



City of Morro Bay  
Stormwater Management Guidance Document  
2014

## Introduction

The purpose of this stormwater management guidance document is to outline the procedure for the City of Morro Bay's fulfillment of the National Pollutant Discharge Elimination System (NPDES) Phase II Small MS4 General Permit Order No. 2013-0001-DWQ (referred to as 'New Permit') requirements. The City will fulfill new requirements while continuing to implement key best management practices (BMPs) of the previous permit (NPDES General Permit Order No. 2003-0005-DWQ), which were outlined in the City's Stormwater Management Plan (SWMP). This guidance document outlines first the new required implementation tasks and then the additional continuing tasks for each of the following categories:

1. Program Management
2. Education and Outreach
3. Public Participation and Involvement
4. Illicit Discharge Detection and Elimination (IDDE)
5. Construction Site Storm Water Runoff Control Program
6. Pollution Prevention / Good Housekeeping for City Operations
7. Post-Construction Stormwater Management Program
8. Water Quality Monitoring
9. Program Effectiveness Assessment
10. Total Maximum Daily Loads Compliance
11. Annual Reporting

Please note that there are a number of BMPs listed in the SWMP. This document only lists those BMPs that go above and beyond the tasks required in the permit and will continue to be implemented during the current permit cycle. Many of the above categories require separate plans to be written as a first task under the new permit in order to fully implement all of the required elements, both new and continuing.

All documents electronically filed with the State Water Board to fulfill the new permit requirements, including annual reports, can be viewed by the public using the Storm Water Multiple Application and Report Tracking System (SMARTs), which can be accessed at <https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.jsp>.

## 1. Program Management

The program management section of the permit ensures that the City has the legal authority to implement and enforce stormwater regulations.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.6</b>	<b>PROGRAM MANAGEMENT ELEMENT</b>	
<b>E.6.a</b>	Legal Authority to Prohibit, Detect, and Eliminate Discharges	2015 The City currently has relevant City ordinances, and will review and revise these and other regulatory mechanisms, or adopt any new ordinances, to obtain adequate legal authority to control pollutant discharges.
<b>E.6.b</b>	Certification of Legal Authority	2015 This task certifies that the City has and will maintain full legal authority to implement and enforce each of the requirements contained in the Permit.
<b>E.6.c</b>	Enforcement Response Plan	2016 The Enforcement Response Plan shall contain enforcement procedures and actions and identify the City's responses to violations and describe how the City will address repeat and continuing violations by implementing progressively stricter responses as needed to achieve compliance.

### Continuing SWMP BMPs

There was no program management section of the SWMP and thus no additional BMPs to add to the requirements above.

## 2. Education and Outreach

The public component to education and outreach will be combined with the public participation plan into a single “Public Education, Outreach, Participation and Involvement” program. There are a number of both new and continuing BMPs for educating both the public and municipal staff.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.7</b>	<b>EDUCATION AND OUTREACH PROGRAM</b>	
<b>E.7</b>	<b>CBSM per letter CCRWQCB letter 5.3.14</b>	
	2014	CBSM stands for “Community-Based Social Marketing,” which is a comprehensive way to approach education and outreach. The City will begin this task in year 1, in conjunction with a larger county-wide CBSM pilot project with the SLO Partners for Water Quality. The county-wide pilot project is to educate the public about the need to pick up their pets’ poop.
	2014	
		One CBSM pilot project to address the highest priority water issue.
		CBSM pilot project shall include: (a) research on barriers and benefits of desired behaviors (b) Elicit commitment to implement desired behavior from target audience (c) Prompts reminding audience of desired behavior (d) Use concept of social norms/modeling desired behavior (e) Educational messages that are specific, easy to remember, from credible source and appropriate for audience (f) create incentives for desired behavior (g) remove barriers to desired behavior (g) remove barriers to the desired behavior
<b>E.7.a.</b>	<b>Public Outreach and Education</b>	
<b>E.7.a.(i)</b>	2014	The City will conduct both its own outreach programs and participate in regional ones, as applicable.
<b>E.7.a.(ii)</b>	2014	City currently has begun a Public Education and Outreach Program with the previous permit and will continue to develop and implement the program in the future.
	2016	(b)Conduct surveys 2x during permit term (1) According to the Permit, the purpose of the surveys is “to gauge the level of awareness in target audiences and effectiveness of education tasks.”

Permit Section Number and Element		Permit Compliance Year	Additional Notes
	(b) Conduct surveys 2x during permit term (2)	2018	According to the Permit, the purpose of the surveys is "to gauge the level of awareness in target audiences and effectiveness of education tasks."
<b>E.7.a.(ii)</b>	(c) Develop and convey a specific stormwater message	2015	As required, the message will focus on: 1) Local pollutants of concern 2) Target audience 3) Regional water quality issues
	(d) Disseminate education materials to target audiences and translate as appropriate	2014	The materials can utilize various media such as printed materials, billboard and mass transit advertisements, signage at select locations, stenciling at storm drain inlets, radio advertisements, television advertisements, and websites.
	(e) Utilize public input in developing outreach program	2015	May include the opportunity for public comment or public meetings.
	(f) Distribute educational material	2014	Will be distributed using whichever methods and procedures determined appropriate during development of the Public Education and Outreach Program.
	(g) Provide water efficient/ stormwater friendly landscaping information	2014	The City currently provides landscape water efficiency information as part of its water conservation efforts, and uses Our Water Our World brochures for stormwater friendly landscaping. Both of these efforts will be built upon in this Permit cycle.
	(h) Promote public reporting of illicit discharges	2014	The City will develop and convey messages specific to reducing illicit discharges with information about how the public can report incidents to the appropriate authorities.
	(i) Provide pesticide/fertilizer application information	2014	The City currently supplies Our Water Our World brochures for stormwater friendly landscaping and pesticide use, and will build upon this program in this Permit cycle.
	(j) Provide materials to school children	2014	The City currently sponsors water conservation and stormwater science programs in elementary schools; further educational materials may be developed.
	(k,l,m) Develop messaging to reduce discharges from organized car washes, mobile cleaning and pressure washing, including education material for participants	2014	This component will be incorporated into the Public Education and Outreach Program, perhaps based on existing "river friendly" carwash programs.
<b>E.7.b.1.</b>	<b>Staff and Site Operator Training and Education</b>		

Permit Section Number and Element		Permit Compliance Year	Additional Notes
<b>E.7.b.1.</b>	Staff and Site Operator Training program IDDE, develop training program including: (a) Identification of illicit discharge or illegal connection (b) procedures for reporting or responding (c) Follow-up training addressing any staff, procedure, technical changes (d) Annual assessment and refresher training as needed (e) Training for new staff within 6 months of start (f) Contact info and reporting procedures in fleet vehicle (g) Focus on existing ID and associated locations	2014	The City currently has Staff training for illicit discharge detection and elimination, and will continue to implement and improve upon this training.
<b>E.7.b.2.</b>	<b>Construction Education and Outreach</b>		
<b>E.7.b.2.(a)</b>	<b>Permittee Staff Training</b>		
	(a) Plan Reviewers and Permitting Staff-knowledgeable in technical review of erosion and sediment control plans-implementation, installation, maintenance etc. At least one designated staff with QSD credential	2014	The City currently has Staff training for Construction site storm water runoff control and will continue to implement and improve upon this training.
	(b) Erosion Sediment Control/Storm Water Inspectors; At minimum designated person possesses QSD and/or QSP.	2015	The City currently has QSD and/or QSP qualified inspectors, and will utilize them for Erosion Sediment Control/Storm Water Inspections.
	Third Party plan reviewers, permitting or inspectors shall be trained accordingly	2015	If the City utilizes outside parties to review plans and/or conduct inspections, the City shall ensure these staff are trained.
<b>E.7.b.2.(b)</b>	<b>Construction site operator education</b>		

Permit Section Number and Element		Permit Compliance Year	Additional Notes
	(a)Provide info on training opportunities for construction operators on BMP selection (b)Develop outreach tools , on appropriate selection, installation, implementation, and maintenance of BMPs, as well as an overall compliance program (c)Distribute materials to all construction workers (d)Update stormwater website	2016	The City currently has developed an education program for Construction Site Operators but not for these specific requirements. Therefore the City will continue the current construction site operator education and will implement the new permit requirements in year 3.
<b>E.7.b.3.</b>	<b>Pollution Prevention and Good Housekeeping training</b>		
	Pollution prevention and good housekeeping staff training (a)biennial employee training (b)biennial assessment (c)Requirement that any contractors hired shall be contractually required to comply with BMP's etc. (create contract) (d)Provide oversight of contractor activities	2014	The City will begin in year 1, since the City currently has Staff training for pollution prevention and good housekeeping with the previous permit.

### Continuing SWMP BMPs

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
PE1	Use collaborative regional partnerships (“SLO County Partners for Water Quality”) to leverage shared resources to distribute stormwater pollution prevention public education and outreach information, materials, and activities throughout the City. Target audiences include, but are not limited to: General Public, Residential, Commercial Business, Industrial, Construction, Development, Municipal and Quasi-governmental agencies, as well as Tourists, and School Age Children.	<b>PE1A:</b> Participate in SLO County Partners for Water Quality Meetings each year for planning and evaluating the status and performance of the stormwater pollution prevention public education and outreach programs within the County and for sharing information about what is working or not working. Participation will begin in year 1 and continue through the permit term.
PE2	Implement section E.7.a.(ii) Topics may include, but will not limited to: General stormwater pollution prevention information about the impacts of urban runoff and the distinction between municipal storm sewer and sanitary sewer	<b>PE2A:</b> If brochures are used as the media type to educate the residents, then the City will reach 20% of the households per year, with 100% of the households reached by Year 5. <b>PE2B:</b> Post brochures on the City’s website, If applicable

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
	systems; proper lawn and garden care; Sustainable landscaping; proper household hazardous waste storage and disposal including used motor oil; proper pet waste disposal; Water conservation, proper automotive car washing; Integrated Pest Management and the use of less toxic household products; illegal dumping, and illicit discharge prohibitions; and Public hotline reporting mechanisms.	
PE3	The City will maintain stormwater informative signage targeted at tourists. Topics may include, but will not limited to include: Why stormwater pollution prevention is important; Impacts of urban runoff on local water bodies; Keep the Central Coast Beautiful; Stormwater Pollution Prevention Travel Tips; Clean Water recreational guides; Don't Feed the Wildlife, the Marine Plastic Debris Problem, and Don't Trash California campaign.	<b>PE3A:</b> The City will evaluate these signs on an annual basis and determine if new opportunities for signage are necessary. Partner with the National Estuary Program to provide interpretive signage at high tourist impact areas.
PE4	Provide a Stormwater Pollution Prevention Telephone Information Line /Reporting Line for the public to get more information and report stormwater pollution problems.	<b>PE4A:</b> Promote the Public Services Main Line Citywide for Pollution Reporting Hotline in printed materials and on the City Stormwater Pollution Prevention Website. <b>PE4B:</b> Record the number of Hotline calls received. Track the types of reports, inquiries and how they were resolved.
PE5	Implement a special pet waste management and responsible pet ownership public education and outreach campaign targeting dogs and cat owners. The program will also emphasize public health concerns for surfers and other recreational water users and shellfish harvesting as well as other water quality problems associated with urban runoff contaminated by pathogens and nutrients from fecal material. Critical topics include, but are not limited to: instructions on how to properly dispose of cat litter and other pet wastes in the trash rather than flushing it down the toilet to keep pathogens out of creeks and the ocean, pet spay/neuter programs, and feral animal control programs.	<b>PE5A:</b> Provide mutt mitt stations in all City Parks. Partner with the Morro Bay Mutt Mitt Program to maintain mutt mitt supplies on an ongoing basis. <b>PE5B:</b> Publicize the pet waste ordinance on an ongoing basis. The number and type of enforcement actions will be tracked <b>PE5C:</b> Distribute pet waste management brochures at Pet Stores and, Veterinarian Offices within the City or use another media type to educate the public on pet waste management. <b>PE5D:</b> Post pet waste management public education and outreach information on the City website.
PE6	Distribute stormwater pollution prevention educational materials using the City's Stormwater Pollution Prevention Website. Audiences and topics may include, but	<b>PE6A:</b> Maintain and update the City's Stormwater Pollution Prevention webpage <a href="http://www.morro-bay.ca.us/stormwater">www.morro-bay.ca.us/stormwater</a>



<b>BMP ID#</b>	<b>Best Management Practices (BMP)</b>	<b>Measurable Goals and Outcomes</b>
	would not be limited to: General Public; Residential BMPs; Commercial Business BMPs; Industrial BMPs; Tourists, School Age Children and Educators.	
<b>PE7</b>	Implement the CBSM per the Central Coast Regional Water Quality Control Board May 3, 2013 CBSM requirement letter.	<b>PE7A:</b> Begin implementing CBSM strategies.

### 3. Public Participation and Involvement

As discussed in the previous section, the public participation and involvement plan will be combined with the public component to education and outreach to create a single “Public Education, Outreach, Participation and Involvement” program. The specific tasks for public participation and involvement are as follows:

#### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.8</b>	<b>PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM</b>	
	Develop program with input of the public and implement	
	(a) Develop Public Involvement strategy	2015 This strategy, and including notes on who is responsible for each task, will be incorporated into the Public Education, Outreach, Participation and Involvement program.
	(b) Consider Citizen Advisory Group	2015 The City may choose to invite a citizen advisory group to participate in the development and implementation of all parts of the community’s storm water program.
	(c) Create Involvement Opportunities	2014 Involvement opportunities will include beach and creek clean-ups, and volunteer opportunities with the CBSM pilot program.
	(d) Ensure public can access info about program	2014 Brochures and other outreach materials will be available both online and from the City’s Public Services division.
	(e) Engage in IRWMP or equivalent	2014 The City currently participates in IRWMP.

#### Continuing SWMP BMPs

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
PP1	Promote public participation in Coastal Cleanup Day and Creek Cleanups by collaborating with the SLO County Partners for water quality to advertise the events and assist with provision of incentives to participants.	<b>PP1A:</b> Promote and support at least one annual coast and/or creek cleanup opportunities within the SWMP coverage area. Record the amount and types of trash and debris removed and the number of participants.
		<b>PP1B:</b> Promote and support at least one public event per permit year with the partners group.
PP2	Storm Drain Marking Program	<b>PP2A:</b> Storm drain marking will be required on all new development projects with storm drains inlets.
		<b>PP2B:</b> Check storm drain decals with the storm drain cleaning, replace decal as needed.

## 4. Illicit Discharge Detection and Elimination (IDDE)

Illicit discharge detection and elimination is a key element to the new permit. The City has a number of existing BMPs to maintain, as well as new investigative and spill response procedures to implement.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes	
<b>E.9</b>	<b>ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>		
<b>E.9.a</b>	<b>Outfall Mapping</b>		
	Create and maintain accurate outfall map <b>including a site visit to each outfall</b> (a) location of outfalls (b) location of all water bodies receiving direct discharges from the outfall pipes. (c) priority areas (d) Field sampling stations (e) permit boundary	2015 (summer 2014)	The City has a storm drain atlas map, but not a map meeting the new permit requirements. Site visits will occur in Summer 2014 so the new data may be incorporated into the map before the 2015 deadline.
<b>E.9.b</b>	<b>Illicit Discharge Source/Facility Inventory</b>		
	(a,b) Create inventory of all industrial/commercial facilities and (c) report any facilities that are required to be covered by the IGP to the Regional Water Board (d) update annually (e) Develop and implement procedures to proactively identify illicit discharge originating from priority areas	2015	The City will maintain an inventory of all industrial/commercial facilities/sources within its jurisdiction (regardless of ownership), such as vehicle mechanical repair, maintenance or cleaning and landscape nurseries, that could discharge pollutants in storm water.
	Assess priority areas once during permit term	2017	
<b>E.9.c</b>	<b>Field Sampling to Detect Illicit Discharges</b>		
	Sample any flowing outfalls while conducting E.9.a	Summer 2014	While inventorying the outfall locations, outfalls flowing around non-rain events will be sampled for pollutants.
	Annually sample priority area outfalls determined in E.9.a.	2015, 2016, 2017	Outfalls in priority areas will be sampled annually for pollutants.
	Conduct follow up investigation within 72 hours if action levels exceeded	2015, 2016, 2018	If the sampled outfall water (from the task above) contains pollutants in high concentration (i.e. exceeding the action levels outlined in the Permit) then a follow up investigation will occur.
<b>E.9.d</b>	<b>Illicit Discharge Detection and Elimination Source Investigations and Corrective Actions</b>		

Permit Section Number and Element		Permit Compliance Year	Additional Notes
	Develop written procedures for investigations and corrective actions. Including approaches to eliminate discharge and procedures for corrective actions	2015	These procedures shall be included as part of the Illicit Discharge Detection and Elimination program. The City may leverage existing inspection procedures and personnel to conduct illicit discharge detection and elimination source investigations and corrective actions.
	Once source of discharge is identified, require responsible party to correct within 72 hours of notification and verify with follow-up investigation. Suspected sanitary sewage discharge shall be investigated within 24 hours and prioritized over other cooling water, wash water or natural flow discharge.	2015	This task will be incorporated into the written procedures required above and implemented.
	Conduct follow up investigation within 72 hours if action levels exceeded and document investigation	2015	This task will be incorporated into the written procedures required above and implemented. Resulting enforcement actions shall follow the City's Enforcement Response Plan as specified in task E.6.c.
<b>E.9.e</b>	<b>Spill Response Plan</b>		
	Develop plan, including: (a) agency roles and responsibility (b) procedures for responding to complaints (c) how investigations are to be conducted (d) How clean up is initiated or conducted (e) How reporting is completed and what information is required.	2014	The current municipal operations spill plan will be expanded to include the necessary procedures for the entire city, including those items listed at left.

### Continuing SWMP BMPs

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
<b>IL1</b>	Implement procedures for illicit connections/discharge inspections and dry weather screening for the storm drain system for restaurant business, and industrial facilities. These procedures will apply to anyone discharging into the City storm drain system. The procedures will	<b>IL1A:</b> Conduct illicit discharge and detection inspections for restaurants. 25% of restaurants will be inspected annually, all stormwater violations will be reported to Public Services Department for follow up. For all violations the City must follow up on all reports, and include response actions and response times in the Annual Report. Number of illicit discharges found and

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
	ensure that any illicit connection or discharge detected will be detected and eliminated.	<p>number of facilities inspected. The 25% of inspections will include high priority sites; the City will determine these sites by the businesses potential threat to water quality, past complaint records, and business type. The list of "highest priority sites" is a working list of businesses where new businesses can be added as needed and others removed after continued compliance.</p> <p><b>IL1B:</b> Perform illicit discharge and detection inspections for industrial facilities listed in the Phase II Small MS4 General Permit 2013-0001-DWQ E.9.b(ii)(b) . 25% of these facilities will be inspected annually through an inspection program. Inspectors will report all stormwater violations to the Public Services, Engineering Department for follow up. For all violations the City must follow up on all reports, and include response actions and response times in the Annual Report. The 25% of inspections will include high priority sites; the City will determine these sites by the businesses potential threat to water quality, past complaint records, and business type. The list of "highest priority sites" is a working list of businesses where new businesses can be added as needed and others removed after continued compliance.</p> <p><b>IL1C:</b> Track and trend violations to determine additional preventive and corrective actions that may be needed. Report these results every other year.</p>
IL2	Enforce a Pet Waste Management Ordinance	<b>IL2A:</b> Enforce a pet waste ordinance according to MBMC 7.08.025 and 14.48.120.
IL3	Maintain the pump-out stations free of charge at various locations throughout the bay. Maintain the signage of pump out locations and pamphlet handouts of the pump-out locations.	<p><b>IL3A:</b> Maintain the Harbor departments free of charge pump out stations, along with signage and pamphlets delineating where the pump out station are located. The pump-out at Tidelands park has a meter which counts the usage in hours. The number of hours will be reported in the annual report for this pump-out station.</p> <p><b>IL3B:</b> Enforce existing provisions in Municipal Code chapter 15.24.010 which prohibits discharge of waste.</p>
IL6	Maintain the waste oil disposal for used oil, oil filters, oily diapers, and oily bilge water.	<p><b>IL6B:</b> Maintain the pamphlet with information and VHF radio or telephone number for waste oil disposal information.</p> <p><b>IL6A:</b> Maintain the Harbor departments waste oil disposal for used oil, oil filters, oily diapers, and oily bilge water. The amount of oil waste disposed of by the Harbor department will be tracked and used as a means to measure the use.</p>

## 5. Construction Site Storm Water Runoff Control Program

The City currently inspects all applicable construction sites to ensure that proper stormwater management is occurring. This practice will continue as the BMPs are implemented. The construction outreach and education strategy required below will be incorporated into the overall Public Education, Outreach and Involvement Plan discussed earlier.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.10</b>	<b>CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM</b>	
Develop and implement construction outreach and education strategy (plan) Include enforceable ordinance requirements for: erosion and sediment control, soil stabilization, dewatering, source controls, pollution prevention measures and prohibited discharges.		
<b>E.10.a</b>	<b>Construction Site Inventory</b>	
	Create inventory of all projects subject to local stormwater ordinance. Inventory includes: (a) relevant contact info for owner and contractor (b) basic site info; location, status, size of project and area disturbed (c) location of project with respect to all water bodies (d) project threat to water quality (e) current construction phase (f) required inspection frequency per ordinance (g) start and anticipated completion dates (h) date of approved erosion and sediment control plan	2014  The City will modify its current inventory and maintain it to the required specifications.
<b>E.10.b</b>	<b>Construction Plan Review and Approval Procedures</b>	
	Develop procedures to review and approve construction plan documents. Must include erosion and sediment control plan with site specific BMP's, rationale for BMP's including soil loss calculations in necessary, applicable permits and evidence of approval before soil disturbance, Review documents with checklist or similar process.	2014  The City will develop procedures and a checklist for use in the plan review process.

E.10.c	Construction Site Inspection and Enforcement		
	<p>Inspect construction sites; At minimum inspections conducted at priority sites prior to land disturbance (during the rainy season) during active construction and following active construction. Inspections will cover maintenance of BMP's, effectiveness of BMP's installed and verification that pollutants of concern are not being discharged into receiving water bodies. Prioritize sites based on threat to water quality: soil erosion potential, site slope, project size and type, sensitivity of receiving water bodies, proximity to water bodies, non-storm water dischargers, projects more than 1 acre that are not under CGP, and past non-compliance by operator of construction site. Confirm all disturbed areas stabilized and all temporary control measures removed</p>	2014	<p>The City currently has a Construction site inspection and enforcement BMP with the previous permit, and will incorporate these new permit requirements into our existing program.</p>

### Continuing SWMP BMPs

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
CON1	<p>Revise City Municipal Code Chapter 14.48 to update erosion and sediment control requirements and enforcement provisions for construction activities that are required to comply with the General Permit for discharge of stormwater associated with Construction Activities (Construction General Permit). Also revise chapter 14.48 to include construction activities that are not required to comply with the Construction General Permit, construction activities which disturb less than one acre of land.</p>	<p><b>CON1A:</b> Enforce new regulations on construction sites subject to the Construction General Permit. Number of construction site subject to the Construction general. Number of construction sites subject to the construction general permit, compared to the number inspected.</p> <p><b>CON1B:</b> Enforce new municipal code regulations on construction sites less than one acre of land. Number of building permits for construction sites less than one acre and number inspected will be tracked. Compare how many are compliant from year to year.</p>

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
CON2	Conduct construction site inspections and enforce construction site runoff control requirements.	<p><b>CON2A:</b> Inspect construction site stormwater BMPs to ensure that they are being implemented and are properly maintained. Highest priority will go to site over an acre, steep slopes (over 15%) and sites with detailed erosion control plans. Create an erosion and sediment checklist for on-site inspections.</p> <p><b>CON2B:</b> The City will track erosion control inspections in the same way all inspections are tracked in our permit tracking program HDL. One inspection will be conducted at the beginning of the rainy season for applicable construction sites. A follow up inspection will only occur if warranted. Number of inspections conducted, number of compliant sites compared to the number of non-compliant sites, and enforcement actions will be tracked.</p>
CON3	Conduct a public education and outreach program for construction runoff controls targeting project applicants, contractors, developers, property owners and other responsible parties.	<p><b>CON3A:</b> Make available at the Public Services counter and on the City website construction site education and outreach information. Post education and outreach information on erosion and sediment control on the City website.</p> <p>Report in the annual report the number of compliant sites compared to the number of non-compliant sites and compare year to year for an effectiveness measures.</p> <p>This BMP will be conducted until Year 3, when section E.7.b.2(b) will begin implementation</p>



## 6. Pollution Prevention / Good Housekeeping for City Operations

The City already follows a number of BMPs to prevent stormwater contamination from its municipal operations. The implementation tasks required by the new permit will build on those practices to improve citywide stormwater quality.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes	
<b>E.11</b>	<b>POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS PROGRAM</b>		
<b>Develop and implement a program to prevent or reduce the amount of pollutant runoff from permittee operations</b>			
<b>E.11.a</b>	<b>Inventory of Permittee-Owned and Operated Facilities</b>		
	Develop and maintain inventory of all permittee owned or operated facilities that are a potential threat to water quality: chemical storage, equipment storage and maintenance facilities, material storage yard, pesticide storage, public buildings- schools, libraries, police station, fire station, municipal buildings, restrooms etc., public parking lots, public parks, public works yards, vehicle storage and maintenance yards, vehicle fueling .	2014	The City already maintains an inventory of all permittee owned or operated facilities and will continue to update it to meet the specifications required by this task.
<b>E.11.b</b>	<b>Map of Permittee-owned or Operated Facilities</b>		
	Develop a map of inventoried facilities.	2014	The City already maintains a map of the facilities inventoried in the above task.
<b>E.11.c</b>	<b>Facility Assessment</b>		
	Conduct comprehensive annual assessment and identify subset of all municipally owned facilities that could be considered hotspots	2015	The City will conduct comprehensive inspection and assessment of pollutant discharge potential and identification of pollutant hotspots using the Center for Watershed Protection's (CWP) guide on Urban Subwatershed and Site Reconnaissance.
	Document comprehensive assessment procedures and results	2015	The City will document the procedures it uses for conducting the comprehensive assessment along with a copy of any site evaluation checklists used to conduct the comprehensive assessment.
<b>E.11.d</b>	<b>Stormwater Pollution Prevention Plans</b>		

Permit Section Number and Element		Permit Compliance Year	Additional Notes
	Develop SWPPPS for hotspots	2016	The City will develop and implement Stormwater Pollution Prevention Plans for pollutant hotspots identified in the task above. The City already has a SWPPP for the Corp yard, and will continue to implement it.
<b>E.11.e</b>	<b>Inspections, Visual Monitoring and Remedial Action</b>		
	<b>Quarterly</b> visual inspection of hotspots using inspection checklist, tracked in log and kept with SWPPP.	2017	The City will conduct inspections, both visual and comprehensive, of its facilities according to the Permit schedule. Currently the City has a SWPPP for the Corp yard, and will continue with the inspection of this facility according to the SWPPP prior to the implementation of this task in 2017.
	<b>Annual</b> comprehensive hotspot inspection	2017	
	<b>Quarterly</b> hotspot visual observation of storm water and non-stormwater discharges, observe discharge locations and identify any problems and BMP's that shall be remedied. Visual inspections documented and kept with SWPPP	2017	
	<b>Non-Hotspots</b> - Inspect each inventoried facility that is not a hotspot once during permit	2017	
<b>E.11.f</b>	<b>Storm Drain System Assessment and Prioritization</b>		
	Implement procedures to assess and prioritize maintenance of storm drain system infrastructure. Assign a priority to each facility based on: (a) accumulation of sediment, trash and/or debris, (b) collection of large volumes of run-off (c) collection of runoff from areas not receiving regular street sweeping (d) collecting run-off from drainage areas with exposed or disturbed soil (e) catch basins that receive citizen complaints/reports	2014	The City currently has a BMP for storm drain cleaning and these new permit requirements will be incorporated into this existing BMP.
<b>E.11.g</b>	<b>Maintenance of Storm Drain System</b>		

Permit Section Number and Element		Permit Compliance Year	Additional Notes
	(a) Inspect storm drain systems based on assigned priorities. Inspect high priority catch basins annually. Develop and implement a strategy to inspect storm drain systems	2014	The City currently has a BMP for storm drain cleaning and these new permit requirements will be incorporated into this existing BMP.
	(b) Clean high priority storm drains. Cleaning frequency based on priority	2014	
	(c) Label catch basins	2014	The City currently has a BMP for labeling storm drains and these new permit requirements will be incorporated into this existing BMP.
	(d) Maintain surface drainage structures, removal of trash and debris from high priority areas annually prior to rainy season	2014	The City currently has a BMP for storm drain cleaning and these new permit requirements will be incorporated into this existing BMP.
	(e) Develop procedure to dispose of waste materials removed from catch basins. Develop and implement procedure to dewater and dispose of materials collected from catch basins and ensure that water removed will not reenter the MS4.	2014	
<b>E.11.h</b>	<b>Permittee Operations and Maintenance Activities (O&amp;M)</b>		
	Develop program to assess O&M activities for potential to discharge pollutants and inspect all O&M BMPs quarterly. (a) road and parking lot maintenance, sidewalk repair, curb and gutter repair, pothole repair, pavement marking, sealing and repaving (b) bridge maintenance, rechipping, grinding, saw cutting, painting (c) right of way maintenance, mowing, herbicide and pesticide application, planting vegetation (d) storm water relevant events (e) green waste deposited in street (f) graffiti removal	2014	Identify all materials that could be discharged from these operations. The City currently has a similar BMP to assess Operations and Maintenance activities and these new permit requirements will be incorporated into this existing BMP.

Permit Section Number and Element		Permit Compliance Year	Additional Notes
	(g) hydrant flushing		
	Develop and implement set of BMP's and evaluate BMP's quarterly	2015	Develop a set of Best Management Practices for the Operations and Maintenance activities assessed above.
<b>E.11.i</b>	<b>Incorporation of Water Quality and Habitat Enhancement Features in Flood Management Facilities</b>		
	Develop and implement process for incorporating water quality and habitat enhancement into new and rehabilitated flood management projects.	2016	This is a new BMP for the City, therefore the City will implement within the timeframe defined in the new permit.
<b>E.11.j</b>	<b>Landscape Design and Maintenance</b>		
	Implement a landscape design and maintenance program to reduce the amount of water, pesticides and fertilizers used by Permittees	2015	The City Parks and Recreation division will continue to reduce the amount of water, pesticides, and fertilizer it uses in maintaining the City's parks and resources by evaluating its current usage rates and implementing best practices as applicable.
	Evaluate use of pesticides, herbicides and fertilizers	2015	
	Implement best practices to reduce pesticides and fertilizers( that rely on non-chemical solutions)	2015	
	Implement educational activities for municipal applicators and distributors	2015	The City Parks and Recreation division will continue to reduce the amount of water, pesticides, and fertilizer it uses in maintaining the City's parks and resources by evaluating its current usage rates and implementing best practices as applicable.
	Proper disposal of unused chemicals	2015	
	Evapo-based irrigation and rain sensors	2015	
	Record amount of chemical usage	2015	

## Continuing SWMP BMPs

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
MO1	Implement a City street sweeping program.	<p><b>MO1A:</b> Sweep City roads on a weekly basis in heavily soiled areas. Heavily soiled areas are the Embarcadero and Downtown areas. Remaining areas including streets with out curb and gutter will be swept once prior to the rainy season. These streets will be swept by the end of October. Streets with curb and gutter that are not in heavily soiled areas will be swept twice a month.</p>
		<p><b>MO1B:</b> Sweep City-owned parking lots semi-monthly</p>
		<p><b>MO1C:</b> Track miles swept and the amount of material collected annually.</p>
MO2	Implement Storm drain Inspection and Maintenance Procedures and Schedules	<p><b>MO2A:</b> Implement routine inspection and cleaning procedures and schedules for storm drain catch basins and other components of the storm drain system that require cleaning at least twice per year (once before the wet-season) on an ongoing basis. Additional cleaning may be needed based on historical need in specific locations. The storm drain collection system inspection program will include inspecting all catch basins and other storm drain components twice per year. Catch basins and other storm drain components will be cleaned at least twice per year unless the inspections demonstrate that cleaning is not necessary. The number of storm drains cleaned per year will be tracked.</p>

## 7. Post-Construction Stormwater Management Program

The City recently approved post-construction stormwater management guidelines for new construction. These guidelines fulfill most of the Permit tasks E.12.a through E.12.k, and so these tasks are NOT listed in the following table. Those tasks which are listed below will be used to help ensure that these guidelines are effectively implemented.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes	
<b>E.12</b>	<b>POST CONSTRUCTION STORMWATER MANAGEMENT PROGRAM</b>		
<b>E.12.k</b>	<b>Post-Construction Control Requirements</b>		
	Adopt the Central Coast Water Resources Control Board Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region	March. 6 2013	This BMP has already been implemented.
<b>E.12.d. (12.e(ii)( e )</b>	<b>Source Control Measures -</b> Regulated Projects shall implement source control measures	2014	Regulated Projects with pollutant-generating activities and sources shall be required to implement standard permanent and/or operation source control measures as applicable.
<b>E.12.j</b>	<b>Planning and Development Review Process</b>		
	Conduct review using an existing guide such as Municipal Regulatory Update Assistance Program	2014	This review will help ensure the quality of the recently approved post-construction stormwater management guidelines for new construction.
	Conduct an analysis of the landscape code to correct gaps hindering post construction requirements	2014	This analysis and corresponding changes will help to improve the already approved post-construction stormwater management guidelines for new construction.
	Complete any changes to landscape code to administer post-construction req	2014	

## Continuing SWMP BMPs

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
PC1	Continue enforcing Morro Bay's current Zoning Ordinance with existing riparian buffer zones of 50 feet and wetland buffer zones of 100 feet.	<b>PC1A:</b> Continue requiring projects to protect riparian and wetland areas by requiring a buffer zone, according to Morro Bay's Zoning Ordinance chapter 17.40.040, to the maximum extent practicable.
PC2	Continue to review post-construction stormwater management in the development review process.	<b>PC2A:</b> Continue to review current post-construction stormwater management in the development review process.
PC3	Implement a post-construction stormwater management maintenance inspection program. The program will include the following components; inspections during construction to ensure BMPs are built as planned, specific timeframe after construction termination for the first post construction site inspection, post construction inspections to ensure proper BMP maintenance and BMP effectiveness (in coordination with a self-certification program) and tracking of approved treatment and flow/volumes based BMPs.	<p><b>PC3A:</b> Create a maintenance inspection program. Inspect project sites with post-construction runoff controls as defined in the revised City Municipal Code (14.48). Number of site inspections for post-construction runoff controls and number of sites in compliance with the maintenance program will be tracked.</p> <p><b>PC3B:</b> Inspect projects with post construction controls during construction to ensure BMPs are built as planned. Number of inspections for construction sites subject to the post construction hydromodification controls will be tracked.</p>
PC4	Include the importance of post-construction stormwater management in the revised Conservation and Open Space Element of the General Plan.	<b>PC4A:</b> The City will adopt a policy in the general plan that will include the importance of post construction and LID measures for stormwater management. The City will make these revisions in year 3 of the new permit.
PC5	Commit to long-term watershed planning.	<p><b>PC5B:</b> Develop a schedule of BMP's to integrate all stormwater management control measures into all aspects of and use planning and development to attain and protect healthy watersheds</p> <p><b>PC5C:</b> Coordinate with municipalities/agencies located in our watershed, work together and pool resources to define watershed scale issues and asses watershed conditions.</p>
PC6	Enforceable Mechanisms: Develop and/or modify enforceable mechanisms that will effectively implement hydromodification controls and LID. Enforceable mechanisms may include municipal codes, regulations, standards, and specifications	<p><b>PC6A:</b> Approved new and/or modified enforceable mechanisms that effectively resolve regulatory conflicts and implement hydromodification controls and LID in new and redevelopment projects. The post-construction and LID requirements will be enforceable by March 6, 2014.</p> <p><b>PC6B:</b> Apply new and/or modified enforceable mechanisms to all applicable new and redevelopment projects. The post-construction and LID requirements will be enforceable by March 6, 2014.</p>

BMP ID#	Best Management Practices (BMP)	Measurable Goals and Outcomes
PC7	Implementation Strategy for LID and Hydromodification Control: Develop and enact a strategy for implementing LID and hydromodification control for new and redevelopment projects. The strategy will provide appropriate education and outreach for all applicable target audiences, and will include specific guidance for LID BMP design and for complying with hydromodification control criteria. The strategy will also apply LID principles and features to new and redevelopment projects during the two-year period preceding adoption of hydromodification control criteria.	<b>PC7A:</b> Develop, advertise and make available LID BMP Design Guidance suitable for all stakeholders. Completed by March 6, 2014
		<b>PC7B:</b> Provide specific guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements. Make available to new and redevelopment project applicants. Developed by March 6, 2014
		<b>PC7C:</b> Education and Outreach: Documentation of 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. Document between March 31, 2011 to March 6, 2014
		<b>PC7D:</b> Tracking Report indicating municipality's accomplishments in education and outreach supporting implementation of LID and hydromodification control for new and redevelopment projects. Tracking for March 31, 2011 to March 6, 2014
		<b>PC7E:</b> Interim LID Implementation Apply LID principles and features to all applicable new and redevelopment projects. Maintain Jan. 11, 2011 through March 6, 2014.
		<b>PC7F:</b> Tracking Report, for the period Q2 to Q8, identifying LID design principles and features incorporated into each applicable new and redevelopment project. The City will track LID projects from Jan. 11, 2011 through March 6, 2014.



## 8. Water Quality Monitoring

The TMDL monitoring required below will help to inform TMDL Compliance, discussed in Section 10. At times these two sections may be combined to streamline the overall TMDL compliance process. The City currently complies with monitoring requirements by following the Waste load Allocation Plan (WAAP). A new WAAP may be developed to better comply with the new permit implementation tasks.

### New Permit Implementation Tasks

Permit Section Number and Element		Permit Compliance Year	Additional Notes
<b>E.13</b>	<b>WATER QUALITY MONITORING</b>		
<b>E.13.b.</b>	<b>TMDL Monitoring</b> - MS4s with TMDLs must comply with Attachment G and consult with Regional Board within 1 year of effective date to determine monitoring requirements and schedule. And shall implement TMDL monitoring as specified by Regional Board Executive Officer.	2014	The City will be updating our WAAP according to Attachment G of the New Permit. The City's TMDL water bodies are Moro Bay and Chorro Creek.

### Continuing SWMP BMPs

There are no existing monitoring BMPs that exceed the requirements of the new permit.

## 9. Program Effectiveness Assessment

In the SWMP, each BMP was required to have measurable goals and outcomes, which have been listing in the Continuing SWMP BMP tables above. In the new permit, these measurable goals and outcomes will be part of a Program Effectiveness Assessment and Improvement Plan (PEAIP), rather than part of this guidance document.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.14</b>	<b>PROGRAM EFFECTIVENESS ASSESSMENT</b>	
<b>E.14.a</b>	<b>Program Effectiveness Assessment and Improvement Plan (PEAIP)</b>	
	Submit PEAIP. PEAIP should track annual and long term effectiveness, include strategy used to gauge effectiveness of BMP, annual assessments will identify potential modifications. May be modeled after most recent version of Municipal Storm Water Program Effectiveness Assessment Guidance	2015  The Program Effectiveness Assessment and Improvement Plan shall identify the strategy used to gauge the effectiveness of prioritized BMPs and program implementation as a whole. Prioritized BMPs include BMPs implemented based on pollutants of concern. The annual effectiveness assessments will help identify potential modifications to the program to ensure long-term effectiveness. Water quality monitoring data, where available, will be used to answer long-term management questions, effectiveness of BMPs and the overall storm water program.
<b>E.14.b</b>	<b>Storm Water Program Modifications</b>	
	Identify and summarize BMP and/or program modifications identified in priority program areas that will be made in the next permit term, including any changes, expansions, discontinuing BMP's or shifting priorities to make more effective use of resources.	2018  The City will modify BMPs and/or the program as a whole to improve compliance with permit conditions and improve program effectiveness at reducing pollutant loads, achieving the MEP standard, and protecting water quality. Information gained through effectiveness assessment and MS4 discharge and receiving water monitoring to identify priority areas for program improvement.

### Continuing SWMP BMPs

There are no existing effectiveness assessment BMPs that exceed the requirements of the new permit. Continuing SWMP measureable goals and outcomes will be incorporated into the PEAIP as applicable.

## 10. Total Maximum Daily Loads (TMDLs) Compliance

The TMDL monitoring discussed in Section 8 above will help to inform compliance. At times these two sections may be combined to streamline the overall TMDL compliance process, and both will be incorporated into the WAAP update.

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.15</b>	<b>TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS</b>	
<b>E.15.a</b>	Comply with all approved TMDLs (Attachment G)	2014
<b>E.15.b</b>	Waste load allocations are incorporated herein by reference as enforceable parts of this Order	2014
<b>E.15.c</b>	Regional Board reviews TMDLs within one year of effective date and may propose modifications to requirements	2014
<b>E.15.d</b>	Report status of implementation via SMARTS	2014
<b>E.15.e</b>	Comply with Clean Water Act Sections 303d,306b and 314	2014

The City will be updating our WAAP according to Attachment G of the New Permit. The City's TMDL water bodies are Moro Bay and Chorro Creek.

### Continuing SWMP BMPs

There are no existing TMDL BMPs that exceed the requirements of the new permit.

## 11. Annual Reporting

The City has submitted annual reports to the regional water board in the past, and will continue to do so under the new permit requirements. The new permit requires that the reports be submitted online via the Storm Water Multiple Application and Report Tracking System (SMARTS).

### New Permit Implementation Tasks

Permit Section Number and Element	Permit Compliance Year	Additional Notes
<b>E.16</b>	<b>ANNUAL REPORTING PROGRAM</b>	
<b>E.16.a</b>	Use SMARTS to report and certify	The City will submit its first annual report for the new Permit online in 2015 for the 2014 compliance year, and will continue to submit reports for all subsequent years.
<b>E.16.b</b>	Complete and retain annual reports and make available to RWQCB during working hours	
<b>E.16.c</b>	Submit detailed written or oral report to RWQCB if directed.	
<b>E.16.d</b>	May coordinate reporting if regional programs	

### Continuing SWMP BMPs

Annual reports, while required, were not previously considered a BMP and thus there are no additional BMPs to add to the requirements above.