

ANNUAL REPORT

General Permit Report for Discharger of Stormwater from Small Municipal Separate Storm Sewer System (MS4)

Check box if this is a new name, address, etc.

A. Permit Holder Information

1. Permittee (Agency Name): City of San Luis Obispo
2. Contact Person: Freddy Otte, Stormwater Program Coordinator
3. Mailing Address: 990 Palm Street
4. City, State and Zip Code: San Luis Obispo, CA 93401
5. Contact Phone: 805-781-7511
6. WDID#: 3 40MS03009
7. Have any areas been added to the MS4 during the reporting period: Yes No
8. Are you subject to the Design Standards contained in Attachment 4 of the General Permit?
 Yes No

Topics covered in Attachment 4 have been integrated into the Post-Construction section of the City's SWMP. The other topics in Attachment 4 related to Hydromodification will be addressed by the Joint Effort tasked with developing Hydromodification numeric criteria and will be reported upon when complete.

B. Reporting Period: Coverage Period June 16, 2010 to June 15, 2011 (Year 2).

C. 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 of 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.

Freddy Otte
Freddy Otte
Biologist / Stormwater Coordinator
City of San Luis Obispo

9/15/11
Date

D. Executive Summary

The City of San Luis Obispo (City) has completed Year 2 of the Stormwater Management Program (SWMP). The documentation of the Best Management Practices (BMP's) contained herein is intended to demonstrate to the Central Coast Regional Water Quality Control Board (Board) that the City has been diligent in implementing the more than 200 BMP's specified for Year 2 to protect and improve water quality within City limits. The City's SWMP was approved by the Board on June 30, 2009 after a number of revisions were incorporated by the City to elevate the level of the program to the Maximum Extent Practicable (MEP). Our SWMP was written to fit San Luis Obispo and focus specifically on the issues that are impacting water quality locally.

The current SWMP is very successful in water quality improvement through trash and debris removal and prevention of that material from entering the waterway system. Wastewater Collections crews have removed over 1,000,000 of trash and debris from the stormdrain system (drain inlets, stormdrain pipes, and catchment basins since program inception), the street sweeping program removes approximately 50 tons of trash and debris annually before entering local waterways and over 100,000 pounds of trash has been removed from the creek corridor (transient related and general trash removal, camp cleaning, and creek day efforts). Coupling the direct removal of material from the creeks and preventing the rest of the aforementioned material from getting to the creek, the construction site inspections and education programs are becoming a bigger tool for water quality improvement through the indirect methods. With this program still in its infancy, gaging the effectiveness is going to take more time. All indicators are pointing to positive impacts but going through an assessment of each BMP is a laborious process that will require at least a few more years before we can begin seeing which BMP's are truly effective in attaining MEP.

Coordination of the program has remained with the Natural Resources Program in Administration and a "Core Group" of staff, established across several departments to emphasize the interdepartmental nature of the SWMP and complete their associated BMP's still meets monthly to ensure progress and address problems or issues they may be facing in the field. The major Core Group staff members involved from different departments (Public Works, Community Development, Utilities, and Administration) has the responsibility of implementing 90% of the BMP's identified in the SWMP. The remaining 10% are completed by other City staff (Full Implementation Team) who receive guidance from the Core Group members. Role clarifications were addressed in the beginning to promote consistency in implementation and reduce duplicative work. With the overlap of BMP's and different Department staff being involved with similarly worded BMP's, there was and still is the need for clear direction as to what each staff is responsible for. The implementation of a new program of this magnitude will lead to the need for clarification on a case by case or site by site analysis throughout implementation of the SWMP. Department heads (Stormwater Steering Committee) had monthly stormwater meetings in the beginning but those have not been needed on a regular basis as staff is finally settling in with their roles and responsibilities. If new issues arise, or as with the new draft Phase II permit being released, meetings will begin again as we will need to determine how the City will comply with the multitude of new program elements as proposed in the new permit. As post-construction projects and monitoring becomes a larger component of the overarching

program, this will be another avenue to follow to determine which elements are most effective in improving water quality. As the Board continues to advance the Joint-Effort and more information specific to our area is revealed, more BMP's can be identified again to raise the bar for water quality improvement from new and redevelopment projects within City limits.

Some of the challenges City staff has encountered during Year 2 is still roles and responsibilities internally. The Core Group is functioning well but with such a holistic program only being in Year 2, staff are still trying to eliminate the redundancy and overlap in responses, recommendations, and follow-up. The City is looking to upgrade a computer program that will allow for better tracking that would also allow the stormwater program to have a common database from which all staff could determine if contact has been made at a particular site and reduce the duplicative visits and tracking. That program is anticipated to come on line by the end of the year. BMP's associated with transients have been challenging to implement due to the fact this is not just an environmental issue; it is also a social and political issue. The City is diligent on continued efforts but this will need careful evaluation to ensure we are compliant with local, state and federal statutes. We have developed a better process for having the Police Department follow-up on camps or individuals who have been posted to leave a specific area so staff would be able to remove the trash and debris and this new program is showing promise in dealing with this specific component of the population in San Luis Obispo.

Staff has been very proactive about the stormwater program and with the buy-in from the multiple departments associated with it, we are setting the stage for more improvements over a wider scale as staff disseminates the information we have learned as required to remain in compliance with the provisions of our permit, the public can see and understand what we are doing, why we are doing it, and how they can ultimately help us improve not only the quality of water in San Luis Obispo, but also the quality of life for the residents of our city. We appreciate the positive working relationship and collaboration between the City and the Board in implementation and enacting the guidance received from the Board on how to negotiate through new or challenging situations.

Public Education and Outreach (PE)

BMP Number: PE 1.1 Publish educational materials on the Phase II Municipal Stormwater Program and water quality issues, including brochures and fact sheets, for City residents, business and industrial sector, construction and development community, City staff and all types of community members. Distribute materials at public events, by mail, through enforcement activities, and make them available at City offices and on the stormwater website.

General Summary: The intent of this BMP is to publish educational materials on the Phase II Municipal Stormwater Program and water quality issues, including brochures and fact sheets, for City residents, business and industrial sectors, the construction and development community, City staff, and all types of community members. Further, the City is required to post all these materials on the City's stormwater website.

Status of Measurable Goals: Staff within the City's stormwater program has completed the stated goal during year 2. Over 1,000 brochures, pamphlets, and BMP guides were distributed to the respective populations to further spread the word about how they can change practices to improve stormwater quality.

Appropriateness: This BMP is appropriate since a significant portion of the community has access to the internet. The posting of all stormwater educational materials on the internet is both an economical and appropriate means of making stormwater related information (i.e. materials) available to the community as a whole.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness through education from distributed materials.

Proposed Modifications: No modifications are proposed at this time.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change and educational materials are updated to reflect those changes, staff will continue to update the stormwater program resources.

BMP Number: PE 1.2 Publish educational materials on the Phase II Municipal Stormwater Program and water quality issues, including brochures and fact sheets, for City residents, business and industrial sector, construction and development community, City staff and all types of community members. Distribute materials at public events, by mail, through enforcement activities, and make them available at City offices and on the stormwater website.

General Summary: The intent of this BMP is to publish educational materials on the Phase II Municipal Stormwater Program and water quality issues, including brochures and fact sheets, for City residents, business and industrial sectors, the construction and development community, City staff, and all types of community members. Further, the City is required to post all these materials on the City's stormwater website.

Status of Measurable Goals: Staff within the City's stormwater division of Building and Safety has completed the stated goal during year 2. All informational brochures, booklets, guides, fact sheets and etcetera developed by stormwater staff have been posted on the City's stormwater website.

Appropriateness: This BMP is appropriate since a significant portion of the community has access to the internet. The posting of all stormwater educational materials on the internet is both an economical and appropriate means of making stormwater related information (i.e. materials) available to the community as a whole.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: At this time, staff only anticipates expanding the website to include additional stormwater related topics, such as LID or other information as it comes available.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change and educational materials are updated to reflect those changes, staff will continue to update the stormwater website. Additional educational materials covering target specific topics as developed will be placed on the City's website.

BMP Number: PE 1.3 Publish educational materials on the Phase II Municipal Storm Water Program and water quality issues, including brochures and fact sheets, for City residents, business and industrial sector, construction and development community, City staff and all types of community members. Distribute materials at public events, by mail, through enforcement activities, and make them available at City offices, and on the storm water website.

General Summary: The intent of this BMP is to publish educational materials on the Phase II Municipal Storm Water Program and water quality issues, including brochures and fact sheets, for City residents, business and industrial sector, construction and development community, City staff and all types of community members. Further, the City is required to post all these materials on the City's stormwater website.

Status of Measurable Goals: Staff within the City's stormwater program has placed the website on all stormwater program materials.

Appropriateness: This BMP is appropriate since a significant portion of the community has access to the internet the posting of all stormwater educational materials on the internet is both an economical and appropriate means of making stormwater related information available to the community as a whole.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: At this time no modifications are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change and educational materials are updated to reflect appropriate changes, staff will continue to update the stormwater website.

BMP Number: PE 1.5 Bilingual Public Outreach Materials, Training, and Workshops

General Summary: The City of San Luis Obispo is required to provide bilingual educational materials, trainings, and workshops on the Phase II Municipal Stormwater Program and water quality issues for City residents, business and industrial sectors, the construction and development community, City staff, and all types of community members when appropriate.

Status of Measurable Goals: During year two of the program the need for bilingual trainings, workshops, and educational materials within the construction and post construction program areas of the City's Stormwater Program did not rise to such a level to warrant the expenditure of funds to such a limited target audience.

Appropriateness: Bilingual educational materials, trainings, and workshops are an appropriate means of disseminating information and heightening the awareness of members of the community about the potential residual effects of our actions and activities on local water quality when a significant portion of our population does not speak or read English.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness through education from distributed materials.

Proposed Modifications: At this time, staff does not anticipate developing any bilingual public educational and/or outreach materials within the construction and development areas of the stormwater program.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff will continue to expand and update our public education and outreach activities within year three of the program in response to changing regulations and program needs.

BMP Number: PE 1.6 Publish education materials on the Phase II Municipal Stormwater Program.

General Summary: Educational materials provide information for all types of community members on how they can prevent stormwater pollution.

Status of Measurable Goals: The idea was brought before the Tourist Business Improvement District Board at their meeting in January 12, 2011. The concept was endorsed but with a focus on environmental programs the City is currently involved with beyond the stormwater program. Development of a brochure detailing the environmental programs undertaken by the City was a suggestion from the hoteliers so that they might display the material. They did not want to display a brochure detailing regulations and penalties but rather something advertising what stewardship programs the City is completing.

Appropriateness: This BMP is appropriate for the desired outcome as tourists come into the City from other areas and are not aware of resources or programs the City is currently undertaking to ensure water quality is protected and enhanced. As more information is disseminated in the community, better understanding of the issues facing our natural resources can be passed to the public for recognition and implementation of programs to protect those resources.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: In the next reporting cycle, we will be pursuing grant funding from the Promotional Coordination Committee (PCC) to design and develop a brochure highlighting the programs the City undertakes to protect our natural resources. Once the brochure is developed, we will solicit individual hoteliers around the City to post in their lobby.

BMP Number: PE 2.1 The Utilities Department produces a newsletter which is mailed quarterly to all City residents.

General Summary: The City's Utilities Department publishes a quarterly newsletter, which is mailed to all City residences, including all single and multi-family homes. Articles regarding the departments activities and an array of resource conservation topics are included in each issue.

Status of Measurable Goals: During the reporting year, four newsletters were mailed to all single and multi-family addresses equally, approximately 20,500 newsletters. Stormwater pollution prevention topics were included in each newsletter throughout the year and included the following subject:

- The benefit of picking up and properly disposing of pet waste, and the related impact on water quality;
- The importance of reporting suspected sanitary sewer overflows and the methods to report;
- Stormwater pollution prevention tips;
- The results of the community stormwater survey.

Appropriateness: This BMP is very appropriate in that it is an effective means to distribute stormwater pollution prevention information to a wide variety of people in the community. Two focus groups commissioned by the City in 2007 to determine the effectiveness of the various outreach activities from the Utilities Department found that *The Resource* was highly rated in regards to readership and a mean to receive information.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The Utilities Department will continue to produce four newsletters per reporting year with stormwater pollution prevention related information.

BMP Number: PE 3.2 Notification and Pressure Washing

General Summary: Staff in the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development of a comprehensive public education and outreach program geared towards Downtown Merchants and individuals engaged in commercial and/or industrial pressure/power washing services for hire. One portion of this program includes the conceptualization, development, and dissemination of various informational materials (*i.e. brochures, informational handouts, press releases, and etcetera*) to both Downtown Merchants and to individuals engaged in commercial and/or industrial pressure/power washing services for hire.

Status of Measurable Goals: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety has developed multiple public outreach and educational materials that address stormwater regulations and specifically the appropriate BMPs to implement during pressure/power washing activities. During year two staff developed a newsletter insert concerning pressure washing that was included in the downtown business newsletter and via direct mail distributed an industry specific brochure to all business owners/operators of businesses that offer pressure/power washing services to hire within the City of San Luis Obispo. In addition, we conducted our second training session or workshop with the Downtown Association and addressed the topic of appropriate BMPs to employ during routine cleaning of exterior impervious surfaces.

Appropriateness: The general intent of BMP PE 3.2 is to reduce and eliminate pollution caused by discharging wastewater from pressure washing activities in the downtown business area and elsewhere within the community via voluntary compliance through public outreach and education. Public outreach and education is an appropriate means of raising a community's awareness of an issue of concern and achieving compliance.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness through education from distributed materials.

Proposed Modifications: At this time, we do not anticipate any changes to this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff in the Building and Safety Division will continually update and modify all public outreach materials in response to changing rules and regulations associated with stormwater and the needs of target audiences.

BMP Number: PE 3.4 Enforcement Response Plan Notification and Pressure Washing

General Summary: Stormwater staff within the Building and Safety Division will implement the City's Enforcement Response Plan (*approved August 2007 by Central Coast Regional Water Quality Control Board*), which includes Notices of Violation and escalation of fines for all activities related to the cleaning of exterior impervious surfaces.

Status of Measurable Goals: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety implemented the City's approved Enforcement Response Plan (*approved August 2007 by Central Coast Regional Water Quality Control Board*) in year two of the program. Staff adheres to the requirements contained within the approved plan as an effective means of securing compliance from reluctant responsible parties who engage in the cleaning of exterior impervious surfaces (*pressure/power washing activities*).

Appropriateness: The general intent is to utilize the existing approved enforcement mechanisms to achieve compliance by reluctant responsible parties.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness through education from distributed materials.

Proposed Modifications: At this time the City of San Luis Obispo requests that the Board consider modifying the requirements of this BMP to pertain only to non-permitted facilities for the following reasons.

- First, enforcement issues pertaining to permitted facilities are already addressed under BMP ID 10.3, which has been established to track the number stormwater violations noted, NOVs, and Administrative Citation Fines issued, including those pertaining to pressure washing activities in compliance with the approved Enforcement Response Plan applicable to permitted facilities.
- Second, the City's current Administrative Citation process more closely mirrors the State Water Board's own "Water Quality Enforcement Policy" and is more suited for non-permitted facilities.

Stormwater activities undertaken during the next Stormwater reporting cycle: During year three, staff anticipates incorporating all enforcement related activities pertaining to pressure washing into the City's new canned software system (*Energov*) to expand our reporting and monitoring capabilities.

BMP Number: PE 4.1 Work with the SLO County Partners for Water Quality to share public education and outreach resources and activities.

General Summary: The City is an active participant with the Central Coast Partners for Water Quality group. Working with the participating agencies, an internet site has been established as a place for agencies to post educational materials for sharing. City staff uses the site as a resource to incorporate relevant information into the City's brochures.

Status of Measurable Goals: City staff has been closely working with the Partners group for the past several years to electronically collect information from each participating agency. Using Yahoo Groups as the repository location did not work well for most agencies, so the alternative was to use email as the means to distribute information. The Partners group will be evaluating the effectiveness of using this means of sharing information and looking at alternatives in the future. To date, the City has over 30 informational pieces that it hands out on commercial and residential issues.

Appropriateness: This BMP is appropriate in that it is an effective means to gather information from other jurisdictions to create common messages to the public. Until there is a more formal, unified approach to public education in the county, the Partners group can continue to be a clearing house for educational materials.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to participate with the Partners group in the upcoming year. As part of the leadership role the City has assumed for the group, the City will continue to encourage the sharing of information and educational materials.

<p>BMP Number: <i>PE 4.2</i> Work with the SLO County Partners for Water Quality to share public education and outreach resources and activities.</p>
--

General Summary: The City is an active participant with the Central Coast Partners for Water Quality group. The City has taken a leadership role with the group and co-chairs the monthly meeting.

Status of Measurable Goals: City staff has been actively involved with the Partners for Water Quality for about nine years. For approximately three years, the City has co-chaired the meetings. This has involved creating the agendas, organizing projects, securing the meeting facility, arranging for guest speakers and facilitating the meetings. The Partners meeting have been scheduled on a quarterly basis which has been successful in bringing in consistent participation. City staff has attended all the Partners meetings held during the reporting cycle.

Appropriateness: This BMP is appropriate in that it is an effective means to share information, assist agencies in implementing their stormwater plans, unifying the message broadcasted to the various communities and involving other interested parties like environmental groups and trade organizations.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications are proposed for the upcoming year

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to participate in and lead the Partners group in the upcoming year. As part of the leadership role the City has assumed for the group, the City will continue to encourage regional participation by all the agencies in the County of San Luis Obispo.

BMP Number: PE 6.1 Work with SLO Partners for Water Quality, community members, and nonprofit groups to promote public events related to water conservation, sustainable landscape, water quality, and stormwater pollution prevention.

General Summary: The City is an active participant Central Coast Partners for Water Quality group, as well as other community and nonprofit groups, and has worked with them to promote public events. At least two public events were attended during this reporting year.

Status of Measurable Goals: The City Utilities Department promoted conservation, sustainable landscape, water quality and stormwater pollution prevention, by participating in two public events as follows:

- Small Garden Seminar hosted by City of San Luis Obispo: Utilities Conservation Staff conducted a workshop at the seminar – One event.
- Farmer’s Market Booth – One event.

Appropriateness: This BMP is appropriate in that it is an effective means of providing stormwater pollution prevention related information to broad and diverse groups of the County’s population.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to participate and promote in at least 2 public events during the next reporting cycle.

BMP Number: PE 6.2 Work with SLO Partners for Water Quality, community members, and nonprofit groups to promote public events related to water conservation, sustainable landscape, water quality, and stormwater pollution prevention.

General Summary: The City is an active participant Central Coast Partners for Water Quality group, a well as other community and nonprofit groups, and has worked with them to promote public events. At least two public events were attended during this reporting year.

Status of Measurable Goals: Events the City Utilities Department participated in are followed by the number of event attendees:

- Small Garden Seminar hosted by City of San Luis Obispo. Utilities Conservation Staff conducted a workshop at the seminar – One event.
- Farmer’s Market Booth – One event.

The attendance numbers were obtained, post event, from the organizations hosting the events.

Appropriateness: This BMP is appropriate in that it is an effective means of providing stormwater pollution prevention related information to broad and diverse groups of the County’s population.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to participate and promote in at least 2 public events during the next reporting cycle.

BMP Number: PE 7.1 Broadcast Public Service Announcements (PSAs) and paid advertising to reach a wide audience on stormwater pollution prevention. PSAs will include tips on proper disposal of pet waste and solid waste, automobile care, and proper use of fertilizers. Implementation will include television PSAs and radio PSAs.

General Summary: In order to reach a wide audience with information regarding stormwater pollutants that impair local water bodies and specific actions the public can take to prevent stormwater pollution, public service announcements (PSA) both on television and radio will be developed and aired on local television and radio stations.

Status of Measurable Goals: Partnering with the County of San Luis Obispo, PSAs were run for the fall of 2010, with a reach totaling 207,190 individuals. PSAs then aired again during May and June 2011, with a reach of 207,190 individuals.

Appropriateness: This BMP is appropriate in that it is an effective means of reaching a significant number of people with the stormwater pollution prevention message.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to air television PSAs in the upcoming reporting cycle.

BMP Number: PE 7.2 Broadcast Public Service Announcements (PSAs) and paid advertising to reach a wide audience on stormwater pollution prevention. PSAs will include tips on proper disposal of pet waste and solid waste, automobile care, and proper use of fertilizers. Implementation will include television PSAs and radio PSAs.

General Summary: In order to reach a wide audience with information regarding stormwater pollutants that impair local water bodies and specific actions the public can take to prevent stormwater pollution, public service announcements (PSA) both on television and radio will be developed and aired on local television and radio stations.

Status of Measurable Goals: Partnering with the County of San Luis Obispo, radio PSAs were run during the fall of 2010 with a reach totaling 90,500 individuals. The PSAs were again aired during the spring 2011 with a reach totaling 90,500. It is important to note that the City and County have been running the radio campaign for several years, prior to the City coming under permit for the Stormwater Program.

Appropriateness: This BMP is appropriate in that it is an effective means of reaching a significant number of people with the stormwater pollution prevention message.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to air radio PSAs in the upcoming reporting cycle.

BMP Number: PE 8.1 Promote and fund the stormwater education program geared towards 4th through 6th grades and middle school to include a classroom stormwater presentation that can be used throughout the County, using the complimentary interactive stormwater display.

General Summary: The City is committed to educating children on stormwater pollution prevention issues and fostering behaviors that will prevent stormwater pollution and create water quality awareness. To this end, the City has partnered with an environmental education consultant to create, promote, and present a school education program geared to 1st through 6th grade and middle school students.

City staff, working with an environmental education consultant, developed a classroom presentation that focuses on sources of stormwater pollution, the impacts of stormwater pollution on the environment, and ways to prevent stormwater pollution.

Students learn about many of the potential pollutants found around their homes and how they can prevent these pollutants from contaminating local creeks, waterways, and the ocean. Students identify and discuss how they can affect local ecosystems using two 3-D display boards specifically designed for this presentation. This 45-minute classroom presentation also

emphasizes stream ecology, stormwater runoff, and food chains.

At the conclusion of the program, students are asked to determine what actions they can do where they live to reduce or eliminate runoff and contaminants from entering storm drains. This often includes: picking up pet waste, placing nozzles on hoses, putting leaves in green-waste containers, using car washes instead of rinsing cars in driveway, picking up litter, and informing their parents about the importance of stormwater pollution prevention.

Status of Measurable Goals: During the 2010-2011 school year, school presentations were offered to grades 1 through 8. Eight presentations to grades 1 through 6 were delivered during this reporting cycle.

Appropriateness: This BMP is appropriate in that it is an extremely effective means of educating elementary school age children the importance of stormwater pollution prevention.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to provide stormwater pollution prevention presentations to grades 1st through 8th. The City researched creating a separate program for middle school students that correlate better with the required curriculum. It was determined that the City did not have sufficient funds to move forward with the program.

<p>BMP Number: PE 8.2 Promote and fund the stormwater education program geared towards 4th through 6th grades and middle school to include a classroom stormwater presentation that can be used throughout the County, using the complimentary interactive stormwater display.</p>

General Summary: The City is committed to educating children on stormwater pollution prevention issues and fostering behaviors that will prevent stormwater pollution and create water quality awareness. To this end, the City has partnered with an environmental education consultant to create, promote, and present a school education program geared to 1st through 6th grade and middle school students.

City staff, working with an environmental education consultant, developed a classroom presentation that focuses on sources of stormwater pollution, the impacts of stormwater pollution on the environment, and ways to prevent stormwater pollution.

Students learn about many of the potential pollutants found around their homes and how they can prevent these pollutants from contaminating local creeks, waterways, and the ocean. Students identify and discuss how they can affect local ecosystems using two, 3-D display boards specifically designed for this presentation. This 45-minute classroom presentation also emphasizes stream ecology, stormwater runoff, and food chains.

At the conclusion of the program, students are asked to determine what actions they can do where they live to reduce or eliminate runoff and contaminants from entering storm drains. This often includes: picking up pet waste, placing nozzles on hoses, putting leaves in green-waste containers, using car washes instead of rinsing cars in driveway, picking up litter, and informing their parents about the importance of stormwater pollution prevention.

Status of Measurable Goals: This goal was not achieved. It appears there was a misunderstanding between the environmental education consultant and City staff. When the program was in its beta testing phase, the consultant used surveys to gauge the effectiveness of the program and made changes according to teacher input. The consultant did not distribute surveys once the program development phase was completed. This misunderstanding has been addressed, a draft survey has been submitted to the City for approval and during the next reporting year, surveys will be disseminated and tracked.

Appropriateness: This BMP is appropriate in that it is an extremely effective means of educating elementary school age children the importance of stormwater pollution prevention.

Effectiveness: The goal was not achieved; therefore, an effectiveness rating is not appropriate at this time.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City, through the contracted consultant, will disseminate surveys to all teachers during the next reporting cycle.

<p>BMP Number: PE 9.1 Staff in the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for restocking the OWOW fact sheets at local retailers within the City of San Luis Obispo.</p>
--

General Summary: Continue to support and give financial assistance to the statewide Our Water, Our World Program, which provides information on less-toxic choices for the garden and pest control, with the overall intent of reducing the amount of toxic chemicals entering the waterways and creating awareness of water quality issues in the community we serve.

Status of Measurable Goals: Staff in the City of San Luis Obispo's Stormwater Division within Building and Safety routinely visit participating retailers and restock the informational fact sheets provided by OWOW.

Appropriateness: The general intent of BMP PE 9.1 is to provide informational materials to encourage the various members of our community (*i.e. commercial, construction, industrial, residential and others*) to use products that are less toxic to the environment. The end goal is to reduce and eliminate pollution caused by the use of fertilizers, herbicides, pesticides, etcetera by providing informative materials regarding environmentally safer alternatives.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness through education from distributed materials.

Proposed Modifications: At this time, we do not anticipate any changes to this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will continue to seek out participation of additional retailers of fertilizers, herbicides and pesticides to meet the needs of target audiences during year three.

BMP Number: PE 9.2 Tracking Number of Restocked Fact Sheets OWOW—Number of fact sheets distributed per year

General Summary: Staff in the City of San Luis Obispo’s Stormwater Division within Building and Safety is responsible for tracking the number of OWOW fact sheets restocked at local retailers within the City of San Luis Obispo.

Status of Measurable Goals: Staff in the City of San Luis Obispo’s Stormwater Division within Building and Safety restocked just over 478 OWOW fact sheets during the 2010 – 2011 reporting period.

Appropriateness: Documenting voluntary acceptance of distributed informational materials is a simple and effective means of measuring “traffic” from a marketing viewpoint.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness through education from distributed materials.

Proposed Modifications: At this time we do not anticipate any changes to this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will continue to track and document the number of informational flyers replaced monthly and seek out participation of additional retailers of fertilizers, herbicides, and pesticides to better meet the needs of target audiences during year three.

BMP Number: PE 10.1 Work with Cal Poly University to provide information to students on stormwater pollution prevention, proper pet waste disposal and potential penalties, solid and household hazardous waste, and water quality issues.

General Summary: The majority of Cal Poly students live in the City of San Luis Obispo. As a method for educating this population about stormwater issues, the City created an advertisement for the *Mustang Daily*, Cal Poly’s student newspaper.

BMP Intent: Reduce non-stormwater discharges and stormwater pollution by educating college students on the actions they can take to reduce stormwater pollution.

Status of Measurable Goals: *PE 10.1: In Year 2, the City created an advertisement and ran it in the Cal Poly Newspaper, the Mustang Daily.*

The advertisement covered the following topics:

- Using a broom to clean up outside areas instead of a water hose.
- The importance of picking up pet waste.
- Proper disposal of household hazardous waste.
- The importance of maintaining vehicles to avoid automotive fluids from dripping.

Cal Poly distributes 6,000 issues a day and has an average of 94% of these picked up daily. This would equate to an estimated 5,640 issues being distributed.

Appropriateness: This BMP is the most effective method found to date to reach a large number of Cal Poly students.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. This BMP targets a large population of Cal Poly students with a wide range of stormwater related activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will again run this advertisement.

BMP Number: *PE 10.2* Work with Cal Poly University to provide information to students on stormwater pollution prevention, proper pet waste disposal and potential penalties, solid and household hazardous waste, and water quality issues.

General Summary: The majority of Cal Poly students live in the City of San Luis Obispo. As a method for educating this population about stormwater issues, the City created an advertisement for the *Mustang Daily*, Cal Poly's student newspaper.

BMP Intent: Reduce non-stormwater discharges and stormwater pollution by educating college students on the actions they can take to reduce stormwater pollution.

Status of Measurable Goals: In year 2, the City created an advertisement and ran it in the Cal Poly Newspaper, the Mustang Daily.

The advertisement covered the following topics:

- Using a broom to clean up outside areas instead of a water hose.
- The importance of picking up pet waste.
- Proper disposal of household hazardous waste.
- The importance of maintaining vehicles to avoid automotive fluids from dripping.

Cal Poly distributes 6,000 issues a day and has an average of 94% of these picked up daily. This would equate to an estimated 5,640 issues being distributed.

Included in the advertisement this year, was information on penalties associated with failing to meet stormwater regulations, as stated in the City's adopted municipal code.

Appropriateness: This BMP is the most effective method found to date to reach a large number of Cal Poly students.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. This BMP targets a large population of Cal Poly students with a wide range of stormwater related activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will again run this advertisement.

<p>BMP Number: PE 11.2 Distribute educational materials to educate the public on fecal coliform and the associated health risks of fecal coliform in surface waters, actions that individuals can take to reduce loading, and potential penalties of not complying with new ordinances.</p>
--

General Summary: Fecal coliform contamination can be an issue in a city such as San Luis Obispo that has so many creeks flowing through it. To address this, the City has sent out Utility billing inserts and an article in our quarterly newsletter, *The Resource*.

BMP Intent: To increase awareness of the problems associated with improper disposal of pet waste and to reduce the number of sewage overflows from private laterals by educating property owners on lateral maintenance.

Status of Measurable Goals: In year 2, the City included information in three of the quarterly newsletters it sends out, *The Resource*, regarding pet waste and water quality issues. *The Resource* is distributed to 19,500 residences in the City.

Appropriateness: This BMP is appropriate for the desired outcome of educating the public on pet waste and sewer lateral maintenance.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. The articles in *The Resource* serve to educate the public on water quality issues and raising awareness about proper pet waste disposal.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will issue another article for *The Resource* discussing the issue of pet waste and pet care tips.

BMP Number: PE 11.3 Distribute educational materials to educate the public on fecal coliform and the associated health risks of fecal coliform in surface waters loading, and potential penalties of not complying with new ordinances.

General Summary: The City is committed to increasing awareness of the problems associated with improper disposal of pet waste, and to reduce the number of sewage overflows from private laterals by educating property owners on lateral maintenance. To facilitate this, brochures were distributed to the public through various means. Related information was distributed in the quarterly Utilities newsletter (*The Resource*) and numerous materials were posted on the City's Stormwater website.

Status of Measurable Goals: This goal was achieved and exceeded with the completion of both alternatives. Sixty-two Brochures were distributed with sewer lateral rebate applications, and one article was printed in the Fall 2010 issue of *The Resource*. This goal will continue to be implemented through reporting year 5.

Appropriateness: This BMP is appropriate for educating the public on fecal coliform issues related to sewer laterals and stormwater pollution prevention.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to implement all goals relevant to reporting years 3-5.

BMP Number: PE 11.4 Distribute educational materials to educate the public on fecal coliform and the associated health risks of fecal coliform in surface waters, actions that individuals can take to reduce loading, and potential penalties of not complying with new ordinances.

General Summary: The intent of this BMP is to increase awareness of the problems associated with improper disposal of pet waste and to reduce the number of sewage overflows from private laterals by educating property owners on lateral maintenance.

Status of Measurable Goals: Materials related to the City's stormwater ordinance and materials addressing pet waste and sewer overflows are located on the website to educate the public about ways they can reduce stormwater pollution.

Appropriateness: This BMP is appropriate for the desired outcome of educating the public on pet waste and sewer lateral maintenance.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: As placing materials associated with the stormwater program on the City's webpage is referenced in numerous locations (CO 6.3, PC 4.2, and PC 5.2) we are proposing to consolidate the three BMP's mentioned into this BMP to address all materials being placed on the website.

Stormwater activities undertaken during the next Stormwater reporting cycle: During the next reporting cycle, the City will likely have a new website and a subcommittee from the Core Group will be established to ensure all the required elements are located on the website and that only one or two staff are responsible for reporting on this BMP.

BMP Number: PE 12.1 Revise/expand existing education materials and information regarding water and other resource management topics to include stormwater pollution preventing information. The Utilities Conservation Program contracts with a local public relations firm to provide professional consulting service on how best to reach the public on water conservation, stormwater issues, and other resource conservation issues.

General Summary: In order to increase public awareness of how water conservation, landscaping, and proper use of pesticides and herbicides can affect water quality and what citizens can do to reduce stormwater pollution; the City will revise and expand existing educational materials to incorporate stormwater pollution information.

The program's public education and outreach materials include:

- Sustainable landscape, including the use of native plants in landscapes
- Water conservation and leak detection
- Proper use and disposal of fertilizers and chemicals typically used in landscape applications
- Use of compost and mulch to decrease or eliminate the need to use chemicals
- Recycling solid and green waste
- Proper disposal of solid waste
- Proper irrigation management techniques to avoid water overspray and runoff
- Home and business water audits
- Participation at local public event
- Direct mail outreach on specific resource conservation topics

Status of Measurable Goals: During the year 2 reporting cycle, all brochures were evaluated, and no further modifications were necessary. Annual evaluations will take place through year 5, and additional revisions and expansions will be reported.

Appropriateness: This BMP is appropriate since it is important to combine resource conservation issues like water conservation and stormwater pollution prevention.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: During the next reporting cycle staff will continue to look for opportunities to expand information related to water conservation and stormwater pollution prevention.

BMP Number: PE 13.2 Expand the designated storm water web page on the City's web site to provide information for residents, businesses, contractors and developers.

General Summary: The intent of this BMP is the development and expansion of a website dedicated to stormwater topics to provide information for all segments of the public.

Status of Measurable Goals: Staff within the City of San Luis Obispo's Stormwater division within Building and Safety has installed a "counter" on the stormwater web page to identify the number of hits the web page has been getting. Over 2,000 hits were recorded in the reporting period.

Appropriateness: This BMP is appropriate since internet usage plays a significant role in people's lives today and such a website specifically pertaining to the City of San Luis Obispo's stormwater program is an essential component to a fully developed program that can reach and be reached by all segments of our community.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: At this time, no modifications are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue to monitor how well the website is used and how many "hits" are recorded.

BMP Number: PE 14.2 Mark all City owned storm drains.

General Summary: Raise public awareness of the connection of the storm drains to the waterways and ocean and replace markers on a continuous basis as needed.

Status of Measurable Goals: This BMP is appropriate and is continually inspected to ensure markers are in place.

Appropriateness: This BMP complies too the requirements of the program and is appropriate.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and continue to replace markers on a continual basis as needed.

BMP Number: PE 15.1 Partner with the SLO County Integrated Waste Management Authority (IWMA) to: distribute information for residential and small commercial generators on the proper disposal of household hazardous waste, solid waste, green waste, and used motor oil; offer residents and small businesses the opportunity to dispose of small quantities of materials at the Cold Canyon Household Hazardous Waste Facility; and provide support in the production of the recycling guide in the phone book on the safe handling and disposal of household hazardous waste and the recycling of green and solid wastes.

General Summary: Educating the public on proper disposal of solid waste, green waste, used motor oil and household hazardous waste will reduce the amount of these wastes that are disposed of illegally and will increase the public's awareness on how to prevent stormwater pollution.

Status of Measurable Goals: Prior to and during the reporting cycle, in order to inform citizens of recycling possibilities and details of what materials are recyclable, the IWMA places signs on multi-family trash receptacles throughout the City, as well as warnings not to place hazardous materials with regular trash or recycling. Information about recycling and hazardous household waste disposal is outlined in detail in the 18-page IWMA Recycling Guide contained in the AT&T Yellow Pages phone book, which is distributed annually to approximately 12,800 residences and businesses in the City of San Luis Obispo. A sticker on the front of each telephone book advises customers of the Recycling section. The IWMA has an extensive website with detailed information about recycling and hazardous waste disposal. The City website also contains information on these topics and refers website visitors to the IWMA site. The front office of the City's Utilities Department has publications displayed for citizens to take regarding recycling and hazardous waste disposal. Approximately 180 of these were taken during the reporting period of 6/15/10 through 6/15/11. Approximately 150 contacts were made through phone calls to the City's Utilities Conservation group and various media contacts throughout the year.

Appropriateness: This BMP is appropriate since it is important to combine resource conservation issues and stormwater pollution prevention.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: During the next reporting cycle staff will continue to track the number of educational materials distributed

regarding the proper disposal of solid waste, green waste, used motor oil, and household hazardous waste.

BMP Number: PE 16.1 Provide stormwater pollution prevention materials to businesses during annual industrial waste inspections. (Includes all restaurants)

General Summary: The City has worked in a cooperative fashion with the Central Coast Partner's for Water Quality to develop a stormwater BMP flyer for automotive shops.

BMP Intent: Educate employees and business owners on measures that can be taken to prevent stormwater pollution.

Status of Measurable Goals: The City has completed the task of distributing this brochure to all automotive shops. The brochure was also laminated and we asked that the automotive shops hang this in an area where it will be seen by all employees.

Appropriateness: This BMP is appropriate for the desired outcome of stormwater education at automotive shops.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. By working with the Partner's group, we can better achieve a universal approach to stormwater education and regulations.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities you plan to undertake during the next reporting cycle: During the next reporting cycle, the City will continue to distribute these brochures at any facility where it is not being displayed.

BMP Number: PE 16.3 Provide stormwater pollution prevention materials to businesses during annual industrial waste inspections. (Includes all restaurants)

General Summary: The City has developed a stormwater BMP flyer for restaurants detailing BMPs.

BMP Intent: Educate employees and business owners on measures that can be taken to prevent stormwater pollution.

Status of Measurable Goals: The City has completed the task of distributing this brochure to all restaurants.

Appropriateness: This BMP is appropriate for the desired outcome of stormwater education at restaurants.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. This brochure serves to further explain stormwater BMPs and regulations as they relate to the restaurant industry.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities you plan to undertake during the next reporting cycle: During the next reporting cycle, the City will continue to distribute these brochures at all restaurant facilities.

<p>BMP Number: PE 17.1 Develop and implement a Stormwater Hotline tracking form intended to document the details and resolution of each community call.</p>
--

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development of a Stormwater Hotline tracking form to document, track and manage all complaints or concerns received from various members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential or actual stormwater violations and/or discharges from origination to resolution from construction sites and a portion of various non-permitted sites. Complaints concerning potential pollutant discharges from all construction sites and various non-permitted sites into the City's stormwater conveyance system can be received by Stormwater staff via the City's on-line report a water quality concern form, via the City's 24-Hour Water Pollution Report Hotline, via email, in person or via a general line at the City.

Status of Measurable Goals: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety developed a standardized incident response form for reporting, tracking and incident management purposes in year two of the program. During year two of the program this form was modified in response to regulatory changes and program needs.

Appropriateness: The use of a standardized tracking form is an appropriate means to effectively manage the reporting of all potential stormwater / water quality concerns and / or complaints, track field investigations, manage enforcement activities when needed to resolution of the purported incident.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness with the means to receive additional stormwater incidents to investigate.

Proposed Modifications: The only proposed or potentially anticipated changes to this BMP will be pinged to the new database management software the City will be launching next year.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continually update and modify the standardized incident report form in response to changing rules and regulations associated with stormwater.

BMP Number: PE 17.2 Provide contact phone numbers for the public to report non-stormwater discharges and provide an electronic reporting form on the City's web page.

General Summary: The intent of this BMP is to provide a hotline for the public as a means to report illicit discharges.

Status of Measurable Goals: Stormwater staff has completed the stated goal during Year 2. In order to meet these goals and objectives stormwater staff has advertised the City's stormwater / water quality hotline telephone number through the following public outreach components:

- Informational brochures
- Informational booklets or guides
- Informational handouts and fact sheets
- Via the City's website
- Via newsletter inserts

Public Education and Outreach materials that are distributable have been disseminated by stormwater staff via the following avenues:

- Public Events
- Direct Mailings to target businesses
- Enforcement Activities
- Routine Inspections
- City Facilities
- Stormwater Website
- Training Sessions

Appropriateness: This BMP is appropriate by advertising the City's stormwater / water quality hotline is necessary in order to inform the community as a whole of the opportunity to report stormwater and water quality concerns 24 hours a day, 7 days a week.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: At this time, the only changes recommended are to: (1) enhance both our public and internal training programs to facilitate the dissemination of specific informational materials; (2) translate specific brochures specifically towards the Spanish speaking portion of our population as appropriate and (3) expand our website to address both the Spanish speaking portion of our community's needs and to address additional stormwater topics if the need arises and the resources are available.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change, educational materials shall be updated to reflect any and all necessary changes. Additional avenues of dissemination for educational materials shall be developed, if appropriate. In addition, staff anticipates developing additional Public Outreach materials as the need arises on various other specific topics.

BMP Number: PE 17.3 Tracking Number' of Calls and Responses

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety shall track all calls (*i.e. via the City's on-line report a water quality concern form, via the City's 24-Hour Water Pollution Report Hotline, via email, in person or via a general line at the City*) and all responses to all calls (*i.e. complaints or concerns*) received from various members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential or actual stormwater violations and/or discharges from origination to resolution from construction sites and a portion of various non-permitted sites.

Status of Measurable Goals: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety developed in year two of the program a standardized process to track all calls (*i.e. via the City's on-line report a water quality concern form, via the City's 24-Hour Water Pollution Report Hotline, in person or via a general line at the City*) and all responses to all calls (*i.e. complaints or concerns*) received from various members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential or actual stormwater violations and/or discharges from origination to resolution from construction sites and a portion of various non-permitted sites.

Appropriateness: The general intent of BMP PE 17.3 is to develop a standardized procedure to track all calls (*i.e. via the City's on-line report a water quality concern form, via the City's 24-Hour Water Pollution Report Hotline, in person or via a general line at the City*) and all responses to all calls (*i.e. complaints or concerns*) received from various members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential or actual stormwater violations and/or discharges from origination to resolution from construction sites and a portion of various non-permitted sites. This process shall ensure that all reports (*i.e. complaints and concerns*) are handled in a uniform manner to ensure consistency and completeness from origination to resolution.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness and is an effective way to monitor and ensure that no matter who handles the incident that the responding party will handle the process in a consistent and thorough manner.

Proposed Modifications: Again, at this time the City of San Luis Obispo respectively request that the Board recognize that the reporting requirements of BMP PE 17.3 are duplicative to the requirements of various other BMP's addressed within this report and that BMP PE 17.3 be removed. The following BMP's already serve to track the number of calls received as well as the City's response to each call.

- BMP PP 6.2 which tracks the number of public service requests received for stormwater issues which may be complaint driven.
- BMP ID 7.1 which tracks the number of complaints received and investigated.
- BMP ID 7.2 which tracks the number of notices of violations (NOV) issued and number of spills reported to the RWQCB which can be complaint driven.

- BMP ID 7.3 which tracks the number of NOV's and administrative citation fines issued for illicit connections which can be complaint driven.
- BMP ID 8.1 which tracks the number of sewage spills responded to which may be complaint driven.
- BMP ID 8.2 which tracks the number of NOV's issued which may be complaint driven.
- BMP ID 10.3 which tracks the number of stormwater violations noted, NOV's and administrative citations issued which may be complaint driven.
- BMP ID 12.2 which tracks the number of complaints received and investigated which may also be complaint driven.
- BMP ID 12. 3 which tracks the number of NOV's or administrative citations issued which may have been complaint driven.
- BMP PE 17.1 requires the development and implementation of a Stormwater Hotline tracking form intended to document the details and resolution of each community call which are complaint or report driven.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continually update and modify standardized tracking procedures in response to changing rules and regulations associated with stormwater.

BMP Number: PE 17.4 Provide contact phone numbers for the public to report non-stormwater discharges and provide an electronic reporting form on the City's web page.

General Summary: The intent of this BMP is to allow for the public to contact City staff and report stormwater quality concerns. Phone numbers and the website address is included on every brochure produced for the program and an electronic version of a report-a-form is available for the public to also report issues.

Status of Measurable Goals: The goal is to respond to calls/notifications from the public within one working day and has been achieved with a 90% success rate. The differentiation of materials when responded to may limit resources available to deal with the situation but appropriate staff is called in to deal with the location. A First Responders table has been developed by the Core Group for responders to identify as calls come in to administrative staff who can then triage the nature of the call and notify the appropriate staff to respond.

Appropriateness: This BMP is appropriate in design and as the stormwater program key responders and administrative staff are continually educated on the response protocol, the City will achieve the 100% response level for calls regarding stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Ongoing response to calls with the intention of achieving the 100% response to calls within one working day as can be achieved.

BMP Number: PE 18.1 Investigate and implement Social Marketing approach to stormwater education to engage the public more actively in improving stormwater quality.

General Summary: In order to engage the public more actively in improving stormwater quality, the City will research Social Based Marketing concepts as they relate to stormwater public information programs.

- Investigate social marketing concepts as they relate to stormwater and compile examples of other agency social marketing activities.
- Develop list of potential social marketing educational opportunities and select and implement one as a pilot program.
- Evaluate success of pilot program. Convert traditional educational methods to social marketing concept if pilot is successful in changing behavior.

Status of Measurable Goals: During the reporting cycle, City staff coordinated with the members of the Partners group to develop new Public Service Announcements directing the public to a website landing page which can be tracked for activity. The webpage would also be a vehicle to disseminate update to date information and promote events. It was the intent to have the development and implementation completed by June 2011. Because of the logistics to coordinate with the other agencies to commit financially to the project, the project will not be implemented until September 2011.

Appropriateness: This BMP is appropriate since it is important to try new and different approaches in delivering the stormwater pollution prevention message to the community.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: During the next reporting cycle staff will monitor the new program and make adjustments as needed.

BMP Number: PE 18.2 Investigate and implement Social Based Marketing approach to stormwater education.

General Summary: The City is committed to actively engage the public to improve stormwater quality through Social Based Marketing.

Status of Measurable Goals: Working with the Partner's group and a public relations professional, the City has made progress towards selecting a CSBM pilot program. Based on the research to date, the Partner's group plan is to move forward with the pilot program in

September 2011. This goal will continue to be implemented through reporting year 5.

Appropriateness: Social Based Marketing is a way to communicate with a segment of society that may not be engaged through other media. Therefore, the implementation of this goal is an effective communication tool for that segment of society.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to implement all goals relevant to reporting years 3-5.

<p><i>BMP Number: PE 19.2</i> Provide information to private property owners.</p>
--

General Summary: The intent of this BMP is to educate private property owners who have a creek or drainage that comes through their property on the proper care and maintenance techniques of those waterways and the available resources for consultation.

Status of measurable goals: Working with our GIS Dept., a map was created of all the properties that are located along a creek or drainage in the MS4. A postcard mailer was created and sent to the 819 identified properties detailing what resources were available to private property owners who have a creek or drainage coming through their property. A Creekside Property Owner Flyer and Stormwater BMP Creekside Property maintenance Brochure were the highlighted resources.

Appropriateness: This BMP is appropriate because many private property landowners are not aware of proper maintenance activities and which other agencies may need to be consulted before major work is completed.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. As these resources are distributed, it raises the awareness of the private property owners who may have simply undertaken maintenance or other activities in the creek or drainage on their property since they might think that since this is private property, I can do what I want. This perceived view is what needs to be changed to continue to improve the quality of our drainages around the City.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: We will continue to educate private landowners as we encounter them on a 1-on-1 basis and continue to distribute materials which contain additional resources for them to access..

Public Participation (PP)

BMP Number: PP 1.1 Comply with all applicable state and local public notice requirements.

General Summary: The intent of this BMP is to ensure compliance with public notice requirements.

Status of Measurable Goals: The BMP has been achieved through advertising for public workshops on and events with those records being kept by the department hosting the event or making the presentation. Different departments around the City have the same requirements to follow and have been directed to maintain interested parties lists for their activities.

Appropriateness: This BMP is appropriate to ensure City staff follows appropriate noticing protocol to maintain the integrity of the stormwater program over the implementation phase.

Effectiveness: This BMP has achieved CASQA Level I: documenting activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Ongoing implementation of this BMP is projected for the next reporting cycle as needed. Once the City upgrades to the Ener-Gov computer program, this will give a better means for collaborative reporting. Currently, records are kept for each event by that specific department.

BMP Number: PP 2.1 Participate in Stormwater Stakeholder meetings.

General Summary: The intent of this BMP is to receive comments from stakeholders through assisting with and participating in the Regional Partners for Water Quality meetings.

Status of measurable goals: The Utilities Dept. has taken on Co-Chair responsibilities with the City of Paso Robles and other staff from the City of San Luis Obispo aid in the meeting as needed.

Appropriateness: This BMP is appropriate for the MS4's to be able to get together, share information on where the different MS4's are at in terms of implementation and compliance with the approved permit.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities. This BMP does not meet criteria to be raised to Level 2: Raising Awareness.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to participate and help coordinate in putting on the Partners for Water Quality program.

BMP Number: PP 3.1 Partner with local environmental groups to promote creek clean-up day.

General Summary: The intent of this BMP is to promote watershed awareness through creek clean-up day.

Status of measurable goals: The City of San Luis Obispo helped the Land Conservancy and Cal Poly promote through radio, TV and print materials Creek Clean-up day which was held on Saturday October 2, 2010.

Appropriateness: This BMP is appropriate for the MS4's to be able to get the public involved with cleaning up our local waterways and there is also a small education fair at a central location to further educate those who attend about being environmental stewards.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. As the public is sent out, they get to see some of the challenges we as a municipality face when dealing with our local watershed.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to participate and help coordinate in putting on the annual Creek Clean-up day. In 2011, we will be partnering with Coastal Clean-up Day to draw more public members inland since this is where the majority of the beach trash is generated.

BMP Number: PP 3.2 Partner with local environmental groups to promote creek clean-up day.

General Summary: The intent of this BMP is to promote watershed awareness through creek clean-up day.

Status of measurable goals: The City of San Luis Obispo in collaboration with other local environmental organizations removed 2,540 pounds of trash from selected sites around the City. Over 60 public volunteers came out to help in the effort

Appropriateness: This BMP is appropriate for the MS4's to be able to get the public involved with cleaning up our local waterways and there is also a small education fair at a central location to further educate those who attend about being environmental stewards.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. As the public is sent out, they get to see some of the challenges we as a municipality face when dealing with our local watershed.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to participate and help coordinate in putting on the annual Creek Clean-up day. In 2011, we will be partnering with Coastal Clean-up Day to draw more public members inland and remove more trash.

BMP Number: PP 4.1 Conduct public opinion surveys to determine the public's knowledge of stormwater issues, willingness to reduce pollution sources, and effectiveness of public education program.

General Summary: A public survey will help the City determine the effectiveness of the stormwater program and assist in allocating the limited resources available to areas of the program which will have the most impact.

Status of Measurable Goals: Place the survey on the stormwater web page and distribute a survey to all City residents via the Utilities Department newsletter (19,500 surveys). A survey will be distributed in year 5 as indicated in the City's plan.

Appropriateness: The survey BMP is appropriate in that it provides the City a "snapshot" of the community's understanding and awareness of stormwater issues.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Though another survey will not be distributed until year 5 of the program, the information and knowledge gathered from the survey will be incorporated into the City's stormwater program.

BMP Number: PP 4.2 Conduct public opinion surveys to determine the public's knowledge of stormwater issues, willingness to reduce pollution sources, and effectiveness of public education program.

General Summary: A public survey will help the City determine the effectiveness of the stormwater program and assist in allocating the limited resources available to areas of the program which will have the most impact.

Status of Measurable Goals: A sixteen question survey was mailed via the Utilities Department quarterly newsletter to approximately 19,500 addresses in the City and posted on the City's website in May 2010. An article in the newsletter explained the importance of completing the survey and how the information would be used. The survey questions were designed to both gauge the awareness of community in regards to stormwater issues and provide educational tips as part of the questions that were asked. The survey was pre-postage paid so there was no cost to residents who chose to respond and mail the survey back to the City. The City received 672 survey responses. Of these about 50 were completed online, the remainder were received through

the mail.

Appropriateness: The survey BMP is appropriate in that it provides the City a “snapshot” of the community’s understanding and awareness of stormwater issues. The response rate was about 3.5% which is statistically in a response range that will assist the City in directing program resources.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Though another survey will not be distributed until year 5 of the program, the information and knowledge gathered from the survey will be incorporated into the City’s stormwater program.

BMP Number: PP 5.2 Interested Parties List Maintained

General Summary: The purpose of this BMP is to maintain an interested parties (*i.e. residents, visitors, business owners, various agencies and etcetera*) list and send notification for workshops and available documents for review to interested parties.

The general intent of this BMP is to ensure every opportunity for interested parties within the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) to be kept up to date on various issues and proposed program changes concerning the City’s stormwater management program.

Status of Measurable Goals: Staff has maintained a list of interested parties during year two of the program.

Appropriateness: The development and maintenance of an interested parties list is a highly effective and affordable means of communicating directly with those members our community who have expressed an interest in being kept informed about stormwater program changes and / or pending issues.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will continue to update the list and modify it to make it more user friendly in year three of the program.

BMP Number: PP 5.3 Solicit public participation and input on the City’s Stormwater Program.

General Summary: The intent of this BMP is to promote public participation in the City's stormwater program and develop mechanisms to increase opportunities for input from the public.

Status of measurable goals: This BMP has only been explored in a small context. The preparation for (announcement of, venue selection, resource preparation, etc.), hosting, and following up on meetings is very time consuming and for the output for the few people that may attend the meeting, our resources need to be focused where we can have a positive impact on water quality.

Appropriateness: Having a public involvement process may be appropriate if there were adequate resources to provide some expectation for the public's voice to be heard but in the economy, the City is going to set priorities of where activities and BMP's are implemented and the general public typically does not have the insight for these decisions. It would be very time intensive for City staff to solicit people to a public forum and then to not have any of their input implemented undermines the public involvement process.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modification: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to educate the public at events and through presentations as the opportunities arise.

BMP Number: PP 5.4 Solicit public participation and input on the City's Stormwater Program.

General Summary: The intent of this BMP is to promote public participation in the City's stormwater program and develop mechanisms to increase opportunities for input from the public.

Status of measurable goals: To provide details on meetings, including target audience, solicitation methods, and meeting frequencies. This BMP was listed under Administration to be the lead and then as All for the support department but has been lost in the mix of BMP's. This BMP could be explored more but our resources are getting to be stretched so our focus is on BMP's where water quality can be actually improved.

Appropriateness: Having the public involved may be worthwhile but the water quality benefits will take years to realize. It is far more efficient for the City to be putting its resources to programs and BMP's that can directly impact water quality.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to educate the public at events and through presentations as the opportunities arise.

BMP Number: PP 6.1 Number of Complaints Reported and Received

General Summary: The purpose of this BMP is to track and manage all complaints and reports from various members of our community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential stormwater violations (*i.e. illicit discharges*).

Status of Measurable Goals: Staff tracked and managed all complaints and reports from various members of our community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning illicit discharges during year two of the program directly related to areas of the program managed by the Building and Safety Division (*construction, post construction and non-permitted facilities*). Stormwater staff responded to roughly 131 stormwater related service request, complaints and/or reports during year two.

Appropriateness: Tracking all complaints and reports from various members of our community (*i.e. residents, visitors, business owners, various agencies and etcetera*) is an appropriate means of establishing a statistical base for analysis of the success of various elements of the program in the future.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. The statistical base generated in year one (*350 reports of illicit discharges and or stormwater violations*) of the stormwater program compared to the number of complaints received in year two (*131 complaints*) of the program concerning potential illicit discharges reflects a drastic reduction which could be viewed as a direct result of an effective public education and outreach program when all other variables are considered static.

Proposed Modifications: Again, at this time the City of San Luis Obispo request that the Board consider that the reporting requirements detailed in BMP PP 6.1 be eliminated since the information being sought is already addressed in BMP CO 3.7, CO 4.6; ID 7.1, 7.2, 7.3 and 11.1.

Stormwater activities undertaken during the next Stormwater reporting cycle: The only anticipated modification is the elimination of the reporting on this specific BMP, since the information is addressed elsewhere within the annual report.

Illicit Discharge Detection and Elimination (ID)

BMP Number: ID 1.2 Revise the current stormwater ordinance to prohibit non-stormwater discharges into the City's storm drain system. The revised ordinance will clearly define stormwater and non-stormwater discharges, illicit discharge, reference the stormwater requirements in the Waterway Management plan, Building codes, and Engineering Standards and Standard Specifications, and implement appropriate enforcement procedures and actions.

General Summary: The intent of this BMP is to provide tools to reduce the amount of pollutants entering the stormwater system and waterways.

Status of Measurable Goals: The Council approved for final passage an ordinance that prohibits non-stormwater discharge and clearly defines discharges, and references relevant City documents.

Appropriateness: The change is appropriate to provide the City tools to control illicit discharge.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Ordinance hearings provide the opportunity for the City Council and the public to be more aware of stormwater issues.

Proposed Modifications: No modifications to this BMP are proposed. The BMP is complete.

Stormwater activities undertaken during the next reporting cycle: Staff will provide implementation and enforcement of the ordinance under the various BMPs in the City's Stormwater Management Plan.

BMP Number: ID 1.3 Revise the current storm water ordinance to prohibit non-storm water discharges into the City's storm drain system. The revised ordinance will clearly define storm water and non-storm water discharges, illicit discharge, reference the storm water requirements in the Waterway Management Plan, Building codes and Engineering Standards and Standard Specifications, and implement appropriate enforcement procedures and actions.

General Summary: The intent of this BMP is to reduce the amount of pollutants entering the storm water system and waterways.

Status of Measurable Goals: An implementation group who would be the most likely to utilize the ordinance was gathered and the ordinance was gone over as it related to the different staff members in the group. We are focusing on an educational campaign in the first year to educate the public about the ordinance and who they could be cited in the future. This is raising the awareness of the public that there will be citations coming out from things that may have typically gone unaddressed.

Appropriateness: This BMP is appropriate since stormwater is becoming a significant regulatory field, City staff needs to start getting the message out in the community and with the

threat of fines, there are many contractors, developers, and general citizens who will change their practices once they are aware of the new ordinance implications.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness of the ordinance and the implications it has with stormwater related offenses.

Proposed Modifications: No modifications are proposed at this time.

Stormwater activities undertaken during the next Stormwater reporting cycle: As adoption of the ordinance is complete during Year 2, no future requirements are identified.

BMP Number: ID 1.4 Revise the current storm water ordinance to prohibit non-storm water discharges into the City's storm drain system. The revised ordinance will clearly define storm water and non-storm water discharges, illicit discharge, reference the storm water requirements in the Waterway Management Plan, Building codes and Engineering Standards and Standard Specifications, and implement appropriate enforcement procedures and actions.

General Summary: The intent of this BMP is to reduce the amount of pollutants entering the storm water system and waterways.

Status of Measurable Goals: With the approved ordinance in our toolbox for enforcement, City staff has a dedicated ordinance to begin fighting polluters.

Appropriateness: This BMP is appropriate since stormwater is becoming a significant regulatory field, City staff needs to start getting the message out in the community and with the threat of fines, there are many contractors, developers, and general citizens who will change their practices once they are aware of the new ordinance implications.

Effectiveness: The BMP meets CASQA Level 2: Raising awareness of the public that the City has an ordinance and the implications it has with stormwater related offenses.

Proposed Modifications: No modifications are proposed at this time.

Stormwater activities undertaken during the next Stormwater reporting cycle: As implementation of the ordinance is underway, no future requirements are identified. If new requirements should come out, we will revise the ordinance to keep current with state and federal regulations as needed.

BMP Number: ID 2.1 The City has completed the mapping of the existing locations of the drainage inlets, manholes, culverts, lined channels and creek sections using the Global Position System (GPS). The map is on the City's GIS system and is available from the Public Works Department.

General Summary: To facilitate tracking illicit discharges and the maintenance of the storm drain system.

- Verify and update the storm drain map data in conjunction with the storm drain maintenance program described in BMP MO 4.

Status of Measurable Goals: This BMP has been completed and mapping/ GIS records are updated bi-monthly.

Appropriateness: This BMP is appropriate to ensure the storm drain system is identified and mapped accurately.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: This BMP will be ongoing to ensure accurate mapping and records are maintained up to date.

BMP Number: ID 2.2 The City has completed the mapping of the existing locations of the drainage inlets, manholes, culverts, lined channels and creek sections using the Global Position System (GPS). The map is on the City's GIS system and is available from the Public Works Department.

General Summary: The intent of this BMP is to facilitate tracking illicit discharges and the maintenance of the storm drain system.

Status of Measurable Goals: Ongoing mapping of stormwater infrastructures are completed and an agreement between the stormwater crew and GIS staff is made to continuously update the information.

Appropriateness: This BMP is very appropriate as one cannot manage facilities well without knowing the location information.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities

Proposed Modifications: No modifications are proposed at this time.

Stormwater activities undertaken during the next Stormwater reporting cycle: The work process for updating the stormwater information in GIS layer is working very well. Both GIS staff and stormwater crew have a clear understanding of their role and tasks and will continue the same work process to maintain accurate storm water GIS information.

BMP Number: ID 3.2 Adopt and enforce a pet waste ordinance to reduce / eliminate fecal coliform loading from pet waste.

General Summary: The intent of this BMP is to provide tools to reduce the amount of pollutants in stormwater run off from pet waste.

Status of Measurable Goals: The Council approved for final passage an ordinance that requires removal of pet waste by owners.

Appropriateness: The change is appropriate to provide the City tools to reduce fecal coliform.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Ordinance hearings provide the opportunity for the City Council and the public to be more aware of stormwater issues.

Proposed Modifications: No modifications to this BMP are proposed. The BMP is complete.

Stormwater activities undertaken during the next reporting cycle: Staff will provide implementation and enforcement of the ordinance under the various BMPs in the City's Stormwater Management Plan.

BMP Number: ID 3.3 Adopt and enforce a pet waste ordinance to reduce/eliminate fecal coliform loading from pet waste.

General Summary: The intent of this BMP is to reduce the amount of pollutants in stormwater runoff from pet waste.

Status of Measurable Goals: This element was wrapped into the general stormwater ordinance and will be enforced as witnessed.

Appropriateness: This BMP is appropriate but will be hard to enforce to a point where we will see a reduction/elimination of pet waste pollution from stormwater. The City is fortunate to have numerous large open space areas and miles of trails used by the public and for those who do not pick up after their dog, we do not have the resources to patrol and have staff at every location to be able to effectively enforce this specific measure in the stormwater ordinance.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications are proposed at this time.

Stormwater activities undertaken during the next Stormwater reporting cycle: As implementation of the ordinance is underway, no future requirements are identified.

BMP Number: ID 4.1 Removal of pet waste at City parks.

General Summary: The intent of this BMP is to reduce the amount of pollutants in stormwater runoff from pet waste by encouraging removal of pet waste at City parks through provision of Mutt Mitts.

Status of Measurable Goals: 280,000 Mutt Mitts were distributed to parks during the last year.

Appropriateness: This is an appropriate activity for encouraging owners to clean up after their dog.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: This BMP is proposed to be consolidated under MO 1.1: E-17 which details pet waste in parks.

Stormwater activities undertaken during the next Stormwater reporting cycle: This particular BMP has no additional follow up BMPs; however, staff will be working on other BMPs related to wild animal waste that are related to the same pollutant.

BMP Number: ID 5.2 Implement strategies to reduce / eliminate fecal coliform loading from wild animals inhabiting the tunnelized area of the Creek.

General Summary: The intent of this BMP is to provide tools to reduce the amount of fecal coliform loading from wild animals in the Creek.

Status of Measurable Goals: The Council approved for final passage an ordinance that allows the City to enforce the installation and maintenance of animal preclusion devices if required by the City Attorney. The City's water quality ordinance prohibits feeding of animals near the creek and postings have been installed.

Appropriateness: The change is appropriate to provide the City tools to control fecal coliform.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness, and Level 3: Changing Behavior. Ordinance hearings provide the opportunity for the City Council and the public to be more aware of stormwater issues. Staff at Laguna Lake Park observed a noticeable decrease in feeding once the area was posted.

Proposed Modifications: No modifications to this BMP are proposed. The BMP is complete.

Stormwater activities undertaken during the next reporting cycle: The City will pursue implementation and enforcement of the ordinance under the various BMPs in the City's Stormwater Management Plan when determined to be appropriate.

BMP Number: ID 6.1 Detect and eliminate illicit discharges of sewage and non-stormwater to the tunnelized portion of the SLO Creek.

General Summary: To eliminate sources of fecal coliform from sewage in the tunnel. Number of creek walks conducted and number and type of non-stormwater leaks observed.

Status of Measurable Goals: The Utilities Department has in place an existing spill reporting guild lines to report SSO's and clean up procedures identified in the Sanitary Sewer Management Plan (SSMP).

Appropriateness: This BMP is appropriate to ensure adequate clean-up of Sanitary Sewer Overflows (SSO's) and comply with the SSMP.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with the SSMP procedures in place and ensure to detect and eliminate illegal discharges into the tunnelized portion of the SLO Creek.

<p><i>BMP Number: ID 6.2</i> Detect and eliminate illicit discharges of sewage and non-stormwater to the tunnelized portion of the SLO Creek.</p>
--

General Summary: The City of San Luis Obispo will inspect the tunnelized portion of downtown to reduce fecal coliform loading to the creek and as part of the Pathogen TMDL.

The City performs this activity at a minimum on a quarterly basis. Additional days of sampling for the Pathogen TMDL and performing the tasks stated in the Wasteload Allocation Attainment Plan allow for additional days of lateral observation in the tunnelized area of San Luis Obispo Creek.

If during any of the inspections a leaking lateral was observed it would be documented and an NOV would be issued immediately. If the issue was not corrected, then the City would follow the approved Enforcement Response Plan and issue an Administrative Citation Fine.

BMP Intent: To eliminate sources of fecal coliform from sewage in the tunnel.

Status of Measurable Goals: ID 6.2: In year 1 through year 5, the City will continue to detect and eliminate illicit discharges of sewage and non-stormwater to the tunnelized portion of the SLO Creek.

During a quarterly walk this year, a section of newly installed suspended plumbing was noticed to have staining on it, leading staff to believe there may exist a leaking lateral. Upon further inspection, it was determined that the source of the leak was actually from a leaking floor drain and that the substance leaking was coffee from Peet's Coffee located n Court Street in downtown San Luis Obispo. City staff issued an NOV and the leak was fixed.

Appropriateness: This BMP is appropriate for ensuring no leaking laterals are contributing to fecal coliform loading in the Creek, though this leak was not likely contaminated with fecal coliform.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: Lateral inspections in the tunnelized area will continue on a minimum of a quarterly basis. This is part of the Pathogen TMDL and will be furthered by work on the Tunnel Study.

BMP Number: ID 6.3 Detect and eliminate illicit discharges of sewage and non-stormwater to the tunnelized portion of the SLO Creek.

General Summary: The City of San Luis Obispo will inspect the tunnelized portion of downtown to reduce fecal coliform loading to the creek and as part of the Pathogen TMDL.

The City performs this activity at a minimum on a quarterly basis. Additional days of sampling for the Pathogen TMDL and performing the tasks stated in the Wasteload Allocation Attainment Plan allow for additional days of lateral inspection in the tunnelized area of San Luis Obispo Creek.

If during any of the inspections a leaking lateral was observed it would be documented and an NOV would be issued immediately. If the issue was not corrected, then the City would follow its approved Enforcement Response Plan and issue an Administrative Citation Fine.

BMP Intent: To eliminate sources of fecal coliform from sewage in the tunnel.

Status of Measurable Goals: ID 6.3: In year 1 through year 5, the City will continue to detect and eliminate illicit discharges of sewage and non-stormwater to the tunnelized portion of the SLO Creek. This BMP is an additional part of BMP ID 6.2.

As stated in BMP 6.2, there was a single leaking plumbing fixture discovered during the quarterly creek walks. After the repair was made, an initial inspection was conducted, followed by all of the subsequent creek walks and other Pathogen TMDL related work.

Appropriateness: This BMP is appropriate for ensuring no leaking laterals are contributing to fecal coliform loading in the Creek.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Issuing an NOV to the restaurant definitely raised their awareness of the issue.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: Lateral inspections in the tunnelized area will continue on a minimum of a quarterly basis. This is part of the Pathogen TMDL and will be furthered by work on the Tunnel Study.

BMP Number: ID 7.1 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to respond to complaints and/or concerns from all segments of our community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential pollutant discharges from all construction sites and various non-permitted sites into the City's stormwater conveyance system within 72 hours.

General Summary: Staff within the City of San Luis Obispo's Building and Safety Division take all complaints or concerns that may affect local water quality from members of the community seriously, and as such typically respond to complaints as soon as possible (*i.e. within the hour*). Building and Safety personnel have developed an incident response form to track all complaints or concerns brought to our attention concerning all construction sites and various non-permitted sites from origination to resolution. This form also allows management personnel to review our current practices and procedures to determine if changes are necessary in order to improve overall program effectiveness. Complaints concerning potential pollutant discharges from all construction sites and various non-permitted sites into the City's stormwater conveyance system can be received by Stormwater staff via the City's on-line report a water quality concern form, via the City's 24-Hour Water Pollution Report Hotline, via email, in person or via a general line at the City and from staff within the organization.

The general intent of complaint driven investigations is to allow staff to utilize direct input from the community (*all aspects*) to address potential water quality impacts. It is impossible to be at every site 24 hours a day, however, with the assistance of members of the community we are in effect out and about at every location within the city 24 hours a day, 7 days a week. Truly input from the community at large is an invaluable tool for staff.

Status of Measurable Goals: Building and Safety Division staff responded to all complaints or concerns involving potential pollutant discharges from all construction sites and various non-permitted sites into the City's stormwater conveyance system within the community within 72 hours during the reporting period of July 1, 2010 through June 30, 2011. The majority of complaints were responded to within 1 hour of receipt of the tip. Staff responded to over 131 complaints in year 2.

Appropriateness: Complaints from the community at large are a highly appropriate way to supplement the ability of staff to address any and all water quality concerns throughout the City 24 hours a day, 7 days a week. Complaints concerning a particular site allow staff to focus their attention on potential pollutant discharges.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: Again, at this time the City of San Luis Obispo request that the Board consider that the reporting requirements for BMP 7.1 be augmented to reflect that this BMP should only address non-permitted facilities and residential issues, excluding solid waste related,

hazardous materials related and excessive irrigation runoff. This request is based upon the following facts:

- BMP ID 11.1 is established to track the number of complaints received / reported concerning illegal dumping of solid waste issues throughout the City.
- BMP ID 12. 2 is established to track the number of complaints received / reported concerning excessive irrigation run-off
- BMP CO 3.7 addresses construction related complaints / reports pertaining to stormwater concerns.
- BMP CO 4.6 addresses additional construction related complaints / reports pertaining to stormwater concerns.
- BMP PP 6.1 has been established to track the number of complaints and/or reports concerning illicit discharges to the City's stormwater system in general.
- The number of complaints and/or reports received concerning discharges of sewage or general discharges from permitted facilities (*i.e. food service and automotive facilities*) are addressed via the City's Industrial Waste Program to the Board annually.
- BMP ID 19.1 indirectly tracks the number of complaints received / reported concerning hazardous materials.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our complaint driven response and tracking plan in Year 3 of the program.

BMP Number: ID 7.2 Notice of Violations (NOV) issued and number of spills reported to the RWQCB
--

General Summary: The intent of this BMP is document and track all significant stormwater violations that either did or did not result in the discharge of a POC into the environment. In addition, the goal is to apprise the RWQCB and all other affected regulatory agencies of a spill that could have a significant negative impact upon the environment.

Status of Measurable Goals: During the reporting period of July 1, 2010 through June 30, 2011 Stormwater Staff within the Building and Safety Division issued well over 37 notices of violation and reported approximately six significant stormwater issues (*violations and/or spills*) to the regional water quality control board and/or other affected regulatory agencies (*i.e. Department of Fish & Game, San Luis Obispo County District Attorney's Office, Army Corp, San Luis Obispo City Fire Department*). At least one of the issue's resulted in the issuance of an arrest warrant concerning numerous and repeated stormwater violations.

Appropriateness: Collaboration amongst various regulatory agencies with common oversight or authority over a common goal is completely reliant upon the timely exchange of information amongst the various agencies. Thus, tracking and managing stormwater violations is an important aspect in achieving and/or protecting local water quality. Informing staff at the RWQCB about a spill that may or has affected water quality is only one significant component of the City of San Luis Obispo's Stormwater Enforcement Program, but a critical means of

seeking consistent collaboration amongst all parties with a vested interest in protecting local water quality.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Since, the instances of notices of violations decreased significantly and the instances of reportable spills decreased during this reporting period it is reasonable to assume that public outreach, education and enforcement activities have been effective in changing the target audience's behavior, resulting from the implementation of the recommended BMPs.

Proposed Modifications: Again, the City of San Luis Obispo request that the Board consider that the reporting requirements for BMP 7.2 be augmented to reflect that this BMP should only address non-permitted facilities and residential issues, excluding solid waste related, hazardous materials related and excessive irrigation runoff. This request is based upon the following facts:

- BMP ID 10.3 has been established to track the number stormwater violations noted, NOVs and Administrative Citation Fines issued.
- BMP ID 9.3 has been established to track the number of stormwater violations noted, NOVs and Administrative Citation Fines issued.
- BMP CO 4.5 has been established to track the number of notices of noncompliance for stormwater violations issued.
- BMP ID 19.1 indirectly tracks the number of notices issued and spills reported to the RWQCB concerning hazardous materials.
- BMP ID 8.1 has been established to track the number sewage spills responded to the Board on annual basis. In addition, all sewage related spills are reported via the City's Industrial Waste Program.
- BMP ID 6.2 has been established to track the number of NOVs and Administrative Citation Fines issued for sewage spills or plumbing found in substandard condition.
- The number of notices of violations (NOV) issued and number of spills reported to the RWQCB concerning discharges of sewage or general discharges from permitted facilities (*i.e. food service and automotive facilities*) are addressed via the City's Industrial Waste Program to the Board annually.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our complaint driven response plan in Year 3 of the program. The City is also currently in the process of updating our computer software systems to a fully integrated canned system that will enable comprehensive tracking and reporting systems.

BMP Number: ID 7.3 Staff within the City of San Luis Obispo's Stormwater Division is responsible for the development and implementation of a comprehensive program to respond to complaints and/or concerns from all segments of our community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential illicit connections to the City's stormwater conveyance system within 72 hours from all construction sites, various non-permitted sites (*excluding issues pertaining to solid waste, hazardous waste, sewage and irrigation related*) and residential sites (*excluding solid waste materials, hazardous waste*

materials, sewage and irrigation run-off issues). This program includes various levels of enforcement from verbal directives to formal (*i.e. written*) communications of notices to comply, notices to correct, notices of violations and/or the issuance of “Administrative Citations” (fines).

General Summary: The intent of this BMP is for the development of a fully integrated compliance monitoring system designed to identify and correct violations, help establish a consistent and comprehensive enforcement presence, ensure that evidence is collected and documented that is needed to support enforcement actions where there are identified violations, and streamline the process to help target and rank enforcement priorities. To achieve this stormwater staff consistently respond to all complaints and/or concerns from all segments of our community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning potential illicit connections to the City’s stormwater conveyance system within 72 hours from all construction sites, various non-permitted sites (*excluding solid waste materials, hazardous waste materials, sewage and irrigation run-off issues*) and residential sites (*excluding solid waste materials, hazardous waste materials, sewage and irrigation run-off issues*) in order to protect all beneficial uses associated with local waterways to the maximum extent practicable.

Responses to complaints and reported illicit discharges from illicit connections from all sources and just illicit connections discovered to the City’s storm drain system are handled according to the “first Responders List” (*i.e. Wastewater, Water, & Stormwater Related Calls Received handout, see attachment “E”*) developed by our industrial waste division. Illicit connections, discharges and spills from illicit connections can be handled in numerous ways depending upon the magnitude of the discharge and /or the level of culpability (*i.e. accidental discharge, negligent discharge, intentional discharge*) of the identified responsible party. The levels of enforcement include; verbal directives to formal (*i.e. written*) communications of notices to comply, notices to correct, notices of violations and/or the issuance of “Administrative Citations.” The goal of enforcement is to seek compliance and cleanup. All enforcement activities (*i.e. NOVs and Administrative Citations*) concerning illicit connections are tracked via an electronic database and via inspection reports.

Status of Measurable Goals: During the reporting period of July 1, 2010 through June 30, 2011 no illicit connections to the City’s stormwater conveyance system were reported and/or discovered from construction sites, various non-permitted sites (*excluding solid waste materials, hazardous waste materials, sewage and irrigation run-off issues*) and residential sites (*excluding solid waste materials, hazardous waste materials, sewage and irrigation run-off issues*).

Appropriateness: Addressing illicit connections is an appropriate way to address potential discharges into the City’s stormwater conveyance system. Enforcement activities, including the issuance of notices to comply, notices to correct, notices of violation and the issuance of administrative citations are an invaluable means of seeking compliance from those members of the community who decline to voluntarily comply. Incidences of illicit connections that result in the issuance of an NOV and/or administrative citation are all tracked and reported to the regional board where appropriate depending upon the magnitude or risk level posed the connection.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Since, no instances of illicit connections to the categories mentioned herein were discovered this year it is reasonable to

assume that public outreach, education and enforcement activities have been effective in changing the target audience's behavior, resulting from the implementation of the recommended BMPs.

Proposed Modifications: In the July 1, 2009 through June 30, 2010 annual report staff requested that the Board consider that the reporting requirements for BMP 7.3 be augmented to reflect that this BMP only addresses non-permitted facilities and residential issues, excluding solid waste related, sewage related, hazardous materials related and excessive irrigation runoff. The request was based upon the following facts:

- BMP ID 10.3 has been established to track the number stormwater violations noted, NOVs and Administrative Citation Fines issued which includes illicit connections.
- BMP ID 9.3 has been established to track the number of stormwater violations noted, NOVs and Administrative Citation Fines issued which includes illicit connections.
- BMP CO 4.5 has been established to track the number of notices of noncompliance for stormwater violations issued which includes illicit connections.
- BMP ID 19.1 indirectly tracks the number of notices issued and spills reported to the RWQCB concerning hazardous materials.
- BMP ID 8.1 has been established to track the number sewage spills responded to the Board on annual basis. In addition, all sewage related spills are reported via the City's Industrial Waste Program which includes illicit connections.
- The number of notices of violations (NOV) and Administrative Citations issued concerning discharges of sewage or general discharges from permitted facilities (*i.e. food service and automotive facilities*) are addressed via the City's Industrial Waste Program to the Board annually.
- The number of notices of violations (NOV) and Administrative Citations issued concerning discharges of hazardous materials from an illicit connection from any site within the City are also addressed via the City's CUPA program annually.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division Stormwater program will continue to enhance our illicit connection program in Year 3 of the program. The City is also currently in the process of updating our computer software systems to a fully integrated canned system that will enable comprehensive tracking and reporting systems.

BMP Number: ID 8.1 Respond to all reports of sewage spills immediately from businesses, residences and the City's system.

General Summary: The City of San Luis Obispo Industrial Waste Section handles all of the *during hours* required spill reporting for the Utilities Wastewater Collection Section. After hours spill reporting is handled by the on call Wastewater Collection staff responding to the incident. This reporting system is further defined in the City's approved Sanitary Sewer Management Plan (SSMP).

BMP Intent: To reduce/prevent the amount of sewage entering the storm drain system or waterways.

Status of Measurable Goals: Completed and ongoing. During Year 2, the City responded to 19 sewage spills. Of these spills, 13 were from private sources such as laterals, while 6 were from the City of San Luis Obispo's wastewater collection system.

Appropriateness: This BMP is appropriate for the desired outcome and is required by our SSMP.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will continue to respond to all reports of sewage spills from both public and private sources.

BMP Number: ID 8.2 Respond to all reports of sewage spills immediately from businesses, residences and the City's system.

General Summary: The City of San Luis Obispo Industrial Waste Section handles all of the *during* hours required spill reporting for the Utilities Wastewater Collection Section. After hours spill reporting is handled by the on call Wastewater Collection staff responding to the incident. This reporting system is further defined in the City's approved Sanitary Sewer Management Plan (SSMP).

BMP Intent: To reduce/prevent the amount of sewage entering the storm drain system or waterways.

Status of Measurable Goals: During Year 2 the City responded to 19 sewage spills. Of these spills 13 were from private sources such as laterals, while 6 were from the City of San Luis Obispo's wastewater collection system. NOVs are issued to private residences and businesses where a sewage spill occurs. In *Year 2*, the City issued 13 NOVs.

Appropriateness: This BMP is appropriate for the desired outcome and is required by our SSMP.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Issuing NOVs raises awareness of sewage spills to property owners and facility managers.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will continue to respond to all reports of sewage spills from both public and private sources. When appropriate, NOVs will be issued related to these sewage spills.

BMP Number: ID 9.2 Inspect business and industries in the Industrial Waste Program annually for stormwater management activities and illicit discharges/connections.

General Summary: The City of San Luis Obispo currently inspects all industries and restaurant facilities which discharge or have the ability to discharge liquid wastes as part of the Industrial Waste Program. These dischargers are considered Class I facilities.

Any violations are noted on the inspection record and are then corrected for a re-inspection of the facility.

BMP Intent: Reduce pollutants from commercial/industrial processes by identifying possible sources of discharges or violations during annual inspections.

Status of Measurable Goals: During Year 2 the City conducted inspections at all of the 120 Class I facilities. This meets the requirement of 100% completed annually.

Appropriateness: This BMP is efficient in both its use of staff time and for the desired outcome of the inspector's primary role of monitoring facilities for proper disposal of liquid waste.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. Part of the stormwater inspection process involves the City inspector walking through the facility with the manager / staff. During this process, a great opportunity for education exists in which, the inspector can start the process of awareness of stormwater issues and how a facility's actions can have an effect on stormwater quality.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will continue to inspect these facilities.

BMP Number: ID 9.3 Inspect business and industries in the Industrial Waste Program annually for stormwater management activities and illicit discharges/connections.

General Summary: The City of San Luis Obispo currently inspects all industries and restaurant facilities which discharge or have the ability to discharge liquid wastes as part of the Industrial Waste Program. These dischargers are considered Class I facilities.

Any violations are noted on the inspection record and are then corrected for a re-inspection of the facility.

BMP Intent: Reduce pollutants from commercial/industrial processes by identifying possible sources of discharges or violations during annual inspections.

Status of Measurable Goals: During Year 2 the City conducted inspections at all of the 120 Class I facilities. This meets the requirement of 100% completed annually. Of the NOV's issued, none were related to stormwater.

Appropriateness: This BMP is appropriate.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Issuing NOV's allows facility owners / managers to know where their facilities are deficient in controlling stormwater related issues.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle:
During the next reporting cycle, the City will continue to inspect these facilities.

BMP Number: ID 10.2 Inspect restaurants which are permitted by the pretreatment program annually for stormwater management issues.

General Summary: The City of San Luis Obispo has implemented a Fats, Oils, and Grease Program as part of the City's Industrial Waste Program (Pretreatment). As part of this program, all restaurants, along with other dischargers that produce only typical domestic wastes, in larger than household amount, are to be inspected on an annual basis. These facilities are categorized as Class II Industrial Dischargers. As part of the inspection process, the Environmental Compliance Inspector observes, documents, and advises restaurant owners and managers on various stormwater issues related to their place of business.

BMP Intent: Reduce the pollutants from restaurants by identifying sources of discharges or violations.

Status of Measurable Goals: Completed and ongoing. At present there are 167 Class II facilities inspected by the City of San Luis Obispo.

Appropriateness: This BMP is efficient in both its use of staff time and for the desired outcome of the inspector's primary role of monitoring facilities for proper disposal of liquid waste.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. Part of the restaurant stormwater inspection process involves the City inspector walking through the facility with the manager / staff. During this process, a great opportunity for education exists in which, the inspector can start the process of awareness of stormwater issues and how a restaurant's actions can have an effect on stormwater quality.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: Educational materials related to stormwater have been created and are distributed to restaurant managers, further outlining BMPs that can assist them in achieving compliance with stormwater requirements.

<p>BMP Number: ID 10.3 Inspect restaurants which are permitted by the pretreatment program annually for stormwater management issues.</p>
--

General Summary: The City of San Luis Obispo has implemented a Fats, Oils, and Grease Program as part of the City's Industrial Waste Program (Pretreatment). As part of this program, all restaurants, along with other dischargers that produce only typical domestic wastes, in larger than household amounts, are to be inspected on an annual basis. These facilities are categorized as Class II Industrial Dischargers. As part of the inspection process, the Industrial Waste Inspector observes, documents, and advises restaurant owners and managers on various stormwater issues related to their place of business.

Potential violations that could be observed during an inspection may include washing of floor mats outside without proper collection of runoff, not adequately maintaining grease traps which could lead to an overflow, or failure to have proper records of grease trap servicing available for review.

When an inspector notices an issue, they will first try to determine if it can be resolved at the time of the inspection so that it is no longer a problem. An example of this could be a bucket stored outside without a cover which is easily correctable. This helps to facilitate the end goal of compliance. Violations which are not easily fixed are noted on the inspection record and are then corrected for a re-inspection of the facility.

BMP Intent: Reduce the pollutants from restaurants by identifying sources of discharges or violations.

Status of Measurable Goals: During Year 2, the City issued one violation which resulted in an NOV. No Administrative Citation Fines were issued. This BMP is completed and ongoing.

Appropriateness: This BMP is consistent with other inspection processes performed by the City of San Luis Obispo.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Issuing an NOV or Administrative Fine will raise the awareness of restaurant staff to the requirements of stormwater regulations.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: The City will continue to perform stormwater inspections of restaurants during regularly scheduled Class II

inspections. All violations, NOVs and Administrative Citation Fines issued will continue to be documented.

BMP Number: ID 11.1 Illegal dumping and improper storage of solid waste is investigated and enforced by an authorized representative of the City.

- Staff responds and investigates illegal dumping of solid waste within 24 hours of reporting. Staff determines if the person who dumped the waste can be traced by addresses found in the trash, serial number on appliances, etc.
- If the responsible party is identified, a NOV is issued and cleanup must be completed within five days.
- Residents or businesses which improperly store solid waste are notified and are issued a warning and timeline for cleanup.
- If the responsible party does not comply, an Administrative Citation is issued which can result in a fine up to \$500 per day that the violation continues.

General Summary: By removing abandoned or improperly stored solid waste items such as furniture, appliances, TVs, exposed trash piles, etc. from public outdoor locations in a timely manner, this BMP is intended to reduce the amount of trash and pollutants entering storm drains and waterways.

The process for removal begins when Utilities Conservation staff is contacted via email or phone advising of the location and type of item suspected to be illegally dumped or abandoned. Staff visits the site, notes exact location and description and whether there are safety issues with accessing the item, such as a steep embankment, proximity to railroad tracks, etc. If the item is on private property, staff contacts the property owner to request removal within 24 hours. If on public property and source is not traceable, staff creates a spreadsheet with details of item type and location and sends an email containing the list to the Garbage Company. Pickup is usually accomplished the same day.

Utilities Conservation staff also works with the Garbage Company to promote and publicize an annual Garbage Clean-up Week that is timed to coincide with the end of the school year. This is an opportunity for students and the public to dispose of excess materials for free, and bulky items for only \$10 apiece. This program is a tremendous assistance to preventing extra items from being illegally dumped.

Status of Measurable Goals: One hundred percent of reported items have been investigated and processed to completion. Between 6/15/10 and 6/15/11, 303 illegally dumped and abandoned items were removed from public outdoor locations by San Luis Garbage at the City's request, most within 24 hours of being reported. Some of these items were in or near waterways. An additional 32 sites were investigated following reports of abandoned items but the items were not located, indicating that the items were removed by property owners or other persons.

Appropriateness: This BMP is extremely appropriate for the desired outcome, keeping pollutants out of waterways while enhancing the safety of the community by removing potential tripping hazards and blockages in streets, sidewalks, and public rights of way.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to remove illegally dumped solid waste items from the public right of way, vacant lots, and other properties in the City at which items have appeared from unknown sources as they are called in to the City by citizens or reported by the Police or Fire Departments, and will document the number and type of items removed.

BMP Number: ID 11.2 Illegal dumping and improper storage of solid waste is investigated and enforced by an authorized representative of the City.

- Staff responds and investigates illegal dumping of solid waste within 24 hours of reporting. Staff determines if the person who dumped the waste can be traced by addresses found in the trash, serial number on appliances, etc.
- If the responsible party is identified, a NOV is issued and cleanup must be completed within five days.
- Residents or businesses which improperly store solid waste are notified and are issued a warning and timeline for cleanup.
- If the responsible party does not comply, an Administrative Citation is issued which can result in a fine up to \$500 per day that the violation continues.

General Summary: By removing abandoned or improperly stored solid waste items such as furniture, appliances, TVs, and exposed trash piles from public outdoor locations in a timely manner, this BMP is intended to reduce the amount of trash and pollutants entering storm drains and waterways.

Status of Measurable Goals: The measurable goal of section ID-11.2 is the number of Notices of Violation or Administrative Citations issued. During this reporting period, one hundred percent of items reported as illegally dumped or improperly stored have been investigated and processed to completion in a timely manner, none resulting in the need for an NOV, Administrative Citation or Fine.

Appropriateness: This BMP is appropriate for circumstances in which the person or entity who illegally dumps or improperly stores items can be traced and contacted, and provides recourse in the form of administrative citations and/or fines if they refuse to comply with rules for clean-up in a timely manner.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: A No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to remove illegally dumped solid waste items from the public right of way, vacant lots, and other properties in the City at which items have appeared from unknown sources as they are called in to the City by citizens or reported by the Police or Fire Departments. The City will continue to document the number and type of items removed. If the source of these items can be identified, the City will continue to pursue payment for removal of the items, or for the source person/entity to dispose of the items in a timely manner, with the option to impose deadlines, citations and fines for failure to do so.

BMP Number: ID 12.1 Investigate and enforce the Municipal Code which prohibits excessive irrigation runoff.

- The Utilities Conservation Office responds and investigates complaints of excessive runoff from irrigation within 24 hours.
- An NOV is issued when needed.
- Provide irrigation audits to assist water customer so that they can comply with the provisions of the Municipal Code which prohibits irrigation runoff
- If the responsible party does not comply, an Administrative Citation is issued which can result in a fine up to \$500 per day that the violation continues.

General Summary: Irrigation Runoff can be a source of pollutants entering the storm drains and waterways. By investigating and enforcing the Municipal Code which prohibits excessive irrigation runoff the City can reduce the amount of trash entering the storm drains and waterways. Prevention is always preferable to enforcement activities.

Status of Measurable Goals: During this reporting year, 30 handouts were distributed to the public while attending one Farmer's Market, during summer months. 10 handouts were distributed at a Small Garden Seminar. Materials that identify water waste runoff as a violation were also distributed during 1,961 water audit related contacts throughout the reporting year.

Appropriateness: Pollution prevention is always preferable to enforcement activities after the fact, therefore distributing related materials will remain an appropriate activity.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities

Proposed Modifications: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Related materials and distribution methods will be reviewed and updated where appropriate.

BMP Number: ID 12.2 Investigate and enforce the Municipal Code which prohibits excessive irrigation runoff.

- The Utilities Conservation Office responds and investigates complaints of excessive runoff from irrigation within 24 hours.
- An NOV is issued when needed.
- Provide irrigation audits to assist water customer so that they can comply with the provisions of the Municipal Code which prohibits irrigation runoff
- If the responsible party does not comply, an Administrative Citation is issued which can result in a fine up to \$500 per day that the violation continues.

General Summary: Irrigation Runoff can be a source of pollutants entering the storm drains and waterways. Investigating complaints of water runoff and follow-up contacts has been ongoing practice for a number of years.

Status of Measurable Goals: During this reporting year, 25 complaints were received from both City employees and Citizens; all were investigated and resolved.

Appropriateness: Irrigation Runoff can be a source of pollutants entering the storm drains and waterways. Investigating complaints will therefore continue as an appropriate activity.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities

Proposed Modifications: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City's database software is scheduled to be upgraded in the near future. Related materials and data recording methods will be reviewed and updated where appropriate to assure that enforcement contacts continue to be accurately reported.

BMP Number: ID 12.3 Investigate and enforce the Municipal Code which prohibits excessive irrigation runoff.

- The Utilities Conservation Office responds and investigates complaints of excessive runoff from irrigation within 24 hours.
- An NOV is issued when needed.
- Provide irrigation audits to assist water customer so that they can comply with the provisions of the Municipal Code which prohibits irrigation runoff
- If the responsible party does not comply, an Administrative Citation is issued which can result in a fine up to \$500 per day that the violation continues.

General Summary: Irrigation Runoff can be a source of pollutants entering the storm drains and waterways. By investigating and enforcing the Municipal Code which prohibits excessive irrigation runoff the City can reduce the amount of trash entering the storm drains and waterways. Prevention is always preferable to enforcement activities.

Status of Measurable Goals: In years 1 through 5, and ongoing, the City will continue to investigate complaint driven runoff violations and issue NOV's or fines where appropriate. During this reporting year, 25 complaints were received from both City employees and Citizens; all were investigated and notices of violations were issued in all cases. No Fines were levied, as all instances were resolved with NOV's.

Appropriateness: Irrigation Runoff can be a source of pollutants entering the storm drains and waterways. Code enforcement will remain an appropriate activity.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities

Proposed Modifications: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City's database software is scheduled to be upgraded in the near future. Related materials and data recording methods will be reviewed and updated where appropriate, to assure that enforcement contacts continue to be accurately reported. Some NOV warnings that may have been generated during other Department activities were probably not recorded in the present database; the new database should accommodate these activities.

BMP Number: ID 13.1 Provide curbside collection of used motor oil to residents through the City's franchise agreement with the San Luis Garbage Company in order to provide a safe alternative for disposal of these materials which could otherwise end up in the waterways of the community.

General Summary: The City of San Luis Obispo works closely with its solid waste franchisee, San Luis Garbage Company, to reduce the amount of waste oil dumped illegally in the City by providing a convenient alternative in the form of on-site pickup for residential and commercial garbage customers. When a customer would like oil picked up, they call the Garbage Company to request this service. The Garbage Company will drop off a container for the waste oil along with a bag for the oil filter(s). The customer puts materials in these containers and sets them out with their garbage containers on their regular pickup service day. There is no charge to the customer for this service. The City and the Garbage Company distribute and publish educational materials about the oil pickup program through a variety of resources.

- San Luis Garbage Company is required to distribute information on the program once each year to all customers.
- Information is provided at least twice a year in the Utilities Department newsletter.

Status of Measurable Goals: This section addresses the number of used motor oil pickups during the reporting period. San Luis Garbage Company collects ongoing data on the number of residential and commercial pickups within the City of San Luis Obispo. Between 6/16/10 and 6/15/11, there were 721 residential pickups and 37 commercial pickups.

Appropriateness: This BMP is appropriate for keeping used motor oil from entering waterways due to improper disposal.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to encourage, promote and advertise the used motor oil collection program and will track numbers of residential and commercial pickups on an ongoing basis.

BMP Number: ID 13.2 Provide curbside collection of used motor oil to residents through the City's franchise agreement with the San Luis Garbage Company in order to provide a safe alternative for disposal of these materials which could otherwise end up in the waterways of the community. San Luis Garbage Company is required to distribute information on the program once each year to all customers. Information is provided at least twice a year in the Utilities Department newsletter.

General Summary: The City of San Luis Obispo works closely with its solid waste franchisee, San Luis Garbage Company, to reduce the amount of waste oil dumped illegally in the City by providing a convenient alternative in the form of on-site pickup for residential and commercial garbage customers. When a customer would like used oil picked up, they call the Garbage Company to request this service. The Garbage Company will drop off a container for the waste oil and a bag for the oil filter(s). The customer puts materials in these containers and sets them out with their garbage containers on their regular pickup service day. There is no charge to the customer for this service. The City and the Garbage Company distribute and publish educational materials about the oil pickup program through a variety of resources.

Status of Measurable Goals: This section addresses the number of informational materials distributed to inform citizens of the curbside collection program for used motor oil. San Luis Garbage Company includes a brochure about this program in all new account packets, approximately 500 per year. Callers asking about the program are directed to the AT&T Yellow Pages which contain information on this and other recycling programs in the green pages entitled *San Luis Obispo Recycling Guide*. San Luis Garbage Company regularly promotes the program in telephone contacts with customers. Approximately 250 flyers were taken by citizens during visits to their Administrative Office during the reporting period.

Appropriateness: This BMP is appropriate for keeping used motor oil from entering waterways due to improper disposal.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City and San Luis Garbage Company will continue to encourage, promote and advertise the used motor oil collection program and will track numbers of residential and commercial pickups on an ongoing basis.

BMP Number: ID 14.1 Partner with the SLO County Integrated Waste Management Authority (IWMA) to Offer residents and small businesses the opportunity to dispose of small quantities of hazardous materials at the Cold Canyon Household Hazardous Waste Facility and to Offer residents the opportunity to recycle construction and demolition materials, including green waste, concrete and asphalt, lumber, tires, scrap metal and appliances, and cardboard at IWMA certified facilities.

General Summary: The City of San Luis Obispo works with the SLO County IWMA in many recycling activities. BMP ID-14 relates to hazardous waste collection, as well as the recycling of materials from construction projects within the City, with the goal of reducing pollutants in stormwater and reducing incidents of illegal dumping by promoting environmentally safe, convenient alternatives for disposal of hazardous waste and recyclable items.

Status of Measurable Goals: To alert and inform citizens of recycling possibilities and details of what materials are recyclable, the IWMA places signs on multi-family trash receptacles throughout the City, as well as warnings not to place hazardous materials with regular trash or recycling. Information about recycling and hazardous household waste disposal is outlined in detail in the 18-page IWMA Recycling Guide contained in the AT&T Yellow Pages phone book, which is distributed annually to approximately 12,800 residences and businesses in the City of San Luis Obispo. There is a sticker on the front of each telephone book advising customers of the Recycling section within. The IWMA has an extensive website with detailed information about recycling and hazardous waste disposal. The City website also contains information on these topics and refers website visitors to the IWMA site. The front office of the City's Utilities Department has publications displayed for citizens to take regarding recycling and hazardous waste disposal. Approximately 275 of these were taken during the reporting period of 6/15/10 through 6/15/11. Approximately 150 contacts are made through phone calls to the City's Utilities Conservation group and various media contacts throughout the year.

Appropriateness: This BMP is appropriate for its intended purpose.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to promote recycling and hazardous waste collection programs in order to reduce

the amount of trash entering storm drains and waterways and will track the number of public educational materials distributed within the City.

BMP Number: ID 14.2 Partner with the SLO County Integrated Waste Management Authority (IWMA) to Offer residents and small businesses the opportunity to dispose of small quantities of hazardous materials at the Cold Canyon Household Hazardous Waste Facility and to Offer residents the opportunity to recycle construction and demolition materials, including green waste, concrete and asphalt, lumber, tires, scrap metal and appliances, and cardboard at IWMA certified facilities.

General Summary: The City of San Luis Obispo works with the SLO County IWMA in many recycling activities. BMP ID-14 relates to hazardous waste collection, as well as the recycling of materials from construction projects within the City, with the goal of reducing pollutants in stormwater and reducing incidents of illegal dumping by promoting environmentally safe, convenient alternatives for disposal of hazardous waste and recyclable items.

Status of Measurable Goals: The IWMA must annually submit to the California Integrated Waste Management Board a completed Form 303 providing waste volume totals for all household hazardous waste collected in its jurisdiction. During the reporting period of 6/16/10 to 6/15/11, there were 1130 City of San Luis Obispo drop-offs at the Cold Canyon Household Hazardous Waste Facility.

The City manages a Construction & Demolition Recycling program and tracks tonnages of recycled construction and demolition materials, including green waste, concrete, asphalt, clean soil, lumber, metal and cardboard if they are associated with a construction project within City limits that exceeds 1,000 square feet or \$50,000 in value. Total weight of materials recycled through this program during the reporting period of 6/16/10 to 6/15/11 was 319 tons.

The Recycling Center at Cold Canyon Landfill reported 11,358 dropoffs from City of San Luis Obispo residents during the reporting period of 6/16/10 through 6/15/11, with a total tonnage of 3,872. Number of dropoffs from City businesses was 4,038 with total tonnage of 4,818.

Appropriateness: This BMP is appropriate for its intended purpose.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to promote recycling and hazardous waste collection programs in order to reduce the amount of trash entering storm drains and waterways, and will track the number of City residents that use the Hazardous Household Waste Collection program. The City will also track tonnages of construction waste dropped off at the Resource Recovery Center at Cold Canyon Landfill.

BMP Number: ID 15.1 Remove trash and debris from transient encampments on City property. Private landowners receive notification to remove the trash and debris.

General Summary: Due to the large number of transients living in the City of San Luis Obispo, and the fact that the City owns several parcels along San Luis Obispo Creek and its tributaries, removing their trash and debris is extremely beneficial in reducing stormwater pollution.

Status of Measurable Goals: Due to the large number of transients living in the City of San Luis Obispo, and the fact that the City owns several parcels along San Luis Obispo Creek and its tributaries, removing their trash and debris is extremely beneficial in reducing stormwater pollution. City staff has been overwhelmed with the amount of trash and has a contract cleaner come in every 4-6 weeks after several locations are identified for clean-up. During this reporting cycle, 37,980 pounds of trash have been removed from transient encampments in the City of San Luis Obispo.

Appropriateness: This BMP is extremely appropriate for the desired outcome but there are social and political issues tied to dealing with transients along with the benefit of cleaning up the environment. City staff is required to follow strict guidelines when posting camps and before any clean-up is to begin due to lawsuits finding for the transients (Case 1:06-cv-01445-OWW-SMS, Class Representatives v. City of Fresno).

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. This BMP does not meet criteria to be raised to Level 2: Raising Awareness but as we are educating the campers through our clean-up efforts, their awareness is being raised.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: We will continue to post and follow-up with camps and transients as they move on and continue to remove their trash and debris so it is not able to be washed down the creek during winter storm events or under any circumstances. We are limited by current case law which is expanding all the time but we will enact the program to the Maximum Extent Practicable (MEP).

BMP Number: ID 15.2 Remove trash and debris from transient encampments on City property. Private landowners receive notification to remove the trash and debris.

General Summary: Due to the large number of transients living in the City of San Luis Obispo, and the fact that the City owns several parcels along San Luis Obispo Creek and its tributaries, removing their trash and debris is extremely beneficial in reducing stormwater pollution.

Status of Measurable Goals: Numerous private property parcels are located along the San Luis Obispo Creek watershed but few actual residents have issues associated with transients. Off-site landowners present a significant problem and 1 landowner was issued a letter to comply with keeping transients and debris off his property. French Hospital has undeveloped property along

two drainages and their property backs up to the rail-road tracks so there is usually transient activity in this area. Private individuals do not have the capacity to engage these individuals without fear of potential retaliation so City staff solicits access through a 602 Form. This allows the City and its resources to enter private property to deal with these sorts of issues without the landowner needing to confront transients. The City works collaboratively with landowners or typically deals with the transients and their debris. Should this effort continue to command more time and resources, the City will investigate cost recovery activities for the clean-up.

Appropriateness: This BMP is appropriate for the desired outcome but transients typically don't enter private property due to the visibility and attention they will draw. This is contrary to larger parcels of private property usually with off-site landowners where City staff solicit access to deal with transient issues efficiently and in a timely manner instead of having to use the landowner as a liaison. This process is always supported.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. As we contact private property landowners about the issue of transients on their property, they are made aware of the penalties and implications of having transients on their property.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue ongoing patrol and enforcement as requested and continue to solicit access to "problem private parcels" through acquiring 602 Forms.

BMP Number: ID 16.1 Computer Database Violation Tracking & Administrative Citation Program

General Summary: The purpose of this BMP is to require the establishment of a computer database for stormwater violation tracking and enforcement activities to enable City staff to identify recalcitrant violators and/or areas of the City that have reoccurring stormwater problems. This database will be used for tracking and data management purposes for all stormwater inspections (*i.e. routine, drive-by, complaint driven, follow-up and etcetera*).

Status of Measurable Goals: Stormwater staff within the City of San Luis Obispo's Building and Safety Division track all stormwater enforcement activities, violations and administrative citations in the City's Foxpro Database and Violation Tracking Systems that pertain to the areas of the stormwater program handled by this division.

Appropriateness: The ability to track and manage all stormwater activities within a centralized database is an immeasurable asset to the entire program.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: The City is about to upgrade its software system to energov later this year which should enhance our tracking and reporting capabilities.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Stormwater Program within the Building and Safety Division will continue to enhance our data management and data tracking abilities in Year 3 of the program.

BMP Number: ID 16.2 Stormwater-Related Enforcement Actions

General Summary: The purpose of this BMP is to accurately track all stormwater violations and/or enforcement activities to enable City staff to identify recalcitrant violators and/or areas of the City that have reoccurring stormwater problems.

Status of Measurable Goals: Stormwater staff within the City of San Luis Obispo's Building and Safety Division track and document all stormwater enforcement activities, violations and administrative citations in the City's Foxpro Database and Violation Tracking Systems that pertain to the areas of the stormwater program handled by this division. During the July 1, 2010 through June 30, 2011 reporting period Stormwater staff handled roughly 295 stormwater enforcement actions as reflected in the following tables.

Enforcement Activities I	2010 - 2011
Commercial Related Enforcement Activities	54 plus
- Automotive related enforcement activities	5
- Chemical storage related enforcement activities	2
- Discharge into the city's stormwater conveyance system	2
- Food services related enforcement activities	33
- General commercial service related enforcement activities	1
- Pressure washing industry related enforcement activities	8
- Water line leak related enforcement activities	3
Construction Related Enforcement Activities	193 plus
- Concrete related enforcement activities	7
- General construction related enforcement activities	168
- Landscape construction related enforcement activities	6
- Painting related enforcement activities	2
- Pressure washing industry related enforcement activities	1
- Public works related enforcement activities	9
Creek Enforcement Related Activities	11 plus
- Discharge into the city's stormwater conveyance system	4
- Other or general related enforcement activities	3
- Solid waste related enforcement activities	4
Downtown San Luis Obispo Related Enforcement Activities	3
- Food services related enforcement activities	2
- Pressure washing industry related enforcement activities	1
Homeless Related Enforcement Activities	5 plus
Industrial Related Enforcement Activities	6 plus
- Pool, fountain maintenance related enforcement activities	1
- Janitorial related enforcement activities	1
- Pressure washing industry related enforcement activities	3
- Solid waste related enforcement activities	1
Other Related Enforcement Activities	3 plus
- Fecal matter related enforcement activities	2
- Agricultural related enforcement activities	1
Residential related enforcement activities	18 plus
- Discharge into the city's stormwater conveyance system	3
- Automotive related enforcement activities	5
- Other or general related enforcement activities	3
- Solid waste related enforcement activities	4
- Parks / open space related enforcement activities	1
- Pool, fountain maintenance related enforcement activities	2
Stormwater Conveyance System Discharge Related Enforcement Activities	2
ESTIMATED TOTAL	295 plus

Enforcement Activities II	2010 - 2011
Correction Notices Issued	11
Field Correction Notices Issued	1
Notices of Violation Issued	37
Notices to Comply Issued	60
Job shut downs	1

Appropriateness: The ability to track and manage all stormwater enforcement activities within a centralized database is an immeasurable asset to the entire program.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities. Documenting and tracking all stormwater violations, enforcement activities and citations enables City staff to

identify and effectively manage all recalcitrant violators and/or areas of the City that have reoccurring stormwater problems and take appropriate action.

Proposed Modifications: The City is about to upgrade its software system to energov later this year which should enhance our tracking and reporting capabilities.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Stormwater Program within the Building and Safety Division will continue to enhance our data management and data tracking abilities in Year 3 of the program.

BMP Number: ID 17.1 Number of service investigation requests received from City staff.

General Summary: The purpose of this BMP is develop a system and/or procedures for City staff to report Drainage Inlets (DIs) with possible/potential problems due to non-stormwater discharges, or trash to the Stormwater Program for investigation and follow-up actions when necessary. Once a service investigation request is received, staff will investigate the reported issue, if a problem exist, staff will then refer the problem to the appropriate division for corrective measures, conduct follow-up inspections as needed and manage the respective data.

Status of Measurable Goals: During the reporting period of July 1, 2010 through June 30, 2011 Stormwater staff received approximately sixteen (16) requests from staff within the organization to inspect potential Drainage Inlets (DIs) with possible/potential problems due to non-stormwater discharges, or trash. To facilitate this process, staff at the City has developed numerous lists which inform all City personnel who to contact in regards to a specific stormwater issue, including potential storm drain and drain inlet issues. All reported problems were investigated, referred to the appropriate division for corrective action and follow-up inspections were conducted as necessary. Stormwater staff entered the reported issue into a common data base, then entered the results of each investigation into the common database, when required entered the results of any corrective measures employed into a common database and when necessary entered in the results of any follow-up field investigations into the shared database for reporting purposes.

Appropriateness: The ability to rely upon the eyes of field personnel and other staff within the organization to report Drainage Inlets (DIs) with possible/potential problems due to non-stormwater discharges, or trash is an immeasurable and invaluable means of meeting the stringent requirements of the stormwater program to effectively protect local water quality.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: The City is about to upgrade its software system to energov later this year which should enhance our in house reporting and data management capabilities.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Stormwater Program within the Building and Safety Division will continue to enhance this BMP in Year 3 of the program.

BMP Number: ID 17.2 Number of service investigation requests received from the public.

General Summary: The purpose of this BMP is develop a system and/or procedures for the public to report Drainage Inlets (DIs) with possible/potential problems due to non-stormwater discharges, or trash to the Stormwater Program for investigation and follow-up actions when necessary. Once a service investigation request is received, staff will investigate the reported issue, if a problem exist, staff will then refer the problem to the appropriate division for corrective measures, conduct follow-up inspections as needed and manage the respective data.

Status of Measurable Goals: During the reporting period of July 1, 2010 through June 30, 2011 Stormwater staff received approximately twenty-three (23) requests from the public (*i.e. members of the community, other agencies, and visitors*) to inspect potential Drainage Inlets (DIs) with possible/potential problems due to non-stormwater discharges, or trash. These request were received via the telephone, via our 24-Hour Hotline, via email and via the City of San Luis Obispo's on-line "Stormwater &/or Water Quality Report Form" which was created by staff and launched in 2009. The form is very extensive and includes many drop down menu selections for ease of use and tracking purposes. In addition, staff at the City has developed numerous lists which inform all City personnel who to contact in regards to a specific stormwater issue, including potential storm drain and drain inlet issues. All reported problems were investigated, referred to the appropriate division for corrective action and follow-up inspections were conducted as necessary. Stormwater staff entered the reported issue into a common data base, then entered the results of each investigation into the common database, when required entered the results of any corrective measures employed into a common database and when necessary entered in the results of any follow-up field investigations into the shared database for reporting purposes.

Appropriateness: The ability to rely upon the eyes of the public to report Drainage Inlets (DIs) with possible/potential problems due to non-stormwater discharges, or trash is an immeasurable and invaluable means of meeting the stringent requirements of the stormwater program to effectively protect local water quality.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: The City is about to upgrade its software system to energov later this year which should enhance our in house reporting and data management capabilities.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Stormwater Program within the Building and Safety Division will continue to enhance this BMP in Year 3 of the program.

BMP Number: ID 18.2 Develop a Waste Load Allocation Attainment Plan.

General Summary: Section 303(d) of the Clean Water Act requires States to identify waters not attaining applicable water quality standards. San Luis Obispo Creek (SLO Creek) was placed on the 303(d) list in 1996 when it was found that pathogen levels exceeded the Basin Plan Objectives for the protection of the Water Contact Recreation (REC-1) beneficial use. The water quality objective for the protection of REC-1 is stated in the Basin Plan as:

“Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200/100 mL, nor shall more than ten percent of the total samples during any 30 day period exceed 400/100 mL.”

Fecal coliform concentrations in the Creek exceeded this water quality objective for the protection of REC-1 requiring the Regional Water Quality Control Board (RWQCB) to calculate a Total Maximum Daily Load (TMDL) for pathogens for the San Luis Obispo Creek.

BMP Intent: Complete a Wasteload Allocation Plan to outline an implementation and assessment strategy, and feasibility of attaining specified waste loads, as detailed in the annual reports for this TMDL, for the designated beneficial uses.

Status of Measurable Goals: This measurable goal has been completed. City staff submitted the completed Wasteload Allocation Attainment Plan (WAAP) for the Pathogen TMDL on June 10, 2010. As part of the WAAP, a proposed Tunnel Study was included which will facilitate a specific investigation into the sources of fecal coliform within the tunnelized portion of San Luis Obispo Creek.

Appropriateness: The overall intent of this BMP is appropriate as a method for meeting the requirements of the Pathogen TMDL.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities to be undertaken during the next reporting cycle: During the next reporting cycle, the City will be performing the required tasks of the WAAP for the Pathogen TMDL along with the supplemental Tunnel Study aimed at determining potential specific points of fecal coliform introduction to San Luis Obispo Creek.

Stakeholder meetings will be scheduled with the County of San Luis Obispo, Cal Poly State University, and the Regional Water Quality Control Board.

BMP Number: ID 19.1 Respond to hazardous spills to minimize impacts on water quality.
--

General Summary: The Fire Dept. Hazardous Materials Coordinator responds to spills of hazardous materials to prevent unauthorized releases to waterways and the environment, as well as to reduce impacts on water quality.

Status of Measurable Goals: The number of responses to hazmat spills varies each year, with FY 2010/2011 having less than 10. Several creeks experienced releases that required booms and additional resources to contain hydrocarbon releases (Prefumo Creek; Old Garden Creek near Foothill Blvd. and Broad St.) The spill in Prefumo Creek resulted in a cost recovery invoice from City Finance to the Responsible Party. Containment and control of the spill are major goals, along with determining the Responsible Party, ensuring spill notification to appropriate agencies, and evaluating the need for enforcement action.

Appropriateness: This BMP is appropriate to reduce pollutants entering the system from routine City activities.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: The City will continue development of the Municipal Operations and Maintenance Manual.

Construction Site Run-off Control (CO)

BMP Number: CO 1.2 Expand the City's authority in the Municipal Code and other regulations to increase the City's ability to enforce the regulation of erosion, sediment, construction waste, construction site BMPs, and implement appropriate sanctions for non-compliance.

General Summary: The intent of this BMP is to train staff on new codes and construction standards.

Status of Measurable Goals: Stormwater program manager training completed.

Appropriateness: This BMP is appropriate to acquaint staff with the requirements of the City's ordinance.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: Implementation will continue of the City's adopted ordinance.

BMP Number: CO 1.3 Expand the City's authority in the Municipal Code and other regulations to increase the City's ability to enforce the regulation of erosion, sediment, construction waste, construction site BMPs, and implement appropriate sanctions for non-compliance.

General Summary: The intent of this BMP is to implement new regulations.

Status of Measurable Goals: This BMP has been met. As new regulations come out, our Stormwater Code Enforcement Officer ensures the regulations are disseminated to other staff and conveyed to contractors and developers out in the field.

Appropriateness: This BMP is appropriate to educate staff and contractors/developers with the requirements of the City's ordinance and new regulations that come out.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: Implementation will continue of the City's adopted ordinance and new regulations that come out.

BMP Number: CO 2.3 Train staff on new construction waste control codes and City standards to reduce or prevent pollutants in stormwater run-off from construction sites.

General Summary: The intent of this BMP is to provide training to staff on site at construction projects to reduce the amount of pollutants entering the stormwater system and waterways.

Status of Measurable Goals: Staff completed training on the control requirements.

Appropriateness: The training is appropriate to assist staff in working with the construction community to control release of construction related pollutants.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Training increases staff awareness of stormwater issues, and assists in transferring that information to construction site managers.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: Staff will continue to enforce stormwater provisions of construction contracts and encroachment permits.

BMP Number: *CO 2.4* Revise the City Standard Specifications to require 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.

General Summary: Staff within the Building and Safety Division of the City of San Luis Obispo has been given the charge or responsibility to implement a plethora of new codes and regulations pertaining to stormwater during the July 1, 2010 through June 30, 2011 reporting period.

Status of Measurable Goals: Staff within the Building and Safety Division of the City of San Luis Obispo implemented a plethora of new codes and regulations pertaining to stormwater during the July 1, 2010 through June 30, 2011 reporting period.

Appropriateness: As new codes and regulations are developed and approved locally, statewide and nationally it is only appropriate that staff at the local level implement the codes in the overall goal of not only protecting, but improving local water quality.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. The codes, such as stormwater applicable sections of CAGreen 2010 Building codes and others were implemented during the reporting period of July 1, 2010 through June 30, 2011.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: As new codes are adopted they shall be implemented as necessary.

BMP Number: CO 3.3 Continue procedures for site plan review, on-site inspection and enforcement of stormwater requirements for sites greater than one acre or less than one acre if the construction activity is part of a larger development that would disturb one acre or more and permitted under the Statewide General Construction Permit.

General Summary: Staff within the Building and Safety Division of the City of San Luis Obispo has been given the charge and/or responsibility to incorporate the elements of the State Water Boards sample SWPPP review checklist into an in-house standard review checklist for all SWPPPs during the July 1, 2010 through June 30, 2011 reporting period.

Status of Measurable Goals: Staff within the Building and Safety Division of the City of San Luis Obispo implemented a condensed version of the elements of the State Water Board's sample SWPPP review checklist during the July 1, 2010 through June 30, 2011 reporting period.

Appropriateness: The State Water Board's SWPPP review checklist is an appropriate template for SWPPP review for local agencies.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. A condensed version of the State Water Board's SWPPP review checklist was implemented during the reporting period of July 1, 2010 through June 30, 2011.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff intends to implement the full version of the State Water Board's SWPPP checklist during the July 1, 2011 through June 30, 2012 reporting period.

BMP Number: CO 3.4 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive inspection program to address potential pollutant discharges from construction / development sites that are within the State's General Construction Permit program. Sites within this category include projects that are one (1) acre or more in size and that may be under one (1) acre in size that were originally part of a larger common plan of development that required a SWPPP. City staff are to conduct weekly inspections of all construction sites within the States General Construction Permit program during the wet season (10/15-4/15) to ensure compliance with approved ESCP and SWPPP and in general to ensure the protection of water quality.

General Summary: City staff during the during the wet season (10/15-4/15) inspect all construction sites to determine if the site operator (*i.e. responsible party*) has or is implementing, maintaining, inspecting, repairing, documenting and augmenting as necessary all applicable water quality control measures as detailed in the approved project ESCP and/or SWPPP which may include the following:

1. **Primary Control Measures:**
 - a. Appropriate minimization of clearing and grading activities,

- b. Appropriate BMP's to protect waterways,
 - c. Appropriate project scheduling or sequencing – (*i.e. phased construction to limit soil exposure*),
 - d. Appropriate stabilization of exposed soils,
 - e. Protecting all steep slopes and cuts,
 - f. Appropriate tracking control BMP's,
 - g. Etcetera
2. **Secondary controls:**
- i. Perimeter controls, filter strips, velocity dissipaters to control erosion and sediment,
 - ii. Sediment settling controls, where appropriate
 - iii. Sediment capturing controls,
 - iv. Wind erosion controls (*Fugitive Dust controls*),
 - v. Tracking controls
 - vi. Inspection and maintenance plan for BMPs,
 - vii. Etcetera
3. **Other controls as necessary:**
- i. Good housekeeping,
 - ii. Waste management controls (*Solid waste, recycling, sanitary waste, hazardous waste*),
 - iii. Etcetera.
4. **Inspection, maintenance and cleaning plan:**
- The general intent of conducting routine site inspections during the wet season (*10/15 – 4/15*) is to ensure that the legally responsible party is adhering to the approved project ESCP and/or SWPPP on a weekly basis. Plan adherence shall ensure the protection of our local waterways to the maximum extent practicable utilizing the best economically achievable technology. In addition, weekly inspections during the wet season (*10/15 – 4/15*) enable staff to monitor whether or not the BMP's required are achieving the desired results. If the BMP's detailed out in the plan are not achieving the desired results, then staff can stipulate the augmentation of the plan itself in order to ensure the protection of local water quality. Initial contacts include the distribution of site specific informational handouts which is addressed elsewhere within this annual report.

Status of Measurable Goals: In order to achieve optimal results Building and Safety Division staff conducted inspections of all active and inactive construction sites that are within the States General Construction Permit program on a weekly basis during the wet season (*10/15 – 4/15*).

Appropriateness: Weekly inspections of all SWPPP and/or ESCP approved sites by City staff during the wet season (*10/15-4/15*) is an effective way to ensure that the stormwater control measures (*BMPs*) detailed within the approved plans that are within the States General

Construction Permit program are being implemented, maintained, cleaned, repaired and augmented as necessary during the highest risk or threat level period of the year for water quality. In addition, weekly inspections during the wet season (10/15-4/15) affords City staff the opportunity to truly measure the effectiveness of the approved devices to reduce/prevent pollutants in stormwater runoff from construction sites.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. It is safe to assume that since necessary enforcement activities related to construction sites diminished significantly and inspection frequencies increased that the target audiences awareness and behavior has changed.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to conduct inspections of all active and inactive construction sites for plan adherence (*ESCP &/or SWPPP*) on a weekly basis during the wet season (10/15 – 4/15).

BMP Number: CO 3.5 Staff within the City of San Luis Obispo’s Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to address potential pollutant discharges from construction / development sites that do fall under the States General Construction Permit program. Sites within this category include projects that are at least one acre or more in size and that are and/or were part of a larger development at one time that required a SWPPP. Staff inspect all construction sites within this category routinely, during inclement weather conditions, based upon referrals and in response to concerns or complaints from members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning the potential discharge of pollutants of concern (*i.e. sediment, petrochemical products, fugitive dust and etcetera*). When stormwater violations (*i.e. missing, inadequate and or the failure of BMPs*) on construction sites within this category are discovered staff commence enforcement activities. The level of enforcement activity is dictated by the degree of the violation, including water quality impact which can include a work stop order. Our primary goal is to seek voluntary compliance through public outreach and education and when these actions fail to produce an adequate response or appropriate corrective action, then enforcement activities, including potential job shut downs commence.

General Summary: Staff within the City of San Luis Obispo’s Building and Safety Division took appropriate enforcement action on all construction sites wherein BMPs on the sites are found to be missing, inadequate and or failed, and there has been marginal or no attempt to mitigate on the part of the developer / contractor, 100% of the time. Enforcement activity is typically preceded by a public outreach and education effort to seek voluntary compliance. These activities include the discovery of problems during routine site investigations and in response to complaints or concerns from various members of the community that may affect local water quality. Enforcement activities, including job shut downs may include the issuance of a “Field Correction Notice”, specifically created for the City’s Stormwater Enforcement Program and / or

the issuance of a formal enforcement notification (*i.e. Notice to Comply, Notice of Violation, Notice to Correct and/or Administrative Citation*) via the mail.

Status of Measurable Goals: In accordance with the provisions of BMP CO 3.5 staff adhere to a process very similar in design as specified within both the State and Federal governments Enforcement Response Plans. Stormwater Division staff responded to all incidences wherein BMPs on sites were found to be missing, inadequate and or failed, and implemented enforcement action as necessary during the reporting period of July 1, 2010 through June 30, 2011. Enforcement actions included job shut-downs pursuant to BMP CO 3.5. During the reporting period at least one job shut down action was taken.

Appropriateness: A hierarchical enforcement response process is a highly appropriate way to not only manage, but implement enforcement activities within the area of water quality. The ability to shut down a project is an effective method when resistance or reluctance is encountered by a responsible party.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. All incidences wherein BMPs on sites were found to be missing, inadequate and or failed, and there were marginal or no attempt at mitigation on the part of the developer / contractor enforcement action was taken 100% of the time, including a work stop order. This is a highly effective method to achieve water quality protection.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our enforcement response activities in Year 3 of the program.

BMP Number: CO 3.6 Staff within the City of San Luis Obispo's Stormwater Building and Safety Division is responsible for the development and implementation of a comprehensive program to adequately ensure that both structural and nonstructural stormwater control devices are installed in accordance within acceptable design standards (*i.e. in accordance with the approved plans*). These requirements are typically required on construction / development sites that fall under the States General Construction Permit program. Sites within this category include projects that are at least one acre or more in size and that are and/or were part of a larger development at one time that required a SWPPP. However, water quality protection features (*i.e. LID, private stormwater conveyance devices*) are often required on smaller sites as a condition of development and thus, these devices may be required on sites less than one acre in size that were not part of a larger common plan of development. Building and Safety Division personnel review all plans to ensure that acceptable design standards are followed and conduct routine inspections within the field to ensure that the installation standards detailed within the plans are adhered to.

General Summary: Staff within the City of San Luis Obispo's Building and Safety Division have instituted standardized procedures for site plan review, on-site inspection and enforcement to ensure that adequate design standards are included within all plans and that these standards are

adhered to within the field during construction for all post-construction structural or nonstructural control devices.

Status of Measurable Goals: In accordance with the provisions of BMP CO 3.6 staff review all plan sets involving the design of proposed post construction structural and/or nonstructural stormwater control devices to ensure that adequate design standards are included within the plans. During field inspections the installation of these devices are checked for adherence to the approved plans during the reporting period of July 1, 2010 through June 30, 2011.

Appropriateness: Reviewing plans for adherence to industry acceptable standards for both structural and nonstructural post construction stormwater control devices is an appropriate task for the Building and Safety Division. In addition, the inspection of these devices within the field should be conducted by Building and Safety Division and/or Stormwater personnel since these staff are extremely familiar with reviewing plans in relation to plan adherence.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. City staff has the professional expertise and ability to ensure that the design specifications are adhered to during installation / construction. This is a highly effective method to achieve the goal of water quality protection.

Proposed Modifications: Some of the language contained within this BMP is confusing and conflicting. For example, BMP CO 3.6 states “to reduce/prevent the pollutants in stormwater runoff from construction sites by ensuring that controls for stormwater, non-stormwater and post construction controls *are in place prior to work beginning at the site.*” How, can construction site BMPs and post-construction stormwater control devices, be in place prior to work beginning at the site. In fact, the installation of these devices, both the temporary construction site BMPs and post-construction site stormwater control measures include work at the site, thus these measures are typically installed in phases during construction activities. It is proposed that the permit reflect that stormwater control devices, both temporary and permanent are installed at a given site in a phased approach based upon the dynamic needs of the particular site and in a sequencing order based upon construction phasing in order to ensure adequate protection of water quality.

In addition, at this time it is anticipated that final sign off for a project that includes structural and/or nonstructural post construction stormwater control devices will require final certification from the project engineer denoting the type of structural and/or non-structural post construction stormwater control devices installed on the site were installed per industry standards in accordance with the approved plans and are fully operational to meet designed purposes.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to expand this BMP and implement the proposed modification indicated herein in Year 3 of the program.

<p>BMP Number: CO 3.8 Staff within the City of San Luis Obispo’s Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive</p>

program to address potential pollutant discharges from construction / development sites that do fall under the States General Construction Permit program. Sites within this category include projects that are at least one acre or more in size and that are and/or were part of a larger development at one time that required a SWPPP. Staff inspect all construction sites within this category routinely, during inclement weather conditions, based upon referrals and in response to concerns or complaints from members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning the potential discharge of pollutants of concern (*i.e. sediment, petrochemical products, fugitive dust and etcetera*). When BMPs on these sites are found to be missing, inadequate and or have failed, and there is marginal or no attempt to mitigate on the part of the developer / contractor enforcement action is taken 100% of the time. Our primary goal is to seek voluntary compliance through public outreach and education and when these efforts fail to produce an adequate response or appropriate corrective action then enforcement activities commence 100% of the time.

General Summary: Staff within the City of San Luis Obispo's Building and Safety Division took appropriate enforcement action on all construction sites wherein BMPs on the sites were found to be missing, inadequate and or failed, and there was marginal or no attempt to mitigate on the part of the developer / contractor 100% of the time. Enforcement activity is preceded by a public outreach and education effort to seek voluntary compliance. These activities include the discovery of problems during routine site investigations and in response to complaints or concerns from various members of the community that may affect local water quality. Enforcement activities, including job shut downs may include the issuance of a "Field Correction Notice", specifically created for the City's Stormwater Enforcement Program and / or the issuance of an enforcement notification via the mail.

Status of Measurable Goals: In accordance with the provisions of BMP CO 3.8 staff adhered to a process very similar in design as specified within both the State and Federal governments Enforcement Response Plans. Building and Safety Division staff responded to all incidences wherein BMPs on sites were found to be missing, inadequate and or failed, and there were no attempts or marginal efforts on the part of the responsible party to mitigate or take appropriate corrective action during the reporting period of July 1, 2010 through June 30, 2011.

Appropriateness: A hierarchical enforcement response process is a highly appropriate way to not only manage, but implement enforcement activities within the area of water quality.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. All incidences wherein BMPs on sites were found to be missing, inadequate and or failed, and there were marginal or no attempts at mitigation on the part of the developer / contractor enforcement action was taken 100% of the time. This is a highly effective method to achieve water quality protection.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our enforcement response program and activities in Year 3 of the program.

BMP Number: CO 4.3 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to address potential pollutant discharges from construction / development sites that do not fall under the States General Construction Permit program. Sites within this category include projects that are less than one (1) acre in size and that are not and/or were not part of a larger development at one time that required a SWPPP.

General Summary: Via routine inspections City staff inspect sites to determine if the site operator (*i.e. responsible party*) has or is implementing, maintaining, inspecting, repairing, documenting and augmenting as necessary all applicable water quality control measures as detailed in the project WPCP or SWPPP which may include the following:

1. Primary Control Measures:

- a. Appropriate minimization of clearing and grading activities,
- b. Appropriate BMP's to protect waterways,
- c. Appropriate project scheduling or sequencing – (*i.e. phased construction to limit soil exposure*),
- d. Appropriate stabilization of exposed soils,
- e. Protecting all steep slopes and cuts,
- f. Appropriate tracking control BMP's,
- g. Etcetera

2. Secondary controls:

- i. Perimeter controls, filter strips, velocity dissipaters to control erosion and sediment,
- ii. Sediment settling controls, where appropriate
- iii. Sediment capturing controls,
- iv. Wind erosion controls (*i.e. Fugitive Dust controls*),
- v. Tracking controls
- vi. Inspection and maintenance plan for BMPs,
- vii. Etcetera

3. Other controls as necessary:

- i. Good housekeeping,
- ii. Waste management controls (*i.e. Solid waste, recycling, sanitary waste, hazardous waste*),
- iii. Etcetera.

4. Inspection, maintenance plan:

The general intent of conducting routine site inspections is to ensure that the legally responsible party is adhering to the project WPCP or SWPPP on a weekly basis. Plan adherence shall ensure the protection of our local waterways to the maximum extent

practicable utilizing the best economically achievable technology. Every initial contact includes the distribution of site specific informational handouts which is addressed elsewhere within this annual report.

Status of Measurable Goals: In order to achieve optimal results Building and Safety Division staff have conducted weekly inspections of all active construction sites during the rainy season (*i.e. October 15th – April 15th*) and every other week during the dry season (*April 16th through October 14th*). Additional inspections were conducted based upon complaints, referrals, drive bys and inclement weather conditions. Inspections were conducted for the following types of construction activities whether permitted or not permitted:

1. Concrete activities,
2. Creek restoration activities,
3. General construction,
4. Grading,
5. Landscape construction,
6. Painting activities,
7. Paving / slurry coating activities,
8. Etcetera

In addition, this program was greatly expanded during this reporting period to include the requirements outlined within the California Green Building Codes 2010 that pertain to stormwater and water quality protection. The expanded program includes the development and implementation of in-house standardized plan review check list, informational brochures for developing a WPCP and a template Water Pollution Control Plan for applicants to use as a guide to ensure program uniformity and that the over-arching goals of the program are consistently met, even for sites that do not fall under the States Construction General Permit requirements.

Appropriateness: Routine inspections enable staff to ensure that the legally responsible party is implementing, adhering to, maintaining, cleaning, repairing as necessary and augmenting as needed all necessary BMP's on the construction site. Since, the goal is to protect local water quality the only way to ensure that all efforts are being made by the legally responsible party to the maximum extent practicable is to conduct routine inspections at least every other week. The requirement that all project applicants for projects less than one (1) acre for sites that do not fall under the States Construction General Permit program submit and secure approval of a WPCP has given the City more enforcement capabilities on these smaller sites to ensure the protection of local water quality from discharges resulting from construction activities. In addition, routine inspections truly raise the legally responsible party's awareness that the program requirements must be followed.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Routine inspections are an effective way to raise the legally responsible party's awareness that the goals of the program are a significant issue to the community and thus, should be to them. Typically, these inspections enable staff to address issues at construction sites before they can result in impacts to local water quality. Based upon the fact that almost 100% of site operators implement some BMPs prior to staff inspection, and the number of violations decreased during this reporting period it is safe to

assume that the mere presence of an inspector every other week has not only heightened the site operators awareness of the importance of managing stormwater discharges on or from the site, but that the behavior of site operators has changed since year one of the program.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to conduct routine inspections of all construction sites, whether permitted or not on the same frequency described above during year three of the program. We will also likely enhance our public outreach and education elements associated with small construction sites.

BMP Number: CO 4.4 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to address potential pollutant discharges from construction / development sites that do not fall under the States General Construction Permit program. Sites within this category include projects that are less than one (1) acre in size and that are not and/or were not part of a larger development at one time that required a SWPPP.

General Summary: Via routine, inclement weather conditions, based upon referrals and in response to concerns or complaints from members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) City staff inspect all construction sites to determine if the site operator (*i.e. responsible party*) has or is implementing, maintaining, inspecting, repairing, cleaning, documenting and augmenting as necessary all applicable water quality control measures as detailed in the project WPCP or SWPPP which may include the following:

1. **Primary Control Measures:**

- a. Appropriate minimization of clearing and grading activities,
- b. Appropriate BMP's to protect waterways,
- c. Appropriate project scheduling or sequencing – (*i.e. phased construction to limit soil exposure*),
- d. Appropriate stabilization of exposed soils,
- e. Protecting all steep slopes and cuts,
- f. Appropriate tracking control BMP's,
- g. Etcetera

2. **Secondary controls:**

- i. Perimeter controls, filter strips, velocity dissipaters to control erosion and sediment,
- ii. Sediment settling controls, where appropriate
- iii. Sediment capturing controls,
- iv. Wind erosion controls (*Fugitive Dust controls*),

- v. Tracking controls
 - vi. Inspection and maintenance plan for BMPs,
 - vii. Etcetera
3. **Other controls as necessary:**
- i. Good housekeeping,
 - ii. Waste management controls (*Solid waste, recycling, sanitary waste, hazardous waste*),
 - iii. Etcetera.
4. **Inspection, maintenance, cleaning plan:**

The general intent of conducting inspections during a storm event is to ensure that the legally responsible party is adhering to the project WPCP or SWPPP during instances of threat of peak POC discharge potential. Plan adherence shall ensure the protection of our local waterways to the maximum extent practicable utilizing the best economically achievable technology. In addition, inspections conducted during rain events will enable staff to monitor whether or not the BMP's required are achieving the desired results. If the BMP's detailed out in the plan are not achieving the desired results, then staff can stipulate the augmentation of the plan itself in order to ensure the protection of local water quality. Initial contacts include the distribution of site specific informational handouts which is addressed elsewhere within this annual report.

Status of Measurable Goals: In order to achieve optimal results Building and Safety Division staff conducted inspections of all active and inactive construction sites during rain events. Inspections were conducted for the following types of construction activities whether permitted or non-permitted during all inclement weather conditions:

- 1. Concrete activities,
- 2. Creek restoration activities,
- 3. General construction,
- 4. Grading,
- 5. Landscape construction,
- 6. Painting activities,
- 7. Paving / slurry coating activities,
- 8. Etcetera

Appropriateness: Inspections of larger (*i.e. < 1 acre*) or higher risk level sites that are not or were not part of a larger development (*i.e. 1 acre or more*) during storm events enable field inspection personnel to determine if the Control Measures are in place and assess the adequacy and effectiveness of the BMP's in place during a pollutant discharge risk scenario. Since, the goal is to protect local water quality the only way to ensure the effectiveness or adequacy of the Control Measures in place at an individual construction site is to inspect the site during a pollutant discharge risk event (*i.e. rain event*).

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Again, inspections of all active construction sites during a rain event is truly the best way to ascertain if the Control Measures prescribed for the project are in place and assess the adequacy and effectiveness of the BMP's in place during a pollutant discharge risk scenario. Since, the goal is to protect local water quality the only way to ensure the effectiveness or adequacy of the Control Measures in place at an individual construction site is to inspect the site during a pollutant discharge risk event (*i.e. rain event*). These inspections also are an effective way to raise the legally responsible party's awareness that the goals of the program are a significant issue to the community and thus, should be to them. Based upon the fact that almost 100% of site operators implement some BMPs prior to staff inspection, and the number of violations decreased during this reporting period it is safe to assume that the mere presence of an inspector every other week and during rain events has not only heightened the site operators awareness of the importance of managing stormwater discharges on or from the site, but that the behavior of site operators has changed since year one of the program.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to conduct inspections of all active and inactive construction sites, whether permitted or not during any and all rain events during year three of the program.

BMP Number: CO 4.5 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to address potential pollutant discharges from construction / development sites that do not fall under the States General Construction Permit program. Sites within this category include projects that are less than one (1) acre in size and that are not and/or were not part of a larger development at one time that required a SWPPP. Part of this BMP includes public outreach and education which includes the distribution of informational handouts concerning various types of construction activities (*i.e. general construction, painting and concrete*) and enforcement activities which at times include the issuance of: field correction notices, notices to comply, notices to correct, notices of violation and administrative citations. Staff also has the authority to issue stop work notices on the spot for egregious stormwater violations.

General Summary: Via routine, inclement weather conditions, complaint driven and follow-up inspections City staff inspect sites to determine if the site operator (*i.e. responsible party*) has or is implementing, maintaining, cleaning, inspecting, repairing, documenting and augmenting as necessary all applicable water quality control measures as detailed in the project WPCP or SWPPP which may include the following:

5. Primary Control Measures:

- a. Appropriate minimization of clearing and grading activities,
- b. Appropriate BMP's to protect waterways,

- c. Appropriate project scheduling or sequencing – (*i.e. phased construction to limit soil exposure*),
 - d. Appropriate stabilization of exposed soils,
 - e. Protecting all steep slopes and cuts,
 - f. Appropriate tracking control BMP's,
 - g. Etcetera
6. **Secondary controls:**
- i. Perimeter controls, filter strips, velocity dissipaters to control erosion and sediment,
 - ii. Sediment settling controls, where appropriate
 - iii. Sediment capturing controls,
 - iv. Wind erosion controls (*Fugitive Dust controls*),
 - v. Tracking controls
 - vi. Inspection and maintenance plan for BMPs,
 - vii. Etcetera
7. **Other controls as necessary:**
- i. Good housekeeping,
 - ii. Waste management controls (*i.e. Solid waste, recycling, sanitary waste, hazardous waste*),
 - iii. Etcetera.

8. **Inspection, maintenance plan:**

Since a good enforcement program relies on a well-developed compliance monitoring system designed to identify and correct violations, help establish an enforcement presence, collect evidence needed to support enforcement actions where there are identified violations, and help target and rank enforcement priorities Building and Safety staff have adopted the City's existing code enforcement policies and procedures into the City's newly developed stormwater program. Compliance with regulations is critical to protecting public health and the environment, and it is the preference of the City that the most effective and timely methods be used to assure that the regulated community stays in compliance. Staff routinely provides assistance, training, guidance and incentives to the various segments of the community (*i.e. commercial, industrial, residential and construction*) via face to face interactions in order to achieve compliance. However, if violations or water quality control measures deficiencies exist at a particular site depending upon the severity of the deficiency or violation staff will perform one or a combination of the following task:

- **Field Correction Notice:** In year two of the program staff developed and have implemented the use of a "Field Correction Notice" that can be issued on the spot concerning stormwater violations. A formal notice (*i.e. notice to comply, notice to correct, notice of violation, notice to correct and/or administrative citation*) may follow depending upon the severity of the stormwater violation.

- **Notice to comply:** Issue a notice to comply allowing the identified responsible party to immediately rectify the situation, implement corrective measures within 24 hours or take corrective action within ten (10) days or prior to the next predicted rain event whichever is sooner.
- **Notice to correct:** Issue a notice to correct allowing the identified responsible party to immediately rectify the situation, implement corrective measures within 24 hours or take corrective action within ten (10) days or prior to the next predicted rain event which ever is sooner. Typically, notices to correct are issued in situations wherein a responsible party has taken significant steps to the correct the violation or deficiency and additional action still must be taken in order to bring the site into compliance to avoid the discharge of any Pollutant of Concern.
- **Notice of Violation:** Issue a notice to violation allowing the identified responsible party to immediately rectify the situation, implement corrective measures within 24 hours or take corrective action within ten (10) days or prior to the next predicted rain event which ever is sooner. Typically, notices of violation are issued to repeat offenders or in situations wherein the violation is egregious (*i.e. willful failure to implement any water quality control measures*).
- **Administrative Citations:** Issue a “Administrative Citation” to the identified responsible party to immediately rectify the situation, implement corrective measures within 24 hours or take corrective action within ten (10) days or prior to the next predicted rain event which ever is sooner. Typically, administrative citations are issued to repeat offenders or in situations wherein the violation is so egregious (*i.e. willful failure to implement any water quality control measures, despite prior notification to implement*) that water quality is being impacted.
- **Stop work notice:** Stop work notices are levied only in rare situations wherein the identified responsible party has willfully failed to implement any water quality control measures after repeated notifications and / or wherein significant water quality impacts are occurring as a direct result of on-going activities at the site.

The notices, citations and/or stop work notices can either be delivered verbally, verbally with a “Field Correction Notice,” just the posting of a “Field Correction Notice” on the site or verbally with a written follow-up or handled via written correspondence only to either one or all of the following:

- A responsible party or subcontractor,
- The site operator,
- The property owner,

Following the issuance of any notice, citation or stop work notice staff will conduct follow-up inspections of the site within the time allowed or prior to the next predicted storm event to ensure that appropriate corrective measures have been taken by the responsible party.

The general intent of enforcement activities (*i.e. the issuance of a notice to comply too a stop work notices*) is to seek compliance to ensure the protection of our local waterways to the maximum extent practicable utilizing the best economically achievable technology.

Status of Measurable Goals: Building and Safety Division staff has as a result of both complaint driven and routine inspections given verbal notices and/or issued in excess of ninety-five (95) written notices to identifiable responsible parties concerning violations or water quality control measure deficiencies at construction sites during this reporting period.

Appropriateness: The enforcement process serves as a strong back up program to the cooperative approach and without it the entire regulatory framework would be in jeopardy. Enforcement is a critical ingredient in creating the deterrence needed to encourage the regulated community to anticipate, identify, and correct violations. Appropriate penalties (*i.e. field correction notices, notices of violation, citations, work stoppage orders, criminal prosecution and etcetera*) and other consequences for violations offer some assurance of equity between those who choose to comply with requirements and those who violate them. It is also a generally accepted concept that enforcement measures “*improve public confidence when government is ready, willing and able to back up its requirements with actions.*” Enforcement tools are truly the tail end of public outreach and education, but enable staff to impress upon individuals the need to comply with the stormwater regulations.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Roughly, ninety-five percent of responsible parties who receive a written notice then comply without further complications. Based upon the fact that almost 100% of site operators implement some BMPs prior to staff inspection, and the number of violations decreased during this reporting period it is safe to assume that the mere presence of an inspector every other week and a known stormwater enforcement program exists has not only heightened the site operators awareness of the importance of managing stormwater discharges on or from the site, but that the behavior of site operators has changed since year one of the program.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to develop and expand our enforcement program in Year 3 of the program.

BMP Number: CO 4.6 Staff within the City of San Luis Obispo’s Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to address potential pollutant discharges from construction / development sites that do not fall under the State’s General Construction Permit program. Sites within this category include projects that are less than one (1) acre in size and that are not and/or were not part of a larger development at one time that required a SWPPP. Staff inspect all construction sites whether permitted or non-permitted (*i.e. landscape construction sites*) routinely, during inclement weather conditions and in response to concerns or complaints from members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning the potential discharge of pollutants of concern (*i.e. sediment, petrochemical products, fugitive dust and etcetera*) and/or other stormwater violations.

General Summary: Staff within the City of San Luis Obispo's Building and Safety Division take all complaints or concerns that may affect local water quality from members of the community seriously, and as such typically respond to complaints as soon as possible (*i.e. within the hour*). Building and Safety personnel have developed an incident response form to track all complaints or concerns brought to our attention from origination to resolution. This form also allows management personnel to review our current practices and procedures to determine if changes are necessary in order to improve overall program effectiveness. During a complaint driven investigation staff will address the requirements within BMPs: CO 3.4, 3.5, 3.6, 3.8, 4.3, 4.4, California Green Building Codes 2010 and respond according to the protocols detailed in CO 4.5 herein. Complaints concerning issues at construction sites can be received by Stormwater staff via the City's on-line report a water quality concern form (presently *an email due to a technical glitch with the form*), via the City's 24-Hour Water Pollution Report Hotline, in person or via a general line at the City.

The general intent of complaint driven investigations is to allow staff to utilize direct input from the community to address potential water quality impacts. It is impossible to be at every site 24 hours a day, however, with the assistance of members of the community we are in effect out and about at every construction site 24 hours a day, 7 days a week. Truly input from the community at large is an invaluable tool for staff.

During year two of the program we enhanced this BMP by developing and implementing the use of a "Field Correction Notice" for stormwater construction site violations. This form coupled with the development of a template WPCP and adherence to the stormwater regulations outlined within the California Green Building Codes 2010 has greatly enhanced our ability to address stormwater violations on construction sites that are under one acre in size and that were never part of a larger project that required a SWPPP.

Status of Measurable Goals: Building and Safety Division staff responded to all complaints or concerns involving construction sites within the community within 24 hours during the reporting period of July 1, 2010 through June 30, 2011.

Appropriateness: Complaints from the community at large are a highly appropriate way to supplement the ability of staff to address any and all water quality concerns at construction sites 24 hours a day, 7 days a week. Complaints concerning a particular site allow staff to focus their attention on potential pollutant discharges immediately following the report of the alleged incident.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. All water quality complaints concerning construction sites whether valid or unfounded were responded to within 24 hours, typically 1 hour. Complaint driven inspections resulted in numerous corrective actions being taken at many construction sites throughout this reporting period. Based upon the fact that almost 100% of site operators implement some BMPs prior to staff inspection, and the number of violations decreased during this reporting period it is safe to assume that the mere presence of an inspector every other week and a known stormwater enforcement program exists has not only heightened the site operators awareness of the importance of managing stormwater discharges on

or from the site, but that the behavior of site operators has changed since year one of the program.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance and expand our complaint driven response plan in Year 3 of the program in response to regulatory changes and program needs.

<i>BMP Number: CO 5.1</i> Training Program for Site Plan and Site Inspections
--

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive in-house training program for site plan review and site inspection procedures and policies. The general intent of the in-house training program is to establish consistent and routine review and inspection procedures and techniques on stormwater requirements and control measures to be implemented by all staff to reduce the potential discharge of pollutants from construction site runoff to the maximum extent practical. With any in-house training program the underlying purpose is to keep staff focused on program goals, up to date on current and pending regulatory changes and facilitate program buy-in on a recurring basis.

Status of Measurable Goals: Stormwater staff conducted numerous training sessions in year two of the program covering topics like: elements of a SWPPP, elements of a WPCP, private stormwater conveyance systems and post construction requirements, stormwater regulations and California Green Building Codes 2010, stormwater regulations and linear underground overhead projects and much more. Coupled with these powerpoint training sessions and others we developed and implemented the use of a template WPCP for "Minor Public Works Encroachment Projects", "WPCP for Select Building Projects Less Than 1 Acre", various accompanying informational brochures, in-house plan review checklist and much more. Stormwater staff also conducted hands on field training with several key personnel. In addition, during the reporting period of July 1, 2010 through June 30, 2011 staff attended and participated in many training programs including QSD / QSP training, LID training, Caltrans SWPPP training programs and many other training programs.

Appropriateness: In-house training programs are an appropriate means of developing internal partnerships to achieve the overall success of the stormwater program. These programs also create an opportunity to update staff of current and pending regulatory changes.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. The in-house training programs, coupled with the various handouts and tools to meet the overarching goals of the program were effective in streamlining many internal processes. These programs create an opportunity to present necessary program information in a condensed, but useable format to key personnel within the organization.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within Stormwater within the Building and Safety Division will continue to enhance and expand our in-house training program to coincide with the proposed changes contained within the draft State Stormwater General Permit, including the requisite QSD / QSP requirements for all plan reviewers and inspectors in Year 3 in response to ever expanding regulatory changes and program needs.

BMP Number: CO 5.2 Initial Training Program for Site Plan and Site Inspections

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of an initial in-house training program for site plan review and site inspection procedures and policies. The general intent of the in-house training program is to establish consistent and routine review and inspection procedures and techniques on stormwater requirements and control measures to be implemented by all staff to reduce the potential of pollutant discharges from construction site runoff to the maximum extent practical.

Status of Measurable Goals: Stormwater staff conducted initial training sessions in year two of the program covering topics like: elements of a SWPPP, elements of a WPCP, private stormwater conveyance systems and post construction requirements, stormwater regulations and California Green Building Codes 2010, stormwater regulations and linear underground overhead projects and much more. Coupled with these PowerPoint training sessions and others we developed and implemented the use of a template WPCP both for "Minor Public Works Encroachment Projects", "WPCP for Select Building Projects Less Than 1 Acre", various accompanying informational brochures, in-house plan review checklist and much more. Stormwater staff also conducted hands on field training with several key personnel. In addition, during the reporting period of July 1, 2010 through June 30, 2011 staff attended and participated in many training programs including QSD / QSP training, LID training, Caltrans SWPPP training programs and many other training programs.

Appropriateness: Initial in-house training programs are an appropriate means of developing internal partnership to achieve program buy-in to enhance the potential for overall success of the stormwater program.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Initial in-house training programs, coupled with the various handouts and tools to meet the overarching goals of the program were effective in streamlining many internal processes. These programs create an opportunity to present necessary program information in a condensed, but useable format.

Proposed Modifications: BMP CO 5.2 is truly addressed within the reporting requirements of BMP CO 5.1. At this time, we respectfully request that the reporting elements of this BMP be consolidated under BMP CO 5.1.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within Stormwater within the Building and Safety Division will continue to enhance and expand our in-house training program, including the requisite QSD / QSP requirements for all plan reviewers and inspectors in Year 3 in response to ever expanding regulatory changes and program needs.

BMP Number: CO 5.3 Bi-annual Refresher Training Program for Site Plan and Site Inspections

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive in-house training program, including bi-annual refresher training for site plan review and site inspection procedures and policies. The general intent of the in-house bi-annual refresher training program is to establish consistent and routine review and inspection procedures and techniques on stormwater requirements and control measures to be implemented by all staff to reduce the potential discharge of pollutants from construction site runoff to the maximum extent practical.

Status of Measurable Goals: Stormwater staff conducted numerous training sessions in year two of the program covering topics like: elements of a SWPPP, elements of a WPCP, private stormwater conveyance systems and post construction requirements, stormwater regulations and California Green Building Codes 2010, stormwater regulations and linear underground overhead projects and much more. Coupled with these powerpoint training sessions and others we developed and implemented the use of a template WPCP both for "Minor Public Works Encroachment Projects", "WPCP for Select Building Projects Less Than 1 Acre", various accompanying informational brochures, in-house plan review checklist and much more. Stormwater staff also conducted hands on field training with several key personnel. In addition, during the reporting period of July 1, 2010 through June 30, 2011 staff attended and participated in many training programs including QSD / QSP training, LID training, Caltrans SWPPP training programs and many other training programs.

Appropriateness: In-house refresher training programs are an appropriate means of developing internal partnership to achieve the overall success of the stormwater program. These programs also create an opportunity to update staff of current and pending regulatory changes.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. In-house bi-annual refresher training programs, coupled with the various handouts and tools to meet the overarching goals of the program are an effective means to streamline many internal processes. These programs create an opportunity to present necessary program information in a condensed, but useable format.

Proposed Modifications: BMP CO 5.3 is truly addressed within the reporting requirements of BMP CO 5.1. At this time, we respectfully request that the reporting elements of this BMP be consolidated under BMP CO 5.1.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within Stormwater within the Building and Safety Division will continue to enhance and expand our in-

house training program, including the requisite QSD / QSP requirements for all plan reviewers and inspectors in Year 3 in response to ever expanding regulatory changes and program needs.

BMP Number: CO 6.1 Construction-Related Public Educational Materials Developed

General Summary: The City of San Luis Obispo under CO 6.1 is required to publish educational materials on the Phase II Municipal Stormwater Program pertaining to construction / development projects, including *brochures, fact sheets*, guides, templates and other materials which will help guide and assist developers and contractors in meeting the ever expanding requirements and goals of stormwater programs. The primary goal is to reduce pollutants from construction site runoff by educating developers and contractors on stormwater requirements.

Status of Measurable Goals: Staff has completed the stated goal during years 1 and 2. In order to meet these goals and objectives stormwater staff has aggressively undertaken to develop the following public outreach components pertaining to the construction and development industry:

1. **Pre-Construction Activities:** Stormwater staff has developed informational brochures, fact sheets and other materials for the development and construction fields to assist them during the planning and WPCP / SWPPP development phase of their project. The materials include:
 - A template WPCP for Select Building Projects Less than 1 Acre,
 - An informational brochure or “Guide to Developing a WPCP”,
 - A WPCP / SWPPP Plan for Minor Right of Way Encroachment Projects,
 - An informational brochure for “Best Management Practices for Public Works LUP Projects”,
 - An informational brochure concerning “Low Impact Development” concepts and theories,
 - An informational guide on planning, developing and construction a “Residential Rain Garden”,
 - Numerous updates to our Stormwater website resource section to provide developers and contractors with links to relevant websites,
 - And the development of an entire section of the City’s website dedicated to Construction and Development,
 - And many other informational handouts (*Fact sheets, brochures and etc.*).

2. **Construction Activities:** Stormwater staff has developed informational brochures, fact sheets and other materials for the development and construction fields to assist them during the construction phase of the development process. The materials developed to date include:
 - An informational brochure addressing “Stormwater BMPs for Concrete Activities”,
 - An informational brochure entitled “Quick Guide to Public Right-of-Way Work (Work within the public-right-of-way) & Stormwater BMPs,

- An informational brochure addressing “Stormwater BMPs for Erosion and Sediment Control”,
 - An informational brochure addressing “Stormwater BMPs for General Construction Activities”,
 - An informational brochure addressing “Stormwater BMPs for Landscape Construction Activities,
 - An informational brochure addressing “Stormwater BMPs for Landscape Maintenance Activities”,
 - An informational brochure addressing “Stormwater BMPs for LUP Activities”,
 - An informational brochure addressing “Stormwater BMPs for Painting Activities”,
 - An informational brochure addressing “Stormwater BMPs for Saw Cutting Operations”,
 - An informational brochure addressing “Stormwater BMPs for Street Operational and Maintenance Activities”,
 - Numerous updates to our Stormwater website resource section to provide developers and contractors with links to relevant websites,
 - And the development of an entire section of the City’s website dedicated to Construction and Development,
 - And many other informational handouts (*Fact sheets, brochures and etc.*).
3. **Post Construction Activities:** Stormwater staff has developed informational brochures, fact sheets and other materials for the development and construction fields to assist them during both the planning phase of the development process and during the post construction phase to protect both stormwater and water quality. The materials developed to date include:
- An informational brochure concerning “Best Management Practices for Private Stormwater Conveyance Systems”,
 - An approved “City of San Luis Obispo Standard Private Stormwater Conveyance System Management and Maintenance Agreement”,
 - A useful guide in developing a Private Stormwater Conveyance System Operations and Maintenance Manual,
 - Useful templates in developing a Private Stormwater Conveyance System Operations and Maintenance Manual,
 - Various informational brochures concerning routine maintenance, routine cleaning, routine inspections, conducting repairs as necessary and documenting all routine maintenance, cleaning inspections and repair activities performed on private stormwater conveyance system devices and features, including LID.
 - A useful annual report format outline for developing and submitting a Post Construction Private Stormwater Conveyance System Annual Report.

Please note that each and every brochure developed to date includes the following information:

- The City’s website address,

- The telephone number of the City's 24 Hour Water Pollution Reporting Hotline,
- The direct line for Stormwater staff and/or Public Works Staff as necessary,
- Direct line for reporting a suspected or known sewage related issue
- Direct line for reporting a hazardous waste / material spill,
- And useful links pertinent or germane to the topic at hand.

Appropriateness: Target specific / industry specific or population specific educational materials on the City's Phase II Municipal Stormwater Program and various water quality issues are an appropriate media to develop to address the mandates associated with Phase II Stormwater Regulations. The primary goal of developing these materials to create various media vehicles to disseminate to the various segments of the community we serve in order to reduce and possibly eliminate the discharge of pollutants into our local waterways from task that members within the construction / development community perform each and every day.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. Development of educational materials to be handed out will result in compliance through education and raising the awareness of the contractor.

Proposed Modifications: At this time, the only changes recommended are to: (1) enhance both our public and internal training programs to facilitate the dissemination of target specific informational materials to target specialties within the construction field; (2) translate specific brochures specifically towards the Spanish speaking portion of our population and (3) expand our website to address the Spanish speaking portion of our community's needs and to address additional stormwater topics. For example, we anticipate conducting training sessions geared specifically towards licensed painting contractors and to suppliers of painting products during year three of the program.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change, educational materials shall be updated to reflect any and all necessary changes. In addition, staff anticipates developing additional Public Outreach materials as the need arises on various other specific topics.

<i>BMP Number: CO 6.2 Construction-Related Public Educational Materials Distributed</i>
--

General Summary: The City of San Luis Obispo under CO 6.1 is required to publish / distribute educational materials on the Phase II Municipal Stormwater Program pertaining to construction / development projects, including *brochures, fact sheets*, guides, templates and other materials which will help guide and assist developers and contractors in meeting the ever expanding requirements and goals of stormwater programs. The primary goal is to reduce pollutants from construction site runoff by educating developers and contractors on stormwater requirements.

Status of Measurable Goals: Staff has completed the stated goal during years 1 and 2. In order to meet these goals and objectives stormwater staff has aggressively undertaken to distribute the following public outreach components pertaining to the construction and development industry:

1. **Pre-Construction Activities:** Stormwater staff has developed informational brochures, fact sheets and other materials for the development and construction fields to assist them during the planning and WPCP / SWPPP development phase of their project. The materials distributed include:
 - A template WPCP for Select Building Projects Less than 1 Acre,
 - An informational brochure or “Guide to Developing a WPCP”,
 - A WPCP / SWPPP Plan for Minor Right of Way Encroachment Projects,
 - An informational brochure for “Best Management Practices for Public Works LUP Projects”,
 - An informational brochure concerning “Low Impact Development” concepts and theories,
 - An informational guide on planning, developing and construction a “Residential Rain Garden”,
 - Numerous updates to our Stormwater website resource section to provide developers and contractors with links to relevant websites,
 - And the development of an entire section of the City’s website dedicated to Construction and Development,
 - And many other informational handouts (*Fact sheets, brochures and etc.*).

2. **Construction Activities:** Stormwater staff has developed informational brochures, fact sheets and other materials for the development and construction fields to assist them during the construction phase of the development process. The materials distributed to date include:
 - An informational brochure addressing “Stormwater BMPs for Concrete Activities”,
 - An informational brochure entitled “Quick Guide to Public Right-of-Way Work (Work within the public-right-of-way) & Stormwater BMPs,
 - An informational brochure addressing “Stormwater BMPs for Erosion and Sediment Control”,
 - An informational brochure addressing “Stormwater BMPs for General Construction Activities”,
 - An informational brochure addressing “Stormwater BMPs for Landscape Construction Activities,
 - An informational brochure addressing “Stormwater BMPs for Landscape Maintenance Activities”,
 - An informational brochure addressing “Stormwater BMPs for LUP Activities”,
 - An informational brochure addressing “Stormwater BMPs for Painting Activities”,
 - An informational brochure addressing “Stormwater BMPs for Saw Cutting Operations”,
 - An informational brochure addressing “Stormwater BMPs for Street Operational and Maintenance Activities”,
 - Numerous updates to our Stormwater website resource section to provide developers and contractors with links to relevant websites,
 - And the development of an entire section of the City’s website dedicated to Construction and Development,

- And many other informational handouts (*Fact sheets, brochures and etc.*).
3. **Post Construction Activities:** Stormwater staff has developed informational brochures, fact sheets and other materials for the development and construction fields to assist them during both the planning phase of the development process and during the post construction phase to protect both stormwater and water quality. The materials distributed to date include:
- An informational brochure concerning “Best Management Practices for Private Stormwater Conveyance Systems”,
 - An approved “City of San Luis Obispo Standard Private Stormwater Conveyance System Management and Maintenance Agreement”,
 - A useful guide in developing a Private Stormwater Conveyance System Operations and Maintenance Manual,
 - Useful templates in developing a Private Stormwater Conveyance System Operations and Maintenance Manual,
 - Various informational brochures concerning routine maintenance, routine cleaning, routine inspections, conducting repairs as necessary and documenting all routine maintenance, cleaning inspections and repair activities performed on private stormwater conveyance system devices and features, including LID.
 - A useful annual report format outline for developing and submitting a Post Construction Private Stormwater Conveyance System Annual Report.

To facilitate the dissemination of these materials staff has:

1. **Counter Personnel:** During the initial planning phases of a project many of the informational materials described herein are distributed to applicants. Additional materials are distributed during the plan review process.
2. **Email:** In response to inquires either via the telephone and/or email stormwater staff has issued various informational materials via direct mailings to industry specific segments of our community; concrete construction industry, general construction industry, landscape construction industry, landscape maintenance industry and etcetera.
3. **Direct Mailings to target businesses:** Stormwater staff has issued various informational materials via direct mailings to industry specific segments of our community; concrete construction industry, general construction industry, landscape construction industry, landscape maintenance industry and etcetera.
4. **Enforcement Activities:** Staff within stormwater has given out copies of target specific informational brochures, fact sheets and summary sheets during each and every enforcement activity whether the activity is a face to face encounter or via US Mail. These activities range from concrete activities, general construction activities to landscape construction activities.
5. **Routine Inspections:** Stormwater staff has distributed industry specific materials during each and every initial site inspection and as needed. For example, during the initial inspection of an active construction site one of the ten plus construction industry specific stormwater informational handouts will be given to contractors

- present during the inspection. Building personnel and public works field inspectors also routinely distribute these materials during site visits.
6. **City Facilities:** A selection of the stormwater brochures and informational fact sheets are available at all City facilities for the general public.
 7. **Stormwater Website:** Staff within stormwater has developed and implemented the stormwater website which includes a “Resource” section that includes all reviewed and approved informational brochures and fact sheets to date. Again, the website also includes a section completely designated to construction and development activities.

As indicated in BMP CO 6.1 each and every brochure, fact sheet and guide developed and distributed to date includes the following information:

- The City’s website address,
- The telephone number of the City’s 24 Hour Water Pollution Reporting Hotline,
- The direct line for Stormwater staff and/or Public Works Staff as necessary,
- Direct line for reporting a suspected or known sewage related issue
- Direct line for reporting a hazardous waste / material spill,
- Useful links pertinent or germane to the topic at hand.

During this reporting period staff within the City’s stormwater program distributed well over 981 informational brochures and fact sheets concerning various construction related stormwater topics. The following table provides detail on the total number of educational materials distributed by type.

Construction / Development Informational Handouts Distributed	2010 - 2011
Concrete BMP Brochure	32 plus
Erosion and Sediment Control BMP Brochure	80 plus
General Construction BMP Brochure	320 plus
Landscape Construction BMP Brochure	164 plus
Painting BMP Brochure	39 plus
Saw Cutting BMP Brochure	2 plus
Street Maintenance BMP Brochure	15 plus
Encroachment Permit BMP Brochure	2 plus
Demolition BMP Brochure	1 plus
Private Stormwater Conveyance System BMP Brochure	40 plus
Low Impact Development Brochure	24 plus
Linear Underground & Overhead Project BMP Brochure	30 plus
Template WPCP for Select Building Projects Less than 1 Acre	50 plus
Guide to Developing a WPCP	50 plus
A WPCP / SWPPP Plan for Minor Right of Way Encroachment Projects	40 plus
Best Management Practices for Public Works LUP Projects BMP Brochure	40 plus
Residential Rain Garden Guide”	2 plus
City of San Luis Obispo Standard Private Stormwater Conveyance System Management and Maintenance Agreement	20 plus
Guide to developing a Private Stormwater Conveyance System Operations and Maintenance Manual	10 plus
Useful templates in developing a Private Stormwater Conveyance System Operations and Maintenance Manual	10 plus
Annual report format outline for developing and submitting a Private Stormwater Conveyance System Annual Report	10 plus
ESTIMATED TOTAL	981 plus

The total is only estimated, since brochures and other materials are often distributed and a record is not made, since the primary concern is heightening public awareness concerning protecting water quality and building program awareness.

Appropriateness: Target specific / industry specific or population specific educational materials on the City’s Phase II Municipal Stormwater Program and various water quality issues are an appropriate media to develop and distribute to address the mandates associated with Phase II Stormwater Regulations. The primary goal of these materials to increase the public’s awareness concerning water quality and stormwater pollution in order to reduce and possibly eliminate the discharge of pollutants into our local waterways from task that members within the construction / development community perform each and every day.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness.

- **Implementation:** A public education and outreach element of the City's stormwater construction program was implemented as required.
- **Target Audience Awareness:** During the first year of the program very few contractors / developers within the area knew anything about the impact that construction activities could have on water quality, if appropriate measures were not implemented. Now, nearly 98% of the contractors / developers within the area are aware of the impact construction activities can have on local water quality and the appropriate BMPs to implement.
- **Target Audience Behavioral Change:** When the program began, very few contractors / developers knew about the concept of Stormwater and Best Management Practices, much less implementing any BMPs. As we approached the end of year two of the program it is a rare situation to find a site without the implementation of any BMPs. However, there is still room for improvement, specifically in the area of proper installation, maintenance and cleaning of the control measures.

Proposed Modifications: At this time, the only changes recommended are to enhance both our external and internal training programs to increase the target audiences awareness of the importance of not only installing the appropriate BMPs and Control Measures, but to routinely inspect, maintain, clean, repair as needed and augment these devices when necessary.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change, educational materials shall be updated to reflect any and all necessary changes. Additional avenues of dissemination for educational materials shall be developed, if appropriate. In addition, staff anticipates developing additional Public Outreach materials as the need arises on various other specific topics.

<i>BMP Number: CO 6.3 Construction-Related Public Educational Materials Distributed</i>
--

General Summary: The intent of this BMP is implement a public education and outreach program for contractors and developers with resources and links like the California Stormwater Quality Association (CASQA) on the City's stormwater web page.

Status of Measurable Goals: This BMP has been achieved with the CASQA link on several pages of the City's web site as well as a wealth of resources and educational materials. This offers both contractors and developers the opportunity to access information at any time.

Appropriateness: This BMP is appropriate as it provides contractors and developers an opportunity to get additional resources from our web site to educate themselves on new regulations, practices, and updates City policies as they come out.

Effectiveness: This BMP has achieved CASQA Level I: documenting activities.

Proposed Modifications: This BMP is proposed to be consolidated under PE 11.4.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change, educational materials shall be updated to reflect any and all necessary changes. As new links with valuable information are discovered, they will be added to the list of links on the City's web site.

BMP Number: CO 7.1 Implement the use of checklist in the field to verify compliance with SWPPP or WPCP for all construction sites.

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a field checklist to be used in the field to verify a given project's compliance with the approved SWPPP or WPCP; to not only ensure, but document whether or not the appropriate BMP's and / or Control Measures are in fact; not only being implemented on the site, but routinely maintained, routinely cleaned, routinely inspected, repaired / replaced when necessary and augmented when required. The goal of this BMP is to not only reduce the generation of pollutants of concern on construction sites, but to prevent pollutants from leaving construction sites.

Status of Measurable Goals: Stormwater staff has developed a field checklist which is used during every routine, inclement weather, complaint driven and drive-by site inspection of any and all construction sites within City limits. Please note that the phrase drive-by denotes an initial visit to a site. The checklist has been used throughout the course of the past two years and is constantly being adjusted to meet the needs of the program.

Appropriateness: The use of field checklist is an appropriate way to clearly document site compliance and / or non-compliance issues. Field checklists later serve as a means of tracking compliance or non-compliance on a given site throughout the course of the project and later enforcement and follow-up activities by staff. Field checklists also provide a means by which other staff within the organization can follow-up on an issue at a given site when key personnel are out.

Effectiveness: This BMP has achieved CASQA Level I: documenting activities.

Proposed Modifications: Field checklist will be adjusted as necessary to meet program regulatory changes.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within Stormwater within the Building and Safety Division will continue to utilize the current field checklist and adjust it as needed to ensure that the checklist meet future regulatory requirements.

BMP Number: CO 7.2 Develop and train staff on proper field inspection techniques and appropriate enforcement procedures to adhere to.

General Summary: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a field inspection

and enforcement training program. The goal of this BMP is to ensure that proper procedures, policies and legal standards are followed during all field inspections and all enforcement activities.

Status of Measurable Goals: Stormwater staff conducted numerous training sessions in year two of the program covering topics like: elements of a SWPPP, elements of a WPCP, private stormwater conveyance systems and post construction requirements, stormwater regulations and California Green Building Codes 2010, stormwater regulations and linear underground overhead projects and much more. In addition, Stormwater staff has conducted one on one training sessions within the field with other field personnel. The majority of staff within the Building and Safety Division has taken POST 832 training to ensure that field inspections are conducted in accordance with the law.

Appropriateness: In-house training programs are an appropriate means of ensuring consistency in inspection techniques and enforcement activities to achieve the overall success of the stormwater program. These programs also create an opportunity to update staff of current and pending regulatory changes.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. In-house training programs, coupled with the various handouts and tools to meet the overarching goals of the program are effective in streamlining many internal processes. These programs create an opportunity to present necessary program information in a condensed, but useable format to all key staff.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within Stormwater within the Building and Safety Division will continue to enhance and expand our in-house training program in Year 3 in response to ever expanding regulatory changes and program needs.

<p>BMP Number: CO 7.4 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for enforcing project work shut downs when required BMP's and / or Control Measures are completely lacking and /or non-functional.</p>
--

General Summary: Staff within the City of San Luis Obispo's Building and Safety Division took appropriate enforcement action on all construction sites wherein BMPs on the sites are found to be missing, inadequate and or failed, and there has been marginal or no attempt to mitigate on the part of the developer / contractor, 100% of the time. Enforcement activity is typically preceded by a public outreach and education effort to seek voluntary compliance. These activities include the discovery of problems during routine site investigations, drive-bys and in response to complaints or concerns from various members of the community that may affect local water quality. Enforcement activities, including job shut downs may include the issuance of a "Field Correction Notice", specifically created for the City's Stormwater Enforcement Program

and / or the issuance of a formal enforcement notification (*i.e. Notice to Comply, Notice of Violation, Notice to Correct and/or Administrative Citation*) via the mail.

Status of Measurable Goals: In accordance with the provisions of BMP CO 7.4 staff has shut down projects wherein a gross discharge was taking place and/or required BMP's and / or Control Measures were lacking during the reporting period of July 1, 2010 through June 30, 2011.

Appropriateness: The ability to shut down a project is an effective method when resistance is encountered by a responsible party.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. All incidences wherein BMPs on sites were found to be missing, inadequate and or failed, and there were marginal or no attempt at mitigation on the part of the developer / contractor enforcement action was taken 100% of the time, including a work stop order or job shut down order. Job shut-downs are a highly effective method to achieve water quality protection.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our enforcement response activities in Year 3 of the program.

BMP Number: CO 7.5 Post-construction Device Installation and Operation Inspection
--

General Summary: Staff within the City of San Luis Obispo's Building and Safety is responsible for inspecting the installation and operation of all post construction stormwater devices.

Status of Measurable Goals: During the Year 2 of the program staff inspected all post construction devices for plan adherence.

Appropriateness: Inspection of post construction stormwater devices for plan adherence is an appropriate means to ensure that adequate measures have been taken to protect local water quality long term from the effects of development.

Effectiveness: This BMP has achieved CASQA Level 1: Documenting Activities.

Proposed Modifications: At this time we propose that in lieu of requirement that City staff inspect all post construction stormwater devices beyond plan adherence installation standards that the project engineer of record certify that the devices installed were installed per industry specifications, per plans and that the devices were tested and deemed operational. This request is based upon the fact that many of the pre-fabricated stormwater devices and many other non-structural devices require a specific level of expertise that may be best approved by the technical expert within the field of engineering. In addition, with the reduction of staffing due to current

economic conditions locally and nationally we do not believe that we have the resources or time to send staff to obtain the technical expertise to adequately conduct the level of inspection necessary for these devices.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our inspection of post construction devices in Year 3 of the program.

BMP Number: CO 7.6 Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety is responsible for the development and implementation of a comprehensive program to address potential pollutant discharges from construction / development sites whether or not the site falls under the State's General Construction Permit program. Sites subject to the requirements of CO 7.6 include projects that are less than or greater than one (1) acre in size regardless of whether or not the site requires a SWPPP. As required under CO 7.3 and CO 4.3 staff inspect all construction sites whether permitted or non-permitted (*i.e. landscape construction sites*) routinely, during inclement weather conditions, based upon referrals and in response to concerns or complaints from members of the community (*i.e. residents, visitors, business owners, various agencies and etcetera*) concerning the potential discharge of pollutants of concern (*i.e. sediment, petrochemical products, fugitive dust and etcetera*). In addition, to the requirements of CO 7.3 staff continuously prioritize sites based upon various risk factors to allow for some flexibility in the rigorous routine inspection schedule {*i.e. once a week during the rainy (October 15th – April 15th) and every other week during the dry season (i.e. April 16th – October 14th)*} established per CO 7.3 and CO 4.3 when workload exceeds available inspection time. This BMP of the stormwater program has been greatly expanded to account for the California Green Building Codes 2010 Stormwater requirements.

General Summary: The intent of prioritizing sites based upon water quality risk factors enables staff to adjust the frequency of routine inspections based upon current workloads. Thus, sites with the highest risk factor levels for impact to local water quality will always be inspected weekly regardless of work loads and those sites with low risk factors to water quality may occasionally based upon workloads receive slightly less attention. However, the intent remains as in CO 7.3 for City staff to inspect sites on a routine basis to determine if the site operator (*i.e. responsible party*) has or is implementing, maintaining, inspecting, repairing, documenting and augmenting as necessary all applicable water quality control measures as detailed in the project WPCP or SWPPP. Some of the more relevant risk factors considered include: the sites proximity to a water resource, existing drainage patterns and the location of nearest drain inlets, local habitat concerns, the sites terrain and soil type, existing erosion and sediment control issues, existing site pollution and contamination issues and lastly surrounding site features. Again, this BMP of the stormwater program has been greatly expanded to account for the California Green Building Codes 2010 Stormwater requirements.

Status of Measurable Goals: In order to achieve optimal results Building and Safety Division stormwater staff has evaluated each site for the risk factors described herein.

Appropriateness: Flexibility in program requirements is important in order to shift priorities as regulations within the stormwater forum are continuously expanding and changing. Also, workloads are often impacted by complaint driven concerns from members within our community and other priorities within the stormwater program, such as program development in other areas.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. Routine inspections enable staff to ensure that the legally responsible party is implementing, adhering to, maintaining repairing as necessary and augmenting as needed all BMP's on the construction site. Since, the goal is to protect local water quality the only way to ensure that all efforts are being made by the legally responsible party to the maximum extent practicable is to conduct routine inspections at least twice a month. The ability to have some latitude in the rigorous inspection schedule allows staff the opportunity to adjust work schedules slightly, but still focus in on those sites of significant risk to local water quality. Construction site prioritization is an internal process, thus Level 2 outcome is not applicable at this time.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will continue to enhance our routine construction site inspection program which includes the established water quality risk factor assessment phase in response to regulatory changes and/or program needs in Year 3 of the program.

Post-Construction Runoff Control (PC)

BMP Number: PC 1.3 Revise the Municipal Code to address post-construction runoff from new and redevelopment, long-term operation and maintenance of structural and nonstructural controls, develop enforceable mechanisms for implementing hydromodification controls and LID and appropriate sanctions for non-compliance. Develop a staff training program with updated post-construction design standards

General Summary: The intent of this BMP is to train staff on post-construction requirements.

Status of Measurable Goals: This BMP is part of a larger BMP, PC 1, to provide hydromodification control and low impact development requirements under the Joint Effort. To that end, this BMP is premature as that work has not been completed. However, staff has completed training on the City's water quality ordinance, as well as training on low impact development with Dr. Darla Ingles, and through the LID Initiative for Green Streets in Paso Robles.

Appropriateness: This BMP will be appropriate when the post construction hydromodification management plan development is complete.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. Work has not been completed on the Hydromodification Management Plan, so effectiveness has not been achieved for the final hydromodification program and has been achieved for LID and the new water quality ordinance at the staff level.

Proposed Modifications: It appears this BMP was created prior to adoption of the Joint Effort and is now redundant to that effort's activities and reporting. It is recommended that future reporting on staff training be completed under the Joint Effort BMPs.

Stormwater activities undertaken during the next reporting cycle: Work will continue on the Joint Effort Hydromodification Management Plan activities, including training elements.

BMP Number: PC 1.4 Revise the Municipal Code to address post-construction runoff from new and redevelopment, long-term operation and maintenance of structural and nonstructural controls and appropriate sanctions for non-compliance. Develop a staff training program with post-design standards.

General Summary: Reduce post-construction runoff and pollutants by requiring controls, long term operation and maintenance of the controls.

Status of Measurable Goals: Implement post-construction requirements. City staff has tracking all post construction stormwater devices. City staff has developed checklists for use in the field to ensure that maintenance agreements are implemented, annual certifications are submitted, and control devices are maintained. Post construction stormwater devices were inspected on a complaint/service order basis. Enforcement of the post construction devices, maintenance,

cleanings, and repair were conducted in accordance with the City's administrative citation process and code enforcement policies.

Appropriateness: Tracking post-construction controls, using checklists, maintenance agreements, training, inspection, and enforcement are all appropriate techniques to control post-construction runoff.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. Stormwater staff a standardized private stormwater conveyance maintenance agreement which is recorded with the title of the property, a guide for the development of a private stormwater conveyance system operations and maintenance manual, useful templates for owner inspections of these devices, a post construction system database tracking system, a checklist to be used upon intake and review of the operations and maintenance manual to ensure that it includes all requisite elements, a guide in submitting a post construction private stormwater conveyance system required annual report, a checklist to be used upon intake and review of the required annual post construction private stormwater conveyance system report, a field inspection checklist for review of the roughly fifty different LID and private stormwater conveyance systems that may be installed within the City of San Luis Obispo and standardized letters for notification purposes. In addition, stormwater staff developed numerous brochures covering various post construction issues. These measures are all effective in reducing post-construction runoff.

Enforcement of post construction stormwater control device requirements (*routine inspections, maintenance, cleanings and repairs as necessary*) is an effective means to ensure that these devices are being maintained to operate at maximum effectiveness at all times to protect local water quality.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continued implementation of post-construction runoff prevention measures.

<p>BMP Number: PC 4.1 The City will require all new and redevelopment projects to install structural and/or nonstructural controls that minimize runoff and pollutants reaching local water bodies.</p>
--

General Summary: The intent of this BMP is to reduce post-construction runoff and pollutants by requiring controls to be installed.

Status of Measurable Goals: Engineering standards which govern the City's uniform design criteria for drainage and erosion control (1010B) have been modified to give guidance for water quality implementation in new development or redevelopment and reference CASQA BMPs.

Appropriateness: This BMP is appropriate as it has the potential to reduce the amount of sediment or other pollutants entering into stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: This BMP is complete and will support future activities.

Stormwater activities undertaken during the next reporting cycle: PC is complete and no future activities are planned for next reporting cycle.

BMP Number: PC 4.2 The City will require all new and redevelopment projects to install structural and/or nonstructural controls that minimize runoff and pollutants reaching local water bodies.

General Summary: The intent of this BMP is to reduce post-construction runoff and pollutants by requiring controls to be installed.

Status of Measurable Goals: Links to the City's Engineering Standards, Waterway Management Plan and CASQA have been established on the City's website to allow the public greater opportunities to access information related to stormwater management in one location.

Appropriateness: This BMP is appropriate as it has the potential to reduce the amount of sediment or other pollutants entering into stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: This BMP is proposed to be consolidated with BMP PE 11.4

Stormwater activities undertaken during the next reporting cycle: As regulations change, educational materials shall be updated to reflect any and all necessary changes. As new links with valuable information are discovered, they will be added to the list of links on the City's web site.

BMP Number: PC 5.1 Implement a public education and outreach program for developers and contractors on post-construction runoff controls.

General Summary: To reduce runoff and pollutants in post-construction stormwater by educating developers, contractors, and property owners about the importance of the controls and connection to water quality.

Status of Measurable Goals: Design and distribute educational materials with all building permits that include information to assist developers and contractors to reduce post-construction runoff and pollutants.

Stormwater controls and connection to water quality are a regular topic for update at the City's Developers Roundtable; a bi-annual meeting with a cross-representation of developers and their representatives to comment on the City's development review process and review new regulations.

Educational materials are distributed at the Planning and Building counter to alert the public and developers to runoff and pollutant controls. See BMP CO 6.1 for a complete list of handout reference materials.

Appropriateness: Public education and outreach is an appropriate BMP to reduce runoff on new development sites.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. Outreach and educational materials contribute to the public knowledge of LID and Hydro Modification principles. This BMP will be an ongoing goal as the program continues to develop over the years.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Ongoing activity to provide staff training and education on LID/Hydro Mod Concepts.

BMP Number: PC 5.2 Implement a public education and outreach program for developers and contractors on post-construction runoff controls.

General Summary: To reduce runoff and pollutants in post-construction stormwater by educating developers, contractors, and property owners about the importance of the controls and connection to water quality.

Status of Measurable Goals: This BMP is complete with links for CASQA on the City's webpage to aid the public in getting materials from one central location.

Appropriateness: Public education and outreach is an appropriate BMP to reduce runoff on new and redevelopment sites.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: This BMP is proposed to be consolidated under PE 11.4.

Stormwater activities undertaken during the next Stormwater reporting cycle: As regulations change, educational materials shall be updated to reflect any and all necessary changes. As new links with valuable information are discovered, they will be added to the list of links on the City's web site.

BMP Number: PC 6.2 The City will develop methods to ensure long-term operation and maintenance of post-construction stormwater controls. This will be accomplished in part by requiring the responsible party to submit a post-construction Operations and Maintenance Agreement.

General Summary: The intent of this BMP is to reduce post-construction runoff and pollutants by requiring controls to be installed. BMP's will be more effective with regular inspection and maintenance.

Status of Measurable Goals: We have been requiring and receiving simplified agreements for several years. A standard agreement has been developed and plan review checklists have been amended accordingly.

Appropriateness: This BMP is appropriate as it provides clear direction to owners and operators regarding their post-construction BMP's and the required maintenance.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. We have now developed a standardized Operations and Maintenance Agreement (Private Stormwater Conveyance System Management and Maintenance Agreement) form that will be recorded against the property. This will ensure that proper notice is provided to the property owner at the completion of construction and that said notice will be available to future owners and beneficiaries involved in a property transfer.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: We will continue to review development projects for post-construction BMP's and require an Operations and Maintenance Agreement. We will continue to cross-train and educate any new employees about this component of the project review and plan review process.

<i>BMP Number: PC 6.6</i> Track Post-construction Stormwater Device
--

General Summary: Stormwater staff within the City of San Luis Obispo's Building and Safety is responsible for tracking of all post construction stormwater devices.

Status of Measurable Goals: During the Year 2 of the program Stormwater staff expanded our programs to track all post-construction stormwater controls.

Appropriateness: Tracking all post construction stormwater control devices in a database is a critical component in effectively managing the post construction element of the stormwater program.

Effectiveness: This BMP has achieved CASQA Level 1: Documenting Activities. The post construction stormwater control device database is a convenient means of not only tracking all of these devices, but in managing and tracking all private stormwater conveyance system agreements, all annual reports received, and the post construction stormwater inspection element of the City's stormwater program.

Proposed Modifications: At this time we expect that the database will be converted over into the City's new software program (Energov) by mid-2012.

Stormwater activities undertaken during the next Stormwater reporting cycle: Staff within the Building and Safety Division will continue to enhance our tracking program of all post construction stormwater control devices in Year 3 of the program.

BMP Number: PC 7.2 Train all development review and inspection staff on post-construction requirements and controls biennially and as new requirements or controls are adopted or implemented.

General Summary: The intent of this BMP is to reduce runoff from new development and redevelopment sites by training staff on stormwater requirements and controls.

Status of Measurable Goals: Train inspectors on post-construction requirements, means of enforcement, and new technologies and resources for post-construction controls.

Ongoing staff training is being provided as the program develops. Staff informational meetings have been conducted with the entire Community Development Department, weekly updates at the Development Review Team, and the City Engineer has provided training on two occasions to the planners. Eight staff members attended the RWQCB charette on LID/HydroMod and the all-day training on May 5, 2010 sponsored by Cal Trans and the RWQCB on erosion/sediment control, LID, and Hydromodification techniques. All planning development review staff attend the LID Training offered by Darla Inglis in fall, 2010.

Appropriateness: Ongoing training of plan review staff is an appropriate BMP to reduce runoff on new development sites.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. These training sessions contribute to the staff knowledge of LID and Hydro Modification principles. This BMP will be an ongoing goal as the program continues to develop over the years.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Ongoing activity to provide staff training and education on LID/Hydro Mod Concepts.

BMP Number: PC 8.1 Post-construction Stormwater Device Inspection Checklist

General Summary: Stormwater staff within the City of San Luis Obispo's Building and Safety Division is responsible for developing a checklist to be used by staff in the field prior to the wet season to ensure that the Operations and Maintenance Agreement submitted to the City is followed, annual certifications are submitted and control devices are maintained for all post construction stormwater devices.

Status of Measurable Goals: During Year 2 of the program Stormwater staff developed checklist and guides to be used by staff in the field prior to the wet season to ensure that the Operations and Maintenance Agreement submitted to the City is followed, annual certifications are submitted and control devices are maintained.

Appropriateness: Checklist are a useful tool in streamlining processes, ensure that procedures are performed consistently by all staff and result in adequate documentation which reflects that the appropriate task and measures were performed in order to protect local water quality to the maximum extent practical.

Effectiveness: This BMP has achieved CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will update and modify all checklist and guides as regulations change and in response to technological advances in order to better protect local water quality to the maximum extent practical during Year 3 of the program.

<i>BMP Number: PC 8.2 Post-construction Stormwater Device Inspection Training</i>
--

General Summary: Stormwater staff within the City of San Luis Obispo's Building and Safety Division is responsible for developing a training program for all staff that will be responsible for conducting post construction stormwater devices installed since the City was permitted.

Status of Measurable Goals: This element of the program is dependent upon the completion of BMP PC 7.2 (*The training of inspectors on post-construction requirements, means of enforcements and new technologies and resources for post-construction controls*) which is dependent upon the approval of the region wide "joint hydromodification effort" by the RWQCB and, thus this task will be implemented following the completion of the "joint hydromodification effort with the RWQCB. However, in the interim staff have developed numerous educational materials and conducted limited training on this BMP.

Appropriateness: Training field personnel is an appropriate means of ensuring that appropriate procedures are followed and conducted during routine inspections.

Effectiveness: This BMP has achieved CASQA Level 2: Raising Awareness. Again this BMP will be implemented following the approval of the region wide "joint hydromodification effort" by the RWQCB.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue working on implementing the Joint Effort.

BMP Number: PC 8.3 Post-construction Stormwater Device Inspection Training

General Summary: Stormwater staff within the City of San Luis Obispo's Building and Safety Division as part of the post construction stormwater element of the stormwater program implemented a post construction stormwater device inspection program.

Status of Measurable Goals: This element of the program is dependent upon the completion of many other BMPs, for example, BMP PC 7.2 (*The training of inspectors on post-construction requirements, means of enforcements and new technologies and resources for post-construction controls*) which is dependent upon the approval of the region wide "joint hydromodification effort" by the RWQCB and, thus this task will be fully implemented following the completion of the "joint hydromodification effort with the RWQCB. However, in the interim post construction stormwater devices were inspected on a complaint / service order basis. In addition, as part of the City of San Luis Obispo's Post Construction Stormwater program stormwater staff within the Building and Safety Division developed numerous documents and program elements to ensure the success of this portion of the stormwater program. Stormwater staff developed a standardized private stormwater conveyance maintenance agreement which is recorded with the title of the property, a guide for the development of a private stormwater conveyance system operations and maintenance manual, useful templates for owner inspections of these devices, a post construction system database tracking system, a checklist to be used upon intake and review of the operations and maintenance manual to ensure that it includes all requisite elements, a guide in submitting a post construction private stormwater conveyance system required annual report, a checklist to be used upon intake and review of the required annual post construction private stormwater conveyance system report, a field inspection checklist for review of the roughly fifty different LID and private stormwater conveyance systems that may be installed within the City of San Luis Obispo and standardized letters for notification purposes. In addition, stormwater staff developed numerous brochures covering various post construction issues.

Appropriateness: Routine or as needed inspections of post construction stormwater devices is an important requirement in any stormwater program in order to ensure that the devices installed are being routinely inspected, maintained, cleaned and repaired when necessary so that they are operating as intended.

Effectiveness: This BMP has achieved CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue working on implementing the Joint Effort.

BMP Number: PC 8.4 Post-construction Stormwater Device Enforcement Compliance

General Summary: As part of the City of San Luis Obispo's Post Construction Stormwater program stormwater staff within the Building and Safety Division will enforce the long term

required routine inspections, maintenance, cleanings and requisite repairs as needed of these devices through public outreach and education. When public outreach and educational efforts prove ineffective staff will utilize the City's Administrative Citation Process to effectuate compliance.

Status of Measurable Goals: During year two of the stormwater program, post construction stormwater devices were inspected on a complaint / service order basis. Enforcement of the post construction stormwater device routine inspections, maintenance, cleanings and repair requirements were completed in accordance with the City's existing administrative citation process and / or code enforcement policies and procedures.

Appropriateness: Enforcement of post construction stormwater control device requirements (*routine inspections, maintenance, cleanings and repairs as necessary*) is an effective means to ensure that these devices are being maintained to operate at maximum effectiveness at all times to protect local water quality.

Effectiveness: This BMP has achieved CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue working on implementing the Joint Effort.

BMP Number: PC 8.5 Post-construction Stormwater Device Enforcement Compliance (Administrative Citation Process)—Enforcement measures will include means to administer fines.

General Summary: As part of the City of San Luis Obispo's Post Construction Stormwater program, stormwater staff within the Building and Safety Division will levee "Administrative Citations" as necessary in situations wherein the long term required routine inspections, maintenance, cleanings and requisite repairs of these devices have not occurred and the responsible party is reluctant to cooperate following standard public educational/outreach activities and standard enforcement practices were implemented.

Status of Measurable Goals: During year two of the stormwater program, post construction stormwater devices were inspected on a complaint / service order basis. Enforcement of the post construction stormwater device routine inspections, maintenance, cleanings and repair requirements were completed in accordance with the City's existing administrative citation process and / or code enforcement policies and procedures.

Appropriateness: Enforcement of post construction stormwater control device requirements (*routine inspections, maintenance, cleanings and repairs as necessary*), including the issuance of fines is an effective means to ensure that these devices are being maintained to operate at maximum effectiveness at all times to protect local water quality.

Effectiveness: This BMP has achieved CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue to implement enforcement measures in Year 3.

BMP Number: PC 9.1 (Enforceable Mechanisms) As part of the Joint Effort, the City is required to complete an analysis of all applicable codes, regulations, standards, and specifications, that identify modifications and/or additions necessary to effectively implement hydromodification controls and low impact development.

General Summary: The intent of this BMP is to identify City documents that will need to be revised to allow implementation of hydromodification and low impact development.

Status of Measurable Goals: The SLO TAC collected sample code review checklists from other agencies, and developed a checklist for code review in February 2010. A review has been completed of City codes, regulations, standards, specifications, guides, area specific plans, and general plan elements using the SLO TAC checklist.

Appropriateness: This BMP is appropriate as a first step toward regulation and guidance consistent with hydromodification and low impact development.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: This BMP is complete and will support future activities.

Stormwater activities undertaken during the next Stormwater reporting cycle: The next activities related to this are BMP 9.2 and 9.3 to be completed by the end of the 8th quarter and applied in the 9th quarter. They are establishing enforceable mechanisms and applying them.

BMP Number: PC 9.6 (Interim LID Implementation) As part of the Joint Effort, the City is required to apply LID principles and features to all applicable new and redevelopment projects.

General Summary: The intent of this BMP is to begin implementation of low impact development to provide experience for agency staff, as well as applicants, in working with these new concepts, including finding areas of agency regulation that conflict with these concepts. Additionally, some benefit to the watershed can be realized through implementation of low impact development during the interim period prior to completion of the hydromodification management plan.

Status of Measurable Goals: Through the County Hydromodification Technical Advisory Committee, low impact development guidance was established with a determination of project applicability. A brochure was developed for use in assisting development review staff and

applicants with interim activities. Applicable project information has been added to the City Planning checklists.

Appropriateness: This BMP is appropriate as a first step toward regulation and guidance for low impact development.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness, CASQA Level 3: Changing Behavior, Level 4: Reducing Loads from Sources, and Level 5: Protecting Receiving Water Quality.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Tracking of this activity will occur through the remainder of the Joint Effort until completion of the hydromodification management plan. The County TAC is continuing work on refining parameters for larger projects to ensure they are actively engaged in the interim low impact development.

BMP Number: PC 9.6 (Education and Outreach) As part of the Joint Effort, the City is required to document goals, schedules, and target audiences for education and outreach the City 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.

General Summary: The intent of this BMP is to ensure everyone affected by hydromodification and low impact development understands the impact and importance of this new regulation.

Status of Measurable Goals: Through the County Hydromodification Technical Advisory Committee, a target audience and draft training materials have been developed.

Appropriateness: This BMP is appropriate as a first step toward regulation and guidance consistent with hydromodification and low impact development.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities and when training occurs will meet CASQA Level 2: Raising Awareness.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The next activity related to this is the completion of the actual training.

BMP Number: PC 10.1 Provide buffers between riparian areas and development.

General Summary: The intent of this BMP is to implement a strategy to prevent habitat and water quality degradation through application of buffer zones.

Status of Measurable Goals: The City has had a strategy to prevent habitat and water quality degradation for years. The City has and will continue to comply with Muni Code 17.16.025 E.2 a-c for riparian setbacks of 50', 35', and 20'. Where specified setbacks will not mitigate significant environmental impacts, increased setbacks are required per site specific biological surveys.

Appropriateness: Creek setbacks are an appropriate measure to protect water and habitat quality.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. The Ordinance provides strong and effective creek protection. Creek setback exceptions require specific "Variance-type" Findings, biological surveys, and can only be approved when "there is no practicable alternative". No creek setback exceptions were granted in 2010.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue implementation of Creek Setback Ordinance.

<p>BMP Number: PC 10.2 Provide buffers between riparian areas and development.</p>

General Summary: The intent of this BMP is to implement a strategy to prevent habitat and water quality degradation through application of buffer zones.

Status of Measurable Goals: Compliance with the creek setback ordinance is mandatory. The Ordinance sets minimum standards; where specified setbacks will not mitigate environmental impacts, increased setbacks are required. The language also reads that the setback is measured from the top of bank or the edge of riparian vegetation, whichever is farther from the creek.

Appropriateness: Creek setbacks are an appropriate measure to protect water and habitat quality.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. The Ordinance provides strong and effective creek protection. Creek setback exceptions require specific "Variance-type" Findings, biological surveys, and can only be approved when "there is no practicable alternative". No creek setback exceptions were granted in 2010.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Continue implementation of Creek Setback Ordinance.

Pollutions Prevention/Good Housekeeping for Municipal Operations (MO)

BMP Number: MO 1.1 Develop a Municipal Operations and Maintenance Manual including procedures and guidelines to be used by staff to reduce or prevent polluted run-off from municipal operations.

General Summary: The intent of this BMP is to document continued implementation of existing maintenance practices which protect water quality.

Status of Measurable Goals:

Table 11 of the City's Stormwater Management Plan lists the City's current activities. All items were reported on in the City's June 2010 Annual Report with a recommendation to cease reporting. Informal conversation with Board staff indicated it was acceptable to cease discussion on unchanging aspects. The following items will not be reported on:

- E-2 Covered equipment storage
- E-4 Electronic monitoring and presence of spill kits at fuel area
- E-5 Wash bay clarifier and sanitary sewer connection
- E-6 Street sweeping schedule
- E-7 Sawcutting vacuum
- E-9 & 18 Fecal matter pick up
- E-10 Hazardous Waste Manifests
- E-11 Surface cleaning direction to landscaping
- E-12 Sprinkler testing plumbing to sanitary sewer
- E-14 Computerized irrigation controller
- E-15 Fertilizer application schedule
- E-16 Waterless large area cleaning
- E-20 Dechlorination of pool deck washing
- E-21 Pool overflow prevention methods & equipment
- E-22 Pool draining to sanitary sewer if needed
- E-23 Pool backwash connection to sanitary sewer
- E-28 Storage tank overflows with automatic shutoff
- E-34 Transient Encampments: Proposed for consolidation with ID-15.1 and ID 15.2

The following items will have continued reporting. This BMP has been achieved.

E-1 Fleet Maintenance:

Fleet maintenance is an ongoing operation to keep vehicles and equipment operational to allow staff to perform needed work. Activities are tracked in a fleet maintenance computer program. Staff is alerted through the mileage collected at the fuel dock of needed maintenance. PMM stands for Prescribed Maintenance Monthly for vehicles that are used daily or receive excessive wear and tear. These vehicles are maintained monthly. PM90 stands for Prescribed Maintenance 90-day for larger vehicles equipped with air brakes. PM3 stands for Prescribed Maintenance 3-month for larger vehicles that do not acquire high miles, but are whose engines are used at high idle to run remote equipment.

E-3 Waste Disposal:

A double walled waste oil container, and secure, properly labeled containers for oil filters and waste coolant are placed in the immediate vicinity of the fleet operations for proper disposal on site. The material is picked up for remote disposal by Evergreen Environmental when contacted by staff.

E-8 Catch Basin Cleaning:

This BMP has been achieved and a collaborative communication effort allows for different staff to participate in responding, be it from the Utilities Wastewater Collections crew or Natural Resources staff to identify catch basins that require maintenance or weigh in on how they should be cleaned if there are other issues needing consideration.

E-13 Project Inspection:

Construction Management staff inspects public and private projects for compliance with their Water Pollution Control Plans and Stormwater Pollution Prevention Plans. Projects are checked regularly using a checklist.

E-17 Mutt Mitt Dispensers:

Parks staff provides 46 Mutt Mitt dispensers and refills them regularly. The dispenser locations are tied to heavy use areas like trail heads where people go for personal and pet recreation, and several dispensers are located at Laguna Lake park due to the presence of the off leash dog area. A total of 280,000 Mutt Mitts were distributed.

E-19 Woodchip Giveaway:

Approximately 134 cubic yards of wood chips were given away in the last year. One public wood chip and firewood giveaway was held in July 2010. The remainder of the wood chips were used for city property, in the community gardens, fire stations, parks, medians and other areas in the city to reduce weeds and maintain moisture in the ground.

Direct placement in the field is one of the primary reasons why public giveaways were reduced this year. Trimming crews have been working in areas like "Cypress Island" on South Higuera spreading the chips during chipping operations directly in the medians to improve water infiltration and reduce evaporation. Parks staff has also been utilizing the chips to help keep the sun and the wind from drying the soil out as well as reduce water and herbicide usage.

The other factor in reduced public giveaways was that although the City received more than normal rainfall this year, heavy wind was not associated with most of these storms, reducing the number of tree failures. Regular trimming operations create a steady amount of chips, but not the large volume resulting from years where large scale failures occur. Public giveaways will be held when the chip pile is large enough to warrant a giveaway event. The current volume is not enough to last even half a day of an event.

E-24 Sanitary Sewer Overflows:

Overflow stopped and surfaces affected by SSO's are thoroughly cleaned up which includes vacuuming up any sewage on the surface and cleaning as much of the storm drain as possible, raking debris, sanitizing the surface. Staff member is on-call 365 days per year.

E-25 Quarterly Creek Walks in Tunnel:

Continue to conduct quarterly Creek walks in addition to creek walk after significant storm events in the tunnel to determine if there are any private sewer laterals in poor condition or leaking. Notify business/property owners of any observed problems and issue a NOV if in violation of the Municipal Code. Update the photo journal when any changes to plumbing systems are made and document laterals in poor condition or leaking.

E-26 Planned water releases:

43 Planned water releases took place 7-1-10 through 6-30-11. BMPs were followed.

E-27 Emergency water releases:

20 emergency water releases took place during 7-1-10 through 6-30-11. BMPs were followed.

E-29 Hydrant Testing:

Dechlorination tablets are placed in a diffuser mounted on the fire hydrant outlet. Water discharged into the storm drain has been stripped of residual chlorine eliminating that threat to water quality. Hydrants are periodically flowed to determine water pressure for nearby fire sprinkler systems in businesses, as well as to maintain general functional condition of the hydrants.

E-30 Training Facility Water:

Dechlorination tablets are placed into mesh socks and are used in the storm drains at the training facility/parking lot. As with the hydrants, chlorine is striped from the water before entering the storm drain system and the local creeks.

E-31 Pump Testing:

An underground double-wall tank is used for pump testing the fire engines. This is a closed loop system where the fire engines pump water stored in the underground tank from a riser and then return the water directly back to the tank for storage. Minimal water is released during pump testing, and any water making its way into the off-site drainage system flows over dechlor tablets that strip out the chlorine before it enters the storm drain system and creeks.

E-32 Fuel Storage and Dispensing:

Small above ground storage tanks are provided at each station to provide fuel for both diesel and gasoline powered vehicles. The tanks are double walled to provide secondary containment. Additionally, each tank has a spill kit near the dispenser that includes granular absorbent, booms, and absorbent pads. Fueling is done by the driver or operator of the vehicle who stays with the vehicle during fueling. Additional resources are available for larger spills, similar to the contents of the spill kit.

E-33 Vehicle Cleaning:

Vehicles and fire engines are washed in a covered wash rack equipped with a clarifier to collect sediment, oil, and water. This wash rack is adjacent to the Fire Dept. Mechanics shop. The clarifier is inspected each year by the City Industrial Waste Inspector from the Utilities Division.

Appropriateness: This BMP is appropriate to reduce pollutants entering the system from routine City activities.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: The City will continue development of the Municipal Operations and Maintenance Manual.

<p>BMP Number: MO 1.2 Activities and procedures in Table 11 included in the Municipal Operations and Maintenance Program.</p>
--

General Summary: Stormwater staff within the City of San Luis Obispo's Building and Safety Division is responsible for developing a comprehensive Municipal Operations and Maintenance Manual ("MOMM") that includes all activities and procedures listed within "Table 11" of the City's Permit which will guide staff in proper procedures and BMPs to implement during routine activities performed in municipal operations.

Status of Measurable Goals: Staff within the City of San Luis Obispo's Stormwater Division within Building and Safety in collaboration with all other program staff is finalizing a draft MOMM which includes the activities and procedures listed within "Table 11" of the City's Permit.

Appropriateness: The general intent of BMP MO 1.2 is to create a document or tool that includes "Table 11" activities and task from the City's Permit that all staff can refer to for standardized procedures and guidelines as to appropriate measures and BMPs to be employed during routine municipal operations in order to reduce and/or prevent polluted run off and non-stormwater runoff from municipal activities and operations.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. Developing a comprehensive MOMM that includes "Table 11" activities and task from the City's Permit is just the first step in addressing potential stormwater pollutant discharges and non-stormwater runoff from various municipal activities and operations.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division with the collaboration of other staff will finalize the MOMM which includes "Table 11" activities and task from the City's Permit within the next reporting period.

<p>BMP Number: MO 1.3 Development of a MOMM</p>
--

General Summary: Stormwater staff within the City of San Luis Obispo’s Building and Safety Division are responsible for developing a comprehensive Municipal Operations and Maintenance Manual (“*MOMM*”) that includes all current activities and procedures listed within “Table 11” of the City’s Permit which will guide staff in proper procedures and BMPs to implement during routine activities performed in municipal operations.

Status of Measurable Goals: Staff within the City of San Luis Obispo’s Stormwater Division within Building and Safety in collaboration with all other program staff is finalizing a draft *MOMM* which includes current activities and procedures listed within “Table 11” of the City’s Permit.

Appropriateness: The general intent of BMP MO 1.3 is to create a document or tool that includes “Table 11” current activities and task from the City’s Permit that all staff can refer to for standardized procedures and guidelines as to appropriate measures and BMPs to be employed during routine municipal operations and/or activities in order to reduce and/or prevent polluted run-off and non-stormwater runoff from municipal activities and operations.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. Developing a comprehensive *MOMM* that includes “Table 11” current activities and task from the City’s Permit is just the first step in addressing potential stormwater pollutant discharges and non-stormwater runoff from various municipal activities and operations.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division with the collaboration of other staff will finalize the *MOMM* which includes “Table 11” current activities and task from the City’s Permit within the next reporting period.

<i>BMP Number: MO 2.1</i> <i>MOMM Maintenance Staff Training</i>

General Summary: Designated staff will train all City staff on the City’s stormwater management plan and BMPs to use during regular maintenance operations to minimize the release of water pollutants with annual refresher and new employee training. The primary goal is to ensure that City staff is effectively informed and trained to prevent polluted runoff and non-stormwater runoff as much as possible.

Status of Measurable Goals: Staff within the City of San Luis Obispo’s Stormwater Division within Building and Safety has conducted numerous in-house training sessions and developed numerous educational pieces (*i.e. brochures*) from 2009 through June 2011 concerning the City’s stormwater program. The focus of these training sessions and information pieces (*i.e. street maintenance activities, informational brochure on tree trimming and stormwater BMPs, informational brochure on Stormwater BMPs for Pool Maintenance Activities, informational brochure on Stormwater BMPs for Landscape Maintenance Activities, pressure washing activities, LUP, CaGreen Building Codes 2010 and etcetera*) was to provide staff with useful

practices, procedures and options (*BMPs, control measures and alternative materials*) to implement when involved in routine municipal operations and activities to prevent polluted runoff and non-stormwater runoff to the maximum extent practical.

Appropriateness: In house training is an effective method of disseminating information to appropriate staff to build program awareness and staff obligations.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness.

Proposed Modifications: At this time we only anticipate developing more powerpoint training sessions and more informational handouts for staff development.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will continue our in-house training programs, including the requisite QSD / QSP requirements for all plan reviewers and inspectors during the July 1, 2011 through June 30, 2012 reporting period.

<p>BMP Number: MO 3.1 Determine short and long-term goals to allow the City departments to procure funding to ensure compliance with the Phase II Municipal Stormwater requirements.</p>

General Summary: The intent of this BMP is to determine capital improvement projects at City facilities (Years 1-5) to City owned infrastructure to reduce/prevent stormwater pollution and non-stormwater runoff to ensure the City complies with stormwater requirements.

Status of Measurable Goals: City owned property has been identified and reviewed under BMP MO 6.1. That endeavor included creating a prioritization (risk) of each property based on its physical characteristics and proximity to the creek. For year 1, the top priority sites were reviewed for potential stormwater improvements. Capital improvement projects at City facilities have been identified for funding.

Appropriateness: This BMP is appropriate as it will provide incremental improvements at City owned facilities to reduce the potential for pollutants to enter the stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to the BMP proposed.

Stormwater activities undertaken during the next reporting cycle: Preliminary projects determined in this phase will be developed and submitted for funding consideration in the next City Financial Plan. Priority 2 sites will be reviewed, and projects outlined for future funding consideration.

<p>BMP Number: MO 4.2 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.</p>
--

General Summary: Reduce the amount of pollutants washed into the waterways.

- Create a storm drain maintenance database.

Status of Measurable Goals: A storm drain maintenance program has been developed utilizing the wastewater collection Infrastructure Management System (IMS) data base.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the storm drain system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and ensure adequate maintenance operation of the storm drain system.

BMP Number: MO 4.3 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.

General Summary: Reduce the amount of pollutants washed into the waterways.

Status of Measurable Goals: A storm drain maintenance program has been developed utilizing the wastewater collection Infrastructure Management System (IMS) data base.

- Cleaned one quarter of the structurally sound storm pipelines per year.
- Cleaned 1,300 catch basins annually.
- 200 tons of debris has been removed from the storm drain system annually.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the storm drain system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and ensure adequate maintenance operation of the storm drain system.

BMP Number: MO 4.4 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.

General Summary: Reduce the amount of pollutants washed into the waterways.

- CCTV storm drain lines to determine structural or maintenance problems, verify locations of connections and prepare a list of lines to be replaced or repaired.

Status of Measurable Goals: A storm drain maintenance program has been developed utilizing the wastewater collection Infrastructure Management System (IMS) data base.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the storm drain system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and ensure adequate maintenance operation of the storm drain system.

BMP Number: MO 4.5 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.

General Summary: Reduce the amount of pollutants washed into the waterways. CCTV or visually inspect all newly constructed public storm drains.

Status of Measurable Goals: A storm drain maintenance program has been developed utilizing the wastewater collection Infrastructure Management System (IMS) data base.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the storm drain system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and ensure adequate maintenance operation of the storm drain system.

BMP Number: MO 4.6 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.

General Summary: Reduce the amount of pollutants washed into the waterways.

- Clean downtown district drainage inlets annually just prior to the rainy season.
- Clean all other inlets biennially until system (pipelines and inlets) prioritization is developed.

Status of Measurable Goals: A storm drain maintenance program has been developed utilizing the wastewater collection Infrastructure Management System (IMS) data base.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the storm drain system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and ensure adequate maintenance operation of the storm drain system.

BMP Number: MO 4.7 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.

General Summary: Reduce the amount of pollutants washed into the waterways.

Status of Measurable Goals: A storm drain maintenance program has been developed utilizing the wastewater collection Infrastructure Management System (IMS) data base.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the storm drain system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: It is recommended to remove this BMP. MO 4.4 complies with this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with this BMP and ensure adequate maintenance operation of the storm drain system.

BMP Number: MO 4.8 Implement a storm drain cleaning program to prevent accumulated pollutants from being discharged with the stormwater.

General Summary: The intent of this BMP is to develop and implement a maintenance procedure and frequency for City owned detention basins.

Status of Measurable Goals: Between the time period of September 15 and October 15 annually, City owned basin will be reviewed by staff and trash and debris will be removed from

detention basin area. This activity has been documented in the Municipal Operations and Maintenance Manual.

Appropriateness: This BMP is appropriate as it has the potential to reduce the amount of trash and debris entering into stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to the BMP proposed.

Stormwater activities undertaken during the next reporting cycle: Annual maintenance will continue for City owned detention basins.

BMP Number: MO 5.1 A Storm Sewer Master Plan has been completed. This plan is part of a long-term strategy to address urban runoff and will target improvements and upgrades needed. This plan will prioritize maintenance, replacement and expansion of the current system.

General Summary: The intent of this BMP is to document what repairs or improvements that have been completed to the storm sewer system.

Status of Measurable Goals: Two system maintenance/improvement capital improvement projects have been completed between the time period of June 2010 and June 2011. One maintenance project was a sediment removal project which removed sediment in Sydney Creek at a culvert entrance. One storm sewer system improvement project was completed on Monterey Street which replaced several drainage pipes and drainage inlets at an approximate construction cost of \$310,000.

Appropriateness: This BMP is appropriate as it has the potential to reduce the amount of sediment entering into stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities and CASQA Level 4: Reducing Loads from Sources. The corrugated metal pipes are known sources of sediment. Once the bottom of the pipe fails, the system pulls soil from around the pipe, as seen in the voids found during replacement activities.

Proposed Modifications: This BMP is complete and will support future activities.

Stormwater activities undertaken during the next reporting cycle: Additional maintenance and improvement projects are currently in design and the status will be reported once construction is complete.

BMP Number: MO 5.2 A Storm Sewer Master Plan has been completed. This plan is part of a long-term strategy to address urban runoff and will target improvements and upgrades needed. This plan will prioritize maintenance, replacement and expansion of the current system.

General Summary: The intent of this BMP is to develop procedures to track complaints and recommendation concerning the storm sewer system.

Status of Measurable Goals: A procedure has been developed to track complaints and recommendations concerning the storm sewer system. Complaints or recommendations concerning the storm sewer system are forwarded to Public Works Engineering staff where information concerning the location, the problem and possible solution is tracked using GIS. If the solution can be completed by City staff, a work order for repair is issued. If the solution requires the use of an outside contractor, the database is then utilized for project development for future capital improvement projects.

Appropriateness: This BMP is appropriate as it has the potential to reduce the amount of sediment entering into stormwater.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: This BMP is complete and will support future activities.

Stormwater activities undertaken during the next reporting cycle: Continued compilation of system improvement request.

BMP Number: MO 6.2 MOMEM Site Inspection Frequencies and Checklist

General Summary: Stormwater staff within the City of San Luis Obispo's Building and Safety Division is responsible for developing site inspection checklist to accompany the Municipal Operations and Maintenance Manual ("MOMEM"). These checklists include factors that dictate the frequency of inspections on a per site basis. For examples, a site which includes routine soil disturbance activities next to a 303 listed waterway would require a greater frequency of inspections than a site with absolutely no DSA.

Status of Measurable Goals: Stormwater Staff within the Building and Safety Division has developed the requisite checklist, developed a complete list of City properties, including a detailed analysis per site of numerous risk factors to water quality.

Appropriateness: Checklists are a useful tool and means of documenting routine stormwater inspections, ensuring standardized procedures and processes are followed, that inspections are carried out with consistency and lastly to monitor sites for potential issues that may lead to stormwater violations.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities. The requisite list of city owned properties was prepared, a detailed analysis of each site was performed to ascertain water quality risk factors, and checklist and frequencies of inspection were also developed.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: Stormwater staff within the Building and Safety Division will continue to update the requisite checklist in response to changing regulations and program requirements during the next reporting period.

BMP Number: MO 7.1 Street sweeping is conducted on a rotational schedule throughout the City with higher frequencies in the Downtown.

General Summary: The intent of this BMP is to reduce the amount of pollutants discharged to the waterways from paved roads.

Status of Measurable Goals: During this reporting year the number of service requests received from staff and citizens to have streets with excessive debris swept was tracked through the service request program. Staff responded to 18 special sweeping requests.

Appropriateness: The activity is appropriate to remove debris in the street, which can be a source of pollutants.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: Special sweeping requests will be responded to as resources are available.

BMP Number: MO 8.2 Implement strategies to reduce/eliminate fecal coliform loading from streets, parking lots, sidewalks and other urban areas potentially collecting and discharging fecal coliform to the waterways.

General Summary: The intent of this BMP is the identification of strategies to address problem sites.

Status of Measurable Goals: Problem sites were identified as part of Year 1 activities under BMP MO 8.1. The primary locations are City parks where dogs are walked, and the creek system, where human encampments exist. The City addresses park loading by providing Mutt Mitt dispensers to encourage owners to pick up pet waste. This activity is tracked and reported under MO 1.1 as existing activity E17 listed in Table 11 of the City's Stormwater Management Plan. Homeless encampments are regularly addressed to clear them of occupants and clean them of debris. This activity is tracked and reported under MO 1.1 as existing activity E17 listed in Table 11 of the City's Stormwater Management Plan.

Appropriateness: These activities are appropriate; however, the work is undertaken, tracked and reported under redundant BMPs.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. This BMP may also meet Level 3: Changing Behaviors as the Mutt Mitt dispensers encourage removal of pet waste

by owners. As this is a long standing practice of the City's it is difficult to determine if, prior to providing Mutt Mitts, the City had higher levels of pet waste left behind.

Proposed Modifications: Recommend not reporting on problem sites under this BMP. Prior identification of these sites led to inclusion of BMPs specific to those sites. Activities and reporting will continue to occur under those BMPs. This is a redundant BMP.

Stormwater activities undertaken during the next reporting cycle: Continued MO 1.1 and MO 11.3 activities and reporting.

BMP Number: MO 8.3 Implement strategies to reduce/eliminate fecal coliform loading from streets, parking lots, sidewalks and other urban areas potentially collecting and discharging fecal coliform to the waterways.

General Summary: The intent of this BMP is the documentation of practices for addressing fecal coliform for purposes of staff education and establishing acceptable practices.

Status of Measurable Goals: Problem sites were identified as part of Year 1 activities under BMP MO 8.1. The primary locations are City parks where dogs are walked, and the creek system, where human encampments exist. The City addresses park loading by providing Mutt Mitt dispensers to encourage owners to pick up pet waste. This activity is tracked and reported under MO 1.1 as existing activity E17 listed in Table 11 of the City's Stormwater Management Plan. Homeless encampments are regularly addressed to clear them of occupants and clean them of debris. This activity is tracked and reported under MO 11.3 and under MO 1.1 as an existing activity E-34 of the City's Stormwater Management Plan.

These activities have been documented in the Municipal Operations and Maintenance Manual.

Appropriateness: This activity is appropriate to document needed activities and allow for training of staff and to maintain practices through staff turnover.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. This BMP is complete.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next reporting cycle: Activity will become part of MO 1 with the finalization and use of the Municipal Maintenance Manual.

BMP Number: MO 9.1 WWC will continue to maintain the collection system to reduce and prevent SSO's.

General Summary: The collection system will continue to be maintained in a variety of ways to reduce/prevent fecal coliform loading in the waterways from sewage spills.

- Amount of sewer mains hydro cleaned annually in the preventative maintenance and area maintenance programs.

Status of Measurable Goals: The Utilities Department has in place an existing Sanitary Sewer Management Plan (SSMP) that complies with this BMP. It is available online at <http://www.slocity.org/utilities/download/ssmpgoal.pdf>.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the wastewater collection system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: The State Water Resources Control Board (SWRCB) enacted order No.2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The City's WDR/SSMP complies with this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with the WDR/SSMP procedures in place and ensure adequate maintenance and operation of the wastewater collection system.

<p>BMP Number: MO 9.2 WWC will continue to maintain the collection system to reduce and prevent SSO's.</p>

General Summary: The collection system will continue to be maintained in a variety of ways to reduce/prevent fecal coliform loading in the waterways from sewage spills.

- Amount of sewer main treated with chemical root control annually.

Status of Measurable Goals: The Utilities Department has in place an existing Sanitary Sewer Management Plan (SSMP) that complies with this BMP. It is available online at <http://www.slocity.org/utilities/download/ssmpgoal.pdf>.

Appropriateness: This BMP is not appropriate (sewer mains treated with chemical root control) and does not ensure adequate maintenance and operation of the wastewater collection system.

Effectiveness: The BMP meets CASQA Level 2: Documenting Activities.

Proposed Modifications: The State Water Resources Control Board (SWRCB) enacted order No.2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The City's WDR/SSMP complies with this BMP.

- Wastewater collection has determined that chemical root treatment to reduce SSO's is not cost effective and reliable method. Sewer lines on the program have been moved to standard industry mechanical cleanings and included in MO 9.1. It is recommended to remove BMP MO 9.2

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with the WDR/SSMP procedures in place and ensure adequate maintenance and operation of the wastewater collection system.

BMP Number: MO 9.3 WWC will continue to maintain the collection system to reduce and prevent SSO's.

General Summary: The collection system will continue to be maintained in a variety of ways to reduce/prevent fecal coliform loading in the waterways from sewage spills.

- Number of CCTV inspections.

Status of Measurable Goals: The Utilities Department has in place an existing Sanitary Sewer Management Plan (SSMP) that complies with this BMP. It is available online at <http://www.slocity.org/utilities/download/ssmpgoal.pdf>.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the wastewater collection system.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: The State Water Resources Control Board (SWRCB) enacted order No.2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The City's WDR/SSMP complies with this BMP. It is recommended to include this in BMP MO 9.1. It is recommended to remove BMP MO 9.2

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with the WDR/SSMP procedures in place and ensure adequate maintenance and operation of the wastewater collection system.

BMP Number: MO 10.1 The City has an ongoing sewer mainline and related facilities replacement program. Replacement is prioritized based on failure due to age, structural deficiencies, alignment, grade problems, capacity, root intrusion blockages and maintenance. The City will continue to replace and/or upgrade the system.

General Summary: Decrease the number of SSO's from the City's sewer system due to infrastructure problems.

- Amount of sewer line replaced each budget.

Status of Measurable Goals: The Utilities Department has in place an existing Sanitary Sewer Management Plan (SSMP) that complies with this BMP. It is available online at <http://www.slocity.org/utilities/download/ssmpgoal.pdf>.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the wastewater collection system.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: The State Water Resources Control Board (SWRCB) enacted order No.2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The City's WDR/SSMP complies with this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with the WDR/SSMP procedures in place and ensure adequate maintenance and operation of the wastewater collection system.

BMP Number: MO 10.3 The City has an ongoing sewer mainline and related facilities replacement program. Replacement is prioritized based on failure due to age, structural deficiencies, alignment, grade problems, capacity, root intrusion blockages and maintenance. The City will continue to replace and/or upgrade the system.

General Summary: Decrease the number of SSO's from the City's sewer system due to infrastructure problems.

- Decrease in spills and required maintenance in replaced lines.

Status of Measurable Goals: The Utilities Department has in place an existing Sanitary Sewer Management Plan (SSMP) that complies with this BMP. It is available online at <http://www.slocity.org/utilities/download/ssmpgoal.pdf>.

Appropriateness: This BMP is appropriate and ensures adequate maintenance and operation of the wastewater collection system.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities.

Proposed Modifications: The State Water Resources Control Board (SWRCB) enacted order No.2006-0003, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (WDR). The City's WDR/SSMP complies with this BMP.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City will continue to comply with the WDR/SSMP procedures in place and ensure adequate maintenance and operation of the wastewater collection system.

BMP Number: MO 11.2 Implement programs to reduce waste from creek side encampments.

General Summary: The intent of this BMP is to reduce encampment activity and educate campers through reviewing City owned creek property at least four times per year and respond to calls from private property owners regarding encampments.

Status of Measurable Goals: City staff are typically out monthly reviewing City owned creek property and responding to calls from private property owners. In an attempt to prevent large camps from becoming established, constant attention is required to ensure that the campers are educated to keep moving on and not letting them establish large camps.

Appropriateness: This BMP is appropriate for the City since this is where the majority of the trash in our creek systems comes from. The challenge is not treading on the campers civil rights. For staff to be out monthly, this BMP is very appropriate.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. While reviewing both City-owned and responding to private property calls, the campers who are encountered are educated about the issues facing them and the penalties for their actions, and resources available to help themselves.

Proposed Modifications: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to review both City owned creek properties and respond to private property owners calls as well.

BMP Number: MO 11.3 Implement programs to reduce waste from creek side encampments.
--

General Summary: The intent of this BMP is to reduce encampment activity and educate campers then post the area with a “vacate by” date and complete verification of clean-up by trespassers or a contract cleaner.

Status of measurable goals: City staff posted 155 individuals/camps over the reporting year. Staff follows up and determines if police needs to be involved and if we can achieve voluntary compliance, that is the route we choose. In discussions with police, an excel spreadsheet was developed and allows for Natural Resources, the Rangers, and Police to chart the progress on all the postings so we can have an efficient tracking program.

Appropriateness: This BMP is appropriate for the City to be undertaking as this is where the majority of our trash comes into our watershed.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness. As City staff come into contact with the campers, they are educated about the issues facing them and the penalties for their actions, and resources available to help themselves.

Proposed Modification: BMP E-34 was consolidated with this BMP from Year 1 since the reporting would be duplicative.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to post areas and further direct police to the “hot spot” areas to ensure that large camps are not established and we keep this segment of the population on the move.

BMP Number: MO 11.4 Implement programs to reduce waste from creek side encampments.

General Summary: Instead of strictly enforcing City/State ordinances, bringing the staff from the Prado Day Center or the Maxine Lewis Shelter out into the field to engage transients to answer specific question as a large number of transients only use the meal services and typically don't look for help with additional resources to improve their situation.

Status of Measurable Goals: Staff from the Prado Day Center and the Maxine Lewis Shelter were escorted with City staff to "hot spot" locations and a focus on "problem" individuals. Instead of a blanket approach and visiting camps all over town, Specific individuals were selected and removed from the creek system. Coordination with the Service Providers and City staff have made improvements in getting people into housing on a case by case basis. Staff from Social Services has been encountered numerous times out in the field under their own direction interviewing transients for assistance along Elks Lane and the section of the Bob Jones Bike Trail adjacent to the City's Wastewater Reclamation Facility (WRF).

Appropriateness: This BMP is appropriate for the desired outcome but the apathy of a large portion of the transient population it is an effort in futility. The rules transients need to comply with when using the services at the day center or the homeless shelter (drug and alcohol free area, and limitations on pets) limit the number of transients using the facilities.

Effectiveness: The BMP meets CASQA Level 2: Raising Awareness. As we take the providers out in the field to have them reach out to certain individuals, they understand what we are facing and instead of penalties, they need to be more proactive with the chronic offenders to get them out of the creek system.

Proposed Modifications: Removal of the quarterly requirement for service providers to accompany City staff as Social Services budgetary limitations are outside of City staff control as far as designating what their staff is allowed to do (From Year 1).

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to request service providers to come out on as needed basis to engage local transients and reduce their impact on the environment.

BMP Number: MO 12.2 Review existing land use policies, general plan elements, ordinances and other watershed related City documents and determine those having an impact on watershed protection.

General Summary: The intent of this BMP is to identify where existing policies and standards affect watershed health.

During this reporting year, staff evaluated a list of City policies and codes in place to understand their relationship to stormwater issues and watershed protection. The list included:

- Engineering standards and Drainage Design
- Title 5 Licenses, permits and Regulations (includes Recycling Ordinance – construction debris)
- Title 8 Health and Safety
- Title 10 Vehicles and Traffic
- Title 12 Streets, Sidewalks, and public places
- Title 15 Buildings and Construction
- Title 16 Subdivisions
- Title 17 Zoning Code
- General Plan Elements – Land Use, Circulation, Housing, Noise, Safety, Conservation and Open Space, Water and Wastewater
- Community Design Guidelines
- Bicycle Transportation Plan
- Archaeological Resource Preservation Program Guidelines
- Margarita Area Specific Plan
- Orcutt Area Specific Plan
- Airport Area Specific Plan
- Railroad District Plan
- Mid-Higuera Plan
- Draft South Broad Street Corridor Plan
- Parks Master Plan
- Conservation Plans for open space areas: Johnson Ranch, Bishop’s Peak, Cerro San Luis, South Hills, Stenner Springs, Irish Hills Natural Reserve
- Management Plans: Urban Water, Sewer System, Storm Sewer, Access and Parking

Appropriateness: Standards or guidelines that affect impervious surface, creek and drainage areas, materials handling, or development codes may impact stormwater and watershed features.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City’s Land Use and Circulation Elements are proposed to be updated beginning in FY 2011-2012. In addition, the South Broad Street Corridor Plan will be released for public review in the next few months. These documents contain standards and policies affecting physical development in the City and will be reviewed with watershed health issues in mind.

BMP Number: MO 12.3 Assess the current policies, plans, ordinance and other City documents to see if they are leading to the overall 3%-10% goal identified by the RWQCB and if not, which documents need revision to move the City toward the goal.

General Summary: The intent of this BMP is to identify where changes to existing documents, policies and standards may need to be made to ensure the City is meeting RWQCB goals.

Status of measurable goals: During this reporting year, 35 documents containing policies and standards pertaining to a wide variety of topics were reviewed (see 12.2) by City staff to assess where revisions might need to be considered.

The following sections were identified as ones that should be considered for their impacts to water quality and potentially revised:

- 12.38: Engineering standards for driveways and parking areas
- 12.22: Stormwater discharge to open spaces- address flexibility
- 15.04: Grading provisions – potential to add language to address LID concepts
- 16.18: Subdivision provisions – address vertical curbs, minimum dimensions, drainage swale use, and LID provisions
- 17.16 and 17.91: Zoning densities. Infill development, setbacks (review for use for stormwater facilities), and building placement. Review for setting possible parking maximums, reduced aisle widths, parking structures vs. surface lots, pervious parking surfaces,
- 17.17: Impervious surface limits – review for possible reductions.
- Conservation and Open Space Element (COSE): Energy efficiency policies regarding building placement and solar orientation are not explicit for LID and this could be added.
- Community Design Guidelines (CDG) 6.5: Current policy requires minimizing runoff but not to retain existing drainage patterns and amounts.
- CDG 6.3E and 7.1B5: Alternative paving materials are allowed, but could be expanded to include types that address stormwater.
- CDG 3.1.C and 5.2: Could be revised to provide stronger emphasis on pathway connectivity to reduce need for roadway impervious surface.
- CDG 5.2H: Garage and trash enclosure setback location may affect amount of impervious surface.
- CDG 5.2E: Street layouts – could discuss ways to minimize length and associated pavement.
- CDG 6.1F: Review and possible amend provision requiring waste storage to be on concrete.
- CDG 6.5: May need to add language to reflect LID requirements and to address stormwater management.
- Bicycle Transportation Plan (BP) 1.3.7: Consider changes to specific materials to address infiltration.
- Engineering Standards (ES) 1010A: Consider changes to raised curb requirements to address run-off.
- ES 1010A: Review standards for bike lane and sidewalk width.
- ES 2010/2210/2220/2230/2240: Review parking and driveway standards to consider alternative pavements, shared driveways, dimensions, curbs, and landscaping.
- Drainage Design (DD) 7.0/7.29/7.4.3: Freeboard requirements impact size of stormwater BMPs such as swales. Consider changes.
- DD 10.1/10.3.5/ Es 1010B: Review for provisions addressing water quality. Additional language may be possible to support hydromodification and LID concepts.

- Area Specific Plans: Street sections do not explicitly address LID. Review for possible language additions.
- Laguna Lake Master Plan: Facility access requirements may increase impervious area. Review for options that allow infiltration.

Appropriateness: Standards or guidelines that affect impervious surface, drainage areas, materials handling, or development codes may impact stormwater and watershed features. When originally written, these standards, policies and guidelines may not have considered watershed protection as part of the objective to be met.

Effectiveness: This BMP meets CASQA Level 2: Raising Awareness.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City's Land Use and Circulation Elements (LUCE) are proposed to be updated beginning in FY 2011. Grant funding has been obtained for this effort. The City's Zoning map and code will likely follow with revisions to be consistent with the LUCE update. The Subdivision Regulations are also proposed for review beginning in 2011-2012 with future amendments proposed to address a variety of issues.

BMP Number: MO 12.4 Outline the City approval process and estimated timeline for each document needing revision.

General Summary: The intent of this BMP is to reduce the amount of pollutants entering the storm drains and waterways.

Status of measurable goals: City approval process is initiated by Council identification of priorities and assignment of resources. Staff researches issue and provides professional recommendation of changes needed to address issue. Advisory body and community/stakeholder input is sought and direction from this input is incorporated into revisions that are then reviewed by Council. Environmental review accompanies all proposed changes to policies, regulations, and guidelines. Timeline for this process varies anywhere from several months to several years depending on the document and the extent of changes being proposed. During the upcoming year, work on several plans will be initiated. These include the Land Use and Circulation Elements of the General Plan. Changes to these documents will result in changes to the Zoning Map and Zoning Ordinance. In addition, work on the Subdivision Regulations will most likely begin within the upcoming year. Changes to Community Design Guidelines and Engineering Standards have not been identified as a Council priority but may be assigned work efforts as the City moves forward with implementation of a Climate Action Plan.

Appropriateness: Standards or guidelines that affect impervious surface, drainage areas, materials handling, or development codes may impact stormwater and watershed features. When originally written, these standards, policies and guidelines may not have considered watershed

protection as part of the objective to be met. As the city updates various documents, the revisions need to be reviewed for compliance with RWQCB requirements.

Effectiveness: This BMP meets CASQA Level 1: Documenting Activities.

Proposed Modification: No Modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: The City's Land Use and Circulation Elements (LUCE) are proposed to be updated beginning in FY 2011. Grant funding has been obtained for this effort. The City's Zoning map and code will likely follow with revisions to be consistent with the LUCE update. The Subdivision Regulations are also proposed for review beginning in 2011-2012 with future amendments proposed to address a variety of issues.

<p>BMP Number: MO 12.6 Measure the effectiveness of the Stormwater Management Plan activities, existing activities, policies and procedures in improving water quality and providing long-term watershed protection.</p>

General Summary: The intent of this BMP is to work with other agencies in the watershed to identify future growth areas, overall watershed conditions and barriers to achieving a healthy watershed and identify ways to improve watershed health.

Status of Measurable Goals: Watershed partners were identified and include California Polytechnic State University (CalPoly) and the County of San Luis Obispo. Discussions regarding potential growth with both agencies indicate limited growth is expected. CalPoly is pursuing largely infill projects from the 1999 Master Plan. These are largely complete. The County is also anticipating only minor growth in the unincorporated San Luis Obispo area, equating to less than a 600 person population increase in the next 25 years.

Both the City and the County have adopted Conservation and Open Space Elements for their General Plans. The County will be undertaking watershed planning as part of their General Plan work. That effort is currently planned for late 2012.

The City's Natural Resource staff was included in the discussions regarding watershed health and identified livestock control at creeks in the rural watershed to be of prime importance to improving water quality. To that end, the Zone 9 Flood Control and Water Conservation District has extended and expanded an agreement with the Coastal Resource Conservation District (Coastal RCD) to continue outreach and education of rural landowners, and include work toward increasing fencing of riparian areas and locating grant funding to support this endeavor. Livestock fencing addresses erosion and sedimentation issues, as well as fecal contamination.

Through Zone 9, the Coastal RCD has developed a web site and has been actively working with various property owners to stabilize banks to reduce pollutant loads for the last 3 years.

Under the Joint Effort Hydromodification activity with the Central Coast Regional Water Quality Control Board and the upcoming State General Permit for Stormwater, the City, the County, and CalPoly will be regulated and required to implement hydromodification and other best management practices to achieve improved water quality.

Appropriateness: This BMP was appropriate to assess and identify activities outside the City where rural activities affect the water quality of waterways in the City.

Effectiveness: The BMP meets CASQA Level 2 Raising Awareness through Level 4 Reducing Loads.

Proposed Modifications: Given the activities under the Joint Effort and the low growth expectations for the watershed, it is recommended that the BMP focus on the ability of Zone 9 to educate and correct watershed problems. The County and CalPoly will be responsible for compliance with stormwater management practices required by the Board, which will result in watershed water system protections. Those efforts are recommended to be reported by those agencies, in lieu of in the City's stormwater report.

Stormwater activities undertaken during the next reporting cycle: Work will continue to outreach to the rural areas of the watershed through Zone 9 sponsored activities and County and CalPoly Stormwater Management Plan implementation.

<p>BMP Number: MO 12.7 Measure the effectiveness of the Stormwater Management Plan activities, existing activities, policies and procedures in improving water quality and providing long-term watershed protection.</p>

General Summary: The intent of this BMP is to incorporate watershed growth potential and barriers to health in the Hydromodification Management Plan.

Status of Measurable Goals: This goal will be accomplished through implementation of the Joint Effort for Hydromodification. Both the City and County are participating in that effort. Cal Poly, the other agency within the watershed, will be implementing hydromodification controls under the new General and Construction permits.

Appropriateness: This BMP is appropriate in a limited way. As identified in BMP 12.6, the primary threat to the watershed health was not related to hydromodification, but rather to rural land use practices. Growth and development will be addressed as part of the Joint Effort Hydromodification Management Plan.

Effectiveness: Work has not been completed on the Hydromodification Management Plan, so limited effectiveness has been achieved.

Proposed Modifications: It appears this BMP was created prior to adoption of the Joint Effort and is now redundant to that effort's activities and reporting. It is recommended that no additional reporting be completed for this BMP. Each agency will be responsible for compliance

with the Hydromodification requirements which will result in watershed water system protections.

Stormwater activities undertaken during the next reporting cycle: Work will continue on the Joint Effort Hydromodification Management Plan activities, reported primarily under BMP PC 9.

BMP Number: MO 13.1 Effectiveness assessment of various BMP's for program improvement.

General Summary: Establish BMP assessments for all program BMP's to determine whether or not individual program elements are protecting and improving water quality, and to guide program adjustments.

Status of Measurable Goals: As each individual writes their report for each BMP they are responsible for, they are to do their own assessment on how well the BMP was implemented in the reporting year and to what level they achieved effectiveness. Documenting activities is the first step or level in the assessment process for the program so the members are documenting their activities when completed.

Appropriateness: This BMP is appropriate for the reporting individuals to complete as it helps them remember what they are required to complete under the SWMP. It helps to reinforce what they are doing and hopefully reach out to and educate the community members as they are completing their BMP's too.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. This BMP does not meet criteria to be raised to Level 2: Raising Awareness but as we are educating the campers through our clean-up efforts, their awareness is being raised.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to assess the individual program components as each staff member completes their required reporting element.

BMP Number: MO 13.2 Effectiveness assessment of various BMP's for program improvement.

General Summary: Establish BMP assessments for all program BMP's to determine whether or not individual program elements are protecting and improving water quality, and to guide program adjustments.

Status of Measurable Goals: As each individual writes their report for each BMP they are responsible for, they are to do their own assessment on how well the BMP was implemented in the reporting year and to what level they achieved effectiveness. As the City progresses further

into the permit term, Raising Awareness is the second step in getting to the ultimate goal of improving water quality.

Appropriateness: This BMP is appropriate for the reporting individuals to complete as it helps them remember what they are required to complete under the SWMP. It helps to reinforce what they are doing and hopefully reach out to and educate the community members as they are completing their BMP's too. Not all BMP's are applicable to be raised to Level 2 so a subjective filter needs to be applied as City staff go over their BMP's for reporting.

Effectiveness: The BMP meets CASQA Level 1: Documenting Activities. This BMP does not meet criteria to be raised to Level 2: Raising Awareness but as we are educating the campers through our clean-up efforts, their awareness is being raised.

Proposed Modifications: No modifications to this BMP are proposed.

Stormwater activities undertaken during the next Stormwater reporting cycle: City staff will continue to assess the individual program components as each staff member completes their required reporting element.