Ref: 04-205613-001

March 14, 2005

Ms. Mona S. Dougherty
Water Resource Control Engineer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

ENGINEERING DEPARTMENT

Re: City of Rohnert Park Revised Phase II NPDES Storm Water Management Plan

Dear Ms. Dougherty:

The City of Rohnert Park (City) is pleased to submit to the North Coast Regional Water Quality Control Board (Regional Board) the City's revised Phase II NPDES Storm Water Management Plan (SWMP). The City submitted its original SWMP on August 18, 2003. On November 17, 2004, the City received detailed comments to the SWMP, written by a contractor to the Regional Board (unnamed in their letter), with a cover letter written by you. This revised version of the SWMP addresses those comments.

In accordance with the direction of the Regional Board, the City implemented the first fiscal year of its SWMP prior to receiving review comments. Because the City was not officially permitted under the Phase II program, it was not required to submit an Annual Report to the Regional Board by the originally scheduled date of September 15, 2004. The City submitted a brief summary of the first year of implementation to the Regional Board in a September 27, 2004 letter.

Throughout the course of implementation of the SWMP, the City evaluated the selected ongoing Best Management Practices (BMPs) as well as evaluating potential new BMPs.

The table presented in Attachment 1 to this letter provides an explanation of the BMPs that were deleted from the original SWMP, as well as the BMPs that were added. In future years, the City will make any future BMP revisions in the Annual Reports. There are some BMPs that will continue to be implemented by other parties, but which the City has removed from the SWMP because the data necessary to track the BMPs is unavailable to the City. Those BMPs deleted due to data tracking limitations are recycling programs implemented by the City's contractor, distribution of the County recycling guide in the telephone directory, use of the County website by City residents, County recycling efforts, and household hazardous waste collection programs.

The cover letter, written by you, that accompanied the contractor's comments to the draft SWMP listed six main categories where additional details are requested. The City responds as follows:

1. **The Regional Board requests that the City identify target audiences and activities based on their potential to contribute to pollutants of concern.** Within the text of Section 4 of the revised SWMP, the City has added a table that outlines main target audiences and associated polluting activities.

2. **The Regional Board recommends that the City tailor BMPs to address target audiences and activities.** The City has revised the BMP descriptions, where appropriate, throughout the six minimum control measures. This added detail can be found in Table 1 of the SWMP.

3. **The Regional Board requests that each BMP or Minimum Control Measure include a description of the specific staff and material resources needed for implementation.** The March 2003 SWMP included a resources needs table (Table 2) as well as a fiscal year resources needs estimates table (Table 2A), which estimated labor costs as well as full-time equivalents (FTEs). The comments provided by the Regional Board's contractor indicate the tables are not detailed enough to indicate just how much staff time and resources will be needed and if the hiring of new staff will be necessary.

   The SWMP is still in flux and the City needs more time to gather data about the effectiveness of each BMP and the resources needed to implement them. Additionally, the City currently is limited in its ability to hire staff. Nonetheless, several staff members are involved in the implementation of the SWMP, as indicated in Tables 1.

   Based on a telephone conversation that staff representatives had with you, we understand that the Regional Board will allow the City to gauge resource needs as the SWMP is implemented over the course of the permit term.

4. **The Regional Board requests that measurable goals be revised to include numeric targets that better allow the City to gauge success over time.** Numerical goals and targets were added to several BMPs throughout the SWMP, as detailed in Table 1 in the "Measurable Goals / Evaluation Tool" column.

5. **The Regional Board requests that the City add detail to the description of the process by which the post-construction development ordinance will be developed and implemented.** The City has broken down the process in greater detail, adding four new BMPs to that Minimum Control Measure.

6. **The Regional Board requests contact information for all parties responsible for BMP implementation.** The City is providing a list of contacts for the City's storm water management team. The contact list is presented in Attachment 2.

If you have any questions regarding this submittal, please contact Cristina Goulart with Winzler & Kelly at (707) 523-1010.

Sincerely,

CITY OF ROHNERT PARK

Steve Donley
Assistant City Manager/Storm Water Program Leader

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Attachments
Attachment 1 – Alterations to BMP list
Attachment 2 – City Staff Contact List

c: Brad Rosaschi, Street Department Supervisor
Darrin Jenkins, PE, City Engineer, City of Rohnert Park
Cristina Goulart, Winzler & Kelly Consulting Engineers

ATTACHMENT 1

Alterations to BMP list

Minimum Control Measure	New or Deleted BMP	Comments
Public Education and Outreach	**New - Builder's Guide to Recycling** Distribution through the City Building Department.	The City is already conducting this BMP as a method of educating contractors on pollution prevention as related to their job sites.
	New - OWOW Program (Point-of-Sale Pesticide reduction program).	This is a regional, grant-funded program with the purpose of reducing the use of pesticides known to impact water quality through deposition or runoff.
	New – Educational messages placed in the local newspaper.	A minimum of four messages will be placed per year.
	New - Adopt-a-Waterway Program (Public signs carrying storm water messages).	The City joined several local communities in investigating the possibility of approving this program.
	New – Support and participate in the Russian River Watershed Association's (RRWA) public outreach campaigns.	As a member of the RRWA, the City is part of a regional media campaign.
Public Involvement/ Participation	**Deleted – Watershed Cleanup Day.**	Rather than organizing one annual creek cleanup day, the City is supporting volunteer groups in conducting smaller scale creek cleanup events at their convenience.
	New - Develop a Creek Stewardship Program.	The City will investigate joining with Santa Rosa and the SCWA to develop a biology-based creek stewardship program. By emulating and modifying already existing programs, the City will conserve staff resources.
Illicit Connections/ Illicit Discharge	**New – Homeless Encampment Abatement Procedure.**	Homeless encampments develop along City creeks with great frequency causing human health and water quality problems. The program involves referrals to shelters.
Post-Construction Storm Water Management	**New – Provide a summary of new design requirements to developers during the development permitting process.**	Developers will sign a document indicating they have received a copy of the requirements.
	New – City staff representative will volunteer to be a guest speaker at contractor or developers' association meetings.	The BMP replaces holding a workshop, as it is more convenient for the target audience and therefore likely to have a greater attendance.
Pollution Prevention/Good Housekeeping for Municipal Operations	**New – Reduce the quantity of hazardous materials used in City operations.**	This is an operational priority.
	New – Join the Sonoma Green Business Green City Program.	This activity is approved by the City Council and will assist the City staff attain their goal of reducing the use of hazardous materials and natural resources.

ATTACHMENT 2

City Staff Contact List

Program Leader	Steve Donley, Assistant City Manager	(707) 588-2227
City Engineer	Darrin Jenkins, P.E.	(707) 588-2230
Public Works	Brad Rosaschi, Streets Department Supervisor	(707) 588-3300
Public Works	Michael Bracewell, Utilities Supervisor	(707) 588-3300
Public Safety	Tom Bullard, Director	(707) 584-2600

ENGINEERING
DEPARTMENT

REVISED PHASE II NPDES STORM WATER MANAGEMENT PLAN

March 2005

Prepared for:

City of Rohnert Park
6750 Commerce Boulevard
Rohnert Park, California 94927

Prepared by:

WINZLER & KELLY
CONSULTING ENGINEERS
495 Tesconi Circle
Santa Rosa, CA 95401
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CITY OF ROHNERT PARK
REVISED PHASE II NPDES STORM WATER MANAGEMENT PLAN

Prepared for:

City of Rohnert Park
6750 Commerce Boulevard
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March 2005

Reviewed by:_____

Date:_____

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EXECUTIVE SUMMARY

The federal Storm Water Phase II Final Rule requires operators of small municipal separate storm sewer systems (MS4s) to obtain a National Pollutant Discharge Elimination System (NPDES) permit by March 2003. The North Coast Regional Water Quality Control Board (Regional Board) is the regulatory agency with Phase II NPDES permit oversight authority for the City of Rohnert Park (City). On April 30, 2003, the Final State General Storm Water Permit (General Permit) was adopted. Prior to that, on March 10, 2003, the City submitted a Notice of Intent (NOI), a summary outline of a Draft Storm Water Management Plan (Draft Plan), and a permit fee. In August 2003, the City submitted a complete Draft Plan to the Regional Board. Comments to the Draft Plan were received by the City from the Regional Board on November 17, 2004. This document represents the City's Final Plan, which will be submitted to the Regional Board for public review. This Revised Plan delineates how the City will comply with the Phase II Rule. This Revised Plan will be finalized after Public Comments are received and incorporated, as appropriate. At that time, this Revised Plan will become the Final Plan and will also function as the City's Phase II NPDES permit.

The City is located within the Russian River drainage basin. The Laguna de Santa Rosa (Laguna) carries most of the drainage within the City's area to the Russian River. Impacts from agricultural runoff, new development, and urban runoff have resulted in the Regional Board listing of the Laguna on the 2002 Clean Water Act Section 303(d) list for low dissolved oxygen (DO) concentrations, as well as for sedimentation and temperature. The low DO concentrations throughout the Laguna are primarily a result of the presence of nutrients.

The positive aspect of the required implementation of a Storm Water Management Program (SWMP) is that the City has already implemented many of the U.S. EPA's menu of Best Management Practices (BMPs) for each of the six Minimum Control Measures (MCMs). These include recycling programs, storm drain mapping, street sweeping, drop inlet cleaning, and storm drain stenciling, to name a few. There are several agencies and non-profit groups that the City can establish storm water partnerships with for cost-effectiveness, such as the Phase I permittees: the City of Santa Rosa, Sonoma County, and Sonoma County Water Agency (SCWA). The City can also partner with the Sonoma County Waste Management Agency (SCWMA), Sonoma County Department of Emergency Services (SCDES), and local non-profit community organizations to share elements of the SWMP, such as creek maintenance, public education and outreach, and public participation and involvement, to maximize benefits and reduce implementation costs.

The negative aspect of the SWMP is that it is mandated, yet unfunded. Additional actions will likely need to be either implemented by existing staff and resources or by contracted personnel. The City's annual implementation cost is estimated to be approximately $80,000 for each year of the permit term (2003/2004 through 2008/2008). According to representatives of the Regional Board, failure to implement the SWMP and the minimum required BMPs may ultimately result in third party lawsuits and / or agency enforcement actions, including notices of violation and fines of up to $27,500 per day.

With this Revised Plan, the City formalizes and documents the BMPs already implemented. Other SWMP elements will be implemented over the five-year term of the first permit. For purposes of

implementing the SWMP, the Assistant City Manager or his designee will serve as the Program Leader.

New language and elements will be incorporated into existing documents such as the City's General Plan, California Environmental Quality Act (CEQA) checklist, and building and public works inspection procedures. The City's ordinance that prohibits solid waste from being dumped into the City's storm drains will be updated to include a prohibition of all non-storm water discharges. Although the City is not required to develop post-construction design standards, commonly referred to as Standard Urban Storm Water Mitigation Plan (SUSMP), the City is required to implement an ordinance or other regulatory mechanism addressing post-construction runoff for construction sites disturbing more than one acre of land.

1.0 BACKGROUND

1.1 Regulatory Background

The quality of water in our nation's waterways has improved greatly since the Clean Water Act was passed in 1976. In spite of this, many water bodies, approximately 40 percent, remain impaired or degraded. The leading source of this impairment is polluted storm water runoff. Because of this, the U.S. EPA promulgated a national storm water program in 1990. The Storm Water Phase I Rule (Phase I Rule) addresses storm water runoff from cities with populations over 100,000, construction sites over 5 acres in size, and 10 categories of industrial dischargers by using the NPDES program permit coverage.

The federal Storm Water Phase II Final Rule (Phase II Rule) is the follow-up to the Phase I Rule and requires operators of MS4s to obtain a NPDES permit by March 2003. The Phase II Rule includes cities with populations between 10,000 and 100,000. The U.S. EPA automatically designated the City because it is located within an "urbanized area" as defined by the U.S. Bureau of the Census. The Bureau of the Census defines "urbanized area" as an area of one or more places which together have a population of at least 50,000 and an overall population density of at least 1,000 people per square mile.

This Revised Plan describes actions that include BMPs, measurable goals, and timetables for what are defined as MCMs. During the five-year permit term, the City must submit annual reports to the Regional Board that document and convey progress in implementing the six MCMs. This requirement was to begin with the first annual report (due September 15, 2004); however, submittal of that first annual report was waived by the Regional Board, as the City is not yet covered by a permit.

On April 30, 2003, the General Permit was adopted. Prior to that, on March 10, 2003, the City submitted a NOI, a summary outline of the Draft Plan, and permit fee. In August 2003, the City submitted a complete Draft Plan to the Regional Board and comments were received by the City from the Regional Board on November 17, 2004. This document represents the City's Final Plan, which will be submitted to the Regional Board for public review. This Revised Plan delineates how the City will comply with the Phase II Rule.

The six MCMs required by the Phase II Rule are:

- Public Education and Outreach;
- Public Involvement and Participation;
- Illicit Discharge Detection and Elimination;
- Construction Site Storm Water Runoff Control;
- Post-Construction Storm Water Management in New Development and Redevelopment; and
- Pollution Prevention / Good Housekeeping for Municipal Operations.

1.2 City of Rohnert Park Compliance and Schedule

Due to issues involving City staffing, the City was not able to submit a Draft Plan by the original due date of March 10, 2003; however, the City notified the Regional Board and a summary outline

of the Draft Plan was accepted with the NOI and permit fee, in lieu of a Complete Draft Plan. A March 17, 2003 letter (Appendix A) received from the Regional Board acknowledged receipt of the NOI and the permit fee of $5,000. The General Permit was adopted in April 2003. The City submitted a Complete Draft Plan on August 8, 2004.

1.3 City Resources

City resources used in the City storm water management team include the Department of Public Works, Planning Department, Building Department, and outside agencies. Details of activities associated with each department are described below.

1.3.1 Department of Public Works

The Department of Public Works, which will become a part of the Community Services Department after the City's departmental restructuring, operates and maintains the City's water supply system, sewer system, street and traffic lights, parks, swimming pools, athletic fields, playgrounds, tennis courts, public buildings, City vehicles, streets, sidewalks, traffic markings, and drainage systems. The Department of Public Works also contracts with Rohnert Park Disposal, Inc. for solid waste disposal and recycling services.

The Department of Public Works' maintenance crews and / or engineering inspectors currently conduct the following activities that reduce pollutants in storm water runoff:

- Annual storm drain drop inlet cleaning and maintenance at known trouble spots;
- Inspections of the storm water system for illicit connections and discharges;
- Flood control on an as-needed basis;
- Inspections of the storm drain system for blockages prior to predicted significant storm events;
- Response to complaints by members of the public who report dumping in City creeks or channels;
- Maintenance of public parks and streets;
- Review of erosion control plans for all construction sites where grading is to occur; and
- Inspections of construction sites for erosion control measures.

1.3.2 Planning Department

The Planning Department is currently responsible for implementing the City's General Plan and Zoning Code. The Planning Department processes development applications, administers the City's Zoning Code, and provides technical and administrative support to the Planning Commission. The Planning Department also assures that development within the City is in compliance with the CEQA and all applicable State and local codes and ordinances.

The City's Planning Department is already implementing the following activities that will be a part of the Final Plan:

- Reviewing and enforcing CEQA requirements for new development;
- Establishing creek setback standards; and
- Enforcing development requirements.

The Planning Department will be instrumental in the implementation of the Final Plan. Planning Department staff will be particularly involved in implementation of BMPs pertaining to modifications of City ordinances and new development requirements for post-construction runoff control. Please see Table 1 for further details.

1.3.3 Building Department

Administrative duties of the City's Building Department include the enforcement and administration of the California Building Standards Codes and municipal ordinances pertaining to construction on private property within the City. The Building Department currently conducts site inspections of construction sites as well as enforcement of building codes and requirements. Inspection procedures will be enhanced to include new elements to consider for storm water protection BMPs. Please see Table 1 for further details.

1.4 Outside Agencies

Other local agencies also contribute to many activities that ultimately reduce storm water pollution to the receiving waters of the City's storm sewer system, including the Laguna and its tributaries. The following agencies contribute to the City's SWMP through their activities.

- The SCWA maintains creeks and flood control channels within its jurisdiction throughout the flood control zones of Sonoma County;
- The SCWA maintains a citizen complaint call-in telephone line for the reporting of illicit discharges to waterways;
- The SCWA conducts drainage, hydraulics, and hydrology reviews of construction site plans within SCWA rights-of-way;
- The SCDES conducts inspections for sites that store or generate hazardous materials;
- The Sonoma County Department of Environmental Health Services conducts inspections of restaurants, which include inspections for proper grease disposal;
- The Sotoyome Resource Conservation District (SRCD) has began a creek stewardship program in the Copeland Creek watershed in 2003, which allows volunteers to participate in many watershed-monitoring activities;
- The SCWMA distributes recycling information and aids citizens and businesses with the proper disposal of hazardous wastes; and
- The City of Santa Rosa industrial inspectors conduct wastewater collection and pre-treatment system inspections of industrial properties and restaurants within the City.

2.0 ADMINISTRATION, PLANNING, AND FUNDING

2.1 Administration

The Final Plan will be made available to the public by the Regional Board for review and comment.

Though the Draft Plan had not been finalized, the City has been implementing the SWMP after submitting the Draft Plan to the Regional Board for review. The SWMP is administered by the Program Leader, who is responsible for ensuring that the SWMP is moving forward on schedule, and that individuals designated to implement certain BMPs have the personnel and resources to do so. Additionally, the Program Leader ensures that all activities performed are documented for the purposes of preparing the Annual Report.

To ensure the efficient administration of the SWMP, the Program Leader regularly meets with staff to go over roles and responsibilities to evaluate progress in achieving goals, and to identify any obstacles to success. Adjustments will be made to the Final Plan, as necessary, to keep the SWMP viable, and to ensure the dynamic nature of the SWMP as a whole. Changes will be documented in each Annual Report.

2.2 Planning

Implementation of the maximum extent practicable (MEP) standard will typically require the development and implementation of BMPs and the achievement of measurable goals to satisfy each of six defined MCMs. "Maximum extent practicable" refers to the technology-based standard established by Congress in the Clean Water Act that municipal dischargers of storm water must meet. To achieve the MEP standard, municipalities must employ whatever BMPs are technically feasible and are not cost prohibitive. This Revised Plan is a guideline for a SWMP that coordinates the six MCMs so that when they are implemented together, they should result in significant reductions in pollutants discharged to waterways.

The City has already put into practice many of the measures required by the General Permit, but will need to formalize and document these activities for annual reporting purposes. Other program elements and requirements will be implemented over a five-year period, which is the length of the first permit term. The City will also be working cooperatively with the City of Santa Rosa, SCWA, SCWMA, SCDES, and other Phase II communities as applicable, to ensure that resources are utilized efficiently, and that BMPs implemented by each of the agencies do not conflict with or duplicate one another.

Information is provided in Table 1 that details the agencies and departments responsible for implementing specific BMPs. The Program Leader is responsible for the overall implementation of the SWMP, as well as implementation of specific BMPs and the preparation of the Annual Reports.

2.3 Funding

The City's costs for labor, materials, and the annual permit fee are estimated at approximately $80,000 for each year of implementation. This time will also include the organization, coordination, and program management duties associated with the implementation of the City's SWMP. The City currently funds its storm water activities through the City's General Fund.

Multiple departments will devote time to implementing their respective responsibilities for the SWMP. For example, the Planning Department will review plans for post-construction storm water BMPs for all applicable projects within the City. The engineering inspector currently reviews erosion control plans for construction sites and performs inspections of each of those sites. The Engineering Department and the Building Department staff will develop a formalized erosion control plan review and inspection process. The Engineering and Building Department staff will also train City staff and inform the development community of the new construction site and post-construction runoff control measures.

The City will appoint a current staff member or contractor to oversee the data entry, data tracking, word processing, and other administrative tasks involved in managing the SWMP. The paperwork and recordkeeping requirements of the SWMP are substantial, and the Program Leader's time will

be spent more efficiently in SWMP development and coordination, if the SWMP's administrative tasks are delegated.

2.4 Geographic and Land Use Description

2.4.1 Watershed

The watershed of the City includes upland reaches that drain through the City and discharge into the Laguna. The watershed within the city limits is bounded by the Sonoma Mountains to the east, rolling hills to the south and west, and agricultural farms within the Santa Rosa Plain to the north.

Several creeks are located within the watershed and traverse the City. These are the Copeland, Crane, Hinebaugh, Gossage, Five, and Washoe Creeks. Washoe Creek has been largely diverted to the west, away from the watershed through the construction of a flood control channel, but a portion of the watershed still drains along the western boundary of the City. This watershed is located within the SCWA's Zone 1A flood zone designation, which encompasses the Laguna de Santa Rosa–Mark West Creek Watershed.

The climate in Sonoma County is typically dry in the summer, with seasonal rainfall mostly occurring in the period from October through April. The average annual precipitation over the basin is approximately 24 inches. General area-wide storms of two or three days in duration produce most of the rainfall.

The terrain within the drainage basin is quite diverse. The majority of the City and the lower reaches of the watershed are on a flat plain with slopes of approximately one percent. The upland reaches of the watershed in the Sonoma Mountains are quite steep, with many slopes in excess of 30 percent.

The watershed includes three distinct types of hydrologic soils. Soil Type B includes sandy loams and shallow loess (wind-blown volcanic ashes). Soil Type C consists of soils with high clay content, including clay loams and some shallow sandy loams. Soil Type D consists of heavy, plastic clays with significant swell potential.

2.4.2 Land Use Description

The most intensively developed area within the watershed is the area within the city limits, which consists of residential, commercial, and industrial land use. The majority of the commercial and industrial development is located within the northwestern portion of the City, north of the Copeland Creek and west of the Northwest Pacific Railroad Line. Beyond this area are areas of low, medium, and high-density residential development with most of it being low density as defined in the General Plan. The City of Cotati is adjacent to the south and west of Rohnert Park, and consists of urban residential and rural residential land use. Sonoma County lands outside of the city limits are designated for open space, agriculture, land intensive agriculture, residential, and rural development.

3.0 POLLUTANTS OF CONCERN

An important aspect of any storm water quality control plan is an assessment of the beneficial uses that are to be protected. The beneficial uses of the Laguna are defined by California's Porter-

Cologne Water Quality Control Act and the California Regional Water Quality Control Plan for the North Coast Region. The beneficial uses of the Laguna and the point of discharge for the City's creeks, include the following:

- Agricultural supply;
- Industrial service supply;
- Water contract recreation;
- Non-contact water recreation;
- Commercial and sport fishing;
- Cold fresh water habitat;
- Wildlife habitat; and
- The potential use for aquaculture.

Impacts from agricultural runoff, hillside development, and urban runoff have resulted in the Regional Board's listing of the Laguna on the 2002 Clean Water Act Section 303(d) list for low DO concentrations, as well as for sedimentation and temperature. Section 303(d) of the federal Clean Water Act requires that States identify water bodies that do not meet water quality standards. Total Maximum Daily Loads (TMDLs) are then developed for each water body on the list, and include identifying sources of pollutants, defining how much of those pollutants a water body can tolerate while still meeting water quality standards, and specifying actions that create solutions.

3.1 Sediment

The Laguna is listed for sedimentation, as is the entire Russian River watershed. The TMDL priority for sedimentation of the Laguna is listed as medium. Sedimentation will be addressed with BMPs that address erosion control at construction sites, as well as BMPs that address post-construct elements of new and re-development.

3.2 Temperature

The Laguna is listed for temperature, as is the entire Russian River watershed. The TMDL priority for temperature in the Laguna is listed as low. Although the City does not have a specific point source discharge, such as a wastewater treatment plant, the City will address temperature issues within the post-construction requirements that will be developed during this permit term. By encouraging increased infiltration, restoring stream banks to have shade cover, and enforcing creek setbacks, runoff and stream temperature can be reduced. There are limitations to what the City can require, due to the SCWA's jurisdiction over the creeks within the City and due to the flood control functions of the streams.

3.3 Low Dissolved Oxygen and Nutrients

The Laguna was added to the 303(d) List of Impaired Water Bodies in 1990 for high levels of ammonia and low DO concentrations caused by excessive nutrient loadings. A TMDL was completed by the Regional Board for the Laguna for ammonia and DO in 1995. The conclusion was that high ammonia levels in the Laguna were the result of point and non-point source nitrogen inputs of various forms such as agricultural runoff and treated wastewater. Low DO concentrations were a result of organic matter and nutrients, which stimulate algal growth and subsequently cause depressed DO levels when the algae is decomposed.

The TMDL took the form of a Waste Reduction Strategy (WRS), which addressed the reduction of nitrogen loading from point and non-point sources. With the implementation of the WRS and operational improvements at the Santa Rosa Subregional Wastewater Treatment Plant as well as improvements in waste storage and disposal activities at local dairies, nitrogen inputs to the Laguna were significantly reduced. Following implementation of the WRS and the subsequent attainment of nitrogen and ammonia interim concentration goals (as stated in the WRS) the Laguna was removed from the 303(d) List for ammonia and DO in 1998, pursuant to a recommendation by the U.S. EPA.

However, the objectives set forth in the Regional Board's Basin Plan for DO, ammonia, and phosphorus in the Laguna have not been consistently met following the de-listing of the Laguna from the 303(d) List in 1998. In June 2003, the U.S. EPA listed the Laguna for nitrogen and phosphorous, according to Mr. John Short of the Regional Board. Currently, the Laguna has been re-listed for DO, and the U.S. EPA has agreed with the Regional Board in recommending development of a TMDL in order to meet water quality standards for DO concentrations in the Laguna. The City of Santa Rosa has offered to fund the development of the TMDL and the Regional Board is expected to commence this effort immediately.

3.4 Target Audiences

An important element to consider for the effectiveness of BMP implementation is the identification of groups of people, or "target audiences," who collectively are likely to contribute to pollutants of concern entering runoff by their activities. The table below describes these target audiences and their activities that contribute to pollutants of concern in storm water runoff.

Target Audience	Pollutant of Concern	Activity Contributing to Pollutant of Concern
Construction Site Operators	Sediment	Soil Erosion at Construction Sites
Developers / City Planners	Sediment, Temperature	Reduction of Permeable Surfaces; Site Design Lacking Source Control Elements
Restaurant Workers	Nutrients (Grease)	Improper Disposal of Grease
Residents	Nutrients (Grease)	Improper Disposal of Grease
	Nutrients, Debris	Littering, over use of pesticides and fertilizer.
Pet Owners	Pathogens	Not cleaning up after pets.
City Public Works Staff	Nutrients, Sediment, and Temperature	Poor housekeeping practices; Note: City Public Works' staff often remedy polluting activities of other target audiences.

4.0 MINIMUM CONTROL MEASURES

The Phase II Rule defines a SWMP as a program consisting of six elements, or MCMs, that when implemented together, are expected to achieve significant reductions of pollutants discharged into receiving water bodies. In this section, the BMPs and the overall program associated with each MCM will be summarized. Table 1 provides additional details regarding the SWMP (by MCM and BMP), quantifiable targets set to achieve the goals of specified activities (Measurable Goals / Evaluation Tools), a time-frame for implementation, target audiences, and the person or agency responsible for the implementation. Each MCM, along with a general definition of what is entailed in its implementation, is presented below. Some of the BMPs in Table 1 have been completed

because the permit term began in fiscal year 2003/2004. Updates will be provided in the Annual Report.

4.1 Public Education and Outreach

The Public Education and Outreach MCM consists of distributing materials and performing outreach activities to educate and inform citizens about the impacts polluted storm water runoff can have on receiving water bodies. Most citizens are not aware that everyday activities can have negative impacts on the creeks near their homes and businesses. Even when citizens are aware that they may be contributing some form of pollution, they may not realize the cumulative impacts of their actions when multiplied by the actions of other inhabitants in the area. A greater degree of compliance with the Phase II Rule can be expected as the public becomes aware of their personal responsibility to protect water quality.

The City already conducts and participates in a variety of Public Education and Outreach activities that can directly or indirectly prevent storm water pollution. To encourage outdoor water conservation, the City has implemented a water waste prohibition ordinance. Outdoor water waste prevention reduces runoff that can carry sediment, pesticides, petroleum hydrocarbons, and other pollutants from landscaping and pavement. The City has been retrofitting all commercial and residential customer account properties with water meters. Billing customers by volume rather than with a flat rate is expected to further reduce outdoor water use, further reducing landscape runoff. Other pollution prevention public education activities already implemented include household hazardous waste collection events, placement of signs in parks directing visitors to clean up after their pets, and participation in the regional Our Water Our World (OWOW) pesticide use reduction program.

The City's programs will be enhanced for compliance with the Phase II Rule permitting requirements by developing quantifiable targets and evaluation tools for programs that already exist. By documenting the activities the City already conducts, the City can increase compliance with minimal additional commitment of staff time and City funds.

As with all of the required MCMs, the City will maximize the cost-effectiveness of implementation by cost-sharing with other communities, which is encouraged by the State Water Resources Control Board (SWRCB). The development, printing, and distribution of public outreach materials will be shared with other communities. Many Phase I communities, such as the City of Santa Rosa and Sonoma County already have storm water public outreach materials, which they are willing to share, further minimizing SWMP implementation costs. The City has joined the Russian River Watershed Association and will participate in regional outreach programs as a member. This type of cost sharing and partnering will help to create a unified storm water message to the public, as well as help bring the City into compliance with the public education and outreach MCM in a cost-effective manner.

4.2 Public Involvement and Participation

The Public Involvement and Participation MCM has the goal of providing opportunities for citizens to participate in storm water program development and implementation. This includes, for example, participation in public meetings, encouraging citizen representation in a watershed management group, and / or community environmental awareness events. Public Involvement and Participation is encouraged for Phase II communities because it builds increased public support for storm water

programs and provides local MS4s with additional community resources. The City currently supports the creek cleanup activities performed by non-profit organizations and volunteers by providing gloves, garbage bags, and other supplies. The City will continue to provide this support.

The SRCD is in the process of developing a creek stewardship program in the Copeland Creek watershed. This SRCD has received grant funding from several agencies including the SCWA, the Department of Fish and Game, the SWRCB, and the California Department of Forestry and Fire Protection to implement this and other watershed stewardship projects. In 2005, the SRCD will be releasing a report of a baseline study of the health of the upper Copeland Creek watershed. There is also a Sonoma State University student volunteer group called *Friends of Copeland Creek*, and students from a high school biology program at Rancho Cotati High School that conduct activities such as tree planting, water quality monitoring, and creek cleanups within the City. The City will coordinate with these groups and their resources, when feasible, to assist in the implementation of the Plan. The Program Leader will coordinate these entities and their activities to maximize the effectiveness of each entity's individual efforts. Additionally, the Program Leader will coordinate with these groups to work to develop a baseline for the characterization of the water quality of the creeks within the City.

The City is investigating options for cooperation with the SCWA developing a biology-based creek stewardship program. This program would teach volunteers about riparian habitat and stream function while inviting participants to conduct activities such as invasive, non-invasive plant removal.

As a member of the Russian River Watershed Association (RRWA), the City will participate in the RRWA's survey that will assess the publics' understanding of storm water issues in general and obtain input on the publics' perception of storm water managers and programs.

4.3 Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination MCM consists of developing and implementing BMPs to systematically check the storm drain system for illicit connections to sewer or septic systems. Illicit connections cause "illicit discharges" to the storm drain system. "Illicit discharge" is a term defined by the U.S. EPA as "any discharge to an MS4 that is not composed entirely of storm water." This MCM includes developing a storm drain system map indicating the receiving waters of the City's storm sewer system, and informing the community of hazards associated with illegal discharges and improper disposal of wastes. In addition to those mentioned above, illicit discharges can be identified as grease from restaurants, spills from auto accidents, and improper disposal of household toxics and automotive fluids. Compliance with this MCM also includes adopting an ordinance to prohibit non-storm water discharges into the storm sewer system and implementing appropriate response procedures and actions for such discharges. The City adopted such an ordinance since the beginning of the current permit term.

The City has already implemented several of the required components of this MCM. The City has developed maps of its sewer and storm sewer systems and has recently updated them. The Draft Plan was submitted to the SCWA for review in October 2004. City staff conducts inspections of the City's storm drain system for illicit connections and discharges and maintenance crews clear blockages of the storm sewer system as necessary. There are known problem areas in the system on which City staff focuses their efforts on removing obstructions. Public safety officers inform Public

Works when they locate areas of spills or dumping. City staff conduct monthly inspections of the creeks at foot bridge crossings and remove debris or conduct cleanup, if necessary. The City receives frequent complaints from residents about shopping carts and conduct removal in response.

Outside agencies, such as the City of Santa Rosa, conduct activities in the City that also fall under this MCM. Because wastewater generated within the City is treated at the City of Santa Rosa subregional wastewater treatment plant, the City of Santa Rosa Industrial Waste Department is very active in the City. Industrial Waste Inspectors conduct inspections of businesses in the City that have sewer discharge permits. The inspections include storm drains, inspections for proper grease disposal, and distribution of educational materials regarding proper waste disposal. The Santa Rosa Department of Industrial Waste also distributes bi-lingual (English and Spanish) educational materials targeted to residents regarding proper disposal of grease in neighborhoods with consistent blockages of the sewer systems due to grease.

The City will implement BMPs to detect and eliminate non-storm water discharges, such as illegal dumping, as a comprehensive method of complying with the Illicit Discharge Detection and Elimination MCM. The selected BMPs collectively will fulfill this requirement. As stated above, the City can go a long way toward compliance with the Phase II Rule permit provisions by documenting the activities already being implemented within the City. In addition to documenting activities already occurring, the City is in the process of updating its storm drain system maps to include the names and locations of the system's receiving waters. Since the beginning of the current permit term, the City has updated a 1962 ordinance which prohibits dumping of solid waste refuse in gutters or drains within the City to include other forms of illicit discharge to storm drains. The City will also increase public education and outreach regarding illicit discharges and illegal dumping. The City will coordinate with the SCDES and the City of Santa Rosa to enhance their current inspections to include a comprehensive storm water protection element, and to enhance, as needed, their public outreach efforts.

4.4 Construction Site Storm Water Runoff Control

The Construction Site Storm Water Runoff Control MCM consists of developing, implementing and enforcing an erosion and sediment control program for construction activities that disturb one or more acres. The soil that can be carried from a construction site during a relatively short period of time would take much longer to erode under naturally vegetated conditions. Excess sediment requires periodic dredging of navigable waterways and destroys aquatic habitat.

This control measure mandates an erosion and grading ordinance or policy that requires implementation of appropriate sediment controls. Procedures must be implemented for site plan review of construction plans to ensure that the plans define the types of erosion controls and precautions that will be taken during the wet season. Site inspections and checklists must be developed that verify that the erosion control plan has been implemented as approved. An enforcement protocol must also be implemented so that there is a means for enforcing the ordinance or policy. Examples of the types of pollutants that can be discharged from construction sites are sediment, oil and grease from vehicle fueling and maintenance, wash water from concrete trucks, construction chemicals, and debris / trash. Projects or developments that disturb more than one acre must obtain a State-wide Construction Storm Water Permit by submitting an NOI and a Storm Water Pollution Prevention Plan (SWPPP).

The City Engineering Division currently requires erosion control plans for all construction sites on which there will be grading regardless of the size of the site. The City's Engineering Inspector inspects every construction site for compliance with the site's erosion control plan. This procedure of review and inspection occurs simultaneously with the SCWA drainage and hydrology reviews conducted of construction sites occurring within SCWA rights-of-way.

The City is in a good position to be in compliance with the Construction Site Storm Water Runoff Control MCM. Essentially, the City's current practices of requiring erosion control plans and of conducting site inspections based on those plans need to be formalized. A grading and erosion control ordinance was developed and adopted since the beginning of the current permit term to codify the requirement for grading, erosion control plans, and follow-up inspections. Codified sanctions for violations were included in the ordinance. The existing inspections will be expanded, as necessary, to include a comprehensive look at storm water protection measures that may or may not be directly related to erosion control. Inspector training is another necessary component of a successful construction site runoff control program and will be conducted by the City Engineer.

4.5 Post-Construction Storm Water Management in New Development and Redevelopment

The Post-Construction Storm Water Management in New Development and Redevelopment MCM is necessary in areas of new development or redevelopment because of the impact of runoff from those areas. Many studies have indicated that advance planning and designs that minimize and / or treat pollutants in post-construction discharges are the most cost-effective means of storm water quality management. The impact of post-construction runoff on water quality takes two forms. As rainwater flows over areas altered by development, it picks up small particles of soil, chemicals such as oil and grease, pesticides, fertilizers, metals, and fecal matter, and enters creeks and other water conveyances. Once discharged, these materials impair aquatic habitat and ultimately impact the quality of receiving waters, resulting in impairment.

Urban runoff also impacts water bodies by increasing the volume and velocity of water entering storm drains and creeks. Urban development replaces natural vegetation with impervious surfaces such as rooftops, driveways, parking lots, and streets. Impervious surfaces prevent water from percolating into the ground, thus replenishing groundwater supplies, and sends unnaturally large, short-term volumes of storm water to creeks. This combination creates streambed scouring and potential downstream flooding, and may lead to loss of aquatic and human life and property damage.

The City's General Plan contains development standards that address post-construction runoff concerns. The City also requires post-construction BMPs on a project-by-project basis. Many times, post-construction BMP requirements are imposed by the Regional Board, but enforced by the City. The City currently requires the BMPs to be privately owned and maintained. Some examples include bio-swales and fossil filters. However, the City must develop an ordinance or other regulatory mechanism that requires the implementation of long-term post-construction BMPs consistently. Mechanisms for enforcement of these new requirements must be implemented as well. The City will provide training / information to City engineering, planning, and public works staff as well as to the local development community (i.e., engineers, developers, and contractors) on the new requirements.

The General Permit, approved on April 30, 2003, included a list of communities anticipated to be subject to the requirement to develop Post-Construction Design Standards (commonly referred to as a SUSMP). The City was not listed as a community subject to this requirement, but will still have to implement requirements for post-construction runoff control BMPs.

The Phase I NPDES permit, jointly held by the City of Santa Rosa, Sonoma County, and SCWA, require the permittees to develop and implement comprehensive post-construction design standards for new and redevelopment. The City of Santa Rosa and County of Sonoma are currently in the process of developing SUSMP guidelines with the help of a contractor and project completion in mid-2005. The local development community is involved in the process and therefore will be familiar with this concept when the City develops their design standards. The City will strive to make the City design standards consistent with the City of Santa Rosa and County of Sonoma's guidelines.

4.6 Pollution Prevention / Good Housekeeping for Municipal Operations

The Pollution Prevention / Good Housekeeping for Municipal Operations MCM requires MS4 operators to examine and alter their own actions in order to reduce polluted runoff from municipal facilities, streets, parking lots, open spaces, and corporation yards (storage of road repair materials and vehicle fluids, and vehicle maintenance) into local water bodies. In order to implement this MCM, the responsibility of reducing polluted storm water runoff falls on the municipality operating the storm sewer system. This measure requires the development of a Storm Drain System Operation and Maintenance Plan, training employees on good housekeeping techniques, erosion control inspection, storm drain maintenance, pollution prevention practices, and as a whole, determining which BMPs and goals will work best for the particular MS4. The SCWA has ownership and maintenance responsibility for creeks in the city limits.

A contractor retained by the City currently conducts street sweeping on a weekly basis in all areas of the City. City staff check storm drains for blockages and clear obstructions, ensure that most fleet vehicles are washed in commercial car washes that filter wash water before it enters the sanitary sewer, and provide storm water pollution prevention training for appropriate employees. These activities will be comprehensively documented and coordinated, along with all other storm water pollution prevention activities taken by various City departments.

The City once had a level B hazardous materials response team, which included personnel who were trained on the use of self-contained breathing apparatus (SCBAs). The City no longer the funds to obtain that level of responder training, and as such, they no longer have any SCBAs. If a spill requiring "suiting up" were to occur today (whether in a street or creek), the Sonoma County HAZMAT team would be called.

For several years, the City has been actively finding ways to reduce the quantity and toxicity of chemicals and hazardous materials used in City operations, for example, eliminating the use of lead-based paint for street painting and switching to a less-toxic oil cutter for vehicle maintenance.

The City has actively sought to become certified in the Sonoma County Green Business Program (Green Business Program). The City Council has approved participation in the Green Business Program since the current permit term began. The Green Business Program sends trained representatives to conduct assessments of the business / institution's energy, water, and hazardous

materials use and provides recommendations for resource use reduction. The City is currently undergoing the assessments.

5.0 MONITORING AND EVALUATION

The Regional Board requires that an Annual Report be submitted that captures the previous fiscal year's storm water management activities, and the results of those activities. The first report had been originally due on September 15, 2004, and was to document the activities that took place between the date of the City's permit approval and June 30, 2004. As stated in previous sections, the City was not required to submit an Annual Report in 2004. Subsequent Annual Reports are due September 15th of each year, and will summarize the activities performed July 1st of the preceding year through June 30th of the current year. The City will periodically document activities that took place during the fiscal year, regularly determine if measurable goals were achieved, and assess the success or failure of the selected BMPs included in the attached table. If modifications need to be made to alter a BMP to make it more successful, or to modify a goal, or other changes, the City will make those changes and note the decision in the Annual Report.

The tracking of storm water activities will be conducted via the use of Excel spreadsheets (or similar) for each individual department, as well as for the SWMP as a whole. Each of the departments' tracking spreadsheets, as well as the Program Leader's spreadsheet will be developed concurrently and will use the same format for ease of information-sharing. The Annual Report will be prepared using summary tables based on the format of Table 1 of this Revised Plan. These summary tables will be accompanied by text for explanation of, and elaboration on, the activities conducted during the year, as needed. The Regional Board has expressed a preference for the use of spreadsheets to summarize SWMP progress.

The SWMP is dynamic, meaning that BMPs will be altered as necessary to improve their effectiveness. The Annual Reports will document these alterations and will demonstrate the City's efforts to reduce pollutants to the MEP, as well as future plans for the SWMP.

6.0 SIGNATORY REQUIREMENT

This Storm Water Management Plan must be signed and certified by a principal executive officer, ranking elected official, or duly authorized representative.

> *"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is true, accurate, and complete.*
>
> *I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

_____ _____

Steve Donley, Assistant City Manager — Date
Storm Water Program Leader
City of Rohnert Park

7.0 ACRONYM LIST

Acronym	Definition
BMP	Best Management Practice
CEQA	California Environmental Quality Act
DO	Dissolved oxygen
General Permit	Final State General Storm Water Permit adopted April 30, 2003
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
Plan	Storm Water Management Plan
Regional Board	North Coast Regional Water Quality Control Board
SCDES	Sonoma County Department of Emergency Services
SCWA	Sonoma County Water Agency
SCWMA	Sonoma County Waste Management Agency
SRCD	Sotoyome Resource Conservation District
SUSMP	Standard Urban Storm Water Mitigation Plan
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDLs	Total Maximum Daily Loads
U.S. EPA	United States Environmental Protection Agency

Table 1. City of Rohnert Park
Storm Water Management Plan
At A Glance

Minimum Control Measure	Activity / Best Management Practices	Pre-Plan	Implementation Date					Implementation Plan	Measurable Goal / Evaluation Tool	Pollutants Addressed	Target Audience(s)	Implementer(s)
		FY 02/03	FY 03/04	FY 04/05	FY 05/06	FY 06/07	FY 07/08					
Public Education and Outreach	Water Conservation	X →						Already implemented - The City Council approved a water waste prohibition ordinance in 2001. (Gutter flooding and its associated runoff is reduced.)	Ordinance is Enforced (Violations)	Nutrients and sediment from runoff caused by over-watering	All water customers.	Public Works Staff
				X →				Install water meters and bill by volume.	Water consumption is reduced after meters are installed.	Nutrients and sediment in runoff caused by over-watering	All water customers.	Public Works Staff
	Proper Disposal of Trash, Recyclables, Household Toxics, and Hazardous Waste	X →						Already implemented - Builder's Guides Distributed by the Building Department staff.	Distributed to 100% of applicants for building permits.	Proper Disposal / Hazardous Materials and Solid Waste	Contractors / Builders	Building Department
	Integrated Pest Management			X →				Already Implemented - OWOW Regional Point-of-Sale Pesticide reduction program.	At least one retailer involved in OWOW program by end of permit term.	Pesticides	Nurseries / Public	OWOW Regional Program
	Education / Outreach			X →				Educational messages will be placed in the local newspaper on a regular basis.	Four storm water educational messages placed in the local newspaper per year.	Various Pollutants, General Awareness of Storm Water Issues	City Residents	Program Leader
				X →				The City will participate in a regional media public outreach program through the RRWA.	City participation in monthly RRWA meetings during the fiscal year.	General Storm Water Awareness; Pathogens; Nutrients	General Public	RRWA Public Education / Media Working Groups
			X					Adopt-A-Waterway Sign Program	Investigate possibility of a regional Adopt-A-Waterway sign program (Note: completed in first fiscal year).	General Storm Water Awareness; Pathogens; Nutrients	General Public	Adopt-A-Waterway / Program Leader
	Pet Waste	X →						Already implemented - Pet waste collection bags are located in some City parks; Signs are placed in City parks directing people to clean up after their pets.	Signs posted along at least one walking path.	Pathogens and Nutrients	Pet owners who use City parks.	Program Leader / Recreation & Parks Department
Public Involvement and Participation	Stakeholder Meetings	X						Already implemented - Public Meeting #1 - Overview of Phase II NPDES program was presented at City Council meeting held on February 25, 2003. The public was invited to attend and comment.	Document and record comments from the public at the City Council meeting.	Awareness of, and Participation in, City's Storm Water Management Program	The General Public / City Council	City Council / Program Leader
		X						Already implemented - Public Meeting # 2 - Final draft of Storm Water Management Plan was presented for Council and public comment and Council approval at City Council meeting held on July 22, 2003.	Document and record comments from the public at the City Council meeting.	Awareness of, and Participation in, City's Storm Water Management Program	The General Public / City Council	City Council / Program Leader
	Volunteer Creek Cleanup Events	X →						Already implemented - The City receives creek cleanup requests from volunteer organizations. The City public works staff facilitate the volunteer projects by providing a safe location for the event to occur, gloves and trash bags, and by collecting the bagged trash when the event is complete.	Increase number of participants by 20%. Track support provided to the volunteers.	Debris, Litter	Residents	Public Works Supervisor
	Creek Stewardship Program		X →					Coordinate with SSU, the City of Santa Rosa, and SCWA to evaluate options for development of a City-wide Creek Stewardship Program.	Hold at least one meeting with representatives of SSU, City of Santa Rosa, and SCWA.	Various Pollutants; General Storm water Awareness	Residents	Program Leader / SSU Faculty / SCWA
				X →				Based on results of previous BMP, develop a Creek Stewardship program.	Develop program goals, strategy, and framework.	Temperature, Sediment	Residents	Program Leader / SSU Faculty / SCWA
Public Involvement / Participation (cont'd)	Creek Stewardship Program (cont'd)				X →			Implement Creek Stewardship program.	Conduct one volunteer orientation meeting and one creek restoration and / or cleanup activity per year.	Temperature, Sediment	Residents	Program Leader / SSU Faculty / SCWA
	Water Quality Monitoring and Creek Restoration	X →						Already implemented - Rancho Cotati High School students conduct annual water quality monitoring in Copeland Creek and occasionally conduct creek restoration projects. Friends of Copeland Creek, a SSU student group, conducts restoration projects.	Track 100% of monitoring data; track trends in water quality.	Temperature, Sediment	Residents / Business Operators	Program Leader

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		FY 02/03	FY 03/04	FY 04/05	FY 05/06	FY 06/07	FY 07/08					
	Evaluation of Overall Program Goals of Water Quality Protection		X →					Participate in regional efforts to conduct baseline characterization studies through the RRWA.	Study or studies are completed and baseline developed.	Debris, Sediment, Pathogens, Nutrients, Temperature	Residents / Business Operators	Program Leader / RRWA
Illicit Discharge Detection and Elimination	Storm Drain Map	X →						Already implemented - City has maps of storm drain, sewer, and water systems. The City is in the process of updating these maps.	Update maps on a "as needed" basis.	Various Pollutants	Public Works Maintenance Crews	Program Leader / Public Works
			X →					Modify storm drain map to show the locations and names of the waters receiving discharge from the storm drain system.	Complete storm map and include labels for receiving waters.	Various Pollutants	Public Works Maintenance Crews	Program Leader / Public Works
				X →				Develop method to track storm drain system maintenance.	Tracking system in place; identify areas of frequent dumping, if any.	Various Pollutants	Public Works Maintenance Crews	Program Leader / Public Works
	Hazardous Materials Inspection Program	X →						Already implemented - The SCDES regularly inspects sites which store hazardous materials above the exempted amount, or generate hazardous wastes, in the City.	Inspect 100% of applicable businesses during the permit term.	Hazardous Materials Management	Businesses generating or storing hazardous materials.	SCDES / Program Leader
	Illegal Dumping Control	X →						Already implemented - City of Santa Rosa distributes educational materials to restaurants and residents regarding proper disposal of grease in various cities, including Rohnert Park. The materials going to residents are printed in English and Spanish.	Provide education regarding proper grease disposal to 100% of the restaurants in the City during the permit term.	Nutrients, Grease	Restaurant Workers / Residents	Program Leader / City of Santa Rosa Industrial Waste Department
		X →						Already implemented - City of Santa Rosa industrial inspectors conduct cursory inspections of storm drains on industrial sites in various cities, including Rohnert Park. Education occurs on-site as needed regarding storm drain protection and proper discharge and disposal.	Inspect 100% of applicable businesses during the permit term.	Various Pollutants	Restaurant Workers and Industrial Business Operators	Program Leader / City of Santa Rosa Industrial Waste Department
		X →						Update 1962 City ordinance prohibiting dumping of solid waste refuse in gutters or drains within the City. Develop and adopt a comprehensive storm water pollution prevention ordinance and enforcement procedures prohibiting and enforcing non-storm water discharges.	New ordinance developed and adopted; document that ordinance is enforced.	Various Pollutants; General Storm Water Awareness	Residents and Business Operators	Program Leader / City Council
				X →				Inform the public about the new storm water ordinance.	One article, mailer, or other form of public outreach per year regarding the new ordinance.	Various Pollutants; General Storm Water Awareness	Residents / Business Operators	Program Leader
						X →		Coordinate with the SCDES (formerly County Fire), City of Santa Rosa Industrial Waste, and SCDEHS to add or strengthen storm water inspection and education components to their existing business inspection protocol.	Add storm water components to existing inspection protocols.	Proper disposal, handling and storing of hazardous materials and wastes.	Business Operators	Program Leader / SSU Faculty / SCWA
Illicit Discharge Detection and Elimination (cont'd)	Illegal Dumping Control (cont'd)	X →						Homeless encampment abatement to protect creeks from the litter and human waste associated with creekside homeless encampments.	Reduce number of homeless encampments alongside creeks. Ongoing abatement of such encampments (Referrals to social programs are part of the program).	Pathogens, Debris; Streambank Erosion	Homeless people living along streambanks.	Public Safety / Public Works
	Identifying Illicit Discharges	X →						Already Implemented - The City's Public Works Inspector conducts inspections of the storm water system for illicit connections and discharges.	Enforcement of 100% of illicit connections identified.	Various Pollutants	Business Operators	Program Leader / Department of Public Works Engineering Inspector
		X →						Public Safety alerts Public Works staff of observed pollutants, such as oil, having been dumped in creeks so that cleanup may occur.	100% of observed illicit discharges reported.	Various Pollutants	Public Safety Personnel	Program Leader
					X →			Create plan to comprehensively detect and address non-storm water discharges, including illegal dumping. Use updated storm drain and sewer maps to identify illicit connections.	Determine areas of concern to be targeted for additional outreach and monitoring.	Various Pollutants	Residents / Business Operators	Public Works / Program Leader

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		FY 02/03	FY 03/04	FY 04/05	FY 05/06	FY 06/07	FY 07/08					
					X →			Already implemented - SCWA has a citizen complaint line that they respond to regarding illicit discharges.	When the SCWA revises it's tracking methods to track calls by City, track the number and topic of calls from Rohnert Park residents or businesses; document how calls were addressed; Evaluate for "hot spots."	Various Pollutants	Residents / Business Operators	SCWA / Program Leader / Public Works
Construction Site Storm Water Runoff Control	Erosion Control Ordinances / Policies	X →						Already Implemented - General Plan, Policy EC-19 requires site preparation, grading, and foundation designs for prevention of erosion to protect creeks. All sites of any size which will have grading activities are required to submit an ECP. Site inspections are conducted by Public Works Inspector.	100% of construction sites qualifying for ECPs have ECPs approved.	Sediment	Developers / Contractors	Public Works Engineering Inspector / Program Leader
	Construction Review / Inspection		X →					Develop an ordinance or other regulatory mechanism to formalize requirements for ECPs for all construction sites where grading will occur.	Approve ordinance; Document that ordinance is enforced.	Sediment, Debris	Developers / Contractors	Planning and Building Departments / Public Works Engineering Inspector / Program Leader
				X →				Develop procedures for official review of ECPs.	New procedures are developed and approved.	Sediment, Debris	Developers / Contractors	Planning and Building Departments / Public Works Engineering Inspector / Program Leader
				X →				Provide in-house training for all appropriate City staff on new ordinance and new ECP review procedures.	100% of planning review and inspection staff have received training.	Sediment, Debris	Plan Review and Inspection Staff	Darren Jenkins, City Engineer
				X →				Add storm water component to construction site inspections by Public Works and Building Department personnel and distribute educational materials to contractors.	100% of construction sites have erosion control BMPs in place; improvement in sites warranting follow-up inspections.	Sediment, Debris	Developers / Contractors	Building / Public Works Inspectors
Construction Site Storm Water Runoff Control (cont'd)	Construction Review / Inspection (cont'd)					X →		Track proportion of ECPs meeting new ECP requirements.	Evaluate results and determine if additional education and outreach to developers and contractors is needed.	Sediment, Debris	Developers / Contractors	Program Leader
						X →		Develop enforcement mechanisms and procedures for levying sanctions for non-compliance.	100% of construction sites have been inspected at least once during the rainy season. Document results of inspections and reinspections and document enforcement actions taken.	Sediment, Debris	Developers / Contractors	Building / Public Works Engineering Inspector / Program Leader
		X →						Already implemented - SCWA's Revocable License Program - Requires developers with projects within SCWA right-of-way to obtain a permit, thereby subjecting plans to SCWA hydrology and hydraulic review, drainage review, and review of construction BMPs.	100% of projects in SCWA right-of-way go to SCWA for review.	Sediment, Debris	Developers / Contractors / Construction Companies	SCWA
				X →				Participate in joint inspector training opportunities for City of Rohnert Park and Phase I and II MS4s.	100% of inspectors attend training once during permit term; Copies of training certificates included in Annual Report.	Sediment, Debris	Department of Public Works and Building Officials	Public Works / Other MS4 Phase I / II Communities
	Receipt and Consideration of Information Submitted by the Public				X →			Encourage the public to notify the City of construction sites with poor housekeeping practices.	One public outreach message per year.	Sediment, Debris	General Public	Public Works / Program Leader
		X →						Respond to Public Complaints about poor housekeeping practices at construction sites.	100% of complaints investigated.	Sediment, Debris	Contractors / Builders	Public Works / Program Leader
Post-Construction Storm Water Management in New Development and Redevelopment	Completion of Environmental Impact Checklist		X →					For existing CEQA checklist, staff will modify checklist language to directly address Phase II storm water and TMDL-related issues.	Revise checklist; new checklist used for 100% of new project submittals.	Sediment, Nutrients, Temperature	Developers	Planning Department / Program Leader

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		FY 02/03	FY 03/04	FY 04/05	FY 05/06	FY 06/07	FY 07/08					
	Creek Setback Requirement	X →						Already implemented - Construction standard of creek setback of a minimum of 50 feet.	100% of new development and redevelopment along creeks have a 20-foot setback.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers	Planning Director / Plan Reviewers
			X →					Construction standard of creek setback of 150 feet along designated sensitive areas is required.	100% of development projects in the designated areas comply with the new setback requirements.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers	Planning Director / Plan Reviewers
	New Post Construction Requirements			X →				Designate staff for a post-construction guideline team.	Team members identified.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers / Plan Review Staff	Planning Director / Plan Reviewers
					X →			Team members will review City of Santa Rosa's SUSMP requirements and guidelines, and the Start at the Source handbook and other relevant documents. The team will select design standards for new development and redevelopment which address source control measures, treatment control measures, long term post-construction monitoring and maintenance. Team will determine whether a new ordinance is necessary, or if current ordinances / procedures can be amended.	Complete post-construction design standards.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers / Plan Review Staff	Planning Director / Plan Reviewers
Post-Construction Storm Water Management in New Development and Re-Development (cont'd)	New Post Construction Requirements (cont'd)				X →			City Engineer and City Attorney review draft ordinance for approval.	Draft standards / ordinance approved by City Engineer and City Attorney.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers	City Engineer / City Attorney
					X →			Present draft ordinance / amendment to the public and City Council and follow procedures for ordinance adoption.	Ordinance / procedures adopted City Council and, if necessary, planning commission.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	General Public and City Council	City Council / Public Works / Planning & Building Depts. / City Engineer
					X →			Review existing documents (General Plan, ordinances, codes, review process, and design guidelines) for consistency with new ordinance and revise as necessary to ensure long-term operation and maintenance of controls.	Complete a review of appropriate documents for consistency and make revisions, as necessary.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers	City Council / Public Works / Planning & Building Depts. / City Engineer
					X →			Provide training to City staff regarding the new post construction requirements.	100% staff involved in plan review and inspection have received training.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Building and Planning Department Staff	Program Leader
						X →		Presentation to contractor / developer association meetings to explain new requirements. City staff person to conduct presentation as a guest speaker.	Conduct one speaking engagement per year.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers / Engineers / Contractors	City Engineer or Other Appropriate Staff
						X →		Provide a written guide on the new post-construction requirements to developers as part of the permitting process. Require them to sign a statement that they have read the requirements.	100% of applicants for new development or redevelopment receive the post-construction guidelines.	Temperature, minimize pollutants in runoff; limit peak storm water flows.	Developers / Engineers / Contractors	Planning and Building Departments
Pollution Prevention / Good Housekeeping for Municipal Operations	Hazardous Materials Spill Response	X →						Already Implemented - The Public Works Department staff are trained in spill containment and PW trucks contain spill containment material at all times.	100% of City trucks contain spill kits; 100% of PW staff have received training on spill response.	Spilled Materials	NA	Public Works
	Street Sweeping	X →						Already Implemented - The City's contractor conducts streets sweeping daily, reaching each neighborhood of the City once per week.	Identify areas of concern.	Debris in streets, including leaves, trash, and loose soils.	N/A	Department of Public Works / Program Leader / Rohnert Park Disposal, Inc.
	Pollution Prevention Training	X →						Already implemented - City provides appropriate storm water pollution prevention training for Public Works Inspector and employees.	100% of appropriate staff receive training.	Pollution Prevention	Public Works	Program Leader / Public Works

Table 1. City of Rohnert Park
Storm Water Management Plan
At A Glance

Minimum Control Measure	Activity / Best Management Practices	Pre-Plan	Implementation Date					Implementation Plan	Measurable Goal / Evaluation Tool	Pollutants Addressed	Target Audience(s)	Implementer(s)
		FY 02/03	FY 03/04	FY 04/05	FY 05/06	FY 06/07	FY 07/08					
	Materials Management		X→					Join the Sonoma Green Business / Green City Program	City Council approves of a resolution to join the Green Business Program.	Hazardous Materials Reduction	City Council	Program Leader
				X→				Have a Green Business Program evaluation conducted of City facilities	Evaluation and resulting report are complete.	Hazardous Materials Reduction	NA	Program Leader
Pollution Prevention / Good Housekeeping for Municipal Operations (cont'd)	Materials Management (cont'd)				X→			Implement recommendations from the Green Business Program report.	Implement recommendations; achieve a reduction of hazardous materials use (% of reduction will be based on recommendations).	Hazardous Materials Reduction	City personnel currently using hazardous materials.	Program Leader
						X→		Become a certified Green Business	Certification received.	Hazardous Materials Reduction	NA	Program Leader
		X→						Reduce the amount of hazardous materials used in City operations; use materials with a reduced toxicity when possible.	Track use of hazardous materials.	Hazardous Materials Reduction	City personnel currently using hazardous materials.	Program Leader
							X		Document Emergency Services communication that HMBP is not necessary.	Hazardous Materials Reduction	SCDES	Program Leader
	Quarterly Storm Water Management Program Meetings		X→					SWMP Program Leader and other staff who are involved in SWMP implementation meet regularly regarding SWMP implementation issues.	Four meetings per year.	Various Pollutants	All personnel administering the SWMP.	Program Leader / Upper Level Staff
	Stream and Channel Maintenance	X→						Already Implemented - Maintenance of flood control channels and creek beds within the jurisdiction of the SCWA is performed by the SCWA under a Channel Maintenance Agreement between the City and the SCWA.	Tracking of stream and channel maintenance activities within the City.	Debris, Illicit Discharges	N/A	SCWA / Program Leader
		X→						Already Implemented - shopping cart cleanup due to (regular) citizen complaints.	Respond to 100% of complaints.	Solid Waste, Litter	Public Works	Public Works
		X→						Already Implemented - Creek sweeps - Monthly visual inspections of the creeks at all foot bridges.	Twelve inspections per year.	Solid Waste, Litter	Public Works Staff	Public Works
	Storm Drain Cleaning	X→						Already implemented - Prior to and during the rainy season, the City Street Maintenance Division checks storm drains for blockages and clears obstructions.	Document 100% of inspections and maintenance.	Debris, Sediment Deposits, Leaves	Public Works Personnel	Public Works / City Street Maintenance Division
	Vehicle Maintenance	X→						Already implemented - City vehicles are properly maintained and repaired at City's Corporation Yard. Wastes are collected by Safety Kleen.	Hazardous waste is collected by Safety Kleen and the Corporation yard passes SCDES inspections.	By-Products of Vehicle Maintenance	Corporation Yard Personnel	Program Leader / Senior Mechanic
	Vehicle Washing	X→						Already implemented - Non-emergency fleet vehicles are taken to a local commercial car washing facility where wash water is filtered prior to discharge.	100% of non-emergency fleet vehicles taken to car washes with discharge filtration.	Petroleum Hydrocarbons and Heavy Metals	City Personnel	Program Leader / Departments with City Vehicles
					X→			Storm drains located at fire stations in areas where fire department vehicles are washed will have storm drain protection devices put into place when the vehicles are being washed or will have filters installed.	Placement of storm drain protection devices at all stations where vehicles are washed.	Petroleum Hydrocarbons, Nutrients	Public Safety Personnel	Program Leader / Fire Commander

Notes: Placement of an "X" under Implementation Date indicates the year the activity will begin. An "X" in the FY 02/03 column indicates an activity already being implemented. Arrows signify activities that will be implemented continuously in fiscal years after initial implementation.

Acronym Definitions:

CEQA - California Environmental Quality Act
ECP - Erosion Control Plan
MS4 - Municipal Separate Storm Sewer System
NPDES - National Pollutant Discharge Elimination System
SCDES - Sonoma County Department of Emergency Services
SCDEHS - Sonoma County Dept. of Environmental Health Services
SCWA - Sonoma County Water Agency
SWMP - Storm Water Management Plan
TMDL - Total Maximum Daily Load