Chapter 10: SWMP PROGRAM MANAGEMENT

BMP #PM-1: Develop an Effectiveness Assessment Strategy

Scheduled for Year 4

Measurable Goals:

- 1. Identify a process to be used to conduct effectiveness assessments and improve BMP implementation.
- 2. Identifying quantifiable BMP and program effectiveness measurements.
- 3. Assessment of BMP implementation.

Year 4 Summary: In lieu of submitting a complete Effectiveness Assessment strategy following CASQA guidance as was planned in our Permit Year 4 requirements, the City of Santa Cruz submitted the Guidance Document (attached) that was developed to transition our current Storm Water Management Plan (SWMP) into the new Phase II General Permit requirements (adopted in February 2013).

The process used to develop the Guidance Document included a detailed review of all of the City's BMPs and measurable goals with applicable City Departments to identify whether existing BMPs were effective and/or whether some program elements could be improved as part of transitioning to the requirements of the new General Permit. Because we are transitioning from the existing SWMP to the requirements of the new Phase II General Permit, the City feels that conducting a full Effectiveness Assessment strategy per CASQA guidance based on our existing program would have been unproductive since the program is changing in FY2013-14; instead we are planning on following the timeline of the new Phase II General Permit and developing the full Effectiveness Assessment Strategy in Year 2 of the new permit (2015).

In order to develop the Guidance Document, the City coordinated with all the departments involved in implementation of our SWMP through meetings (6), telephone discussions (1), and email coordination to review our existing BMPs and measurable goals, new General Permit requirements, and to identify where applicable program elements that could be modified/improved. For each of our existing BMPs, the Guidance Document identifies which Phase II General Permit chapter it addresses as well as what the City is planning on doing:

- "Continue" implementation and reporting as previously done,
- "Consolidate" implementation and reporting for multiple BMPs that meet the same goal,
- "Reduce" the implementation goal where it will not impact water quality but will be less challenging to fulfill,
- "Substitute" an existing BMP with a new General Permit requirement where the transition to the new requirement will provide an opportunity to improve activities to better meet the City's storm water quality goals,

- "Remove" an existing BMP that is implemented as standard procedure in other municipal programs; the BMP will continue to be implemented but will not be tracked or reported on as part of the Storm Water Program.
- "Cease" the implementation of a BMP that has been ineffective.

For BMPs that are consolidated, reduced, substituted, removed, or ceased, the Guidance Document provides supporting information on why the City is modifying implementation. Thus the Guidance document provides a preliminary effectiveness assessment of the City's SWMP and provides the guidance needed for the City to transition to the new Phase II General Permit. As mentioned above, the City will follow the new General Permit "Program Effectiveness Assessment and Improvement" (Section E.14) requirements and develop a full Effectiveness Assessment Strategy in Permit Year 2 (FY2014-15).

Effectiveness: implementation schedule modified

Proposed Modifications: implementation in FY14-15 per new General Permit Planned FY2013-14 Activities: Scheduled for FY14-15 per new General Permit