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California Regional Water Quality Control Board

Central Coast Region



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November 24, 2008

Mr. Ken Anderson
City of Scotts Valley
One Civic Center Drive
Scotts Valley, CA 95066
kanderson@scottsvally.org

By electronic and regular mail

Dear Mr. Anderson:

WATER BOARD STAFF COMMENTS ON DRAFT STORM WATER MANAGEMENT PLAN, CITY OF SCOTTS VALLEY, SANTA CRUZ COUNTY

On October 27, 2008, the Central Coast Regional Water Quality Control Board (Water Board) received the City of Scotts Valley (City) Draft Storm Water Management Plan (SWMP). Water Board staff has reviewed the Draft SWMP and we have identified improvements the City must make for us to recommend approval of the SWMP. Please see the attached draft Table of Required Revisions. Please respond with a further revised SWMP, or comments describing further revisions to the SWMP, prior to the Water Board's final review and consideration of public comment. The following sequence of events describes an optimal process for final review of the SWMP:

Water Board staff plans to:

- 1) Post the attached draft Table of Required Revisions on or prior to November 25, 2008, on the same webpage where the SWMP will be posted for the 60-day public comment period. Water Board staff will announce the web posting, including web address, to all known interested persons by email.
- 2) At the close of the 60-day public comment period on approximately January 26, 2009, Water Board staff will review comments received on the SWMP from the public, including comments from the City describing their revisions to the SWMP.
- 3) Water Board staff will prepare a final Table of Required Revisions and a final recommendation on the adequacy of the SWMP. Staff will also prepare a response to comments received during the 60-day public comment period.
- 4) If Water Board staff recommends approval of the SWMP, the Water Board's Executive Officer may approve the SWMP and coverage under the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (General Permit), contingent on the City making the required revisions to its SWMP by a date certain (generally within 60 days of the approval letter). The Executive Officer will post the approval letter with required revisions on the Water Board website.
- 5) Alternatively, if a member of the public or the City requests a Water Board hearing during the 60-day public comment period, Water Board staff will provide recommendations to the Water Board on the City's SWMP (with the required revisions) at the March 20, 2009 Water Board Meeting.

California Environmental Protection Agency



Item No. 11 Attachment No. 7
March 19-20, 2009 Meeting
City of Scotts Valley SWMP

Developing Interim Hydromodification Control Criteria as Effective as Water Board Staff's Proposed Criteria

In this letter, we are also providing clarification regarding how interim hydromodification control criteria developed by the City will be reviewed by Water Board staff. At the recent Water Board public hearing for approval of the City of Lompoc's SWMP, Water Board staff was directed by the Water Board to ensure that any interim hydromodification control criteria developed by the City of Lompoc be as effective as the interim hydromodification control criteria we presented in our February 15, 2008 letter. Those criteria are as follows:

- For new and re-development projects, Effective Impervious Area shall be maintained at less than five percent (5%) of total project area.
- For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent (1%) the pre-construction runoff hydrographs, for a range of events with return periods from 1-year to 10-years.
- For projects whose disturbed project area exceeds two acres, preserve the pre-construction drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration.

Based on the Water Board's direction regarding the City of Lompoc's SWMP, Water Board staff has determined it appropriate to require similar language in other municipalities' SWMPs. Therefore, Water Board staff has included language in the attached draft Table of Required Revisions requiring your interim hydromodification criteria to be as effective as the criteria outlined above. Water Board staff expects that implementation of these criteria, together with other planning efforts that contribute to long-term watershed protection, will promote the following desired conditions of healthy watersheds:

- 1) Rainfall surface runoff at pre-development levels,
- 2) Watershed storage of runoff, through infiltration, recharge, baseflow, and interflow, at pre-development levels,
- 3) Watercourse geomorphic regimes within natural ranges (stream banks are stable within natural range; sediment supply and transport within natural ranges), and
- 4) Optimal riparian and aquatic habitats.

Interim hydromodification control criteria primarily focus on items 1 and 2 above. Therefore, Water Board staff will review interim hydromodification control criteria developed by MS4s to ensure that they:

- 1) Provide numeric thresholds that demonstrate optimization of infiltration in order to approximate natural infiltration levels (such as would be achieved by implementation of appropriate low-impact development practices), and
- 2) Achieve post-project runoff discharge rates and durations that do not exceed estimated pre-project levels, where increased discharge rates and durations will result in increased potential for erosion or other significant adverse impacts to beneficial uses.

At the public hearing on the City of Lompoc's SWMP, the Water Board also directed Water Board staff to provide an opportunity for comment on Water Board staff's eventual determination regarding the City of Lompoc's pending interim hydromodification control criteria, and a hearing, if requested, if any party is aggrieved by the determination. In other words, the criteria of the February 15, 2008 letter may only be used as a default set of criteria if the City of Lompoc does not, within one year, develop approvable interim hydromodification control criteria of their own that we agree are as effective as our stated interim criteria. If the City of Lompoc's proposed



criteria are not as effective and we must further condition our approval (either to the exact numerics of our interim criteria or something in-between), AND, the City of Lompoc still finds those conditions unacceptable, the City of Lompoc and other parties will have an opportunity for a Water Board hearing. Water Board staff has determined that this process is beneficial and should be expanded to other municipalities. Therefore, we intend to follow this process during review and approval of the City of Scotts Valley's SWMP. We have included language to this effect in the draft Table of Required Revisions and request you include it in your SWMP.

If you have questions regarding this matter, please contact **Phil Hammer** at (805) 549-3882, or Matt Thompson at (805) 549-3159.

Sincerely,

Roger W. Briggs
Executive Officer

cc: Steve Shimek, Monterey Coastkeeper (by electronic mail)

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**DRAFT TABLE of REQUIRED REVISIONS
City of Scotts Valley Draft SWMP**

Acronyms/Abbreviations:

- BMP - Best Management Practice
- SWMP - Storm Water Management Plan
- Water Board - Central Coast Regional Water Quality Control Board
- City - City of Scotts Valley
- LID - Low Impact Development
- MS4 - Municipal Separate Storm Sewer System
- CEQA - California Environmental Quality Act
- TMDL - Total Maximum Daily Load

Item Number	SWMP Section	Subject	Issue	Required Revisions
1	All Tables, including BMPs # 1-1, 1-2, 1-3, 1-4, 2-1, 2-2, 3-3, 4-2, 4-3, 5-2, 6-2, 6-3, 6-4, 7-1	Implementation Years	For many BMPs, including those listed here, the SWMP appears to indicate that the BMPs will only be implemented for one year. It is unclear whether or not implementation of the BMPs will continue in subsequent years. Following initial implementation, BMP implementation must continue in subsequent years in order for the City to achieve the maximum extent practicable standard.	Review the implementation schedule for each BMP listed in the SWMP's tables and identify every year the BMP will be implemented.
2	Public Education and Outreach	Education BMP Progression	The SWMP includes several educational approaches that have traditionally been used by stormwater programs. However, the Public Education Program must continually assess new public education methods to improve program effectiveness. One particularly promising approach to public education is community-based	Include a BMP to assess community-based social marketing strategies and incorporate them into your program where appropriate.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			<p>social marketing. Community-based social marketing is based upon research in the social sciences that demonstrates behavior change is most effectively achieved through initiatives delivered at the community level which focus on removing barriers to an activity while simultaneously enhancing the activities benefits. More information on community-based social marketing is available at: http://www.cbsm.com/. The techniques of community-based social marketing should be considered when developing, implementing, and assessing your public education and outreach program.</p>	
3	BMP # 1-3	Riparian Restoration and Protection Education	<p>While the SWMP mentions the possibility of educating the public regarding opportunities and activities for riparian restoration and protection, it does not commit to conducting this type of education. Riparian restoration and protection are important aspects of achieving healthy functioning watersheds.</p>	<p>Modify BMP #1-3 to commit the City to educating the public on opportunities and activities for riparian restoration and protection.</p>
4	BMP # 1-3	Measurable Goal	<p>The measurable goals for this BMP do not identify the scope or magnitude of BMP implementation. Without these kinds of measurable goals, the City will not know whether the BMP is as effective as planned.</p>	<p>Include a quantifiable goal for BMP # 1-3 that the City will use to measure the scope and magnitude of BMP implementation, such as identifying the number of local events the City will attend annually.</p>
5	Illicit Discharge Detection	Illicit Discharge tracking	<p>Procedures to trace the sources of illicit discharges, once detected, are not discussed. Such procedures are</p>	<p>Include procedures to trace the sources of illicit discharges.</p>

Item Number	SWMP Section	Subject	Issue	Required Revisions
	and Elimination		important tools in the elimination of illicit discharges.	
6	Illicit Discharge Detection and Elimination	Enforcement	The SWMP does not include a description of the procedures the City will use to eliminate identified sources of illicit discharges. This information is necessary to ensure that City staff are aware of procedures to effectively eliminate illicit discharges.	Include a description of the specific procedures and corrective actions the City will use to eliminate sources of illicit discharges.
7	Illicit Discharge Detection and Elimination	Pollutants of Concern	It is unclear how this section of the SWMP directly targets the City's primary pollutants of concern (fecal indicator bacteria and sediment). BMPs do not appear to be tailored to address primary pollutants of concern within the City.	Include new BMPs or tailor existing BMPs to target illicit discharges from potential sources of the primary pollutants of concern.
8	Illicit Discharge Detection and Elimination	Non-Stormwater Discharges	<p>The SWMP discusses review of certain categories of non-storm water discharges to determine if they are significant sources of pollutants, but does not identify this activity as a BMP with an implementation schedule.</p> <p>The SWMP does not state what action the City will take if a category of non-storm water discharges that is reviewed is determined to be a significant source of pollutants. Non-storm water discharges that are determined to be a significant source of pollutants must be prohibited or addressed by BMPs.</p>	<p>Add a BMP, including an implementation schedule, for the review of these categories of non-storm water discharges.</p> <p>Identify the action the City will take if a category of non-storm water discharges that is reviewed is determined to be a significant source of pollutants. Commit to prohibiting such discharges, or requiring implementation of BMPs to address the pollutants in the discharges.</p>
9	BMP # 3-3	Measurable Goal	The measurable goals for this BMP do not identify the scope or magnitude of BMP implementation. Without these	Include quantifiable goals for BMP # 3-3 that the City will use to measure the scope and magnitude of BMP implementation. For

Item Number	SWMP Section	Subject	Issue	Required Revisions
			kinds of measurable goals, the City will not know whether the BMP is as effective as planned.	example, identify the percentage of total open drainage facility distance the City will inspect annually during "facility walks."
10	Illicit Discharge Detection and Elimination	Illicit Discharge Elimination	The SWMP does not clearly state that all detected illicit discharges from all sources will be eliminated.	Clearly state that all detected illicit discharges from all sources will be eliminated.
11	Illicit Discharge Detection and Elimination	Business Inspections	The City has removed the BMP for inspection of high risk businesses without providing justification for the removal.	Reinstate the BMP for City inspections of high risk businesses. Modify the BMP to clarify the inspections include assessment of potential illicit discharges and BMP implementation.
12	BMP # 4-2	Site Review and Inspection Procedures	The SWMP text states that "the City will examine existing site review and inspection procedures and revise them, as appropriate, to address storm water issues." However, this activity is not reflected in Table 4-1 or provided an implementation schedule.	Include a BMP in Table 4-1 for the City to examine existing site review and inspection procedures and revise them, as appropriate, to address storm water issues. Ensure the BMP addresses review and revision of the items cited in the text, including sediment and erosion control programs, existing agency permit requirements, and development of additional controls into planning documentation and policies, such as the CEQA initial study checklist and General Plan. Include an implementation schedule for the BMP.
13	BMP # 4-2	Enforcement	The SWMP states that when a violation is outstanding, additional permits or sign-offs on the project <i>should</i> not occur. This language does not ensure proper enforcement of construction BMP requirements.	Revise the language to change the word <i>should</i> to <i>will</i> .
14	Construction Site Runoff	Inspection Checklist	The SWMP does not discuss development of a construction site	Include a BMP to develop and use a construction site inspection checklist.

Item Number	SWMP Section	Subject	Issue	Required Revisions
	Control		inspection checklist to be used by inspectors. An inspection checklist is an important tool to ensure that all required BMPs are implemented.	
15	Construction Site Runoff Control	Training and Education	The SWMP does not clearly address training of municipal staff regarding construction stormwater issues. The City must train municipal plan review and inspection staff on construction issues and requirements.	Clearly indicate the City will train municipal plan review and inspection staff on construction issues and requirements.
16	BMP # 5-1	Measurable Goal	The SWMP does not include a measurable goal for implementation of new requirements for new development and redevelopment.	Include a measurable goal for implementation of new requirements for new development and redevelopment, such as application of the modified and updated design standards to 100% of new development and redevelopment projects.
17	BMP # 5-1	Interim Hydromodification Control Criteria	The SWMP states the City will adopt an ordinance with post-construction/LID requirements in Year 4. Interim hydromodification control criteria must be implemented and applied to new development and redevelopment projects starting one year after enrollment under the general permit.	Clarify that the City will implement and apply interim hydromodification control criteria to new development and redevelopment projects starting one year after enrollment under the general permit.
18	BMP # 5-1	Stormwater Filters	The SWMP focuses on stormwater filters as post-construction BMPs that the City will require to treat runoff from new development and redevelopment projects. However, depending upon their design, stormwater filters are frequently not the most effective stormwater BMPs for treating storm water. Instead, the City must develop a project review process that requires	Include a BMP for the City to develop a project review process that requires implementation of effective treatment BMPs for new development and redevelopment projects' pollutants of concern, and only allows for implementation of less effective treatment BMPs when implementation of the more effective treatment BMPs is infeasible.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			implementation of effective treatment BMPs for new development and redevelopment projects' pollutants of concern, and only allows for implementation of less effective treatment BMPs when implementation of the more effective treatment BMPs is infeasible.	
19	Post-Construction Runoff Control	Interim Hydromodification Control Criteria	The SWMP states that the City will develop interim hydromodification control criteria in Year 2. Interim hydromodification control criteria must be developed and implemented within one year of enrollment under the general permit.	Modify the interim hydromodification control criteria schedule so that the criteria is developed and implemented within one year of enrollment under the general permit.
20	Post-Construction Runoff Control	Interim Hydromodification Control Criteria	The SWMP does not include an adequate schedule describing the process the City will follow to develop the interim hydromodification control criteria. The SWMP also does not identify the goals and expected effectiveness of the alternative interim hydromodification control criteria.	Revise the SWMP to include a schedule for developing interim hydromodification control criteria, including a period of no less than three (3) weeks to allow for Water Board staff's review of the proposed criteria. The revised SWMP shall state that any interim hydromodification control criteria (numeric and non-numeric) proposed by the City will be submitted within one year of enrollment and should take into account the ability to maximize infiltration of clean storm water, minimize runoff volume and rate, serve as a useful quantifiable measure of healthy watersheds, and be consistent with the intended goals of the Water Board including, but not limited to, healthier and more sustainable watersheds by 2025. The revised SWMP shall state the proposed criteria will be as effective as the following:

Item Number	SWMP Section	Subject	Issue	Required Revisions
				<ul style="list-style-type: none"> • For new and re-development projects, Effective Impervious Area¹ shall be maintained at less than five percent (5%) of total project area. • For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent (1%) the pre-construction² runoff hydrographs, for a range of events with return periods from 1-year to 10-years. • For projects whose disturbed project area exceeds two acres, preserve the pre-construction drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream³ or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration. <p>The SWMP should also explain the following: The Water Board Executive Officer will notify the City and other interested persons of the acceptability of the City's proposed interim</p>

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

² Pre-construction condition is defined as undeveloped soil type and vegetation.

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

Item Number	SWMP Section	Subject	Issue	Required Revisions
				hydromodification control criteria for new and re-development. The Water Board shall provide interested persons the opportunity for comment and a hearing, if requested, before the Water Board if any party is aggrieved by the Water Board staff's determination, prior to Water Board action being final.
21	Post-Construction Runoff Control	Interim Hydromodification Control Criteria	Development and implementation of interim hydromodification control criteria is not identified as a specific BMP in the SWMP. Due to the importance of interim hydromodification control criteria in protecting beneficial uses, development and implementation of the criteria must be identified as a specific BMP within the SWMP.	Identify development and implementation of interim hydromodification control criteria as a specific BMP in the SWMP.
22	Post-Construction Runoff Control	Application of New Design Standards	The SWMP does not identify the stage in the project planning, design, and funding process the City will use as the cut-off point to determine which projects in the development review pipeline will be subject to new design requirements, such as interim hydromodification control criteria.	Identify the stage in the project planning, design, and funding process that the City will use as the cut-off point to determine which projects in the development review pipeline will be subject to new design requirements. For projects in the planning, design, and funding process at the time the new design requirements take effect, the cut-off point must be chosen in order to apply the new design requirements to as many projects as is feasible.
23	Post-Construction Runoff Control	Hydromodification Management Plan	The SWMP does not commit the City to having long-term hydromodification criteria in place and implemented by the end of Year 5.	Include a statement in the SWMP committing the City to having long-term hydromodification criteria in place and implemented by the end of Year 5.
24	Post-Construction	Hydromodification Management Plan	While the SWMP discusses development of interim	Include a BMP describing how and when the City will develop long-term hydromodification

Item Number	SWMP Section	Subject	Issue	Required Revisions
	Runoff Control		hydromodification control criteria, it does not clearly describe the process the City will follow to develop long-term hydromodification criteria as part of a Hydromodification Management Plan.	<p>criteria and control measures as part of a Hydromodification Management Plan that will be based on a technical assessment of the impacts of development on the City's watersheds. An adequate technical assessment will address the following:</p> <ul style="list-style-type: none"> • Hydrograph modification (flow volume, duration, and rate); • A wide range of flow events and continuous flow modeling; • Effects of imperviousness; • Evaluation of downstream affects (stream stability); • Buffer zone requirements; and • Water quality impacts. <p>The assessment should result in:</p> <ul style="list-style-type: none"> • Numeric criteria for runoff rate, duration, and volume control for development and redevelopment projects; • Numeric criteria for stream stability impacts for development and redevelopment projects; • Identification of areas within the City where these criteria must be met; • Specific performance and monitoring criteria for installed hydromodification control infrastructure; • Riparian buffer zone requirements; and • Appropriate hydromodification control measures such as LID concepts, on-site hydrologic and water quality

Item Number	SWMP Section	Subject	Issue	Required Revisions
				<p>controls, and in-stream controls.</p> <p>Identify the key steps in the process that will be used to develop the Hydromodification Management Plan. Examples of steps that should be considered include:</p> <ul style="list-style-type: none"> • Development of problem statement and objectives; • Review of literature and data availability; • Characterization of watershed and future development patterns; • Determination of assessment methodology; • Development of criteria and guidance; and • Development of an implementation strategy.
25	Post-Construction Runoff Control	Long-Term Watershed Protection	The SWMP does not include a specific BMP to collectively enact long-term watershed protection.	<p>Include a BMP stating how and when the City will:</p> <ul style="list-style-type: none"> • Develop quantifiable measures that indicate how the City's watershed protection efforts achieve desired watershed conditions; • Evaluate existing watershed protection planning efforts, including: land use policies, plans, ordinances, guidance manuals, development project review procedures, and BMPs; and • Adapt or change the existing efforts if warranted.
26	Post-Construction	Attachment 4 Requirements	The SWMP does not confirm that the City will update its requirements for new	Include a BMP to review and revise the City's requirements for new development and

Item Number	SWMP Section	Subject	Issue	Required Revisions
	Runoff Control		development and redevelopment to be in compliance with Attachment 4 of the general permit.	redevelopment to be in compliance with Attachment 4 of the general permit.
27	BMP # 5-2	Measurable Goals	The measurable goals for this BMP do not identify the scope or magnitude of BMP implementation. Without these kinds of measurable goals, the City will not know whether the BMP is as effective as planned.	Include quantifiable goals for BMP # 5-2 that the City will use to measure the scope and magnitude of BMP implementation, such as identifying the percentage of projects the City will inspect for compliance with BMP design requirements and the frequency that post-construction BMPs will be inspected for maintenance.
28	Post-Construction Runoff Control	Application of Post-Construction Requirements	The SWMP states that post-construction requirements will be applied to development projects that disturb more than one acre. However, the City must also apply post-construction requirements to the new development and redevelopment project categories listed in Attachment 4. In addition, the Water Board's February 15, 2008 letter states our expectation that interim hydromodification control criteria apply to all projects requiring discretionary approvals.	Confirm that the City will apply post-construction requirements to the new development and redevelopment project categories listed in Attachment 4. Also confirm that the City will apply interim hydromodification control criteria to all projects requiring discretionary approvals.
29	Total Maximum Daily Loads	Program Goals	The SWMP states that a "goal of the SWMP is not to target BMPs to specific TMDLs or geographic areas, but to implement the BMPs throughout the management area in order to reduce controllable sources of sediment and FIB associated with the storm drain system to the maximum extent practicable." However, the SWMP must also acknowledge another goal,	Include in the SWMP the goal of achieving wasteload allocations in watersheds where TMDLs have been adopted.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			<p>which is to achieve wasteload allocations in watersheds where TMDLs have been adopted. The City may need to implement targeted BMPs to achieve this goal.</p>	
30	Total Maximum Daily Loads	Wasteload Allocation Attainment Plans	<p>The SWMP does not address the City's development and implementation of Wasteload Allocation Attainment Plans addressing the Carbonera Creek Sediment TMDL and Carbonera/Camp Evers Creek Pathogens TMDL. Due to the significant challenge of meeting these TMDLs' wasteload allocations, the City must use a comprehensive planning approach for addressing the TMDLs, as represented by Wasteload Allocation Attainment Plans. Wasteload Allocation Attainment Plans may be waterbody or pollutant specific.</p>	<p>Include a BMP committing the City to develop, submit, and implement Wasteload Allocation Attainment Plans addressing the Carbonera Creek Sediment TMDL and Carbonera/Camp Evers Creek Pathogens TMDL. Identify the specific items that the Wasteload Allocation Attainment Plans will address, including:</p> <ul style="list-style-type: none"> • An implementation and assessment strategy; • Source identification and prioritization; • BMP identification, prioritization, implementation (including schedule), analysis, and assessment; • Monitoring program development and implementation (including schedule); • Reporting and evaluation of progress towards achieving wasteload allocations; • Coordination with stakeholders; and • Other pertinent factors.
31	Existing Storm Water Management Practices	Inspections	<p>The SWMP discusses municipal inspections, but does not identify the activity as a specific BMP. Identification of municipal inspections as a specific BMP in the SWMP will better ensure implementation and assessment of the</p>	<p>Include municipal inspections as a specific BMP in the SWMP. Identify measurable goals for the BMP and commit to tracking and assessing the effectiveness of the activity.</p>

Item Number	SWMP Section	Subject	Issue	Required Revisions
			activity's effectiveness.	
32	Existing Storm Water Management Practices	Municipal BMPs	The SWMP identifies a number of BMPs that are implemented at municipal facilities and during municipal operations. However, some municipal facilities or operations, such as parks, park maintenance, vehicle cleaning, landscaping, bridge maintenance, etc. are not addressed by these BMPs.	Include a BMP to review and update the BMPs implemented for municipal facilities and operations to ensure they address all municipal facilities and operations that have the potential to generate significant levels of pollutants. We recommend using the California Stormwater Quality Association's <i>Municipal Stormwater Best Management Practice Handbook</i> to identify appropriate BMPs for all municipal facilities and operations.
33	Municipal Operations	Grounds Maintenance	The SWMP does not discuss pollution prevention and other BMPs to be used during landscaping, lawn care, and other grounds maintenance. Pollution prevention and other BMPs, such as integrated pest management and postponement of pesticide/herbicide application prior to predicted rain, must be included in the SWMP.	Identify pollution prevention and other BMPs the City will use during landscaping, lawn care, and other grounds maintenance. Include integrated pest management and postponement of pesticide/herbicide application prior to predicted rain as BMPs.
34	Municipal Operations	Spill Response	The SWMP does not include BMPs to address large scale spill response.	Include a description of the BMPs that will be implemented for large scale spill response.
35	BMP # 6-4	Measurable Goal	The SWMP states that the City will provide in-house training to municipal employees annually, but does not identify the percentage of Engineering, Planning, Building, Streets, and Wastewater employees that the City will train each year. In addition, BMP # 6-4 in Table 6-1 does not state that training will occur annually.	Update BMP # 6-4 to identify the percentage of Engineering, Planning, Building, Streets, and Wastewater employees that the City will train, and confirm that the City will conduct training annually.

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36	Program Effectiveness Assessment	Implementation Schedule	The text of the SWMP states that the City will use Level 1 outcomes to assess program effectiveness in Years 1 and 2. However, Table 7-1 states that an assessment strategy using Level 1 outcomes will not be developed until Year 2. Table 7-1 must be modified to exhibit that the City will develop and implement the assessment strategy for using Level 1 outcomes starting in Year 1.	Modify Table 7-1 to exhibit that the City will develop and implement the assessment strategy for using Level 1 outcomes starting in Year 1.
37	Program Effectiveness Assessment	Implementation Schedule	The SWMP states that an effectiveness assessment strategy will be developed in Year 4, but does not commit the City to continuing assessment of Level 1 outcomes during Years 3 and 4. At a minimum, the City must continue to assess Level 1 outcomes in Years 3 and 4 while an effectiveness assessment strategy is developed.	Include a statement that the City will continue to assess Level 1 outcomes during Years 3 and 4.
38	Program Effectiveness Assessment	Extent of Implementation	The SWMP includes a commitment by the City to use Level 1 outcomes, but does not identify the extent to which the City will use Level 1 outcomes for assessment.	Include a statement that the City will use Level 1 outcomes to assess the effectiveness of all applicable BMPs.
39	Program Effectiveness Assessment	Consistency with Guidance Manual	The SWMP includes a commitment by the City to use the California Stormwater Quality Association's <i>Municipal Stormwater Program Effectiveness Assessment Guidance</i> as the basis for its effectiveness assessment strategy, but the City does not discuss integrated assessments, which are a critical component of the	Include a statement that the effectiveness assessment strategy will seek to identify links between BMP/program implementation and improvement in water quality and beneficial use conditions.

Item Number	SWMP Section	Subject	Issue	Required Revisions
			guidance. Integrated assessment, or the establishment of links between BMP/program implementation and improvement in water quality and beneficial use conditions, is necessary in order to have confidence the activities being implemented are having a positive effect on water quality and beneficial uses.	
40	Program Effectiveness Assessment	Implementation Schedule	The SWMP discusses development of an assessment strategy in Year 4, but does not identify when the City will begin implementation of the strategy. Implementation of the strategy must occur immediately after development of the strategy, in Year 5.	Confirm that the City will begin implementation of the assessment strategy in Year 5.