



City of El Paso De Robles

Storm Water Management Program



June 2, 2010
Contact:
Patti Gwathmey
805-227-1654
City of Paso Robles
Public Works Department

Table of Contents

1.0 Introduction	1
1.1 Regulatory Background	1
2.0 City of Paso Robles Overview	4
2.1 Land Use	5
2.2 Upper Salinas River Watershed.....	7
2.3 Soils.....	10
2.4 Storm Water Drainage.....	10
3.0 Pollutants of Concern	11
4.0 SWMP Development	12
4.1 Lessons Learned	12
4.2 Prioritization of Minimum Control Measures and BMP Selection.....	16
5.0 Record Keeping and Reporting	17
5.1 Record Keeping.....	17
5.2 Reporting	17
5.3 Effectiveness Assessment.....	17
6.0 Implementation of the Storm Water Program	19
6.1 Public Education	20
6.2 Public Participation	26
6.3 Illicit Discharge Detection/Elimination	30
6.4 Section Construction Site Storm Water Runoff Control	35
6.5 Post-Construction Storm Water Management	39
6.5 Pollution Prevention and Good Housekeeping for Municipal Operations.....	44
7.0 Certification	47

Tables

Table 1: Population	4
Table 2: Pollutants of Concern	11
Table 3 – Public Education and Outreach BMPs	21
Table 4 – Public Involvement/Participation BMPs	27
Table 5 – Illicit Discharge Detection and Elimination BMPs	31
Table 6 – Construction Site Storm Water Runoff Control BMPs	36
Table 7 – Post-Construction Storm Water Management BMPs	40
Table 8 – Pollution Prevention/Good Housekeeping for Municipal Operations BMPs...	45

Figures

Figure 1: Paso Robles Land Use Designations.....	6
Figure 2: Salinas Watershed	7
Figure 3: Aerial of the City of Paso Robles.....	8
Figure 4: Waterways and Urbanized Areas.....	9
Figure 5: Outcome Levels	18

1.0 Introduction

This document serves as the City of El Paso de Robles' (City) National Pollutant Discharge Elimination System (NPDES) Phase II Storm Water Management Program (SWMP). The SWMP describes the City's program to comply with the State's General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems CAS000004 (General Permit).

The City received coverage under the General Permit on January 6, 2005 and has completed the first five year permit term. Although the State Water Resource Control Board has not completed the new General Permit, the City feels that the previously approved Storm Water Management Program (SWMP) is inconsistent with other approved SWMPs in the Region. Therefore, the City has chosen to submit a new SWMP as opposed to implementing the previously approved SWMP until the New General Permit is adopted.

The SWMP is a guidance document to be used by the City's regulatory body, contractors and developers, and the general public. It is an evolving program that will be monitored and revised as necessary in order to address changes in the compliance programs or in the Permit requirements.

The City's SWMP defines strategies and guidelines for the protection of water quality, and reduction of pollutant discharges to the Maximum Extent Practicable (MEP) from all areas and all City maintained facilities. The Central Coast Regional Water Quality Control Board (RWQCB) has created a "Vision of Healthy Watersheds" to focus its implementation of state and federal water quality laws to best protect and enhance our watersheds. This vision is currently being realized with the Regional Joint Effort for the Development of Hydromodification Control Criteria and the requirement for all Small Municipal Separate Storm Sewer Systems (MS4s) in its jurisdiction to implement Best Management Practices (BMPs) for long-term watershed protection.

1.1 Regulatory Background

In 1972, the federal Water Pollution Control Act, which established the NPDES program, was adopted. The NPDES program regulates the discharge of wastes from point sources to surface waters. The Federal Water Pollution Control Act was amended in 1977 and became known as the Clean Water Act (CWA). In 1987 the CWA was again amended to add section 402, which established a framework for regulating discharges from MS4s as a special Category of point source under the NPDES Program. In 1990, the United States Environmental Protection Agency (EPA) promulgated regulations for permitting MS4s serving a population of 100,000 people or more. These regulations, known as the Phase I regulations, require operators of medium and large MS4s to obtain storm water permits.

The EPA adopted the NPDES Phase II Storm Water regulations which expanded the NPDES program to cover smaller MS4s, in 1999. The State of California adopted the EPA's NPDES Phase II Final Rule and the State Water Resource Control Board (SWRCB) and the General Permit No. CAS000004 on April 30, 2003.

The current General Permit requires BMPs, measurable goals and effectiveness measures and timetables be developed for six Minimum Control Measures (MCMs) to be included into the SWMP. The MCMs are:

- Public Education
- Public Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post Construction Storm Water Management
- Pollution Prevention/Good Housekeeping for Municipal Operations

The SWMP must include BMPs that reduce pollutants in a storm water runoff to the technology-based standard of MEP to protect water quality. MEP is the technology-based standard established by Congress in the CWA section 402(p)(3)(B)(iii) that municipal dischargers of storm water must meet. These standards establish the level of pollutant reductions that dischargers must achieve. MEP is generally a result of emphasizing pollution prevention and source control BMPs as the first lines of defense in combination with structural and treatment methods where appropriate serving as additional lines of defense. The MEP approach is an ever evolving, flexible, and advancing concept, which considers technical and economic feasibility. In choosing BMPs, the major focus is on technical feasibility however, cost, effectiveness, and public acceptance are also relevant.

Storm water programs are developed based on local conditions. A community with a greater impact on water quality must put forth a greater level of effort. Therefore, the BMPs included in the City's SWMP will be based on the prioritization of the pollutants of concern based on their known or potential impact on storm water runoff. A greater amount of effort and resources will be given to those BMPs that will have the greatest potential of protecting water quality and achieving long-term watershed goals.

On February 15, 2008, the RWQCB notified MS4s that BMPs must be adopted for the development of hydromodification criteria to protect beneficial uses and promote the desired conditions of healthy watersheds to meet the MEP standard. This includes:

- I. Maximize infiltration of clean storm water and minimize runoff volume and rate
- II. Protect riparian areas, wetlands, and other buffer zones
- III. Minimize pollutant loading
- IV. Provide long-term watershed protection

These requirements are in addition to the requirements in the General Permit.

On October 20, 2009, the RWQCB notified MS4s in the Central Coast region of the opportunity to participate in a Joint Effort to cooperatively develop hydromodification control criteria with other MS4s. The Joint Effort provides an alternative to the requirements for developing interim and long-term hydromodification criteria independently as outlined in the February 15, 2008 letter from the RWQCB. The Joint Effort is a two phase approach that is expected to span a period of two years. Phase I goals are to:

- Develop a methodology for the development of numeric hydromodification control criteria for new and redevelopment.
- Implement the initial steps of the methodology with the Central Coast Region, which will provide the foundation for watershed characterization and pre-process analysis that will be necessary to develop meaningful and effective hydromodification criteria.

In Phase II of the Joint Effort the City will apply the methodology to determine its landscape-specific hydromodification control criteria based on compilation of data and information to implement the methodology. This will result in the development of criteria that can be used in site planning, design, and development process.

Participation in the Joint Effort has allowed the Water Board staff to replace the February 15, 2008 requirements for developing interim and long-term hydromodification control criteria with new requirements for municipalities participating in the Joint Effort.

On November 20, 2009, the City chose to participate in the Joint Effort and amended the Post-Construction MCM to include the BMPs and Measurable Goals required for all Joint Effort participants for Phase I of the Joint Effort.

2.0 City of Paso Robles Overview

The City is located in the foothills of the California Central Coast, just east of the Santa Lucia Mountain Range in northern San Luis Obispo County at a mean elevation of 720 feet above sea level. The City encompasses 19.9 square miles or 12,739 acres. This portion of Central California has hot, dry summers and low rainfall. The average annual rainfall over the past 10 years is 13.8 inches.

The City has been has seen sustained growth over the past twenty years. The current population is 30,072 residents. Under the General Plan which was updated in 2003, the “population planning threshold” is 44,000 through 2025. Infill development in currently developed areas of the City is expected to accommodate the majority of this growth. While new growth areas, created by the past expansion of the City’s boundaries, totaling a little over 500 acres are also expected to accommodate a portion of this growth.

Table 1: Population

Year	Population	Percent Increase
1990	19,201	
2000	24,297	26.54%
2010	30,072	23.76%

Due to a growth rate over 25% between 1990 and 2000, the City falls under the Attachment 4 of the General Permit. Attachment 4 establishes receiving water limitations and requires design standards for discretionary development and redevelopment projects that fall into one of the following categories:

- Single-family hillside residences (natural land slopes in excess of 10 percent) *
- Commercial developments with at least 10,000 square feet of impervious surfaces. *
- Automotive repair shops
- Restaurants
- Residential development of 5 or more units. *
- Parking lots 5,000 or more square feet of impervious area. *

*The City’s Zoning Codes are stricter than the above General Permit requirements. Therefore, the City has modified the requirements to be consistent with existing codes .

2.1 Land Use

The land within the City is divided up into different land use categories that include residential, commercial, office, business park, industrial, public facilities, agriculture, and open space.

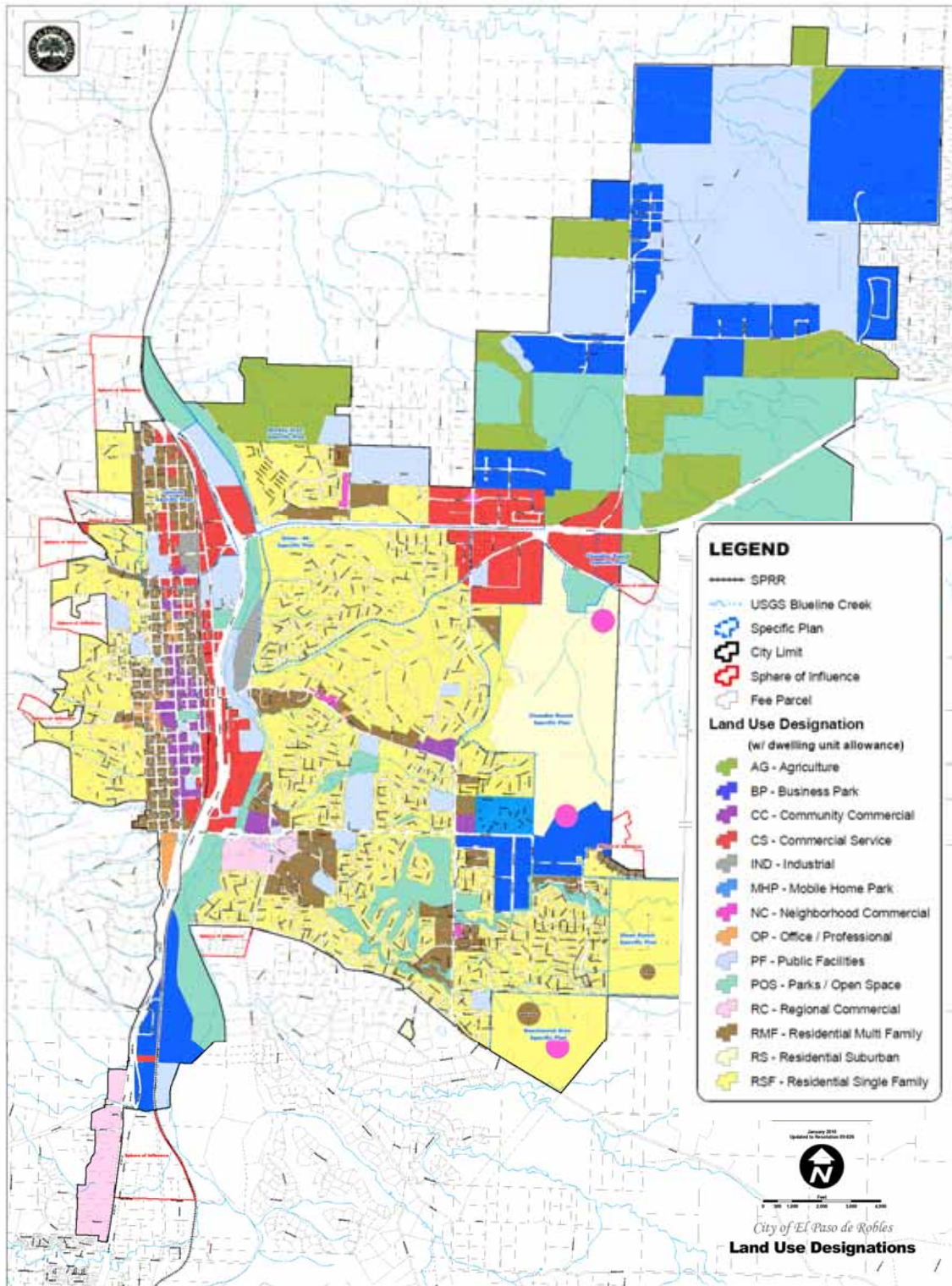
Residential is the single largest land use category in the City, at 41 percent. There are various types and densities of residentially designated land. The most prominent is single family residential, of which the majority is located on the east side of the City. The residential designated properties located on the west side of the City include mainly multi-family duplex and triplex areas, with single family areas in the hills to the west. There are two large specific plan areas (Chandler Ranch and Olsen Beechwood) located along the eastern, south-east city boundaries. These specific plan areas will include residential land use designations (both single family and multi-family) with neighborhood commercial areas and open space and parks.

Agricultural and open space makes up the second highest percentage of acreage at 20 percent. Uses within the City include vineyards/wineries, golf courses, hotel/resorts and other crop farming.

The majority of business park/industrial uses are located around the Paso Robles Municipal Airport, in the Commerce Way Industrial area (southeast area of the City), and at the northern end of Golden Hill Road, north of Highway 46 East. The City has a wide variety of industry including electronics industries, wine processing, manufacturing, machine shops, and forges.

Commercial/professional office uses are spread throughout the City. Commercial uses include the small retail shops within the City's downtown core, and shopping centers with box stores, food service facilities, car dealers, and small retail shops and services located in the eastern side of the City, and to the South.

Figure 1: Paso Robles Land Use Designations



2.2 Upper Salinas River Watershed

Paso Robles is located in the Upper Salinas River watershed. The Salinas River originates in the La Panza Mountains and flows in a northwest direction approximately 180 miles into Monterey County through the Salinas Valley and empties into Monterey Bay. The Upper Salinas Watershed encompasses approximately 2,080 square miles from the confluence of the Nacimiento River to the Santa Margarita Reservoir. Surface flow is seasonal and is dictated by localized rainfall and the Santa Margarita Lake and dam. The width of the River channel within the Paso Robles city limits varies from 300 to 350 feet and drops about 9 feet per mile within the Paso Robles city limits.

Although, flows in the Salinas River are intermittent, during normal rainfall years, the River may have a live stream from November through April. However, the water level in the River can rise quickly and flow from bank to bank for short periods of time due to the substantial amount of runoff from the creeks that originate in the Santa Lucia Mountain Range such as Atascadero Creek, Graves Creek, Paso Robles Creek and Toad Creek, south of Paso Robles and the numerous un-named creeks within the City Limits.

The river rarely contains surface flow from June through October. A report by the California State Lands Commission, described the Salinas River as one of the largest submerged rivers in the United States because of its significant subsurface flow.

Figure 2: Salinas Watershed



The Huerhuero Creek is a sub-watershed within the Salinas watershed. This creek runs through an unpopulated area of the City limits used mainly for agricultural purposes. This Creek is also intermittent and rarely has surface flows lasting longer than a couple of weeks a year. The confluence of the Huerhuero Creek and the Salinas River is north of the City limits.

The City of Paso Robles is known for its naturally occurring geothermal mineral springs. There are several resorts within the City that use this water and several other springs scattered throughout the City that are capped or run to the Salinas River. The 2003 earthquake brought several of these springs to the surface including the sulfur spring in the City Hall parking lot. This spring has a flow rate of 122 gallons per minute and will be piped to a leach field in the Salinas River in the spring of 2010.

Figure 3: Aerial of the City of Paso Robles

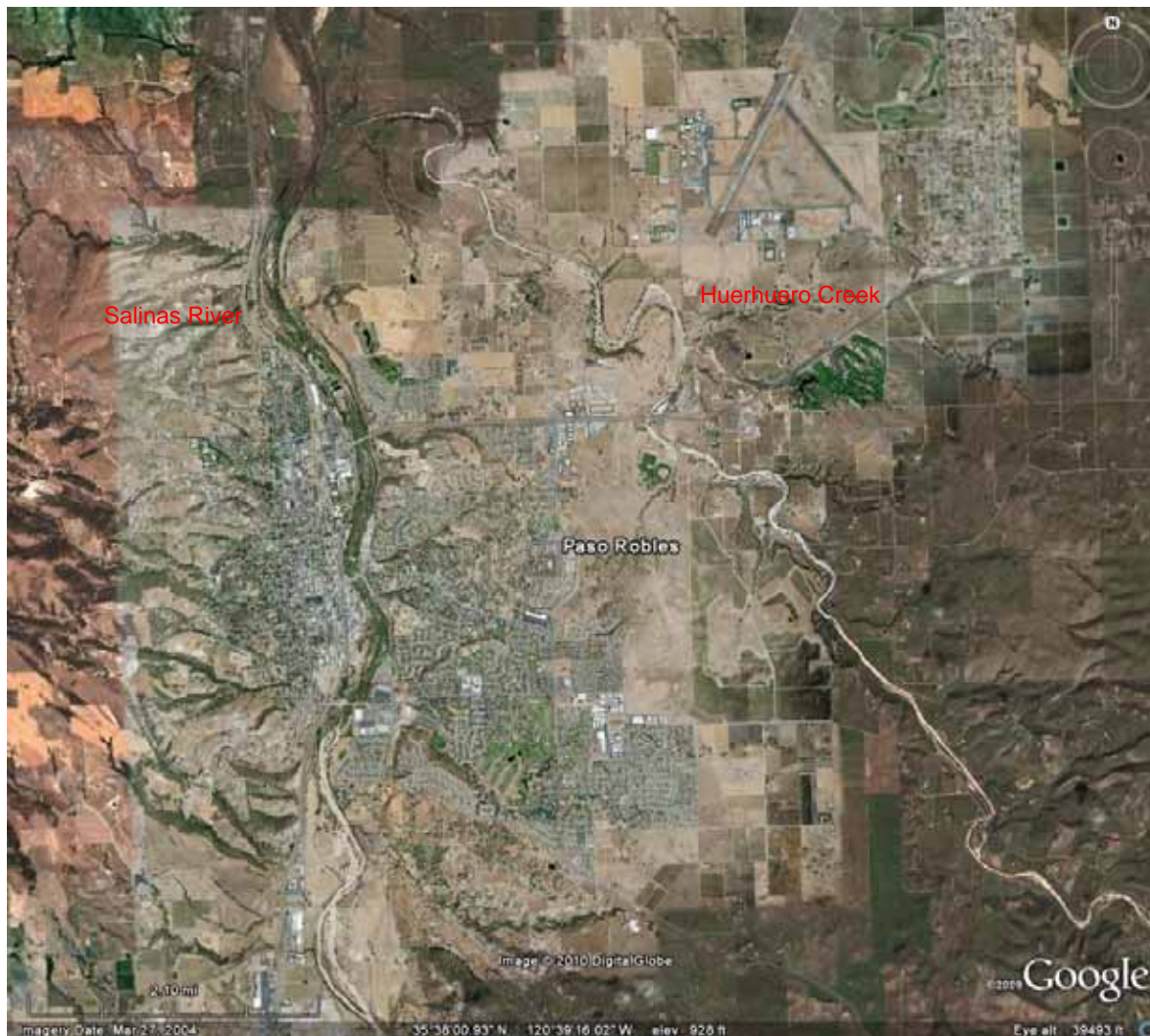
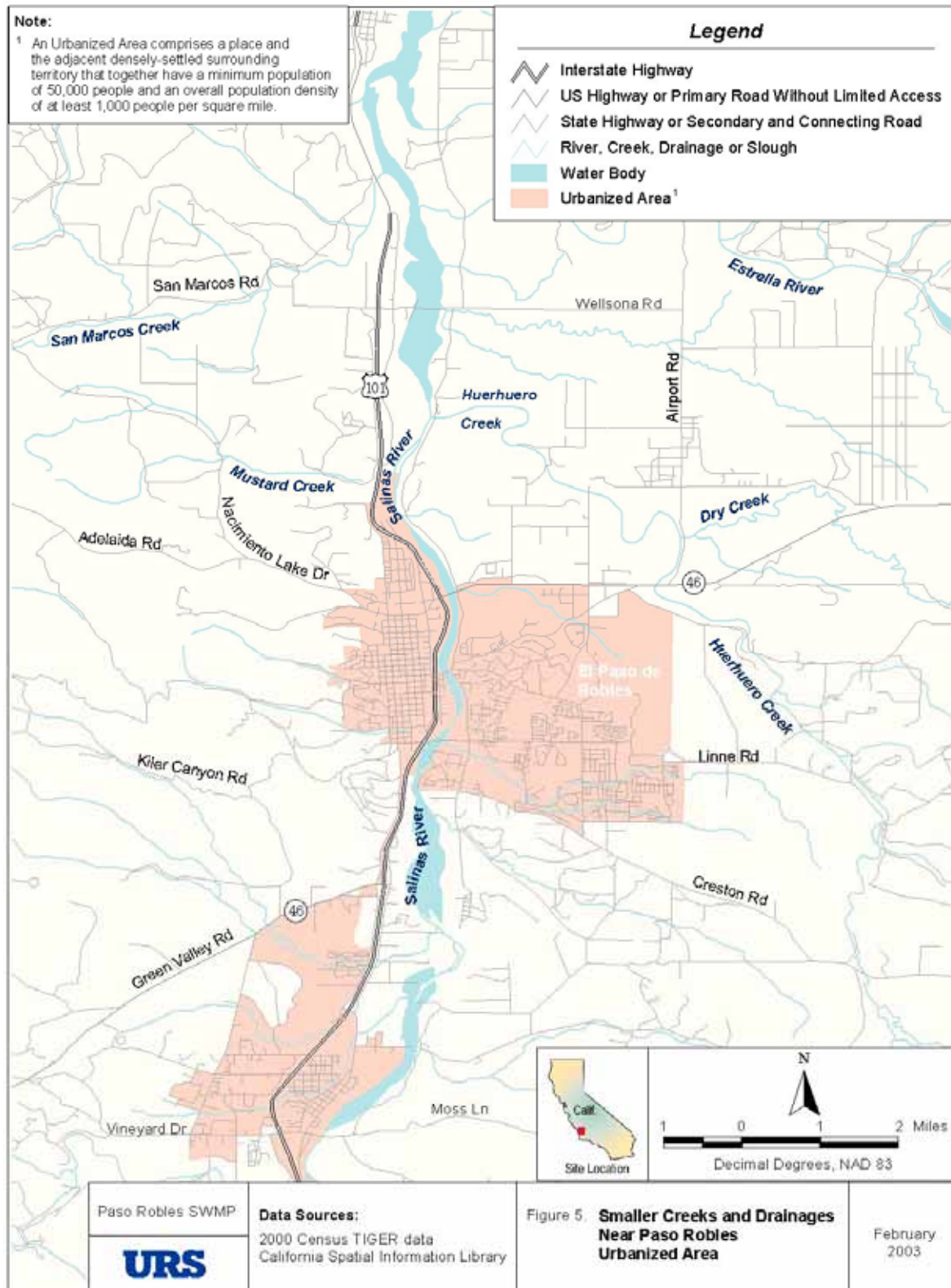


Figure 4: Waterways and Urbanized Areas



2.3 Soils

The City has a variety of soil types. The soils in the area are primarily bedrock derived soils and include calcareous shales, sandstone or mudstone. Due to geologic uplift, calcareous shale is plentiful in the west-side hills of Paso Robles. Shale mines are scattered through out the Santa Lucia Mountain Range. The soils west of the Salinas River are well to moderately–drained soils with a layer of sandy loam to shaley loam, while east of the Salinas River has more clay loam. The soils in the eastern portion of the City are considered to be moderate-to-poorly drained.

2.4 Storm Water Drainage

Much of the Paso Robles downtown area was subdivided in 1886. As customary in those times, the town was subdivided without regards to the natural waterways and buildings and roads were built within waterways. Historic maps show that creeks that once flowed to the Salinas River have been built over. Underground storm drains were not installed to convey the water from the creeks flowing out of the Santa Lucia Mountain Range. Storm water flows on the surface through the streets and ditches in most of the original subdivided part of the west side of town until it is conveyed under Highway 101 in California Department of Transportation (Caltrans) culverts to the Salinas River. Although, this planning practice has created flooding issues for the City, it also gives the City an opportunity to implement Low Impact Development designs to relieve flooding while infiltrating runoff and recharging the groundwater.

In the early 1950's the City began to annex land east of the Salinas River. Underground storm drain systems were installed with the conventional belief that storm water is a flooding liability and should be removed as quickly as possible. Storm water is conveyed through a series of underground storm drains, creeks and channels to the Salinas River. The majority of the city's hydromodification problems are on the east side of the City downstream of these neighborhoods.

3.0 Pollutants of Concern

The Upper Salinas River is listed as an impacted water body on the Clean Water Act 303(d) list for being impaired for Chloride and Sodium. The potential sources listed for these impairments are agriculture, grazing and urban runoff. A Total Maximum Daily Load (TMDL) addressing these pollutants is proposed to be completed in 2019. The City has completed a study that the natural occurring mineral springs and the discharge from the City's wastewater treatment plant are major sources of chloride and sodium within the City limits. The City is required to develop a salts management plan under the Wastewater NPDES Permit. Sodium and chloride are not elevated in the City's storm water runoff. Therefore, chloride and sodium are not included in the pollutants of concern to be addressed by the storm water program.

Other pollutants of concern that are commonly found in urban runoff and are addressed in the BMPs under the public education, construction, post-construction and pollution prevention/good housekeeping this SWMP are listed below in Table 2.

Table 2: Pollutants of Concern

Pollutants of Concern	Land Use	Examples of Sources
Sediment	Residential Construction	Unprotected Landscaping. Grading, trackout,
Trash	Residential Commercial Construction	Uncovered trash receptacles Uncovered trash receptacles Construction debris
Oil and Grease	Residential Commercial Industrial	Leaking autos, waste oil Auto repair, cleaning outdoor surfaces, food service establishments. Manufacturing
Pesticides and Herbicides	Municipal Residential Municipal	Fleet maintenance, Yard care products Parks and median strips
Hydrocarbons	Commercial Municipal	Gas stations, auto shops Roads, equipment storage
Surfactants	Residential Commercial Industrial	Car washing Cleaning outdoor surfaces. Manufacturing

4.0 SWMP Development

Over the past few years of implementing the City's storm water program it has become clear that certain BMPs are effective, others are totally ineffective, while others are very hard to determine if they are effective or not. Additionally, the RWQCB has required MS4s to include BMPs in the SWMPs that were effective in other areas. After implementing the SWMP for five years, the City does not feel that it is effective to include BMPs based on their effectiveness in another community. This SWMP has been developed based on the lessons learned over the first five years of implementing the storm water program.

4.1 Lessons Learned

During the first 5 year term the City accomplished many of the requirements of the General Permit. The City developed and distributed public education materials directed at mobile cleaners/services, food facilities, businesses, pet waste, and storm water pollution information, established a storm water web page, provided training to municipal workers, implemented classroom presentations, began participating in the County-wide Creek Clean-up Day, issued Notice of Violations (NOVs) for illicit discharges, conducted storm water inspections at food service establishments and construction sites the last two years of the permit, located outfalls in the Salinas River, wrote a storm water ordinance and organized a Hydromodification Technical Advisory Committee. The following is a summary of the BMPs or MCMs that were effective or not effective:

Public Education

Public Education materials are most effective when handed out in response to specific situations such as illicit discharges from mobile cleaners, inspections of food facilities, or businesses cleaning outdoor surfaces. The recipient is much more likely to review the information. Distributing educational materials at public events and by mail is difficult, if not impossible to determine the effectiveness. The City can document how many items were distributed however it is not possible to determine if the information was read and if the reader changed any behaviors because of the material.

The effectiveness of attending public events is also hard to determine. Public events with environmental themes such as Earth Day are usually attended by community members that are concerned about the environment and already have behaviors that are protective of the environment and water quality. Therefore, it is really "preaching to the choir". However, attending public events with other themes are difficult to get the patrons to stop and visit a display on storm water pollution prevention.

The City feels that the most effective BMP for changing behaviors towards preventing storm water pollution is educating school age children. Children are not set in their

ways and can easily change behaviors and many of them share this information with their families and can change behaviors or family members. City staff have attended some of these classroom presentations and observed that the children do retain the information from the various environmental classroom presentations that they have seen in the past. In Paso Robles, teachers are offered free presentations on storm water, water conservation, wastewater, and the Integrated Waste Management Classes on recycling, composting, and household hazardous waste.

Other programs such as Our Water Our World, offers education materials to a large audience by placing free materials in retail stores. Store employees working in the garden department receive training about the program so that they are able to discuss less toxic alternatives with customers. Not only does this program reach a variety of audiences, it also serves a very large geographical area since customers in these stores come from areas in and out of the City and County. Additionally, with the “green movement” being advertised in all media, customers are more willing to consider less toxic products.

Assessing the effectiveness of the public education BMPs is not easily done on an annual basis. While the number of materials handed out and hits on the storm water web page can be counted, it is not possible to determine if behaviors have changed.

The City believes that many of the public education BMPs have long-term results and are very difficult to determine changes in behaviors on an annual basis.

Public Participation

The goal of getting the public to participate in the storm water program sounds easier than it actually is. Simply sending out announcements or advertising a workshop to participate or give feedback to a storm water program usually attracts one or two participants and they are frequently those that are vehemently opposed to the program’s required authorities. Public hearings for annuals reports often suffer the same result and no written comments are received. The public is more likely to get involved in a municipal program if it will directly affect their personal life or cost them money.

The City has two volunteer programs, Adopt-A-Street and the Annual Creek Clean-up Day. Many of the volunteers in the Adopt-A-Street Program are willing to pick up trash, but do not want to be bothered by the City with surveys about storm water pollution or notify the City when they have picked up the trash so that the bags can be counted and weighed. Staff have contacted participants by phone and in writing to explain the purpose of surveys and reporting the amount of trash. Unfortunately, most of the volunteers still do not notify the City that they have picked up trash or take part in surveys. Storm water staff then decided to hand out the surveys when a volunteer signed up. This was done with the last three volunteers that signed up and not one survey was returned. The most successful volunteer day is the annual County-wide

Creek Day due to the mass advertising campaign done with the help of the Non-Government Organizations (NGOs). This type of advertising is not cost effective for a single municipality to do. Creek Day is attended by many Scouting clubs and therefore can change behaviors in the kids. Both of these activities remove a large amount of trash from the streets and the Salinas River and therefore directly improve water quality.

In San Luis Obispo County, the MS4s work together in both the Central Coast Partners for Water Quality and the County-wide San Luis Obispo Hydromodification TAC. Both of these groups include stakeholders such as the Resource Conservation Districts, Home Builders Association, Salmon Enhancement, and the Coast Keeper. These meetings serve as a way to keep the NGOs informed and involved in our programs and have been very successful. The NGOs were asked if they would comment on Annual Reports or SWMP prepared by the MS4s. They responded that since they attend the meetings, they are aware what the MS4s are doing and do not need to review or comment on the reports and programs.

Illicit Discharge

The most successful BMP in this MCM has been issuing Notice of Violations for illicit discharges. Unfortunately, there are business owners and residents in the City that will not change practices that pollute storm water unless they receive a written notice. While there are some recalcitrant violations, many of recipients of NOV's do change their practices after receiving a NOV.

Unsuccessful BMPs include the formation of an on-line complaint form and a storm water information phone line for reporting illicit discharges. These two reporting methods have not been utilized by the public even though they are advertised on the public educational materials. The public prefers to call complaints into the Public Works Departments main phone line. Although neither of these methods is used by the public, they will be kept.

Construction

The City began conducting construction site inspections at all sites regardless of size to ensure that BMPs are in place to prevent erosion and ensure compliance with the Storm Water Pollution Prevention Plan on sites. Inspections showed that many of the smaller construction sites had violations such as tracking mud off the site. As a result the City developed source control BMPs for construction sites that are in the City's Engineering Standards and are referenced in the storm water ordinance. The changes to the Engineering Standards and the Ordinance will be adopted by City Council early summer 2010. These BMPs will be applicable to all private and public sites. The City will continue to inspect all construction sites and will enforce the requirements for source control. The City feels that requiring source control inspections for all private and public construction sites will result in the reduction of storm water pollution and non-storm water discharges from construction sites.

The City feels that the construction MCM is a top priority along with post construction due to the fact that the City has more growth than other areas in the County and that storm water pollution from construction sites have a greater potential to impact water quality.

Post Construction

The Post Construction MCM has been a priority for the City since October 2009. The City organized the County-wide Hydromodification Technical Advisory Committee and has been actively involved as the secretary and organizing the monthly meetings. The fact that all of the MS4s in the Central Coast RWQCB's region have mostly the same BMPs makes this MCM very effective. The MS4s are able to work together to implement many of the BMPs which will create consistency throughout the area.

The City will be adopting a storm water ordinance in summer 2010. The ordinance will include Attachment 4 requirements and the authority to require annual certifications of structural BMPs.

As previously stated this MCM has the potential, along with the Construction MCM to have the greatest potential to improve water quality for the long-term in Paso Robles due to the proposed growth rate.

Good Housekeeping/Municipal Operations

Staff is conscientious about storm water discharges as evident by the number of questions received about the correct manner to handle discharges from special events and municipal operations. The City feels that reminding staff of storm water issues on a frequent basis is more beneficial than receiving annual training.

Reporting

The City is required to annually report on the effectiveness of each BMP implemented during the previous year as far as its ability to directly affect water quality or change behaviors towards protecting water quality. Although it is possible to annually report what actions the City took to implement each BMP, it is not possible to determine behavioral changes in the general population. It has become obvious that certain BMPs have results that can be measured on an annual basis, while other BMPs, such as school education program would be better measured over the long term. Changing people's behavior patterns that have been in place for decades in some cases is not going to happen in one year or even five years. Although many people appear to be aware of the program, determining if this has a direct effect on water quality is very hard to quantify.

4.2 Prioritization of Minimum Control Measures and BMP Selection

The General Permit states that “because storm water programs are locally driven and local conditions vary, some BMPs may be more effective in one community than in another. A community that has a high growth rate would derive more benefit on focusing on construction and post-construction programs than on an illicit connection program.”

Additionally, on November 14, 2008 the City Managers from the MS4s in San Luis Obispo County and the City of Santa Maria met with members of the RWQCB including the Executive Officer, Roger Briggs. RWQCB staff stated during that meeting that focusing on the Construction and Post-Construction MCMs have a greater potential to improve water quality and that a MS4 could reduce the amount of effort placed on BMPs in other MCMs such as Public Education if the majority of the MS4’s efforts focus on these two MCMs.

Over the past five years the City has met most of the requirements of the current General Permit for Public Education, Public Participation, and Illicit Discharge Detection and Elimination. Therefore, the City will be focusing its effort on the Construction and Post Construction MCMs which have the greatest potential to reduce storm water pollutants based on the City’s projected growth.

The City also feels that working with other MS4s in the region will create a consistent message that will be more effective in changing behaviors in the general population. This SWMP incorporates BMPs that are consistent with many of the other MS4s so that the City can work with other MS4s to create consistent, cost effective messages throughout the County. These BMPs include public service announcements, training for certain types of businesses, and working with the Partners for Water Quality and the County-wide Hydromodification Technical Advisory Committee.

The City will continue to evaluate the effectiveness of BMPs in the annual report. BMPs that are found to be ineffective or that do not meet MEP will be modified or replaced.

5.0 Record Keeping and Reporting

5.1 Record Keeping

The City will keep all records required by the General Permit for five years or the duration of the current General Permit.

5.2 Reporting

Annual Report

The City will annually report on the status of compliance with the General Permit and assess the effectiveness of the BMPs and whether the measurable goals were met in addition to overall effectiveness of the SWMP. The City will use the effectiveness assessment described in the next section. Based on the effectiveness of the BMPs, the City may propose changes to the SWMP to better meet MEP as allowed by the General permit.

The progress measurements and effectiveness of the BMPs listed in the Post-Construction MCM associated with the Joint Effort for the Development of Hydromodification Criteria will be included in the annual report as well as the quarterly reporting required by the RWQCB for the two year period. Once the Joint Effort is completed, the City will revert to the annual reporting for any new BMPs developed.

Noncompliance Reporting

The City will notify the RWQCB within 30 days of any noncompliance. Instances of noncompliance resulting in emergencies will be reported orally to the RWQCB within 24 hours from the time the City becomes aware of the circumstance and in writing within five days of the occurrence. The notification will identify the noncompliance event and an initial assessment of any impact caused by the event, describe the actions necessary to achieve compliance, and include a time schedule indicating when compliance will be achieved.

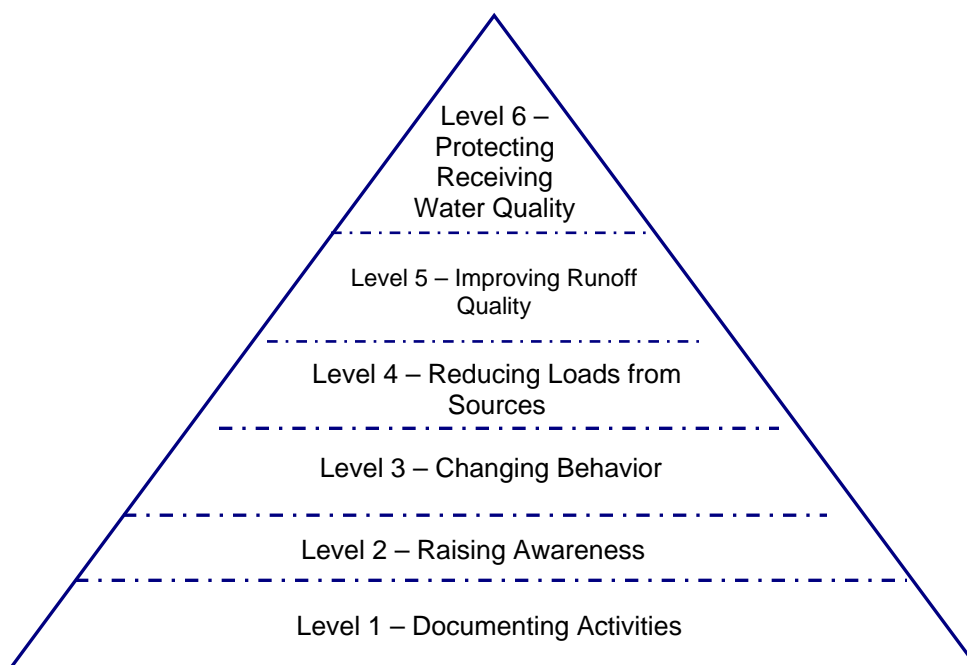
5.3 Effectiveness Assessment

The General Permit requires the City to assess the appropriateness and effectiveness of the Individual Best Management Practices (BMPs) used to achieve the programs goals. In order to do this the City will use the "Municipal Stormwater Program Effectiveness Assessment Guidance" manual developed by the California Stormwater Quality Association's (CASQA) to assist storm water managers in evaluating the progress and effectiveness of their storm water management programs using a range of assessment methods.

The City will use this assessment in determining whether BMPs are effective and meet MEP. BMPs that are not effective will be modified or replaced as proposed in the annual report.

As described in the CASQA Guidance Document, the rating system uses outcome levels which refer to the results of the implementation of a BMP, program element or overall program. Program elements and control measures may have outcomes at more than one of the levels described and not all levels are applicable to all activities. The six outcome levels are shown below.

Figure 5: Outcome Levels



- Level 1: This level reflects program development and implementation and basic compliance with the General Storm Water Permit requirements.
- Level 2: At this level the target audience's awareness of an issue has been raised through education.
- Level 3: The change in the target audience's behaviors results in the implementation of BMPs.
- Level 4: The outcome is a reduction in the amounts of pollutants associated with specific sources resulting from the implementation of a BMP.
- Level 5: Results in the reduction in one or more specific pollutants.
- Level 6: Compliance with water quality standards, protection of biological integrity, and beneficial use attainment.

6.0 Implementation of the Storm Water Program

This section describes the BMPs that the City will implement to meet the six MCMs in the General Permit to protect water quality. BMPs are designed to reduce the discharge of pollutants from an MS4 to the maximum extent practicable.

6.1 Public Education

The General Permit requires the City to implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impact of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff. Public education is an important aspect to raise the awareness of the issues with polluted storm water runoff.

Table 3 – Public Education and Outreach BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PE 1	Public school outreach for water conservation, wastewater, and storm water educational program for 3 rd through 6 th grades.	To educate school age children and change behavior patterns and views on water quality issues related to storm water pollution. The program has a benefit of instilling environmental conscience behavior and the opportunity for the children to share the information with their family and friends. This is a long term goal that will create social norms of protecting water quality.	PE 1: Work with the City’s education contractor to promote the program to local schools and address water quality issues related to water conservation, wastewater, storm water and non storm water discharges from homes. The effects of common household items such as paints, oil, fertilizer, pet waste, excess landscaping water, cleaning products, and yard waste can have on water quality and how to prevent discharges.	PE 1: Document the number of classroom presentations for each subject given to each grade during the school year and number of students. The City’s goal is to have at least five classes per year receive this presentation.	Public Works	X	X	X	X	X
PE 2	Contribute funding towards County-wide Public Service Announcements (PSAs) for storm water and water quality issues.	PSAs reach a wide audience with a consistent message about preventing and reducing storm water pollution and preserving water quality.	PE 2A: Run storm water PSAs on radio targeting approximately 60,000 individuals county-wide using 30 second announcements on at least one radio station, two times per year.	PE 2A: Document if radio PSAs were ran two times per year and any feedback received.	Public Works	X	X	X	X	X

Table 3 – Public Education and Outreach BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PE 2	Contribute funding towards County-wide Public Service Announcements (PSAs) for storm water and water quality issues. (Cont.)		PE 2B: Run storm water PSAs on television targeting approximately 180,000 individuals county-wide using 30 second television ads on at least one local TV channel, two times per year.	PE 2B: Document if television PSAs were ran two times per year.	Public Works	X	X	X	X	X
PE 3	Provide educational materials to residents on storm water pollution prevention and water quality issues.	Reduce the amount of pollutants reaching the waterways by educating residents on water quality issues related common pollutants and storm water pollution prevention.	PE 3A: Continue to provide educational materials to residents on topics such as: home repair, yard care including green waste and chemicals, spa and swimming pools, proper disposal of pet waste, trash, recyclables, and household hazardous waste, reporting illegal dumping. Educational materials maybe handed out at public events, presentations, at public offices, or with Notice of Violations.	PE 3A: Document the number of any new educational materials developed, posted on the web site and distributed to the public. Continue to document current public educational materials distributed to the public.	Public Works	X	X	X	X	X

Table 3 – Public Education and Outreach BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PE 4	Provide educational materials to specific types of businesses and industries on storm water pollution prevention and water quality issues.	To raise awareness, change behaviors, and reduce the amount of storm water pollution from commercial businesses and industries.	<p>PE 4A: Provide written educational materials to specific types of businesses such as food establishments, and mobile cleaners which are known to have a higher incident rate of causing non-storm water discharges.</p> <p>PE 4B: Partner with other MS4s in the County to provide training for businesses such as pressure washers and food establishments.</p> <p>PE 4C: Develop and distribute additional education materials on specific business such as auto shops, wineries, auto detailing, and heavy industry.</p>	<p>PE 4A: Document the number of educational materials distributed to businesses during annual Fats, Oil, and Grease Inspections, with applications for business licenses for mobile cleaners, and Notice of Violations.</p> <p>PE 4B: Document the number of county-wide trainings that the City participates in, the number of participants that attend. Post applicable training materials on the web site.</p> <p>PE 4C: Develop educational materials for auto shops and industry. Distribute this information during industrial waste inspections and Notice of Violations and post on the web site.</p>	Public Works	X	X	X	X	X
					Public Works		X		X	
					Public Works				X	X
PE 5	Participate in the Our Water Our World Program (OWOW).	This program provides the public with information on alternative pest control and garden chemicals that reduce the	PE 5A: Work with OSH and Farm Supply Co. to keep fact sheets stocked.	PE 5A: Number of fact sheets distributed per year to stores and other events where appropriate.	Public Works	X	X	X	X	X

Table 3 – Public Education and Outreach BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PE 5	Participate in the Our Water Our World Program (OWOW). (Cont.)	amount of toxic chemicals entering the waterways. The program is in place at two local retail stores located within the City, Orchard Supply Hardware (OSH) and Farm Supply. Having a large retail store promoting this program allows the message to reach a wide sector of the population.	PE 5B: Provide funding for OWOW representatives to provide training to store employees on the program. Staff training will be done biennially.	PE 5B: Provide funding for training store employees on the program.	Public Works		X		X	
PE 6	The City will investigate Community-Based Social Marketing (CBSM) strategies through the EPA's guide for <i>Conducting Watershed Outreach Campaigns</i> . Manual. Incorporate strategies into the City's educational material where appropriate to target specific audiences.	To enhance the public education program by creating public awareness and in changing behaviors towards the appropriate BMP.	PE 6A: Investigate CBSM strategies that can be incorporated into educational materials to target specific audiences.	PE 6A: Compare public's behavior from the previous years without CBSM strategies being used.	Public Works			X	X	X
PE 7	Provide information on the City's web site about preventing storm water pollution including links to the City's SWMP, educational materials	Raise awareness and reduce storm water pollution by providing information on storm water issues by posting educational materials on BMPs for different	PE 7A: Provide copies of the City's SWMP and annual Reports, related links, and educational materials for residents, specific types of businesses, and the	PE 7A: Track the number of hits on the City's SWMP, and various storm water web pages to determine interest in the program.	Public Works	X	X	X	X	X

Table 3 – Public Education and Outreach BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PE 7 cont'd	on BMPs for residents, businesses, and the construction and development community.	audiences, providing the public a method to comment on the City's program, submit illegal storm water discharges, and to inform the public about storm water upcoming events.	construction and development community. Public education materials include a reference to the City's web site.							
PE 8	IWMA Partnership	To educate school aged children about trash, recycling, and composting in order to change behaviors on disposing of trash and unwanted household hazardous waste.	The City is a member of the IWMA and contributes to the school based program which includes several classroom presentations that are given by a private contractor.	Track the number and grades receiving the IWMA classroom presentations in the City of Paso Robles.	Public Works	X	X	X	X	X

6.2 Public Participation

The City must at a minimum comply with State and local public notice requirements when implementing a public involvement/participation program.

Table 4 – Public Involvement/Participation BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PP 1	Comply with public notice requirements.	To ensure compliance with applicable public notice requirements.	PP 1: Follow public notice requirements to ensure compliance including providing legal notice for all ordinance, zoning, and City standards and other applicable documents or funding related to the storm water program.	PP 1: Maintain evidence of public notices, such as City council agendas, advertisements, for public noticing requirements for all storm water related hearings for City ordinances, zoning codes, standards, funding for special projects, or other applicable documents.	Public Works	X	X	X	X	X
PP 2	Partner with other municipalities, Non-Governmental Organizations, and other stakeholders groups.	Develop and implement consistent message to raise the public's awareness about water quality issues related to watersheds and storm water by partnering with other municipalities and Non-governmental Organizations, and other stakeholders groups in the implementation of BMPs for public education and post construction for the development of consistent and cost effective hydromodification control criteria that is acceptable to the MS4s, engineering and development communities.	PP 2A: Attend a majority of the Central Coast Partners for Water Quality meetings whose goal is to work together to raise awareness to water quality issues, pollution prevention and other issues related to storm water.	PP 2A: Document the number of meetings attended and the level of support provided.	Public Works	X	X	X	X	X
			PP 2B: Participate in the San Luis Obispo County-wide Hydromodification Technical Advisory Committee (SLO TAC).	PP 2B: Document the participation and the attendance at the SLO TAC for the development of hydromodification criteria	Public Works	X	X	X		

Table 4 – Public Involvement/Participation BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PP 3	Provide the public opportunities to comment on the City’s SWMP.	Allow the public an opportunity to review and comment on the City’s SWMP and the annual reports.	<p>PP 3A: Post the SWMP and annual reports on the City’s web site.</p> <p>PP 3B: Provide a method on the storm water web site to comment on the City’s storm water program.</p>	<p>PP 3A: Document if the latest version of the SWMP is posted on the web site</p> <p>PP 3B: Document the number of comments received on-line.</p>	Public Works	X	X	X	X	X
					Public Works	X	X	X	X	X
PP 4	Adopt-A-Street Program	To reduce the amount of litter that can be washed into the waterways.	<p>PP 4A: Promote the program to keep volunteer participation up through flyers and the City’s web site.</p> <p>PP 4B: Trend the quantities of trash picked up by program volunteers.</p>	<p>PP 4A: Document the number of new volunteers enrolled in the program and the number of flyers distributed to advertise the program.</p> <p>PP 4B: Track the number of bags and weight of the bags collected.</p>	Public Works	X	X	X	X	X
					Public Works	X	X	X	X	X
PP 5	Participate in the County-wide annual Creek Cleanup Day by collaborating with the Central Coast Partners for Water Quality and other non-government organizations.	To raise public awareness of the amount of trash and illegal dumping and the relationship to water quality.	PP 5A: The City will partner with NGOs to promote the County-wide annual creek cleanup day events.	PP 5A: Document whether the City clean-up event, how it was publicized, the number of volunteers and amount of trash will be documented.	Public Works	X	X	X	X	X
PP 6	Storm drain marking maintenance	Storm drain markers raise public awareness of about the connection of storm drains to waterways. The markers need to be maintained.	<p>PP 6A: Develop a program that includes public component to report unmarked storm drains to the City.</p> <p>PP 6B: Ensure all new</p>	<p>PP 6A: Document if a program has been developed that will include the public and the number of unmarked drains reported each year.</p> <p>PP 6B: Document the</p>	Public Works		X	X	X	X
					Public Works	X	X	X	X	X

Table 4 – Public Involvement/Participation BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
PP 6	Storm drain marking maintenance (Cont.)		drain inlets are marked per the City Standards by the developer or contractor.	number of new drain inlets marked.						

6.3 Illicit Discharge Detection/Elimination

The City must:

- 1) Develop, implement, and enforce a program to detect and eliminate illicit discharges (as defined at 40CFR §122.26(b)(2)) into the regulated MS4;
- 2) Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the U.S. that receive discharges from those outfalls;
- 3) To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into the MS4 and implement appropriate enforcement procedures and actions;
- 4) Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit;
- 5) Inform public employees, businesses, and the general public of the hazards that are generally associated with illegal discharges and improper disposal of waste; and
- 6) Address the following categories of non-storm water discharges or flows (i.e., authorized non-storm water discharges) only where they are identified as significant contributors of pollutants to the MS4. The City considers the following non-storm water discharges or flows:
 - Water line flushing and Discharges from potable water sources;
 - Landscape irrigation;
 - Diverted stream flows;
 - Rising ground waters;
 - Uncontaminated ground water infiltration;
 - Uncontaminated pumped ground water;
 - Foundation drains;
 - Air conditioning condensation;
 - Irrigation water;
 - Springs;
 - Water from crawl space pumps;
 - Footing Drains;
 - Lawn watering;
 - Individual residential car washing;
 - Flows from riparian habitats and wetlands;
 - Dechlorinated swimming pool discharges;
 - Flows from fire fighting activities

Table 5 – Illicit Discharge Detection and Elimination BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
ID 1	Maintain and update storm drain map	To enable City staff to better track illicit discharges.	ID 1: Work with the GIS staff to continuously upgrade the storm water map.	ID 1: Document the type of updates made to the storm drain map.	Public Works	X	X	X	X	X
ID 2	Adopt and Enforce the Storm Water Ordinance	To reduce the amount of pollutants in storm water runoff by enforcing the illicit discharge prohibitions in the storm water ordinance.	ID 2A: Adopt the Storm Water Ordinance in the summer of 2010. ID 2B: The City will take enforcement actions when appropriate for illicit discharges prohibited in the storm water ordinance. Implementation of the illicit discharge prohibitions are reported under BMPs ID 3 and CO 2.	ID 2A: Whether the City Council Adopted the Storm Water Ordinance or not. ID 2B: See documentation of the type violations and enforcement actions taken under BMPs ID 3 and CO 2.	Public Works	X				
					Public Works	X	X	X	X	X
ID 3	Complaint investigation and response.	To reduce the amount of pollutants discharged to the storm drain system and waterways by enforcing the City's Storm Water Ordinance	ID 3A: Allow the public and City staff various methods of reporting illicit discharges such as the storm water information line, storm water web page, or general phone number.	ID 3A: Keep a log of complaints received on the web site, storm water info line, or by general phone.	Public Works	X	X	X	X	X

Table 5 – Illicit Discharge Detection and Elimination BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
ID 3	Complaint investigation and response. (Cont.)		ID 3B: Respond to complaints within 48 hours and if corrective action is needed a Notice of Violation will be issued to the responsible party.	ID 3B: Document the number of complaints investigated and the number of Notice of violations issued. This information will be used to determine specific subjects that public education materials need to focus on.	Public Works	X	X	X	X	X
ID 4	Illicit connections between the City's collection system and storm drains.	To reduce the amount of pollutants discharged to the storm drain system and waterways by requiring illicit connections be removed. Illicit connections of storm drains to the sewer system are routinely checked for in Closed Circuit Television (CCTV) inspections of the sewer.	ID 4A: Investigate suspected illicit connections between the City sewer and storm drains located during CCTV or industrial waste inspections. Require all such connection removed.	ID 4A: Document the number of illicit connections between the City's sewer system and the storm drains located and removed.	Industrial waste and Wastewater	X	X	X	X	X
ID 5	Sanitary sewer discharges due to grease blockages.	To reduce/eliminate the amount of grease reaching the storm drain system and sewage spills from the collection system from grease blockages, inspections at food facilities to ensure the oil and grease is	ID 5A: Conduct FOG and storm water inspections at food facilities enrolled in the Industrial Waste Program to ensure Fats, Oils, and Grease (FOG) are being properly handled.	ID 5A: Document the number of FOG inspections conducted at food facilities and the number of storm water violations.	Industrial Waste	X	X	X	X	X

Table 5 – Illicit Discharge Detection and Elimination BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
ID 5	Sanitary sewer discharges due to grease blockages. (Cont.)	properly disposed of and grease interceptors are properly maintained. Educational materials on BMPs for handling FOG and storm water are handed out during inspections	ID 5B: Conduct a residential public education campaign in various neighborhoods on the effects of pouring FOG down the drain to reduce sewage spills caused by grease blockages. Neighborhoods will be prioritized based on grease problems documented by the Wastewater Division.	ID 5B: Document the neighborhoods targeted, number and method of educational materials distributed. Track and trend the number of grease blockages to determine if the educational materials had an effect.	Industrial Waste		X		X	
ID 6	Business and industrial inspections	To reduce the amount of pollutants in storm water and non-storm water discharges from businesses and industries.	ID 6: Conduct storm water inspections at businesses and industrial facilities that are enrolled in the Industrial Waste Program. Industries that are federally regulated for pretreatment will be the first priority due to their potential to impact the storm drain system.	ID 6: Document the number of inspections conducted each year and the number and types of storm water violations noted.	Industrial Waste				X	X

6.4 Section Construction Site Storm Water Runoff Control

The City must develop, implement, and enforce a program to reduce pollutants in any storm water runoff to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of storm water discharges from construction activity disturbing less than one acre must be included if the construction activity is part of a larger common plan of development or sale that would disturb one acre or more. The program must include the development and implementation of, at a minimum:

- 1) An ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms, to ensure compliance, to the extent allowable under State, or local law;
- 2) Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;
- 3) Requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;
- 4) Procedures for site plan review which incorporate consideration of potential water quality impacts.;
- 5) Procedures for receipt and consideration of information submitted by the public; and
- 6) Procedures for site inspection and enforcement of control measures.

Table 6 – Construction Site Storm Water Runoff Control BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
CO 1	Construction Site Inspections	To reduce the amount of pollutants in storm water runoff from construction sites.	<p>CO 1A: Inspect all sites, regardless of size, with grading permits for compliance with erosion and sediment control requirements. Prioritize sites based on size, hillside sites, proximity to waterways, and past record of noncompliance.</p>	<p>CO 1A: Document the number of sites inspected and the number and types of violations noted. Track the types of violations noted to determine if public education is needed.</p>	Public Works	X	X	X	X	X
			<p>CO 1B: Inspect all construction sites, regardless of size, for compliance with the Water Quality Standards.</p>	<p>CO 1B: Document the number of sites inspected and the number of violations noted. Track the types of violations noted to determine if public education materials are effective.</p>	Public Works	X	X	X	X	X
CO 2	Enforcement of the construction section of the Ordinance, Erosion and Sediment Control (E&SC) Plans, Water Quality Standards	Eliminate polluted runoff and non-storm water discharges from construction sites.	<p>CO 2: The City will take enforcement actions when appropriate for illicit discharges in the storm water ordinance, violations related to storm water runoff, construction BMPS, or E&SC plans. Enforcement actions may include Notice of Violations (NOVs), issued in the field or by letter, Notice to Comply letters, and stop work orders and or legal</p>	<p>CO 2: Document the number and type of enforcement actions taken at construction sites and the number of sites with recalcitrant violations. Use this information to determine the areas of education needed for contractors.</p>	Public Works	X	X	X	X	X

Table 6 – Construction Site Storm Water Runoff Control BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
			action when necessary.							
CO 3	Conduct education program for project applicants, developers and contractors and the public for storm water related issues.	To reduce the amount of pollutants in storm water runoff from construction sites.	CO 3A: Develop education materials on storm water requirements at construction sites including water quality standards.	CO 3A: Document the number of educational materials developed on storm water requirements at construction sites and revise as needed based on the types of violations noted during inspections.	Public Works	X		X		
			CO 3B: Distribute educational materials during on site inspections, with building permits if applicable, and place on the City's storm water web site.	CO 3B: Document the number of educational materials distributed.		X	X	X	X	X
			CO 3C: Develop and distribute information for the general public on storm water issues at construction sites.	CO 3C: Whether the materials were developed and the number of educational materials distributed.	Public Works		X	X	X	X
			CO 3D: Include the phone number for the storm water information line for the public to report construction site complaints.	CO 3D: Document the number of reports on the storm water information line about construction site issues.	Public Works		X	X	X	X
CO 4	Erosion and Sediment Control Training for City Construction Site Inspectors		CO 4: Require Building Inspectors to receive a minimum of 2 hours of training on erosion and sediment control and storm water handling annually.	CO 4: Document the number of hours of training received that each inspector receives.	Public Works	X	X	X	X	X

Table 6 – Construction Site Storm Water Runoff Control BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
CO 5	Revise the grading and erosion and sediment control ordinances to ensure all construction related storm water measures required by the General Permit are included.	To reduce the amount of pollutants in storm water run off from construction sites during the grading phase.	CO 5A: Update and revise the grading and erosion and sediment ordinances to be consistent with the current General Permit, the City's storm water ordinance, and any applicable requirements of the Joint Effort for Hydromodification Criteria.	CO 5A:	Community Development and Public Works	X	X			

6.5 Post-Construction Storm Water Management

The General Permit requirements are to:

- 1) Develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into the MS4 by ensuring that controls are in place that would prevent or minimize water quality impacts;
- 2) Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for you community;
- 3) Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law. For MS4s that are considered high growth or have a population greater than 50,000, the requirements must at least include the design standards contained in Attachment 4 of the General Permit.
- 4) Ensure adequate long-term operation and maintenance of BMPs.

As stated in the regulatory section, the City is participating in the Joint Effort for the Development for Hydromodification Criteria. BMPs PC 1, 3, 5, and 6 were developed by the RWQCB to be implemented by all Joint Effort participants. The progress of these BMPs are reported to the RWQCB on a quarterly basis.

Table 7 – Post-Construction Storm Water Management BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	BMP Implementation Table (Quarters 1 – 9)								
PC 1	Implementation Strategy for LID and Hydromodification Control.	Develop and enact a strategy for implementing LID and hydromodification control for new and redevelopment projects. The strategy will provide appropriate education and outreach for all applicable target audiences, and will include specified guidance for LID BMP design and for complying with hydromodification control criteria. The strategy will also apply LID principles and features to new and redevelopment projects during the two-year period preceding adoption or hydromodification control criteria.	<p>PC 1A: The city will continue to apply LID principles and features to all applicable new and redevelopment projects during the two-year period preceding adoption of hydromodification control criteria.</p> <p>PC 1B: Establish a tracking mechanism /reporting system of post construction storm water controls installed.</p> <p>PC 1C: Provide appropriate education and outreach for applicable target audiences.</p> <p>PC 1D: The City will develop a tracking report indicating the accomplishments in education and outreach.</p> <p>PC 1E: The City will develop, advertise, and make available LID BMP design guidance suitable for all stakeholders.</p>	<p>PC 1A: The number of projects with LID features included.</p> <p>PC 1B: Whether the tracking/reporting system of post construction storm water control is developed.</p> <p>PC 1C: Document goals, schedules and target audiences for education and outreach that the City will conduct.</p> <p>PC 1D: Whether the tracking report was developed.</p> <p>PC 1E: Document the development and advertisement of LID BMP guidance materials.</p>		X	X	X	X	X	X	X	X

Table 7 – Post-Construction Storm Water Management BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	BMP Implementation Table (Quarters 1 – 9)									
					1	2	3	4	5	6	7	8	9	
PC 3	Enforceable Mechanisms (Cont.)		<p>PC 3B: Any necessary modification and/or additions to codes, regulations, and standards will be approved or adopted.</p> <p>PC 3C: The City will apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects.</p>										X	
PC 4	Post Construction BMP Management	To ensure that post construction devices are maintained.	<p>PC 4A: Develop a form and a procedure for a self-certification program for post construction runoff controls on public and private property.</p> <p>PC 4B: Implement the self-certification program.</p>	<p>PC 4A: Whether or not the form and the program are developed.</p> <p>PC 4B: Document the number of self-certification forms received.</p>				X						
									X	X	X	X	X	
PC 5	Hydromodification Control Criteria	To control hydromodification in new and redevelopment projects.	<p>PC 5: Specific criteria for the City will be derived to control hydromodification in new and redevelopment projects using Water Board-approved methodology developed through the Joint Effort.</p>	<p>PC 5: Hydromodification Control Criteria developed.</p>										X
PC 6	Applicability Thresholds	To develop criteria for applying hydromodification control	<p>PC 6: Select applicability thresholds for applying</p>	<p>PC 6: Applicability thresholds developed.</p>										X

Table 7 – Post-Construction Storm Water Management BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	BMP Implementation Table (Quarters 1 – 9)									
PC 6	Applicability Thresholds (Cont.)	criteria.	hydromodification control criteria to new and redevelopment projects. Applicability thresholds will be consistent with long term watershed protection.											

6.5 Pollution Prevention and Good Housekeeping for Municipal Operations

The City is required to:

- 1) Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and
- 2) Using training materials that are available from the U.S. EPA, the State, or other organizations, the program must include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet building maintenance, new construction and land disturbances, and storm water system maintenance.

Table 8 – Pollution Prevention/Good Housekeeping for Municipal Operations BMPs

BMP ID#	BMP	BMP Intent	Measurable Goals and Outcomes	Effectiveness Measure	Responsible Department	BMP Implementation Table				
GH 1	Facility and maintenance operations inspections	Prevent or reduce pollutant runoff from municipal operations.	GH 1: Conduct annual pollution prevention inspections of all City facilities and two maintenance operations to determine if BMPs are employed to prevent storm water pollution and non-storm water discharges.	GH 1: Document the number and type of violations noted during inspections. Use this information to determine training materials for municipal staff (GH 3).	Public Works					
GH 2	Development of a Municipal BMP Guidance Document	Provide field staff with a reference document for methods to prevent and/or reduce pollutant runoff form municipal operations.	GH 2: Develop a municipal BMP guidance document which will cover the maintenance activities of the streets, parks, building maintenance and fleet maintenance departments using the CASQA manual as a guide. The Water Department follows the procedures and BMPs outlined in the Low Threat Discharge Permit. The Wastewater Division abides by City procedures in compliance with the Statewide General Waster Discharge requirements for Sanitary Sewer	GH 2: Whether the Municipal BMP Guidance Manual was developed and distributed to each department.	Public Works			X	X	

Section 6.0

Implementation of the Storm Water Program

			Systems.							
GH 3	City staff training	Provide employee training on eliminating pollution prevention/good housekeeping techniques	<p>GH 3A: Incorporate pollution prevention/good housekeeping BMPs into safety tail gate meetings at least every four meetings.</p> <p>GH 3B: Training materials related to pollution prevention/good housekeeping will be developed using the CASQA Municipal Operations Manual to be handed out. Training materials will relate to the various staff jobs and season such as cleaning off equipment, herbicide and fertilizer management, spills, chemical storage, etc.</p>	<p>GH 3A: Whether or not pollution prevention/good housekeeping was incorporated into safety tail gate meetings. Document employees trained with sign-in sheets.</p> <p>GH 3B: Document the number of training materials developed and topics covered. Use violations noted in GH 1 to determine if specific topics need to be discussed.</p>	Public Works	X	X	X	X	X
					Public Works					

7.0 Certification

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.

Authorized Representative for the City of Paso Robles

Date