of Reedley's storm water runoff is eventually discharged into the Kings River or sent to ponding basins.

The City of Reedley, on a yearly basis, removes the top one-foot of soil for 25' around the outfall structure of each of the City owned and operated ponding

basins. In addition, the City removes the top one-foot of soil in the low flow areas of the City's ponding basins every three years. This procedure is adequate to prevent a concentration of pollutants in the soil from migrating to the groundwater or being discharged into the Kings River. The ponding basins are allowed to grow grasses and reeds which help to remove pollutants from the storm water entering the basin.

#### **5.4.2 Approach**

The City of Reedley's current practices are adequate to prevent the migration of pollutants that may be present in the storm water to the groundwater or being discharged into the Kings River. At the time of soil removal in the basins, the area is inspected for discoloration or other signs of pollutants that may be present in the soil.

### **5.5 RECEIVING WATER QUALITY ASSESSMENT**

#### **5.5.1 Objective**

The NPDES Phase II permit does not specifically require the City to conduct monitoring for the purpose of "evaluating the effects of urban storm water runoff on receiving waters" beyond visual inspections conducted as part of the storm water conveyance system maintenance program; the illicit discharge/illegal discharges detection programs; and the construction and post-construction programs. The objectives of this program are to request copies of the water quality test results conducted by the Alta Irrigation District and review those reports on a yearly basis to get an indication of whether the BMPs implemented are making a difference in the water quality of the District's canal system.

#### **5.5.2 Approach**

All of the City of Reedley's storm water runoff is eventually discharged into the Kings River or sent to ponding basins.

The Alta Irrigation District tests the water quality of their canal system. The Alta Irrigation District tests their canal system upstream and downstream of the Reedley metropolitan area. In addition, the City of Reedley will visually inspect the discharge points of the Reedley Storm Water conveyance system twice during the dry periods of the canal to determine if there are or have been recent discharges into the canal system, and to visually classify the nature of the discharge. If it is determined that there is or has been an illicit discharge, appropriate measures in accordance with the City's Illicit Discharge Program, see Section 3.7, will be initiated.

As part of the City's construction site inspections and illicit discharge/illegal discharge inspections, visual inspections of the adjacent storm drain system will be made to determine if there is evidence of non-storm water discharges into the City's storm drain system.

#### **5.5.3 Monitoring Frequency**

Alta Irrigation District tests the waters of the canal system up to three times per year during the irrigation season. The City of Reedley will visually inspect the water of the canal twice per year. Inspections of storm water system will be conducted as part of the construction site and illicit discharge/illegal discharge inspection programs as identified in the respective BMPs.

#### **5.5.4 Sample Collection and Analysis**

Sample collection and analysis will be in accordance with the adopted policies and practices of the Alta Irrigation District's Water Sampling Program.

#### **5.5.5 Quality Assurance/Quality Control**

Quality Assurance and Quality Control of the samples and sampling process will be in accordance with the adopted policies and practices of the Alta Irrigation District's Water Sampling Program.

### **5.5.6 Data Management**

Water quality sampling test results will consist of hard copy printouts of the testing data. The copies will be made a part of the Storm Water Quality Management Advisory Committee minutes in which the test results are reviewed by the Committee.

### **5.5.7 Measurable Goals**

#### **1. Coordinate with Alta Irrigation District Monitoring Plan**

Coordinate the City's efforts to improve the storm water quality with the Alta Irrigation District's Monitoring Plan which will include annual review of test results conducted by the Alta Irrigation District.

#### **2. Visual Inspection Monitoring Plan**

Record dates, time, place visually inspected, results of inspection, and any actions/recommendations made by the inspector for all visual inspections by City Staff. Such investigations will occur during construction site inspections, illicit discharge/illegal discharge inspections, and as part of the storm drain maintenance program.

#### **3. Report on Task Completion and Monitoring Results**

Report annually on task completion and water quality monitoring results.  
Provide recommendations for program modifications as necessary.

## **5.6 SCHEDULE AND BUDGET**

The City has sole responsibility to implement the Source Identification Element. The Monitoring Element will be coordinated with Alta Irrigation District's existing Monitoring Plan. Table 5.0-A illustrates the anticipated schedule for implementation of the tasks. Table 5.0-B defines the estimated costs of these tasks over the five-year permit period.

**Table 5-A**  
**Proposed Implementation Schedule and Responsibilities**  
**Source Identification and Monitoring Program**

BMPs and Measurable Goals	Subtasks	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	Administration	Public Works	Planning	Finance	Code Enforcement	Public Information	Police	Fire
<b>Source Identification</b>														
	1. Conduct Source Identification.						<	■	■	<	»»	»»		
<b>In-system Storm Water Quality</b>														
	1. Continue practice of soil removal around outfall structures, low flow areas, and other ponding basin areas as necessary.							■		<				
<b>Receiving Water Assessment</b>														
	1. Coordinate with Alta Irrigation District's Monitoring Plan.							■		<	»»			
	2. Visual Inspection Monitoring Program							■			»»			»»
	3. Report on Task Completion and monitoring results.						<	■		<	»»			»»

Continuing activity, reviewed or revised as needed throughout implementation

One-time specific activity to develop or implement a measurable goal or subtask.

■ Agency to take a lead role in development or implementation of the activity

»» Agency to provide a strong support in the development or implementation of the activity

< Agency to review, provide comments and guidance during the development and/or implementation of the activity.

**Table 5-B**  
**Summary of Proposed Five-Year Budget**  
**Source Identification and Monitoring Program**

<b>PROGRAM ELEMENT</b>	<b>2007/2008</b>	<b>2008/2009</b>	<b>2009/2010</b>	<b>2010/2011</b>	<b>2011/2012</b>
Source Identification Element	\$ 750.00	\$ 0	\$ 0	\$ 0	\$ 0
In-system Storm Water Quality Element	\$ 1,500.00	\$ 1,575.00	\$ 1,650.00	\$ 1,650.00	\$ 1,700.00
Receiving Waters Quality Assessment Element	<u>\$ 1,000.00</u>	<u>\$ 1,050.00</u>	<u>\$ 1,225.00</u>	<u>\$ 1,225.00</u>	<u>\$ 1,300.00</u>
<b>Total PEO Costs Per Fiscal Year</b>	<b>\$ 3,250.00</b>	<b>\$ 2,625.00</b>	<b>\$ 2,875.00</b>	<b>\$ 2,875.00</b>	<b>\$ 3,000.00</b>



## **6.0 IMPLEMENTATION OF THE STORM WATER MANAGEMENT PLAN**

### **6.1 ROLES AND RESPONSIBILITIES IN THE FIRST PERMIT TERM**

The City of Reedley, as owner and operator of the primary urban storm drainage system within the permit area, is and will continue to be the lead agency for the NPDES permit. The City of Reedley is responsible for funding and implementing all elements of the plan.

The various departments of the City will be responsible for implementing the responsibilities delegated to them and will report to the City Manager and City Council on a quarterly basis regarding the status and achievements in implementing the Plan over the preceding three months. Each department will have autonomy in its individual actions to comply with permit responsibilities specific to the department, including determining how it will accomplish the measurable goals and how it will allocate funds.

Specific measurable goals and subtask responsibilities are itemized at the end of each program element section and are summarized below.

### **6.2 PROGRAM ADMINISTRATION AND MANAGEMENT**

The City of Reedley will continue to be responsible for overseeing implementation of the Plan in cooperation with the various City departments. The City will compile annual reports from the various City departments as part of preparing and submitting the annual report to the Regional Board shortly following the end of each fiscal year. The City will coordinate with the Regional Board relating to NPDES permit issues and modifications. Funds have been included in the City's budget to provide staff for these administrative tasks, and pay the annual NPDES permit fee.

### **6.3 COORDINATION WITH THE REGIONAL BOARD**

Coordination with the Regional Board will be essential to facilitate Board review and acceptance of the plan, and to receive information that may affect permit compliance. The City will be responsible for meeting with the Regional Board as necessary to ensure coordination.

### **6.4 ROLES AND RESPONSIBILITIES OF CITY DEPARTMENTS**

Each of the City Department Heads will be responsible for the activities delegated to his/her department under the Storm Water Quality Management Plan. In addition to attending advisory and coordination meetings, these representatives will:

- Oversee implementation of the plan within their respective departments;
- Compile reports and prepare and submit the annual reports of their departments to the City;
- Participate in annual assessment meetings;
- Review reports and other documents related to the plan implementation;
- Participate in cooperative activities (e.g. community educational events) as necessary for the plan implementation; and
- Identify funding for plan implementation within their departments.

Depending on their jurisdictional authority, existing programs, and mandated responsibilities, each department has a varied involvement in implementing the plan.

#### **6.4.1 City of Reedley Administration**

Contact Person: Brian Nakamura

Title: City Manager

Phone: (559) 637-4200

The City of Reedley Administration Department will be the lead department for compiling and submitting the annual report, administering the Storm Water Quality Management Program, and coordinating with the Regional Board. In addition, the City of Reedley Administration Department will have the primary role in overseeing implementation of the plan elements as described below.

Public Education and Outreach (PEO) Program - The City of Reedley Administration Department will review proposed funding, management, and staffing of the PEO Program. The City of Reedley Administration Department will be responsible for reviewing the effectiveness of the Public Education and Outreach Program.

Public Involvement and Participation (PIP) Program - The City of Reedley Administration Department will review proposed funding, management, and staffing the PIP Program. The City of Reedley Administration Department will be responsible for reviewing effectiveness of the Public Involvement and Participation Program.

The City Administration Department will prepare minutes of the Storm Water Management Committee meetings which will be available for public review.

Illicit Discharge (ID) Program - The City of Reedley Administration Department will review proposed funding, management, and staffing of the ID Program. The City of Reedley Administration Department will be responsible for reviewing the effectiveness of the Illicit Discharge Program.

Construction Activities (CSR) Program – The City of Reedley Administration Department will review proposed funding, management, and staffing of the CSR Program. The City of Reedley Administration Department will be responsible for reviewing the effectiveness of the Construction Activities Program.

Development (PCR) Program - The City of Reedley Administration Department will review proposed funding, management, and staffing of the PCR Program. The City of Reedley Administration Department will be responsible for reviewing the effectiveness of the Development Program.

Municipal Operations and Maintenance (MO) Program - The City of Reedley Administration Department will review proposed funding, management, and staffing of the MO Program. The City of Reedley Administration Department will be responsible for reviewing the effectiveness of the Municipal Operations and Maintenance Program.

Legal Authorities - The City will have lead responsibility for enacting and enforcing the Storm Water Quality Control Ordinance within the Reedley City Limits (Permit Area). The City Attorney and City's Risk Management Coordinator will work closely with the City of Reedley Administration Department in the implementation of this plan and development of revisions to the plan as may be necessary.

Source Identification and Monitoring – The City of Reedley discharges into the Alta Irrigation District's canal system. The Alta Irrigation District performs water tests on the canal system both upstream and downstream of the City of Reedley three times during each season when water is in the canal. This monitoring will be sufficient to determine the effectiveness of the Storm Water Pollution Control Measures implemented by the City of Reedley and to determine if any illicit discharges are entering the system.

If illicit discharges are identified by the Alta Irrigation District testing, the City of Reedley will be notified by Alta Irrigation District of the violation and, where the discharge is occurring, and it will be the City's responsibility to trace the discharge through the City's storm drain system until the source of the illicit discharge is identified. The City will then notify the property owner or other potentially responsible party of the violation, ordering the property owner to cease the illicit discharge, and monitor the discharge from the property or other potentially responsible party to insure that the violation has been corrected. All such actions required by the City to correct the violation will be charged to the property owner or other potentially responsible party.

Should the property owner or other potentially responsible party fail to correct the violation, the City of Reedley will notify the appropriate agencies with adequate enforcement powers, such as the Regional Water Quality Control Board or the Fresno County Health Department, so that appropriate action may be taken to correct the violation.

#### **6.4.2 City of Reedley Public Works Department**

Contact Person: Rocky Rogers

Title: Public Works Director

Phone: (559) 637-4200 ext 213

The City of Reedley Public Works Department will annually compile and submit to the City of Reedley Administration Department a report summarizing the Public Works Department's participation and progress in plan implementation to be used in the annual report to the Regional Board. In addition, Public Works Department representatives will participate in meetings and reviews to guide program development and implementation. The City of Reedley Public Works Department's role within the control programs will be as follows:

Public Education and Outreach (PEO) Program – The City of Reedley Public Works Department will be the primary contact between the City and Contractors performing work within the City’s jurisdiction.

It will be the Public Works Department’s responsibility to develop and implement required storm water runoff control measures affecting construction sites. It will be the Public Works Department’s responsibility to see that information required for the Contractor to comply with the storm water regulations is disseminated to the Contractor’s forces.

Public Involvement and Participation (PIP) Program – The City of Reedley Public Works Department will coordinate the Storm Water Management Committee Meetings. The Public Works Department will encourage contractors and developers working within the City’s jurisdiction to participate in the Storm Water Management Committee meetings.

The Public Works Department will coordinate the storm drain stenciling program.

Illicit Discharges (ID) Program – The City of Reedley Public Works Department will work closely with the Reedley Sewer and Waste Water Collection Department to determine if illicit connections to the storm drain system exist.

The City of Reedley Public Works Department will work closely with the Alta Irrigation District to determine if any illicit discharges enter the storm drain system and subsequently the receiving waters of the Alta Irrigation District’s canal system. Any illicit discharges will be identified by the Alta Irrigation District identifying where the discharge is entering their system; it will then be the responsibility of the City Public Works Department to trace the discharge back to its origination. Once the violator has been identified it will be the responsibility of the Public Works Department in conjunction with the City’s Legal Council to submit to the violator a Notice of Violation

and Demand to Correct the Violation to the persons responsible for the illicit discharge. If no action is taken on the part of the violator to correct the violation, the Public Works Department will notify the Regional Water Quality Control Board of the violation for appropriate action.

All costs associated with determining the source of the illicit discharge will be assessed against the violator.

Construction Activities (CSR) Program – The City of Reedley Public Works Department will be the primary contact between the City and Contractors performing work within the City's jurisdiction.

The City of Reedley Public Works Department performs the construction inspection of projects within the City's jurisdiction. The Public Works Department will assume responsibility for being familiar with the Contractor's SWPPP and Storm Water Management Plan and for inspecting storm water runoff control measures.

Development (PCR) Program - The City of Reedley Public Works Department will be the primary contact between the City and Contractors performing work within the City's jurisdiction.

The City of Reedley Public Works Department performs the construction inspection of projects within the City's jurisdiction. The Public Works Department will assume responsibility for ensuring construction of and inspection of the required post construction storm water runoff control measures.

Municipal Operations and Maintenance (MO) Program – The City of Reedley Public Works Department is responsible for the City's Corporation Yard, the City Waste Water Treatment Plant, and Public Works Staff. The Public Works Department will

begin annual reviews of the Corporation Yard procedures relating to materials handling, equipment cleaning, fueling, street sweeping, Waste Water Treatment Plant operations, and storm drain cleaning. Deficiencies found will be addressed and revised as budgetary constraints allow.

The Public Works Department will initiate and maintain an employee training program related to storm water quality issues. Such training may include formal training, on-the-job training, informational fliers and pamphlets, and presentations on storm water issues by civic groups that express an interest in having such presentations.

Legal Authorities – The Public Works Department and its responsibilities are generally established and implemented in Title I of the City Code of the City of Reedley.

Source Identification and Monitoring – The City of Reedley Public Works Department will work closely with the Alta Irrigation District to monitor the water quality in the District's canal system. The Alta Irrigation District tests the canal waters for pollutants both upstream and downstream of the City of Reedley three times a year. That information will provide sufficient detail to assess the impacts of the controls measures implemented by the City of Reedley.

#### **6.4.3 City of Reedley Community Development Department**

Contact Person: Diane Guzman

Title: Community Development Director

Phone: (559) 637-4200

The City of Reedley Community Development Department will annually compile and submit to the City of Reedley Administration Department a report summarizing the



Community Development Department's participation and progress in plan implementation to be used in the annual report to the Regional Board. In addition, Community Development Department representatives will participate in meetings and reviews to guide program development and implementation. The City of Reedley Community Development Department's role within the control programs will be as follows:

Public Education and Outreach (PEO) Program - It will be the Community Development Department's responsibility to assist in the development and implementation of the required storm water runoff control measures affecting construction sites. It will be the Community Development Department's responsibility to see that information required for the Developer to comply with the storm water regulations during the planning phase of the development review process is disseminated to the Developers and Engineers preparing proposed development plans and specifications.

It will be the responsibility of the Community Development Department to ensure that construction runoff control measures and post-construction control measures are included in the plans and specifications during the planning review process for proposed developments.

Public Involvement and Participation (PIP) Program - The Community Development Department will encourage Contractor's and Developers working within the City's jurisdiction to participate in the Storm Water Management Committee meetings.

The Community Development Department will assist the Public Works Department in encouraging Contractors and Developers to stamp storm drain inlets at the time of construction.

Illicit Discharges (ID) Program – It will be the Community Development Department's

responsibility to ensure that connections to the storm drain system from new developments do not allow illicit discharges into the City's storm drain system. This check will be performed during the Community Development Department's review process for the new development.

Construction Activities (CSR) Program – The Community Development Department will require under the Conditions of Approval that all necessary and required storm water control measures are implemented, maintained, and when appropriate, removed.

Development (PCR) Program - The Community Development Department will require under the Conditions of Approval that all necessary and required post-construction storm water control measures are implemented, maintained, and when appropriate, removed.

Legal Authorities – The Community Development Department and its responsibilities are generally established and implemented in Title I, Title VII and Title VIII of the City Code of the City of Reedley.

#### **6.4.4 City of Reedley Finance Department**

Contact Person: Lori Oken

Title: Finance Director

Phone: (559) 637-4200

The City of Reedley Finance Department will annually compile and submit to the City of Reedley Administration Department a report summarizing the Finance Department's participation and progress in plan implementation to be used in the annual report to the Regional Board. In addition, Finance Department

representatives will participate in meetings and reviews to guide program development and implementation. The City of Reedley Finance Department's role within the control programs will be as follows:

Public Education and Outreach (PEO) Program – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

Public Involvement and Participation (PIP) Program - – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

Illicit Discharges (ID) Program - – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

Construction Activities (CSR) Program – – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

Development (PCR) Program - – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

Municipal Operations and Maintenance (MO) Program - – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

Legal Authorities - The Finance Department and its responsibilities are established and implemented in Title I of the City Code of the City of Reedley.

Source Identification and Monitoring – – It will be the responsibility of the Finance Department to assist in the development of the yearly budget for this activity and review of the yearly costs and benefits received from implementation of this activity. The Finance Department will assist in developing a proposed budget for any revisions to this activity that may be deemed appropriate during the term of this permit.

#### **6.4.5 City of Reedley Police Department**

Contact Person: Chief Doug Johnson

Title: Police Chief

Phone: (559) 647-6173

The City of Reedley Police Department will annually compile and submit to the City of Reedley Administration Department a report summarizing the Police Department's

participation and progress in plan implementation to be used in the annual report to the Regional Board. In addition, the Police Department representatives will participate in meetings and reviews to guide program development and implementation. The City of Reedley Police Department's role within the control programs will be as follows:

Illicit Discharges (ID) Program – The Police Department, along with the Fire Department, will be the first responders to accidents, vehicular or otherwise, in which there is a danger of a hazardous material spill to coordinate safety measures and isolate the spill area.

Municipal Operations and Maintenance (MO) Program – The Police Department shall review its procedures relating to potential hazardous material spills, provide training to Police Department Staff, and initiate improvements to procedures as appropriate and where funding is available.

Legal Authorities - The Police Department and its responsibilities are generally established and implemented in Title I, Title V and Title VI of the City Code of the City of Reedley.

Source Identification and Monitoring – The Police Department may under certain circumstances assist the Code Enforcement Department in the delivery of the Notice of Violation to subject property owners or other potentially responsible parties.

#### **6.4.6 City of Reedley Fire Department**

Contact Person: Chief David Powell

Title: Fire Chief

Phone: (559) 637-4230

The City of Reedley Fire Department, which includes the City's Code Enforcement Division, will annually compile and submit to the City of Reedley Administration Department a report summarizing the Fire Department's participation and progress in plan implementation to be used in the annual report to the Regional Board. In addition, Fire Department/Code Enforcement representatives will participate in meetings and reviews to guide program development and implementation. The City of Reedley Fire Department's role within the control programs will be as follows:

Code Enforcement staff will work with the Public Works Department, Parks And Recreation Department and the Planning Department as well as with the Fire and Police Departments to identify and eliminate illicit discharges into the storm drain system.

Illicit Discharges (ID) Program - The Fire Department, along with the Police Department, will be the first responders to accidents, vehicular or otherwise, in which there is a danger of a hazardous material spill to coordinate safety measures and isolate the spill area.

The Code Enforcement Division of the Fire Department will be responsible for administering the Storm Water Hotline and shall be the first responders and perform the initial investigation into public complaints of illicit discharges. If it is determined that an illicit discharge has occurred, the Code Enforcement Division shall notify the Public Works Department of the potential violation and it will be the responsibility of the Code Enforcement Officer to deliver to the subject property owner or other potentially responsible party the Notice of Violation issued by the Public Works Department.

Construction Activities (CSR) Program – The Code Enforcement Officer may, in cooperation with the Public Works Department, inspect the construction and maintenance of any storm water control facility included as a requirement on new and

redevelopment projects.

Development (PCR) Program - The Code Enforcement Officer may, in cooperation with the Public Works Department, inspect the construction and maintenance of any storm water control facility included as a requirement on new and redevelopment projects.

Municipal Operations and Maintenance (MO) Program - The Fire Department shall review its procedures relating to potential hazardous material spills, provide training to Fire Department Staff, and initiate improvements to procedures as appropriate and where funding is available.

Source Identification and Monitoring – The Code Enforcement Department will be responsible for administering the Storm Water Hotline and shall be the first responder to any public complaints regarding illicit discharges.

Legal Authorities - The Fire Department and its responsibilities are generally established and implemented in Title III of the City Code of the City of Reedley.

#### **6.4.7 City of Reedley Parks and Recreation Department**

Contact Person: Joel Glick

Title: Community Services Director

Phone: (559) 637-4203

The City of Reedley Parks and Recreation Department will annually compile and submit to the City of Reedley Administration Department a report summarizing the Parks and Recreation Department's participation and progress in plan implementation to be used in the annual report to the Regional Board. In addition, Parks and

Recreation Department representatives will participate in meetings and reviews to guide program development and implementation. The City of Reedley Parks and Recreation Department's role within the control programs will be as follows:

Public Education and Outreach (PEO) Program – The City of Reedley Parks and Recreation Department will be the primary contact between the City and its residents and organizations that utilize, in form or another, City parks and community facilities.

It will be the Parks and Recreation Department's responsibility to develop and implement required storm water runoff control measures affecting use of those facilities. It will be the Parks and Recreation Department's responsibility to see that information required to comply with the storm water regulations is disseminated to the public that wish to use City facilities.

Public Involvement and Participation (PIP) Program – The City of Reedley Parks and Recreation Department will participate in the Storm Water Management Committee Meetings. The Parks and Recreation Department will encourage Organizations and residents that wish to use City facilities to participate in the Storm Water Management Committee meetings.

Illicit Discharges (ID) Program – The City of Reedley Parks and Recreation Department will work closely with the Reedley Sewer and Waste Water Collection Department to determine if illicit discharges have occurred into the storm drain system as a result of public use of City facilities. The Parks and Recreation Department will work with the Administration Department of the City to determine those responsible for the illicit discharge so that appropriate action can be taken.

Once the violator has been identified it will be the responsibility of the Parks and Recreation Department in conjunction with the City's Legal Counsel to submit to the violator a Notice of Violation and Demand to Correct the Violation to the persons



responsible for the illicit discharge. If no action is taken on the part of the violator to correct the violation, the Parks and Recreation Department will notify the Regional Water Quality Control Board of the violation for appropriate action.

All costs associated with determining the source of the illicit discharge will be assessed against the person or organization found to be responsible for the illicit discharge.

Construction Activities (CSR) Program – The City of Reedley Parks and Recreation Department will be the primary contact between the City and Contractors performing work on the City's public facilities.

The City of Reedley Parks and Recreation in conjunction with the City's Public Works Department shall perform the construction inspection of projects on the City's public facilities. The Public Works Department will assume responsibility for being familiar with the Contractor's SWPPP and Storm Water Management Plan and for inspecting storm water runoff control measures.

Development (PCR) Program - The City of Reedley Parks and Recreation Department will be the primary contact between the City and Contractors performing work on the City's public facilities.

The City of Reedley Parks and Recreation Department and the City's Public Works Department will perform the construction inspection of projects on the City's public facilities. The Public Works Department will assume responsibility for ensuring construction of and inspection of the required post construction storm water runoff control measures.

Municipal Operations and Maintenance (MO) Program – The City of Reedley Parks and Recreation Department is responsible for the maintenance of City Parks,

Community Center, and City Government buildings, and policies governing Parks and Recreation Staff. The Parks and Recreation Department will begin annual reviews of the park maintenance procedures relating to materials handling, equipment cleaning, fueling, mowing, weeding, fertilizing, and disposal of unwanted materials. Deficiencies found will be addressed and revised as budgetary constraints allow.

The Parks and Recreation Department will initiate and maintain an employee training program related to storm water quality issues. Such training may include formal training, on-the-job training, informational fliers and pamphlets, and presentations on storm water issues by civic groups that express an interest in providing such presentations.

Legal Authorities – The Parks and Recreation Department and its responsibilities are generally established and implemented in Title I, Title II and Title X of the City Code of the City of Reedley.

Source Identification and Monitoring – The City of Reedley Parks and Recreation Department will work closely with the City's Public Works Department and the Alta Irrigation District to monitor the water quality in the District's canal system. The Alta Irrigation District tests the canal waters for pollutants both upstream and downstream of the City of Reedley three times a year. That information will provide sufficient detail to assess the impacts of the controls measures implemented by the City of Reedley.

## **6.5 FUNDING PLAN IMPLEMENTATION**

### **6.5.1 City Funding Sources**

The City of Reedley's Storm Water Management Plan will be funded through the City's General Fund or adopted fees and may include other outside funding sources

that may become available.

Costs associated with the City's efforts in identifying illicit discharges shall be assessed against the property owner or other potentially responsible party of the subject property identified as the source of the violation by the City in its investigation of the violation. Costs to be assessed against the property owner or other potentially responsible party may include, but not limited to, all water testing for pollutants, City staff time, legal costs, and any incidental costs associated with detection and identification of illicit discharges.

## **6.6 PLAN EVALUATION AND ANNUAL REPORTING**

### **6.6.1 Methods for Assessing Controls**

The federal storm water regulations require the participating agencies to assess the effectiveness of its program to control and reduce the discharge of pollutants in urban storm water runoff. Direct and indirect methods are typically used to determine program effectiveness. Direct methods are used for most structural controls and include methods such as collecting water quality samples at the inflow and outflow of a structural treatment device to directly measure pollutant reductions. The direct method shall be utilized in evaluating structural BMPs.

Indirect methods are used when actual pollutant reductions cannot be physically measured and are used for nonstructural controls, such as educational BMPs. Indirect methods employ two basic approaches: 1) they measure of the level of effort employed to implement a BMP, such as recording the number of brochures distributed, or taking surveys to measure an increase in public awareness of the problem, and 2) they assume reduction in pollutants has occurred as a result of implementing a measure that reduces or eliminates a source of pollutants, such as cleaning a storm drain system, decreasing the number of dumping incidents or

eliminating an illicit connection.

Many of the BMPs in the plan are nonstructural BMPs. Therefore, the plan uses indirect methods to evaluate the effectiveness of its nonstructural BMPs. Each BMP program in Section 3.0 of this plan includes assessment tasks. These tasks provide a method to regularly record the progress and effectiveness of the BMP program. There are numerous difficulties in assessing the effectiveness of nonstructural controls, including:

- Most controls rely on modifying group behavior,
- Certain controls are aimed at preventing actions that are generally hard to identify in the first place (e.g., illegal dumping), and
- Community response to a proposed BMP or activity can be dependent on and may be influenced by a unique event or incident (e.g., interest in pollution control is generally high after a major pollution incident).

Since many indirect measures involve determining an increase or decrease in something, it will be important to characterize baseline conditions prior to implementing particular controls.

Annually each department will compile and review information describing storm water activities conducted during the year and report the information generated by the assessment tasks. As appropriate, staff responsible for implementation will describe the relative effectiveness of the BMPs compared to baseline conditions using experience, visual observations, and indirect measures of effectiveness.

### **6.6.2 Annual Reporting and Assessment**

The City will revise the uniform reporting tables and forms during the first year of the permit term. Thereafter, the participating departments will use these tables and forms to compile and submit annual activity summaries (e.g., inspections conducted, enforcement actions taken, etc.). Each department will prepare and submit to the City the activity summary and a written evaluation of its progress in fulfilling its responsibilities as described in the plan. These progress reports will be compiled for the annual reports that the City will submit to the Regional Board.

### **6.6.3 Annual Assessment Meeting of the City Departments**

After the City Departments submit the annual progress reports to the City, the City will review the data and assess the effectiveness of the program in reducing the discharge of pollutants in storm water runoff to the maximum extent practicable as required by the federal Clean Water Act. After the City has completed its assessment, the City and its various departments will meet to review the assessment findings and determine plan modifications necessary to ensure compliance with the federal standard.

### **6.6.4 Modifying Management Program Activities**

Planned modifications to the Storm Water Quality Management Program will be described in the annual reports submitted to the Regional Board at the end of each fiscal year. Due to the evolving nature of this type of program, some modifications of the tasks are to be expected.

