

GUIDANCE DOCUMENT
CITY OF SANTA CRUZ STORM WATER PROGRAM

OVERALL PROGRAM PLANNING																			
There are many different potential sources of urban runoff pollution within each City watershed. Significant potential sources include industrial facilities, commercial businesses, residential dwellings, construction and remodeling projects, and the municipal storm sewer system and laterals. Storm water pollutants that can be generated by these sources include: metals, solvents, paint, concrete, masonry products, detergents, vehicle fuels and fluids, oil and grease, pesticides and fertilizers (organic compounds and nutrients), debris and litter, bacteria, pathogens and oxygen demanding compounds, and sediment and silt. Of these pollutants, the primary pollutants of concern in the City watersheds are the following: • Sediment and silt • Fecal Indicator Bacteria The City is targeting these primary pollutants of concern in its Storm Water Program because the San Lorenzo River and several of its tributaries within the City are listed on the Section 303(d) list as impaired for these specific pollutants. A sediment TMDL has been adopted in the San Lorenzo River (including Carbonera Creek, Lompico Creek, and Single Mill Creek) and a pathogen TMDL has been adopted in the San Lorenzo River, Branciforte Creek, Carbonera Creek, Camp Evers Creek, and Lompico Creek. Best Management Practices incorporated in the Wasteload Allocation Attainment Plan developed to meet the TMDLs for sediment and pathogens are incorporated in Section E.15.																			

New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Existing BMPs						General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes
							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
E.6	PROGRAM MANAGEMENT ELEMENT																					
E.6.a	Legal Authority (update or create ordinance)				PW	Eng							2		x							
E.6.b	Certification			PW	Eng							2										
	E.6.a, b	N/A	Permittee shall review and revise relevant ordinances or adopt new ordinances to obtain adequate legal authority, and provide certification by its Principal Executive Officer	PW	Eng	x						2		x							The City has an existing Storm Water Ordinance that provides legal authority to implement the Storm Water Program. The Ordinance will be reviewed to identify whether any modifications are needed to meet the new General Permit Requirements	
E.6.c	Enforcement Response Plan											3										
✓	E.6.c		Develop and implement an Enforcement Response Plan.									3			x							
E.7	EDUCATION AND OUTREACH PROGRAM																					
E.7.a	Public Outreach and Education																					
	E.7.a		Select a Public Outreach & Education option	PW	Eng							1	x								The City has an existing education and outreach program that is a combination of contributing to regional outreach as well as additional outreach conducted within our jurisdictional boundaries	
	E.7	PE-17	Assess Community-Based Social Marketing Strategies and Incorporate Them Where Appropriate	Develop pilot CBSM project	Public Works	Engineering	x					1	x								Included in requirements per RWQCB letter dated 5/3/13	
✓	E.7.a (ii)		Develop and implement a comprehensive storm water public education and outreach program	Develop and Implement a public education strategy that establishes education tasks, based on WQ problems, target audiences, and anticipated task effectiveness	PW	Eng						2		x							The City will review its existing comprehensive public outreach program to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern	
	E.7.a (b)	PE-18		Conduct Surveys to Assess the Effectiveness of the Education Efforts. Conduct a Baseline Evaluation Survey in Year 4 and Conduct an Evaluation Survey Every 5 Years Thereafter.	Public Works	Engineering		x				2 (2x during permit period)	x				x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern	
	E.7.a (c,f,h)	PE-3		Distribute Informational Brochures for Residents	Public Works	Engineering, Environ Compliance		x				2	x	X	x	x	x		Individual outreach BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern	
	E.7.a (c,d,f)	PE-4		Utilize Door Hangers As Needed By Environmental Compliance Inspectors	Public Works	Environ Compliance					x		2	x	X	x	x	x	YES - this is not a required BMP in the General Permit	Remove - follow up conducted by Environmental Compliance Inspectors on 100% of complaints and illicit discharges	Tracking and reporting of door hangers as an individual BMP is not MEP. City tracks all complaints and follow up actions comprehensively.	
	E.7.a (c,d,f,h)	PE-5		Distribute BMP brochures at 100% of new food and vehicle service facilities during the initial site visit by the Environmental Compliance Inspector and once during permit period to existing food and vehicle service facilities	Public Works	Environ Compliance		x				2	x	X	x	x	x		YES - this is not a required BMP in the General Permit	Maintain - individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (c,d,f,h)	PE-6		Implement the Clean Ocean Business Program	Public Works	Environ Compliance		x				2	x	X	x	x	x		YES - this is not a required BMP in the General Permit	Maintain - individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (c,d,f)	PE-7		Partner and Co-sponsor of the Monterey Bay Area Green Business Program	Public Works, Water	Engineering, Refuse & Recycling, Water Cons.		x				2	x	X	x	x	x		YES - this is not a required BMP in the General Permit	Maintain - individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (d,f) E.7.b.2.b E.8. (d)	PE-16		Maintain Environmental Programs and Environmental Compliance Web Pages, and post the City's Draft and Final Storm Water Management Program (SWMP) on the City's Website	Public Works	Environ Compliance		x				2	x	X	x	x	x			Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern

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	E.7.a (d)	PE-1		Replace Worn Stencils or Apply New Stencils to Storm Drain Inlets	Public Works	Engineering, Streets		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (d)			Regional Media Campaign - TV, radio, and/or print ads on various specific SW topics	Public Works	Engineeering		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (f)	PE-2		Participate in at least 1 Public Event annually	Public Works	Engineering, Environ Compliance		x	x				2	x	X	x	x	x	YES - this is not a required BMP in the General Permit	Reduce - SWMP goal was 2 events/year; New goal: 1 public event per year. BMP consolidated in comprehensive public education program BMP.	The most effective public outreach event for environmental programs is Earth Day Santa Cruz and outreach at this event will be maintained. Outreach at other events has not been found to be as successful and thus is not an effective use of staff time; replaced by CBSM	By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (e)	PP-1, PE-15		Hold Public Meetings as needed for SWMP Related Issues and update City Council and Public Works Commission as needed.	Public Works	Engineering		x	x				2	x	X	x	x	x	YES - this is not a required BMP in the General Permit	Reduce - Hold public meetings as needed instead of annually to provide updates on SWMP program and receive comment; additional presentation(s) to PW commission and City Council as needed instead of twice during the permit period. Consolidated in comprehensive public education program.	The goal change will not affect pollutant discharges and will be a more efficient use of City staff time.	By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (i)	PE-9		Continue outreach re: application of pesticides/herbicides/fertilizers through Green Gardener Program or similar	PW	Eng		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
				Partner and Co-sponsor the Regional Pesticide Management Education Program- Our Water Our World Program or similar	Public Works	Engineeering		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
				Hand out SW brochure on proper gardening and maintenance practices for residents at libraries	PW	Eng		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (g)			LID Outreach & Education for Residents (Resource Conservation District)	Public Works	Engineeering		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
	E.7.a (j)	PE-8		Conduct education in Elementary School Classes	Public Works	Engineeering		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern - several education programs may be included under this goal
	E.7.a (j)			Conduct education in Middle & High School Classes	Public Works	Engineeering		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern - several education programs may be included under this goal
	E.7.a.(ii) (k)	CF-1		Revise the BMPs for Vehicle Service Facilities, Food Service Facilities, and Retail and Commercial Businesses As Needed	Public Works	Engineering, Environ Compliance		x					2	x	X	x	x	x		Individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
		PE-14, PC-13		Develop and Implement an Education Program Addressing the Restoration and Protection of Riparian and Wetland Areas	Public Works	Engineeering		x					2	x	X	x	x	x	YES - this is not a required BMP in the General Permit	Maintain - individual BMPs consolidated under BMP for implementation of a comprehensive Storm Water Public Education Program		By the end of Permit Year 2, our public outreach strategy will be assessed to prioritize messages supporting the goals of the General Permit and the City's goals with regards to priority pollutants of concern
✓	E.7.a (k)			Develop and convey messages specific to reducing discharges from organized car washes, mobile cleaning/pressure washing operations	Public Works	Engineeering							2		X	x	x	x				
✓	E.7.a (l)			Conduct stormwater-friendly education to organized car wash participants	Public Works	Engineeering							2		X	x	x	x				
✓	E.7.a (m)			Develop and convey messages specific to mobile cleaning and pressure wash businesses	Public Works	Engineeering							2		X	x	x	x				

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							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
E.7.b.	Staff and Site Operator Training											3										
E.7.b.1	Illicit Discharge Detection and Elimination Training											3										
	E.7.b.1	MO-20	Develop A Storm Water BMP Training Piece	Training brochure, PowerPoint presentation, or other effective method	Public Works, Parks & Rec, Water, Planning	Engineering	x						3	x	x	X	x	x				Completed in 2012 per SWMP and updated as needed. Additional training requirements of the General Permit [see E.7 b. 1. (d), (f), and (g)] will be incorporated into the training.
	E.7.b.1	MO-21	Train and Educate Appropriate Field Crews	1. Train 100% of appropriate staff bi-annually-City TOTAL	Public Works, Parks & Rec, Water, Planning	Engineering, Refuse, Streets, Traffic/Parking, Parks & Rec-Downtown & Central Zone, Parks & Rec-East Zone, Parks & Rec-Neary Lagoon & West Zone, Parks & Rec-Wharf, Water Distribution, Water Production, Building			x				3		x		x	Yes - City has been conducting annual training, permit requires biennial training.	Reduce - bi-annual training for all appropriate staff instead of annual.	Annual assessment of trained staff is a new BMP that will help evaluate information retention by employees. Those employees that do not retain training information well will get an annual refresher.		
				2. Train new staff within 6 months of the beginning of employment-all depts.	Public Works, Parks & Rec, Water, Planning				x				3	x	x	X	x	x	Yes - City has been conducting training within 3 months of the beginning of employment, permit requires training within 6 months of start of employment.	Reduce - training within 6 months of start of employment instead of within 3 months.	Training within 6 months of start of employment complies with the Order and gives more flexibility for the City to provide more effective group trainings.	
✓	E.7.b.1 (d)		Develop and conduct annual assessment of trained staff's knowledge of illicit discharge response and refresher training as needed		PW, P&R, Water, Planning								3			X	x	x				
✓	E.7.b.1 (f)		Contact information, including procedures for reporting illicit discharges, shall be included in each of the Permittee's fleet vehicles that are used by field staff		PW, P&R, Water, Planning								3			X						
✓	E.7.b.1 (g)		Focused education on identified illicit discharges and associated illicit discharge locations		PW, P&R, Water, Planning								3			X						
E.7.b.2	Construction Outreach and Education																					
✓	E.7.b.2.a		Plan reviewers and permitting staff - QSD training (at least one person on staff providing supervision)	At least one designated person on staff with QSD credential	PW, Planning								2		x							
	E.7.b.2.a (a)	CON-7	Provide Training to Planning/ Building Inspectors, Public Works Inspectors, and Planning and Public Works Plan Reviewers on Construction Site BMP Requirements	1.a.Train 100% of Planning/ Building Inspectors, Public Works Inspectors, and Planning and Public Works Plan Reviewers every two years	Public Works, Planning	Public Works	x						2		X		x	Yes - General Permit does not specify training schedule beyond having QSP/QSD credentials	Maintain			
				2. Train new Inspectors and Plan Reviewers within 6 months of the beginning of employment-Planning	Planning, PW	Planning			x				2	x	X	x	x	x	Yes - General Permit does not specify training schedule beyond having QSP/QSD credentials	Reduce - training within 6 months of start of employment instead of within 3 months.	Training within 6 months of start of employment complies with the Order and gives more flexibility for the City to provide more effective group trainings.	
				3. Additional training on new or changed BMPs as needed	Planning/Public Works	Planning/Public Works	x						2	x	X	x	x	x	Yes - General Permit does not specify training schedule beyond having QSP/QSD credentials	Maintain		
✓	E.7.b.2.a (b)		Erosion/sediment control/storm water inspectors - QSP or QSD training (at least one person on staff providing supervision)	At least one designated person on staff with QSP credential	PW, Planning	Building							2		x							
✓	E.7.b.2.a (c)		Third-party plan reviewers must have QSD training		PW, Planning								2		x							
	E.7.b.2.b	CON-8	Distribute Construction BMP Brochure	1. Available At the Planning Department counter	Planning	Building	x						3	x	x	X	x	x				
				2. Distribute to 100% of project applicants for Grading and Building Permits	Planning	Building	x						3	x	x	X	x	x				
	E.7.b.2.b	CON-9	Distribute Construction BMP Handouts By Environmental Compliance Inspectors As Needed	Give BMP handouts to 100% of problems detected either while out in the field or during complaint response	Public Works	Environ Compliance	x						3	x	x	X	x	x				
	E.7.b.2.b	CON-10	Attach BMP Permit Conditions for Public Works Over-the-Counter Street Opening and Concrete Permits	100% Street Opening and Concrete Permits	Public Works	Engineering	x						3	x	x	X	x	x				
	E.7.a (d,f) E.7.b.2.b E.8. (d)	PE-16	Maintain Environmental Programs and Environmental Compliance Web Pages, and post the City's Draft and Final Storm Water Management Program (SWMP) on the City's Website		Public Works	Environ Compliance	x						3	x	x	X	x	x				

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							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018					
E.7.b.3	Pollution Prevention and Good Housekeeping Staff Training																						
	E.7.b.3 (a)	MO-21	Train and Educate Appropriate Field Crews	1. Train 100% of appropriate staff bi-annually-City TOTAL	Public Works, Parks & Rec, Water, Planning	Engineering, Refuse, Streets, Traffic/Parking, Parks & Rec-Downtown & Central Zone, Parks & Rec-East Zone, Parks & Rec-Neary Lagoon & West Zone, Parks & Rec-Wharf, Water Distribution, Water Production, Building			x				2		X		x		Yes - City has been conducting annual training, permit requires biennial training.	Reduce - bi-annual training for all appropriate staff instead of annual	BMP reduction complies with Order; additionally, annual assessment of trained staff is a new BMP that will help identify information retention by employees. Those employees that do not retain training information as well will get an annual refresher.		
				2. Train new staff within 6 months of the beginning of employment-all depts.	Public Works, Parks & Rec, Water, Planning				x				2	x	X	x	x	x	Yes - City has been conducting training within 3 months of the beginning of employment, permit does not specify a date from start of employment.	Reduce - training within 6 months of start of employment instead of within 3 months.	Training within 6 months of start of employment complies with the Order and gives more flexibility for the City to provide more effective group trainings.		
✓	E.7.b.3 (b)		Develop and conduct annual assessment of trained staff's knowledge of pollution prevention and good housekeeping, and revise training as needed		PW, P&R, Water,								2		x	x	x	x					
	E.7.b.3 (c)	MO-23	Develop Boilerplate Contract Language Requiring City Contractors to Abide by the Applicable Mandatory Storm Water BMPs	Inclusion of boilerplate language for bid masters and/or the City contract master	Public Works, Purchasing	Engineering	x						2	x	X							This BMP has already been completed and City contractors are required by contract to comply with SW BMPs	
✓	E.7.b.3 (d)		Provide oversight of contractors hired by the permittee to ensure contractors are following BMPs, good housekeeping practices, and following SOPs.		PW, Water, P&R								2		x	x	x	x					
E.7	Existing BMPs Not Required By the Permit																						
	N/A	PP-2	Staff Will Contact the Downtown Association Annually; and Will Contact the Chamber of Commerce, Local Trade Organizations, and Business Groups on an "As Needed" Basis.	1. Annual contact with Downtown Association 2. Contact with the Chamber of Commerce, local trade organizations, and business groups as needed	Public Works	Engineering				x			N/A						Yes - this is not a required BMP for public outreach and education	Replace - BMP will be replaced by CBSM pilot project (see E.7)	Businesses are contacted directly through several methods, including the Clean Ocean Business and Green Business programs. Additionally, educational information is shared with businesses and residents via several methods including public meetings, workshops, website. Contacting the Downtown Association and Chambers of Commerce annually does not provide significant additional outreach to target businesses; consequently, they will be contacted on an as-needed basis. Replaced by CBSM		
	N/A	PE-12	Support for Earth Vision Environmental Film Festival	300 people attending the event	Public Works	Engineeering				x			N/A						Yes - this is not a required BMP for public outreach and education	Replace - Event discontinued, BMP replaced by Snapshot Day (see E.8.c)	Event was discontinued in 2009. Instead, City funded Snapshot Day-see below under E.8 Public Involvement		
	N/A	IF-4	Conduct Education and Outreach to Regulated Industrial Facilities	Annually distribute BMP brochure at 100% of initial or new sites, and as needed at current sites if the business has not retained a copy.	Public Works	Environ Compliance					x		N/A						Yes - this is not a required BMP for public outreach and education	Remove - BMP no longer tracked in the stormwater program but continued as standard practice in the wastewater program			
E.8	PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM																						
✓	E.8. (a)		Develop a public participation strategy that establishes who is responsible for specific tasks and goals		PW, Water, P&R								2		x							The City already sponsors opportunities for public involvement. We will review our public involvement program to ensure it meets our goals as well as those of the General Permit.	
✓	E.8. (b)		Consider development of a Citizen Advisory Group consisting of balanced representation of stakeholders		PW								2		x								
	E.8. (c)	PP-3, PE-13 / ID-5	Create opportunities for citizens to participate in the implementation of BMPs through sponsoring activities - monitoring	Sponsor volunteer monitoring efforts (e.g. First Flush, Snapshot Day)	Public Works	Engineering		x					2	x	X	x	x	x	YES - City sponsors many opportunities for citizen volunteer involvement	Maintain - individual BMPs consolidated under BMP for creating opportunities for citizen involvement in monitoring			
		PE-10		Sponsor coastal and beach cleanups (e.g. Coastal Clean-Up Day, July 4 Star Spangled Beach Cleanups)	Public Works	Engineering		x					2	x	X	x	x	x	YES - City sponsors many opportunities for citizen volunteer involvement	Maintain - individual BMPs consolidated under BMP for creating opportunities for citizen involvement in cleanups			
				Sponsor river and creak cleanups (e.g. Adopt-A-Levee, Save Our Shores creek cleanups)	Public Works	Engineeering		x					2	x	X	x	x	x	Yes - City provides many opportunities for citizen volunteer involvement	Maintain - individual BMPs consolidated under BMP for creating opportunities for citizen involvement in cleanups			
	E.8. (d)	PE-11	Ensure the public can easily find information about the Permittee's storm water program	Co-Sponsor & Participate in Public Event Annually (e.g. Earth Day Santa Cruz)	Public Works	Engineering		x					2	x	X	x	x	x		Maintain - individual BMPs consolidated under BMP for ensuring the public can easily find information about the storm water program			
		PE-15		Continue Development of the SWMP List of Interested Parties and Use It for Notification of SWMP Developments and Public Meetings	Public Works	Engineering		x					2	x	X	x	x	x		Maintain - individual BMPs consolidated under BMP for ensuring the public can easily find information about the storm water program			

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		PE-16		Maintain Environmental Programs and Environmental Compliance Web Pages, and post the City's Draft and Final Storm Water Management Program (SWMP) on the City's Website	Public Works	Environ Compliance		x					2	x	X	x	x	x		Maintain - individual BMPs consolidated under BMP for ensuring the public can easily find information about the storm water program		
✓	E.8. (e)		Actively engage in the IRWMP or other watershed-level planning effort		PW	Engineering							2		x	x	x	x				
E.8	Existing BMPs Not Required By the Permit																					
	N/A	PP-4	Involve City Staff in the Development and Implementation of the SWMP	4 meetings per year with the appropriate personnel	Public Works	Engineering					x		N/A						Yes - this is not a required BMP	Remove - cease reporting, BMP continued as standard City practice	Key City departments are identified in the guidance document and are actively involved in the implementation of the SWMP. City staff from the various departments coordinate with the SWMP coordinator frequently on an as-needed basis. Additional meetings do not provide additional protection of storm water from pollution discharges.	
E.9	ILLCIT DISCHARGE DETECTION AND ELIMINATION																					
E.9.a	Outfall Mapping												2									
✓	E.9.a		Create and maintain an up-to-date and accurate outfall map		IT, PW	Eng							2		x	x	x	x				
E.9.b	Illicit Discharge Source/Facility Inventory												2									
✓	E.9.b		Maintain (update annually) an inventory of all industrial/commercial facilities/sources within the Permittee's jurisdiction that could discharge pollutants to the MS4. Use the inventory to ID facilities for inspection of potential illicit discharges		IT, PW	Environmental Compliance							2		x	x	x	x				
	E.9.b	IF-1	Conduct Site Visits at Significant Industrial Users (SIUs)	Conduct site visits at 100% of SIUs	Public Works	Environmental Compliance		x					2					x	YES - Permit only requires inspections once over the term of the permit	Reduce - Reporting will be conducted once over the term of the permit, inspections will continue to be done on an annual basis	Inspection schedule will remain the same and thus will not increase pollutant discharges	
	E.9.b	IF-2	Identify and Verify That Regulated Facilities Have Filed a NOI, Notify RWQCB of Discrepancies	1. Annual review of list of regulated industries that have filed a NOI with the RWQCB and comparison to the City's list of permitted industrial facilities	Public Works	Environmental Compliance	x						2	x	X	x	x	x				
	E.9.b			2. Notify the RWQCB of 100% of discrepancies re industries that should have filed a NOI and did not	Public Works	Environmental Compliance	x						2	x	X	x	x	x				
	E.9.b (e)	ID-1	Environmental Compliance Inspectors Conduct Site Inspections at Regulated Businesses	Inspect 100% permitted industrial facilities	Public Works	Environ Compliance		x					2	x	X	x	x	x	YES - Permit only requires inspections once over the term of the permit	Reduce - Reporting will be conducted once over the term of the permit, inspections will continue to be done on an annual basis	Inspection schedule will remain the same and thus will not increase pollutant discharges	
	E.9.b	IF-3	Conduct Site Visits at Industrial Facilities That Have Filed a NOI	Conduct site visit at 100% of additional sites not already in the City's SIU program once every 5 years	Public Works	Environmental Compliance	x						2					x				
	E.9.b	CF-2	Conduct Site Inspections for Vehicle Service Facilities	Conduct inspections at 100% of Vehicle Service Facilities	Public Works	Environmental Compliance		x					2					x	YES - Permit only requires inspections once over the term of the permit	Reduce - Reporting will be conducted once over the term of the permit, inspections will continue to be done on an annual basis	Inspection schedule will remain the same and thus will not increase pollutant discharges	
	E.9.b	CF-4	Conduct Site Inspections for Food Service Facilities	Conduct inspections at 100% of Food Service Facilities	Public Works	Environmental Compliance		x					2					x	YES - Permit does not require inventory and inspection of food service facilities and only requires business inspections once over the term of the permit	Reduce - Reporting will be conducted once over the term of the permit, inspections will continue to be done on an annual basis	Inspection schedule will remain the same and thus will not increase pollutant discharges	
E.9.c	Field Sampling to Detect Illicit Discharges												2									
✓	E.9.c		During outfall inventory, sample any outfalls that are flowing or ponding more than 72 hours after the last rain event; also conduct dry weather sampling of outfalls annually identified as priority areas		PW	Eng, Environmental Compliance, WW							2		x	x	x	x				
E.9.d	Illicit Discharge Detection and Elimination Source Investigations and Corrective Actions												2									
✓	E.9.d.		Develop written procedures for conducting investigations into the source of all non-storm water discharges suspected to be illicit discharges, and procedures to implement corrective actions		PW	Environmental Compliance							2		x							
	E.9.d (d) (e)	ID-2	Conduct Spill and Illegal Discharge Response	Respond to 100% complaints and reports of illegal discharges	Public Works	Environmental Compliance, WW	x						2	x	X	x	x	x				
	E.9.d (ii)	CF-6	Complaints or Staff Observations of Illegal Discharges by Mobile Washers	Follow-up on 100% of complaints or reports of illegal discharges	Public Works	Environmental Compliance	x						2	x	X	x	x	x				
E.9.e	Spill Response Plan												2									
✓	E.9.e		Develop and implement a spill response plan		PW	Environ Compliance, Engineering							1	x								

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New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Existing BMPs						General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes	
							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018					
E.9	Existing BMPs Not Required By the Permit																						
	N/A	ID-3	Conduct Storm Drain Outfall Monitoring for Bacterial Indicators at Three Locations Along West Cliff Drive	Quarterly Monitoring	Public Works	Environ Compliance, Wastewater Lab				X			N/A						Yes- Permit does not require quarterly outfall monitoring at priority areas	Replace with requirement per Section E.9.c	The City is sponsoring a study to identify the sources of bacteria at Cowells Beach. The results of the study will help target effective BMPs to reduce bacteria at Cowells Beach. Dry weather monitoring per E.9.c will help ID potential illicit discharges in the outfalls, whereas quarterly monitoring will not provide additional source info on bacteria.		
	E.15	ID-6	Develop and Implement A Public Storm Water Hotline Number	Plan for Hotline Number	Public Works	Engineering					X		N/A					Yes - this is not a required BMP	Cease - per Annual Report for Permit Year 3	City requested continuation of current contact numbers as distributed in the City's BMP guidance docs and other outreach material			
	N/A	MO-17	Dry Weather Diversion from Neary Lagoon to Wastewater Treatment Facility	Divert lagoon water 108 days per year	Public Works	Wastewater Mains	X						Year 1-5	X	X	X	X	X	Yes - this is not a required BMP	Maintain			
	N/A	MO-18	Clean Neary Lagoon Storm Drain Lines and Discharge Bacteria Laden Water to the Sanitary Sewer System	Clean storm drain lines and discharge the water to the sewer system annually	Public Works	Wastewater Mains	X						Year 1-5	X	X	X	X	X	Yes - this is not a required BMP	Maintain			
E.10	CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM																						
E.10.a	Construction Site Inventory												1										
✓	E.10.a		Maintain an inventory of all projects subject to the local construction site SW runoff control ordinance, incl. location of pjt with respect to waterbodies, threat to WQ, construction phase, required inspection frequency, date of erosion control plan approval		PW, Planning	Eng, Building							1	X	X	X	X	X					
E.10.b	Construction Plan Review and Approval Procedures												1										
✓	E.10.b		Develop/revise procedures to review and approve relevant construction plan documents.	Require operator of construction activity to prepare and submit erosion and sediment control plan for review.	PW, Planning	Eng, Building							1	X	X	X	X	X					
				Require rationale for BMPs used	PW, Planning	Eng, Building							1	X	X	X	X	X					
				Require that erosion/sed control plan list applicable permits associated w/ grading activity (CGP, 401, 404, 1600 agreement)	PW, Planning	Eng, Building							1	X	X	X	X	X					
				Document review using a checklist	PW, Planning	Eng, Building							1	X	X	X	X	X					
				SWPPP may substitute for erosion control plan where a SWPPP is developed	PW, Planning	Eng, Building							1	X	X	X	X	X					
E.10.c	Construction Site Inspection and Enforcement												2										
✓	E.10.c		Use legal authority to implement procedures for inspecting public and private construction projects and conduct enforcement if necessary.		Planning	Building							2		X	X	X	X				Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit	
	E.10.c.	CON-1	Planning/Building Inspectors Will Inspect All Construction Sites Requiring a Grading Permit. Inspections Will Also Be Conducted Prior to Well-Forecasted Rain Events at High Priority Construction Projects. Inspectors Will Also Inspect 50% or More of the Open Sites After Major Rain Events or Storms.	1. During the grading process, 100% of small sites will be inspected 2 times and 100% of large sites will be inspected 3 times (Small sites are defined as generally less than 1/2 acre. Large sites are greater than 1/2 acre.)	Planning	Building				X			1	X					Replace - Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit (see E.10.c) and provide improved focus on tracking and enforcement at high priority sites and in TMDL watersheds	Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit per E.10.c. Existing procedures will remain in place until revised procedures are established.			
				2. Inspect 100% of high priority sites prior to forecasted rain events	Planning	Building				X			1	X					Replace - Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit (see E.10.c) and provide improved focus on tracking and enforcement at high priority sites and in TMDL watersheds	Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit per E.10.c. Existing procedures will remain in place until revised procedures are established.			
				3. After major rain events, 50% or more of “open” sites will be inspected	Planning	Building				X			1	X					Replace - Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit (see E.10.c) and provide improved focus on tracking and enforcement at high priority sites and in TMDL watersheds	Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit per E.10.c. Existing procedures will remain in place until revised procedures are established.			
E.10	Existing BMPs Not Required By the Permit																						
		CON-3	Implement Corrective Measures and Enforcement Procedures in Accordance with the Grading Ordinance As Needed	1. Respond to 100% of complaints 2. Implement corrective actions, as appropriate, for 100% of sites where a violation is detected	Planning	Building					X		N/A						YES - not a required BMP	Remove - cease reporting, BMP continued as standard City practice	Activity will continue to be conducted by the City per our Municipal Code; however, reporting on it is not MEP given additional reporting required on new BMPs.		
		CON-4	Implement Corrective Measures and Enforcement Procedures in Accordance with Title 4 As Needed	Implement corrective actions, as appropriate, for 100% of sites where a violation is detected and referred to Code Enforcement for follow-up	Planning	Code Enforcement					X		N/A						YES - not a required BMP	Remove - cease reporting, BMP continued as standard City practice	Activity will continue to be conducted by the City per our Municipal Code; however, reporting on it is not MEP given additional reporting required on new BMPs.		

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							Existing BMPs						* BMP removed from Storm Water Program but continued under other City Programs - see description of implementation changes											
New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Continue	Consolidate	Reduce	Substitute	Remove*	Cease	General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes		
														2014	2015	2016	2017	2018						
		CON-5	Respond to Complaints and Implement Corrective Measures and Enforcement Procedures in Accordance with the Storm Water Ordinance As Needed	1. Respond to 100% of complaints 2.Implement corrective actions, as appropriate, for 100% of sites where a violation is detected	Public Works, Building	Environ Compliance					X		N/A						YES - not a required BMP	Remove - cease reporting, BMP continued as standard City practice	Activity will continue to be conducted by the City per our Municipal Code; however, reporting on it is not MEP given additional reporting required on new BMPs.			
	E.10.c.	CON-6	Report Violations of the Construction General Permit to the RWQCB	Report violations identified by the City during building and public works inspections	Planning	Building	X						Year 1-5	X	X	X	X	X	YES - not a required BMP	Maintain				
					Public Works	Engineering	X						Year 1-5	X	X	X	X	X	YES - not a required BMP	Maintain				
E.11	POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM																							
E.11.a	Inventory of Permittee-Owned & Operated Facilities																							
✓	E.11.a		Develop and maintain an inventory of City-owned or operated facilities that are a threat to WQ		PW, Parks & Rec, Facilities, Econ Devt, Water, IT								2		X									
E.11.b	Map of Permittee-Owned or Operated Facilities																							
✓	E.11.b		Submit a map of the area within the permit boundary and identify where City-owned/operated facilities are located		PW, IT								2		X									
E.11.c	Facility Assessment																							
✓	E.11.c		For all inventoried facilities, conduct comprehensive inspection / assessment of pollutant discharge potential and identification of pollutant hotspots		PW	Eng. Environmental Compliance							3			X								
E.11.d	Stormwater Pollution Prevention Plans																							
✓	E.11.d		Develop and implement SWPPPs for pollutant hotspots (OK if already have Spill Prevention Plan)		PW, Parks & Rec, Facilities, Water								4				X							
E.11.e	Inspections, Visual Monitoring and Remedial Action																							
✓	E.11.e		Conduct regular inspections of City-owned/operated facilities: quarterly visual hotspot inspections, annual comprehensive hotspot inspection, quarterly visual observation of hotspot SW discharges, non-hotspot inspection once per permit term		PW, Parks & Rec, Facilities, Water								5					X						
E.11.f	Storm Drain System Assessment and Prioritization																							
✓	E.11.f		Develop procedures to prioritize storm drain system maintenance		PW	Eng. Wastewater Mains							2		X									
	E.11.f	MO-4	Inspection, Cleaning, and Repair of City Catch Basins and Inlets	3. After large storm events during the wet season, inspect 90% of catch basins in the Downtown, Beach Flats, and lower Ocean Street areas and re-clean them as needed.	Public Works	Wastewater Mains					X			X	X				Replace after Year 2 with inspection schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness				
	E.11.f			4. Inspect 50% of the catch basins in the outlying areas of the City annually and clean as needed.	Public Works	Wastewater Mains					X			X	X				Replace after Year 2 with inspection schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness				
	E.11.f	MO- 5	Inspection of Branciforte Storm Water Conveyance Channel and Trash Removal As Needed	1. Annual inspection	Public Works	Wastewater Mains					X			X	X				Replace after Year 2 with inspection schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness				
E.11.g	Maintenance of Storm Drain System																							
✓	E.11.g		Begin Maintenance of all high priority storm drains on an on-going schedule according to procedures & priorities developed per E.11.f		PW	Wastewater Mains							3			X	X	X						
	E.11.g	MO-4	Inspection, Cleaning, and Repair of City Catch Basins and Inlets	1. Clean 90% of catch basins and inlets located in the Downtown, Beach Flats, and lower Ocean Street areas annually in the Fall	Public Works	Wastewater Mains					X		N/A	X	X				Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness				
	E.11.g			2. Clean and repair 100% of storm drains or catch basins identified as clogged or non-functional annually in the fall or as soon as possible	Public Works	Wastewater Mains					X		N/A	X	X				Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness				
	E.11.g	MO- 5	Inspection of Branciforte Storm Water Conveyance Channel and Trash Removal As Needed	2. Removal of 100% of large trash and debris items	Public Works	Wastewater Mains					X		N/A	X	X				Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness				

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New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Existing BMPs						General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes
							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
	E.11.g	PE-1	Replace Worn Stencils or Apply New Stencils to Storm Drain Inlets		Public Works	Engineering, Streets	x						N/A	x	x	x	x	x		Maintain		
	E.11.g	MO 6	Clean Pump Stations Along the San Lorenzo River	Clean twice per year (Spring and Fall) Additional cleanings, if needed, during wet season after large storm events	Public Works	Wastewater Mains				x			N/A	x	x					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness	
	E.11.g	MO 7	CDS Unit Maintenance	1. Clean twice per year in Fall and Spring	Public Works	Wastewater Mains				x			N/A	x	x					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness	
	E.11.g			2. Inspect and clean, if necessary, monthly during rainy season	Public Works	Wastewater Mains				x			N/A	x	x					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness	
E.11.h	Permittee Operations and Maintenance Activities																					
✓	E.11.h		Develop a program to assess O&M activities and develop applicable BMPs, including: road/parking lot maintenance, bridge maintenance, ROW maintenance, hydrant flushing, etc.		PW-Traffic, PW-Eng, Water, Parks,								3			x						The City has already developed BMPs for most O&M activities; these BMPs will be reviewed to ensure they meet the requirements of the General Permit
✓	E.11.h		Evaluate municipal operations BMPs quarterly		PW-Traffic, PW-Eng, Water, Parks,								3			x	x	x				
	E.11.h	MO-19	Revise Municipal Operations BMPs If Necessary and Republish Brochure	Distribute revised BMPs to applicable City Department Supervisors	Public Works	Engineering				x				x	x					Cease when replaced by new requirement per E.11.h	Replaced by new GP requirement to evaluate municipal operations BMPs quarterly	
✓	E.11.i		Develop and implement WQ and habitat enhancement features in the design of all new and rehabilitated flood mgmt projects		PW	Eng							3			x						
✓	E.11.j		Implement a landscape design and maintenance program to reduce amount of water, pesticides, herbicides, and fertilizers used during permittee operations		Parks & Rec, Water								2		x							
E.11	Existing BMPs Not Required By the Permit																					
	E.11	MO-12	Repair and Rehabilitation of Minor Storm Drain Lines	Target=Bacteria & Sediments Repair or rehabilitate an average of 100 feet of pipeline per year over the 5 year permit period	Public Works	Engineering					x		N/A							Remove	Stop reporting in Storm Water Program - activity will continue per on-going City maintenance activities	
	E.11	MO-15	Conduct Cleaning at Main and Cowell Beaches	1. Daily maintenance cleaning	Parks & Rec	Wharf, Parks	x						Year 1-5	x	x	x	x	x	Yes - this is not a required BMP	Maintain		
				2. Spring cleaning as needed to remove trash following winter storms	Parks & Rec	Wharf, Parks			x				Year 1-5	x	x	x	x	x	Yes - this is not a required BMP	Reduce - spring trash removal at Main and Cowell Beaches as needed instead of annually.	Debris after winter storms is primarily woody debris. Removal of woody debris on beaches does not significantly affect near-shore water quality. Removal of trash is the primary goal and will be done where trash is identified.	
	E.11	MO-22	City-wide Watershed Issues Team Meetings to Discuss Watershed Issues Re TMDLS and Other Related Topics	Meet semi-annually or more as needed	Public Works, Planning, Water, Parks & Rec, City Manager	WW Lab & Env. Compliance					x		N/A						Yes - this is not a required BMP	Cease	Key City staff involved in storm water and TMDL implementation are regularly in contact and meet on an as-needed basis to discuss specific planning and implementation issues. Additionally, storm water issues are brought up on an as-needed basis at our monthly City sustainability team meetings. Consequently, additional city-wide meetings do not provide additional water quality protection	
	E.11	MO-2	Take Measures to Control Litter	Maintain litter and recycling receptacles in the downtown on a daily basis	Public Works	Parking Maintenance, Refuse	x						Year 1-5	x	x	x	x	x	Yes - this is not a required BMP	Maintain		
				Maintain litter and recycling receptacles in the Wharf, Cowell Beach, and part of Main Beach (from Wharf to near Coconut Grove (Westlake ramp)) a minimum average of 5 days/week	Parks & Rec	Wharf, Parks			x				Year 1-5	x	x	x	x	x		Reduce - revise frequency of receptacle maintenance to a minimum average of 5 days per week instead of daily	City Parks will continue to maintain the receptacles on a daily schedule but the goal revision will accommodate potential staff shortages and low receptacle use during the rainy season.	
				Maintain litter and recycling receptacles in 35 City parks a minimum average of 5 days/week	Parks & Rec	Wharf, Parks			x				Year 1-5	x	x	x	x	x		Reduce - revise frequency of receptacle maintenance to a minimum average of 5 days per week instead of daily	City Parks will continue to maintain the receptacles on a daily schedule but the goal revision will accommodate potential staff shortages and low receptacle use during the rainy season.	
				Receptacles in other areas emptied as needed	Parks & Rec	Parks					x		N/A							Remove - cease reporting, BMP continued as standard City practice	The City will continue to empty receptacles in other areas as needed but will no longer report.	
	E.11, E.15	MO-1	Sweep City Streets By Mechanical Sweepers	Sweep primary streets in downtown & main beach areas once to twice per week	Public Works	Streets			x				Year 1-5	x	x	x	x	x	Yes - this is not a required BMP	Reduce - Goal revised from twice per week to once to twice per week	City will continue to maintain the 2X/week schedule but the goal revision will accommodate potential staff shortages. Previous goal was over-estimated when SWMP was previously developed	

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New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Existing BMPs						General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes
							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
				Sweep primary streets in other commercial areas twice per month	Public Works	Refuse			X				Year 1-5	X	X	X	X	X		Reduce - Goal revised from weekly to twice per month	City will continue to maintain the weekly schedule but the goal revision will accommodate potential staff shortages. Previous goal was over-estimated when SWMP was previously developed	
				Sweep 75% of residential streets once per month	Public Works	Refuse			X				Year 1-5	X	X	X	X	X		Reduce - Goal revised from twice per month to once per month	City will continue to maintain the 2X/month schedule but the goal revision will accommodate potential staff shortages. Previous goal was over-estimated when SWMP was previously developed	
				Sweep streets upon special request	Public Works	Refuse					X		N/A							Remove - cease reporting, BMP continued as <u>standard City practice</u>	The City will continue to respond to special requests but will no longer report.	
				*Additional activity: Sweep Wharf daily on average with mechanical sweeper	Parks & Rec	Wharf	X						Year 1-5	X	X	X	X	X		Maintain		
	E.11, E.15		Scrub downtown sidewalks with driveable Tenant Scrubber	Scrub downtown sidewalks on a monthly average.	Public Works	Parking Maintenance	X						Year 1-5	X	X	X	X	X		Maintain		
	E.11, E.15	MO-3	Sweep Public Parking Lots and Parking Garages Regularly	Clean lots w/a mechanical sweeper 2 or more times per week depending upon which location	Public Works	Traffic/Parking Prog			X				Year 1-5	X	X	X	X	X	Yes - this is not a required BMP	Reduce - Goal revised from 2x to 6x per week to at least 2x per week.	City will continue to maintain same sweeping schedule but the goal revision will accommodate potential staff shortages.	
	E.11	MO 5	Inspection of Branciforte Storm Water Conveyance Channel and Trash Removal As Needed	1. Annual inspection	Public Works	Wastewater Mains				X			N/A	X	X				Yes - this is not a required BMP	Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness	
				2. Removal of 100% of large trash and debris items	Public Works	Wastewater Mains				X			N/A	X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness	
E.12	POST CONSTRUCTION STORMWATER MANAGEMENT PROGRAM																					
E.12.a	Post-Construction Measures																					
✓	E.12.a		Regulate development to comply with the following sections. E.12.b through E.12.l										2	X	X	X	X	X				Implementing Post-Construction requirements set forth by the CCRWQCB (see E.12.k)
	E.12.b		Site Design Measures	see E.12.k																		
	E.12.c		Regulated Projects	see E.12.k																		
✓	E.12.d		Source Control Measures - Regulated Projects shall implement source control measures	E.12.d Source Control Measures included in mandatory development BMPs									2	X	X	X	X	X				Replaces requirements per Attachment 4 of the previous General Permit
	E.12.e		LID Standards - all Regulated Projects shall implement LID standards to treat storm water and provide baseline hydromod mgmt to meet numeric sizing criteria under E.12.e(ii)c	see E.12.k																		
	E.12.f		Hydromodification Management	see E.12.k																		
	E.12.g		Enforceable Mechanisms	see E.12.k																		
	E.12.h		Operation and Maintenance of Post-Construction Stormwater Management Measures	see E.12.k																		
	E.12.i		Post-Construction BMP Condition Assessment	see E.12.k																		
E.12.j	Planning and Development Review Process												2	X								
	E.12.j	PC-10	Develop and/or Modify Enforceable Mechanisms That Will Effectively Implement Hydromodification Controls and LID. Enforceable Mechanisms May Include Municipal Codes, Regulations, Standards, and Specifications.	1. An analysis of all applicable codes, regulations, standards, and/or specifications that identifies modifications and/or additions necessary to effectively implement hydromodification controls and LID	Public Works, Planning	Engineering					X									Delete - completed	City conducted a thorough GAP Analysis review of all City codes and submitted the Gap Analysis Report to the RWQCB	
				2. Approved new and/or modified enforceable mechanisms that effectively resolve regulatory conflicts and implement hydromodification controls and LID in new and redevelopment projects	Public Works, Planning	Engineering	X						1	X								Revision of City mandatory SW BMPs for development and redevelopment to incorporate new PCR requirements in FY2014.
				3. Apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects.	Public Works, Planning	Engineering	X						1	X								Revision of City mandatory SW BMPs for development and redevelopment to incorporate new PCR requirements in FY2014.
E.12.k	Post-Construction Storm Water Management Requirements Based on Assessment and Maintenance of Watershed Processes																					
✓	E.12.k		Post Construction Storm Water Management Requirements Based on Assessment and Maintenance of Watershed Processes	Implement the RWQCB's Post-Construction Requirements for all new regulated development and redevelopment projects	PW	Eng	X						1	X	X	X	X	X				New PCRs adopted by CCRWQCB July 2013.

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New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Existing BMPs						General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes
							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
	E.12.k	PC-2	Revise Mandatory Storm Water BMPs/ Design Standards	1. Revision to require more effective BMPs to treat parking lot runoff	Public Works	Engineering					X		N/A							Delete - Completed.	Implementation completed	
				2. Revision to clarify that all development projects per General Permit Attachment 4 will be subject to structural or treatment control BMP requirements	Public Works	Engineering				X			N/A							Replace - see E.12.d	Replaced by E.12.d requirement, which will be incorporated in mandatory Development BMPs in Yr 1.	
				3. A process for project applicants to follow to identify structural or treatment control BMPs that will be effective in removing a development project's pollutants of concern.	Public Works	Engineering				X			N/A							Replace - see E.12.j	Replaced by E.12.j	
	E.12.k	PC-3	Derive Municipality-Specific Criteria for Controlling Hydromodification in New and Redevelopment Projects Using Water Board-Approved Methodology Developed through the Joint Effort	Hydromodification Control Criteria	Public Works Planning	Engineering					X		N/A							Delete - Completed.	PCRs have been adopted by the CCRWQCB for the entire region. City will continue to be involved in the JERT process to refine implementation of PCRs	
	E.12.k	PC-4	Select Applicability Thresholds for Applying Hydromodification Control Criteria to New & Redevelopment Projects. Applicability Thresholds Will Be Consistent with Long-Term Watershed Protection.	Applicability Thresholds	Public Works, Planning	Engineering					X		N/A							Delete - Completed.	Same as above	
	E.12.k	PC-5	Develop and Enact A Strategy for Implementing LID and Hydromodification Control for New and Redevelopment Projects.	Guidance: 1. Develop, advertise and make available LID BMP Design Guidance suitable for all stakeholders	Public Works, Planning	Engineering	X						1	X								City will revise its mandatory SW BMPs for development and redevelopment to provide guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements per the PCRs in FY2013-2014. The City will also include details for bioretention to its standard details.
				Guidance: 2. Specific guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements made available to new and redevelopment project applicants	Public Works, Planning	Engineering	X						1	X								See above
				Education & Outreach: 1. Documentation of goals, schedules, and target audiences for education and outreach the municipality will conduct in support of the following strategic objectives: enforceable mechanisms, hydromodification control criteria, applicability thresholds, LID BMP design, and compliance with LID and hydromodification control criteria	Public Works, Planning	Engineering					X									Delete - Completed.		
				Education & Outreach: 2. Tracking Report indicating municipality's accomplishments in education and outreach supporting implementation of LID and hydromodification control for new and redevelopment projects (O8)	Public Works, Planning	Engineering	X						1	X								
				Interim LID Implementation: 1. Apply LID principles and features to all applicable new and redevelopment projects.	Public Works	Engineering				X										Replace w/ implementation of adopted PCRs in Permit Yr 1 (E.12.k)		The City has been applying LID principles to all applicable projects since Q2 and even to specific projects prior to the start of Q2.
				2. Tracking Report, for the period Q2 to Q8, identifying LID design principles and features incorporated into each applicable new and redevelopment project.	Public Works	Engineering					X									Delete - completed in FY 2012-13 and tracking report submitted with annual report in Sept 2013.		
	E.12.k	PC-8	Implement Program to Ensure Long-term BMP Inspection and Maintenance. Spot Inspections Will Be Conducted	1. Develop an electronic database or spreadsheet to better track & assess sites over time	Public Works	Engineering					X									Delete - Completed		
				2. Enforce the proof of annual BMP inspection and maintenance requirement at 100% of sites	Public Works	Engineering	X						Year 1-5	X	X	X	X	X		Maintain		
				3. Implement a spot inspection program at 10% of sites annually	Public Works	Engineering	X						Year 1-5	X	X	X	X	X		Maintain		
	E.12.k	PC-9	Implement Corrective Measures and Enforcement Procedures As Needed in Accordance with the Municipal Code	Implement corrective actions, as appropriate, for 100% of sites where a violation is detected	Public Works	Engineering	X							X	X	X	X	X		Maintain		

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New BMP (✓)	Permit Section	Existing BMP #	BMPs	MEASURABLE GOALS	DPT	DIV.	Existing BMPs						General Permit Schedule (Permit Year)	Implementation FY (due date)					Is BMP more protective than minimum Permit requirements?	Maintain, reduce, consolidate or cease Implementation? (Description of Implementation Changes)	Demonstration that reduction or cessation complies with Order and MEP and will not increase pollutant discharges	Other Implementation Notes	
							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018					
E.12	Existing BMPs Not Required By the Permit																						
		PC-1	On City Owned Property, No New City Development Projects Shall Be Permitted Within 30 Feet of a Wetland Without an Approved Project-specific Habitat Management Plan and a Site-specific Water Quality Management Plan.	Formalize and implement strategy	Public Works, Planning,	Engineering						X		N/A						Yes - this is not a required BMP	Delete - completed, policy incorporated into development BMPs.	Requirement included in mandatory Storm Water BMPs for Development & Remodeling Projects revised June 2010 and all subsequent revisions	
		PC-6	Review and Evaluate the City's General Plan and Other Watershed Protection Planning Efforts. In Conjunction, Develop Where Feasible Quantifiable Measures That Indicate How the City's Watershed Protection Efforts Related to Storm Water Management Achieve Desired Watershed Conditions.	1. Determination if long-term watershed management and protection efforts are addressed and, if not, identification of sections needing revisions.	Public Works, Planning	Engineering						X		N/A						Yes - this is not a required BMP	Delete - completed in FY 2013. No edits to General Plan required		
				2. Quantifiable Measures	Public Works, Planning	Engineering						X		N/A							Replace - see E.14.a	Quantifiable measures identified will be incorporated into the program effectiveness assessment strategy to be developed in Year 2 of the General Permit (E.14.a)	
		PC-11	Distribute BMP Brochure for Development and Remodeling Projects	Distribute to 100% of discretionary project applicants	Planning/PW	Development Review staff						X		N/A						Yes - this is not a required BMP	Remove - cease reporting, BMP continued as standard City practice	As a standard practice, mandatory BMPs distributed to project applicants at Planning and PW counters. Phone inquiries directed to City website where BMPs can be downloaded. Tracking and reporting the number of BMP brochures distributed does not provide significant insight re: BMP effectiveness.	
		PC-12	Hold Educational Workshops on LID and Hydromodification Control Requirements	1. One educational workshop after the hydromodification control criteria have been developed	Public Works, Planning	Engineering	X							1	X					Yes - this is not a required BMP	Maintain		
		PC-14	Provide Training to Appropriate Planning & Public Works Staff	1. Train 100% of appropriate staff every two years.	Public Works, Planning	Engineering							X	N/A						Yes - this is not a required BMP	Cease	Dedicated staff persons in PW will be conducting LID plan reviews and inspections; these dedicated persons will have continuing education re: LID through involvement in CASQA, JERT, etc. Training of other staff will only be needed so that they are aware of changing requirements as they will not be involved in post-construction review	
				2. Train new Inspectors and Plan Reviewers within 3 months of the beginning of employment.	Planning	Planning							X	N/A							Cease	See above	
				3. Additional training on new or changed BMPs as needed	Public Works, Planning	Engineering	X							Year 1-5	X	X	X	X	X		Maintain		
		CON-2	PW Staff Will Inspect Installation of Post-construction Treatment Systems and Storm Water Retention Devices at Development Sites Greater Than or Equal to One Acre	Inspect systems and devices at 100% of development sites greater than or equal to one acre	Public Works	Engineering	X							Year 1-5	X	X	X	X	X	Yes - this is not a required BMP	Maintain		
E.13	WATER QUALITY MONITORING																						
✓	E.13.b, E.15		TMDL Monitoring	Comply with the monitoring requirements included in WAAP and/or consult w/ RWQCB to determine monitoring study design and monitoring implementation schedule	PW	Environ Compliance								1	X	X	X	X	X			Consultation with the RWQCB will occur in Permit Year 1; TMDL monitoring implementation will begin in Year 2.	
	E.13.b, E.15		Bacteria Monitoring Pilot Program	Bacteria monitoring in San Lorenzo River, Branciforte Creek, and Carbonera Creek, per specs in WAAP	PW	Environ Compliance					X				X						Replace in Year 2 - per consultation with the RWQCB, the pilot program will be replaced by the TMDL monitoring above	Will be replaced by monitoring per WAAP and as approved by RWQCB (see above)	
E.14	PROGRAM EFFECTIVENESS ASSESSMENT																						
✓	E.14.a		Develop and implement a Program Effectiveness Assessment and Improvement Plan that tracks annual and long-term effectiveness of the storm water program	Develop the Effectiveness Assessment and Improvement Plan	PW	Eng								2		X							
				Describe implementation of the Plan, summarize data obtained through effectiveness assessment measures, and provide an analysis of the data to improve effectiveness	PW	Eng								3			X	X	X				

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							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018						
✓	E.14.b		Modify BMPs and/or the program as a whole to improve compliance with permit conditions and improve program effectiveness at reducing pollutant loads, achieving the MEP standard, and protecting water quality.									5					X							
	E.14.a	PM-1	Develop an Effectiveness Assessment Strategy	1. Identify a process to be used to conduct effectiveness assessments and improve BMP implementation.	Public Works	Engineering				X			N/A								Replace - Instead of conducting a Program Effectiveness Assessment in Year 4 of the existing SWMP; a preliminary review of SWMP BMPs was conducted as part of developing the Guidance Document for the new General Permit. The Effectiveness Assessment strategy will be conducted per the requirements of the new General Permit (E.14.a).	The new General Permit requirements are more detailed than the existing BMP; additionally, conducting effectiveness assessment will provide more useful information on the program we are beginning to implement in 2013 since the program will be modified to meet the new Permit requirements.		
	E.14.a			2. Identify quantifiable BMP and program effectiveness measurements	Public Works	Engineering				X			N/A								See above	See above		
	E.14.b			3. Assessment of BMP implementation and modifications needed	Public Works	Engineering				X			N/A								See above	See above		
E.15	TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS																							
	E.15	TMDL 1	Develop Additional BMPs as Necessary in Conjunction With The TMDL For Sediment	Target=Sediment - Additional BMPs and measures	Public Works	Engineering					X		N/A							Delete - completed	Action completed and BMPs addressed in WAAP and Guidance Document			
	E.15	TMDL 2	Develop Additional BMPs as Necessary in Conjunction With The TMDL For Pathogens	Target=Bacteria - Additional BMPs and measures	Public Works	Engineering					X		N/A							Delete - completed	Action completed and BMPs addressed in WAAP and Guidance Document			
	E.15	TMDL 3	Develop, Submit, and Implement a Wasteload Allocation Attainment Program(s) (WAAP) to Address Controllable Sources Associated with the Storm Water System for Each Impairing Pollutant/TMDLs within the City's Jurisdiction.	Implement WAAPs for pathogens and sediment	Public Works	Engineering					X		N/A							Delete - completed	WAAPs completed and submitted in FY 2013 - TMDL implementation per WAAPs			
✓	E.15		Comply with the effectiveness assessment schedule and process included in WAAP		PW	Eng							1	X	X	X	X	X						
BMPs per City of Santa Cruz WAAP for Pathogens																								
✓	E.11.f, E.15		Develop procedures to prioritize storm drain system maintenance		PW								2		X									
✓	E.11.g, E.15		Begin Maintenance of all high priority storm drains on an on-going schedule according to procedures & priorities developed per E.11.f		PW								3			X								
	E.11.g, E.15	MO-4	Inspection, Cleaning, and Repair of City Catch Basins and Inlets	1. Clean 90% of catch basins and inlets located in the Downtown, Beach Flats, and lower Ocean Street areas annually in the Fall	Public Works	Wastewater Mains, Operations				X				X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness			
				2. Clean and repair 100% of storm drains or catch basins identified as clogged or non-functional annually in the fall or as soon as possible	Public Works	Wastewater Mains				X				X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness			
				3. After large storm events during the wet season, inspect 90% of catch basins in the Downtown, Beach Flats, and lower Ocean Street areas and re-clean them as needed	Public Works	Wastewater Mains, Operations				X				X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness			
				4. Inspect 50% of the catch basins in the outlying areas of the City annually and clean as needed	Public Works	Wastewater Mains, Operations				X				X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness			
	E.15	MO-6	Clean Pump Stations Along the San Lorenzo River	Target=Sediment & Bacteria Clean Twice Per Year (Spring & Fall) Additional cleanings if needed during wet season and after large storm events	Public Works	Wastewater Mains				X				X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness			
	E.15	MO-8	Conduct Inspections of Storm Drain Lines	Target=Bacteria & Sediments TV or visual inspect the inside of an average of 1000 feet of pipeline each year over a 5 year period	Public Works	Engineering, Wastewater Mains				X				X	X					Replace after Year 2 with maintenance schedule and priorities established per system assessment and prioritization in E.11.f	The City will review its maintenance procedures and priorities based on the results of on-going maintenance activities and will identify needed schedule and procedure adjustments to improve effectiveness			
	E.15	MO-10	Replace or Rehabilitate Sanitary Sewer Main Lines	Target=Bacteria & Sediments Replace or rehabilitate sewer main pipeline as needed each year	Public Works	Engineering, Wastewater Mains					X													
	E.15	MO-11	Development and Implementation of a Lateral Inspection Program	Implementation of Program starting FY 2016	Public Works	Engineering	X						3			X				Maintain - implementation postponed due to lengthy process for public outreach and ordinance adoption				

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							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
	E.15	MO-13, MO-14	Dry Weather Diversion of Storm Water from SLR Pump Stations to the (WWTF) Wastewater Treatment Facility	Dry Weather Diversion of Storm Water from SLR Pump Stations 1, 2, 1A, 1B and 3 to the (WWTF) Wastewater Treatment Facility	Public Works	Engineering Wastewater Mains		X					Year 1-5	X	X	X	X	X		Maintain - BMPs consolidated		
	E.15	MO 16	Implement Illegal Campsite Clean-Up Program In City Parks and Open Spaces	Cleanup of illegal campsites at the appropriate locations on an annual basis	Parks & Rec		X						Year 1-5	X	X	X	X	X		Maintain		
	E.9.d, E.15	ID-2	Conduct Spill and Illegal Discharge Response	Target=Sediment & Bacteria Respond to 100% complaints and reports of illegal discharges	Public Works	Environmental Compliance	X						Year 1-5	X	X	X	X	X		Maintain		
	E.7.a, E.11.g, E.15	PE-1	Replace Worn Stencils or Apply New Stencils to Storm Drain Inlets	24 stencils replaced or newly applied annually	Public Works	Engineering	X							X	X	X	X	X		Maintain		
	E.8.c, E.15		Sponsor river and/or creek cleanups	Programs e.g.: Adopt-A-Levee (in partnership with Save Our Shores), River & Creek Cleanups (Save Our Shores)	Public Works	Engineeering	X						Year 1-5	X	X	X	X	X		Maintain		
	E.13.b, E.15		Bacteria Monitoring Pilot Program	Bacteria monitoring in San Lorenzo River, Branciforte Creek, and Carbonera Creek, per specs in WAAP	PW	Environ Compliance				X				X						Replace (see TMDL Monitoring)	Will be replaced by monitoring per WAAP and as approved by RWQCB (see TMDL monitoring in E.13.b and E.15)	
✓	E.13.b, E.15		TMDL Monitoring	Comply with the monitoring requirements included in WAAP and/or consult w/ RWQCB to determine monitoring study design and monitoring implementation schedule	PW	Environ Compliance							1	X	X	X	X	X				
BMPs per City of Santa Cruz WAAP for Sediment																						
	E.11, E.15	MO-1	Sweep City Streets By Mechanical Sweepers	1. Sweep primary streets in downtown & main beach areas once to twice per week	Public Works	Streets			X				Year 1-5	X	X	X	X	X		Modify - Goal revised from twice per week to once to twice per week	City will continue to maintain the 2X/week schedule but the goal revision will accommodate potential staff shortages. Previous goal was over-estimated when SWMP was previously developed	
				2. Sweep primary streets in other commercial areas weekly to twice per month	Public Works	Refuse			X				Year 1-5	X	X	X	X	X		Modify - Goal revised from weekly to at least twice per month	City will continue to maintain the weekly schedule but the goal revision will accommodate potential staff shortages. Previous goal was over-estimated when SWMP was previously developed	
				3. Sweep 75% of residential streets once to twice per month	Public Works	Refuse			X				Year 1-5	X	X	X	X	X		Modify - Goal revised from twice per month to at least once per month	City will continue to maintain the 2X/month schedule but the goal revision will accommodate potential staff shortages. Previous goal was over-estimated when SWMP was previously developed	
	E.11, E.15	MO-3	Sweep Public Parking Lots and Parking Garages Regularly	Target=Sediment & Bacteria. Clean lots w/a mechanical sweeper 2 or more times per week depending upon which location	Public Works	Traffic/Parking Prog			X				Year 1-5	X	X	X	X	X		Modified - Goal revised from 2x to 6x per week to at least 2x per week.	City will continue to maintain same sweeping schedule but the goal revision will accommodate potential staff shortages.	
	E.11, E.15		Scrub downtown sidewalks with driveable Tenant Scrubber	Scrub downtown sidewalks on a monthly average.	Public Works	Parking Maintenance	X						Year 1-5	X	X	X	X	X		Maintain		
✓	E.10.a		Maintain an inventory of all projects subject to the local construction site SW runoff control ordinance, incl. location of project with respect to waterbodies, threat to WQ, construction phase, required inspection frequency, date of erosion control plan approval		PW	Eng							1	X	X	X	X	X				
✓	E.10.b		Develop/revise procedures to review and approve relevant construction plan documents.	Require operator of construction activity to prepare and submit erosion and sediment control plan for review.	PW, Planning	Eng							1	X	X	X	X	X				
				Require rationale for BMPs used	PW, Planning	Eng							1	X	X	X	X	X				
				Require that erosion/sed control plan list applicable permits associated w/ grading activity (CGP, 401, 404, 1600 agreement)	PW, Planning	Eng							1	X	X	X	X	X				
				Document review using a checklist	PW, Planning	Eng							1	X	X	X	X	X				
				SWPPP may substitute for erosion control plan where a SWPPP is developed	PW, Planning	Eng							1	X	X	X	X	X				
✓	E.10.c		Use legal authority to implement procedures for inspecting public and private construction projects and conduct enforcement if necessary.		Planning	Building							2		X	X	X	X				Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit
	E.10.c.	CON-1	Planning/Building Inspectors Will Inspect All Construction Sites Requiring a Grading Permit. Inspections Will Also Be Conducted Prior to Well-Forecasted Rain Events at High Priority Construction Projects. Inspectors Will Also Inspect 50% or More of the Open Sites After Major Rain Events or Storms.	1. During the grading process, 100% of small sites will be inspected 2 times and 100% of large sites will be inspected 3 times (Small sites are defined as generally less than 1/2 acre. Large sites are greater than 1/2 acre.)	Planning	Building				X			1	X						Replace - Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit (see E.10.c) and provide improved focus on tracking and enforcement at high priority sites and in TMDL watersheds	Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit per E.10.c. Existing procedures will remain in place until revised procedures are established.	

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							Continue	Consolidate	Reduce	Substitute	Remove*	Cease		2014	2015	2016	2017	2018				
				2. Inspect 100% of high priority sites prior to forecasted rain events	Planning	Building				X			1	X						Replace - Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit (see E.10.c) and provide improved focus on tracking and enforcement at high priority sites and in TMDL watersheds	Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit per E.10.c. Existing procedures will remain in place until revised procedures are established.	
				3. After major rain events, 50% or more of "open" sites will be inspected	Planning	Building				X			1	X						Replace - Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit (see E.10.c) and provide improved focus on tracking and enforcement at high priority sites and in TMDL watersheds	Existing building inspection procedures will be reviewed and revised as needed to meet the requirements of the General Permit per E.10.c. Existing procedures will remain in place until revised procedures are established.	
	E.10.c, E.15	CON 2	PW Staff Will Inspect Installation of Post-construction Treatment Systems and Storm Water Retention Devices at Development Sites Greater Than or Equal to One Acre	Inspect systems and devices at 100% of development sites greater than or equal to one acre	Public Works	Engineering	X						Year 1-5	X	X	X	X	X		Maintain		
	E.12.k, E.15	PC 5	Develop & Enact A Strategy for Implementing LID & Hydromodification Control For New and Redevelopment Projects	Develop, advertise and make available LID BMP Design Guidance suitable for all stakeholders; Specific guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements made available to new and redevelopment project applicants	Public Works Planning	Engineering	X						1	X								City will revise its mandatory SW BMPs for development and redevelopment to provide guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements per the PCRs in FY2013-2014. The City will also include details for bioretention to its standard details.
	E.12.j	PC-10	Develop and/or Modify Enforceable Mechanisms That Will Effectively Implement Hydromodification Controls and LID. Enforceable Mechanisms May Include Municipal Codes, Regulations, Standards, and Specifications.	Approved new and/or modified enforceable mechanisms that effectively resolve regulatory conflicts and implement hydromodification controls and LID in new and redevelopment projects	Public Works, Planning	Engineering	X						1	X						Maintain		Revision of City mandatory SW BMPs for development and redevelopment to incorporate new PCR requirements in FY2014.
				Apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects.	Public Works, Planning	Engineering	X						Year 1-5	X	X	X	X	X		Maintain		
	E.12.k, E.15	PC-8	Implement Program to Ensure Long-term BMP Inspection and Maintenance. Spot Inspections Will Be Conducted	Enforce the proof of annual BMP inspection and maintenance requirement at 100% of sites	Public Works	Engineering	X						Year 1-5	X	X	X	X	X				
				Implement a spot inspection program at 10% of sites annually	Public Works	Engineering	X						Year 1-5	X	X	X	X	X				
✓	E.13.b, E.15		TMDL Monitoring	Comply with the monitoring requirements included in WAAP and/or consult w/ RWQCB to determine monitoring study design and monitoring implementation schedule	PW	Environ Compliance							1	X	X	X	X	X				
E.16	ANNUAL REPORTING PROGRAM																					
✓	E.16.a		Use SMARTS to report and certify		PW	Eng							Year 1-5	X	X	X	X	X				
	E.16.b		Complete and retain annual reports and make available to RWQCB during working hours		PW	Eng							Year 1-5	X	X	X	X	X				
✓	E.16.c		Submit detailed written or oral report to RWQCB if directed.		PW	Eng							Year 1-5	X	X	X	X	X				
✓	E.16.d		May coordinate reporting if regional programs		PW	Eng							Year 1-5	X	X	X	X	X				