

TO: City Council
FROM: Doug Monn, Public Works Director
SUBJECT: Stormwater Management
DATE: March 18, 2014

NEEDS: For City Council to consider establishment of a full-time Stormwater Manager position.

FACTS:

1. The Federal Clean Water Act requires all cities to implement stormwater management programs, to protect our waters from urban stormwater pollution (e.g., trash, oil, pesticides).
2. The City of Paso Robles presently has a half-time Stormwater Manager to manage and implement its stormwater program. This person is also responsible for controlling industrial discharges to the sanitary sewer system.
3. As a result of increasing regulation, management and implementation of the City's existing stormwater program has become more than a half-time commitment. Also, increased scrutiny of the City's industrial waste program by the U.S. Environmental Protection Agency, and the need to reduce salt discharges into the City sewer system, requires improved control of industrial discharges to the City sewer system.
4. The State of California recently renewed its statewide municipal stormwater permit. The following is a summary of **additional** work required of the City:
 - Participate in a regional community based social marketing campaign;
 - Train plan reviewers and permitting staff in Community Development to review erosion and sediment control plan;
 - Inform contractors about training opportunities for controlling pollution from construction sites;
 - Update City website to include information on controlling pollution from construction sites;
 - Provide public education to reduce pollution from organized car washes;
 - Develop a training program for City staff on pollution prevention and good housekeeping practices;
 - Assess City staff's knowledge of pollution prevention and good housekeeping every other year;
 - Require contractors doing operational or maintenance work for the City to comply with stormwater requirements;
 - Develop a public involvement strategy that establishes which City staff are responsible for specific tasks and goals;
 - Improve the City's electronic storm drain map;
 - Create an inventory of all industrial facilities and update annually. Determine if such facilities have Industrial Stormwater Permit coverage.

- Develop and implement procedures to identify illicit discharges from “priority” areas;
 - Sample any storm drain outfalls that are flowing 72 hours after the last rain event during storm drain mapping;
 - Conduct annual dry weather sampling of discharges from outfalls in priority areas, determine if samples exceed action levels, and do follow-up investigations where illicit discharges are suspected;
 - Develop written procedures for investigating illicit discharges;
 - Determine and document the source of non-stormwater discharges. Require the responsible person to take corrective action within 72 hours;
 - Create and maintain an inventory of construction sites;
 - Develop procedures to review and approve construction plans;
 - Require submittal of Erosion and Sediment Control Plans. Develop a checklist for review of such plans;
 - Develop and maintain an inventory of City owned or operated facilities that are a threat to water quality. Map them;
 - Assess the City facilities annually and identify pollutant hot spots. Document the assessment;
 - Develop and implement Stormwater Pollution Prevention Plans for City facilities with pollutant hot spots;
 - Develop an inspection checklist. Inspect hot spot facilities quarterly and track inspections;
 - Assess and prioritize storm drain maintenance. Determine high priority catch basins (drain inlets);
 - Clean out the high priority catch basins annually;
 - Prioritize surface drainage structures (e.g., detention basins). Clean out trash and debris from priority facilities annually;
 - Assess Public Works maintenance activities (e.g., street repair, herbicide application) and develop and implement applicable best management practices (BMPs). Assess the BMPs quarterly for effectiveness;
 - Change landscaping design and management to rely less on chemicals;
 - Assist Community Development with implementation of the Central Coast’s Post-Construction requirements;
 - Meet with the State Water Board to determine whether water quality monitoring of Salinas River is necessary. If so, the City may participate in a regional monitoring effort;
 - Develop a program to assess effectiveness and improve the stormwater program; and
 - Prepare and submit annual reports to State Water Board.
5. The attached workload analysis indicates that managing and implementing the City’s stormwater program with this additional workload will require approximately 2,100 staff hours per year – equivalent to one full-time person.
6. The City’s stormwater program is funded by the Sewer Enterprise Fund and fees collected from development. The budget that formed the basis of the sewer rates adopted by City Council in December 2011 includes a full-time Stormwater Manager.

7. The knowledge, skills, and abilities required of a Stormwater Manager are consistent with the City's Professional Manager II classification.

**ANALYSIS &
CONCLUSION:**

A full-time Stormwater Manager would enable compliance with increasingly stringent stormwater regulations and reduce the City's liability to violations. A full-time Stormwater Manager will have time to work cooperatively with the general public to prevent stormwater pollution before it occurs.

A full-time Stormwater Manager would also allow the existing Stormwater/Industrial Waste Manager to work full-time with Paso's many industries to improve control of industrial discharges to the City sanitary sewer system. This would help reduce the salinity of the City's wastewater, thus improve the quality of the City's future recycled water supply, consistent with the City's Integrated Water Resource Plan.

**POLICY
REFERENCE:**

Stormwater Management Plan, Integrated Water Resource Plan, Sewer System Management Plan, NPDES permit requirements

**FISCAL
IMPACT:**

The addition of a full-time Stormwater Manager would not impact the General Fund, or adversely affect the Sewer Enterprise Fund, as this change was included in sewer rates adopted by City Council in 2011. The addition is included in the Winter 2014 Financial Forecast Update.

OPTIONS:

- A. Adopt Resolution 14-XX to establish a full-time Stormwater Manager position, and authorize the City Manager to recruit for the position.
- B. Amend, modify or reject the above option.

ATTACHMENTS:

1. Workload Analysis of Stormwater Manager
2. Resolution 14-XX

Workload Analysis for Stormwater Manager, City of Paso Robles

by P. Gwathmey and M. Thompson, September 2013

The following estimated hours are based on staff's best judgement and were developed in consultation with other San Luis Obispo County cities.

NPDES Permit Section	Permit Element	New Best Management Practice (BMP)	Stormwater Manager Estimated Annual Hours Required	Specific Tasks or Notes
	PROGRAM MANAGEMENT ELEMENT			
<i>E.6.a</i>	<i>Legal Authority</i>			
(a)	Adopt Ordinance	The Draft Water Quality Ordinance has been revised to include required legal authorities in the permit and will be considered by City Council for approval by September 2013.	0	Completed
<i>E.6.b</i>	<i>Certification</i>			
E.6.b	Certification	The City will certify by it's Duly Authorized Representative as described in 40CFR122.22(b) that it will maintain legal authority implement and enforce the Permit. Certification to include (a) - (e) of this section.	6	
<i>E.6.c</i>	<i>Enforcement Measures and Tracking</i>			
E.6.c	Enforcement Response Plan	Develop and implement an Enforcement Response Plan (ERP) that will contain enforcement procedures for responding to violations and how to address repeat and continuing violations. ERP will include items (ii)(a) - (f).	10	
E.7.	EDUCATION AND OUTREACH PROGRAM			
<i>E.7.a</i>	<i>Public Education and Outreach</i>			
E.7.a	Public Education & Outreach - Select outreach option (if regional program - develop agreements)	Determine if the City will participate in a Regional Education and Outreach Program, fulfill the Education and Outreach requirements within our jurisdiction or do a combination of the two.	0	
(a)	Public Education & Outreach - Develop/implement comprehensive education and outreach program.	Develop and implement a comprehensive storm water public education and outreach program designed to increase storm water knowledge and awareness in target audiences.	30	
(b)	Public Education & Outreach - Conduct surveys 2x during permit term	Conduct surveys twice during the permit term to gauge the public's level of awareness.	40	
(c)	Develop and convey a specific stormwater messages.	Develop and convey a specific stormwater message that focuses on: local pollutants of concern, target audience, and regional water quality issues.	50	
(d)	Develop & disseminate education materials to target audiences.	Develop and disseminate appropriate educational materials to target audiences. Educational materials will be disseminated in a variety of ways to reach different audiences.	40	
(e)	Utilize public input in developing outreach program	Utilize public input in the development of the stormwater program.	20	
(f)	During the development of the Public Education strategy determine appropriate methods of disseminating Public Education materials.	Distribute the educational materials, using whichever methods and procedures determined appropriate during development of the Public Education strategy.	80	
(g)	Provide water efficient/stormwater friendly landscaping information	Convey messages to explain the benefits of water-efficient and environmentally friendly landscaping using existing materials developed and distributed by the City's Water Conservation Program.	5	
(h)	Promote reporting of illicit discharges	Develop and convey messages specific to reducing illicit discharges with information on how the public can report illicit discharges or water quality impacts through a central contact point using the City's stormwater web site and Stormwater Pollution Line.	5	

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(i)	Provide pesticide/fertilizer application information	Develop and convey messages specific to the proper application of pesticides, herbicides, and fertilizers. Continue to promote the Our Water Our World Program for residents and local participating stores.	30	
(j)	Provide materials to school children	Provide independent, parochial, and public schools with materials to effectively educate school-age children about stormwater runoff and water conservation.	30	
(k)	Provide information on reducing discharges from organized car washes, mobile cleaning, pressure washing, and landscape irrigation.	Develop and convey messages specific to reducing discharges from organized car washes, mobile cleaning, pressure washing, and landscape irrigation.	20	
(l)	Provide stormwater-friendly education for organized car wash participants on reducing car wash discharges.	Conduct storm water-friendly education for organized car wash participants.	40	
(m)	Provide information on specific to Mobile cleaning and pressure wash businesses.	Develop and convey messages specific to mobile cleaning and pressure wash businesses.	10	
CBSM	Implementation of a reduced set of Community Based Social Marketing (CBSM) requirements as described in the May 3, 2013 letter from the CCRWQCB.	Work with other local cities that participate in the Central Coast Partners for Water Quality to determine if aCBSM program will be developed or the City will comply individually with the May 3, 2013 letter from the CCRWQCB.	100	10 - 20 hours/month
(a)	Implement a CBSM pilot project to address its highest priority water quality issue.	Implement a CBSM pilot project to address its highest priority water quality issue. This can be related to a specific type of pollutant, pollutant source, community behavior, or watershed. The Pilot program shall include the following actions: 1) Research barriers to desired behaviors and benefits of desired behaviors. 2) Elicit commitment to implement desired behavior from target audience. 3) Provide prompts reminding target audience of desired behavior from target audience. 4) Use the concept of social norms/modeling of desired behavior. 5) Use education messages that are specific, easy to remember, from a credible source, and appropriate for the target audience. 6) Create incentives for the desired behavior. 7) Remove barriers to the desired behavior.	60	
(b)	Reporting	Submit a summary of the past year CBSM activities and certify compliance with the May 3, 2013 letter. The summary must include: 1) Pilot program. 2) Research on barriers to desired behaviors and benefits of desired behaviors. 4) Implementation of social norms/modeling. Also the use of: 1) Commitments from target audiences to implement desired behaviors. 2) Prompts, 3) education messages, 4) incentives for desired behaviors, 5) Methods for removing barriers to behavior change.	8	
<i>E. 7.b</i>	<i>Staff and Site Operator Training and Education</i>			
b.1	Illicit discharge detection and elimination training for City staff.	Illicit discharge detection and elimination staff training to include: what is an illicit discharge or connection, procedures for reporting and responding, follow-up training, training for new staff within 6 months of hire, information on reporting illicit discharges in all fleet vehicles.	30	30 hours first year to set up. 20 hours annually.
b.2.	Construction outreach /training for City staff			
(a)	Plan Reviewers and Permitting Staff	Plan Reviewers and Permitting Staff will be trained to be knowledgeable in Erosion & Sediment Control (ESC) Plans. Staff reviewing ESC plans will be certified as a (Qualified Stormwater Developer) QSD or work under the designated person on staff that possesses the QSD credential. ESC plans will be reviewed by the City Engineer or the Water Quality Specialist.	20	Set up training and tracking.

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(b)	ESC/Stormwater Inspectors	ESC/Stormwater Inspectors shall be certified and maintain certification as a QSD or QSP.	0	
(c)	Contract Plan Reviewers	The City shall ensure that contract plan reviewers, permitting staff, and Inspectors are trained if used.	0	
E.7.b.2.(b)	Construction Site Operator Education			
(a)	Provide information each year on training opportunities for construction Operators.	Provide information each year on training opportunities for construction operators on BMP selection, installation, implementation, and maintenance as well as overall compliance.	30	Development of brochures, guide books, links, web site contents
(b)	Develop outreach tools for educating construction operators.	Develop outreach tools aimed at educating construction operators on appropriate selection, installation, implementation, and maintenance of stormwater BMPs and program compliance.	20	
(c)	Distribute outreach materials to construction operators disturbing land.	Distribute appropriate outreach materials to all construction operators disturbing land within the City.	0	
(d)	Update existing website to include information on BMPs.	Update the existing stormwater website, as necessary to include information on appropriate selection, installation, implementation, and maintenance of stormwater BMPs.	10	
E.7.b.3	<i>Pollution Prevention and Good Housekeeping Staff Training</i>			
(a)	Biennial training for all staff implementing this program element.	Develop a biennial employee training program for appropriate employees involved in implementing pollution prevention and good housekeeping practices as specified in E.11. Conduct training during alternate years when necessary. Train all new hires within the first year of the hire date.	30	30 hours first year to set up web based training. 20 hours annually to update training.
(b)	Biennial assessment.	Biennial assessment of trained staff's knowledge.	10	Develop test and track deficiencies.
(c)	Contractors performing O&M activities.	Require contractors hired to perform O&M activities shall be contractually required to comply with all stormwater BMPs & SOPs.	5	
(d)	Provide oversight of contractor activities.	Provide oversight of contractor activities to ensure BMPs, housekeeping practices, and SOPs followed.	5	
E.8	PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM			
E.8	<i>Public Involvement and Participation Program</i>			
E.8	Involve the public in the development and implementation of activities related to the program.	Involve the public in the development and implementation of activities related to the program. The program shall encourage volunteerism, public comment and input on policy, and activism in the community.	10	
(a)	Public Involvement and participation strategy.	Develop public involvement strategy that establishes who is responsible for specific tasks and goals.	10	
(b)	Consider development of a citizen group.	The City will continue to attend the Partners for Water Quality which is open to the public and includes NGO members.	100	Co-chair/organize monthly Partners for Water Quality meeting and member of the subcommittee. Member of CASQA (Monthly conference calls.)

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(c)	Create opportunities for citizens to participate.	Create opportunities for citizens to participate in the implementation of BMPs through sponsoring activities such as clean-ups, and educational activities. The City will continue to: run the Adopt-a-Street program and tracking the amount of trash picked up by volunteers, organize and host the annual Creek Day and track the number of volunteers and amount of trash collected, and give the public a means to report unmarked publicly owned storm drains.	80	Adopt-a-Street oversight and questions. Creek Day: committee member, development of advertising, press release, event planning.
(d)	Information on program	Ensure the public can find information on the stormwater program by posting information related to the program on the stormwater web page.	25	
(e)	Actively engage in the Integrated Regional Water Management Plan (IRWMP) or watershed planning effort.	The City's Water Department is involved in development of the revised IRWMP. The City's Wastewater Department is involved in the development of a regional Salt and Nutrient Management Plan for the Paso Robles Groundwater Basin.	1	
E.9	ILLICIT DISCHARGE DETECTION AND ELIMINATION			
<i>E.9.a</i>	<i>Outfall Mapping</i>			
E.9.a	Create and maintain accurate outfall map including a site visit to each outfall	Create and maintain an up-to-date and accurate map of outfalls owned by the City. The map will include alphanumeric IDs, priority areas, water bodies receiving direct discharges, and the permit boundary.	12	
(a)	Map to show all outfalls owned by the City.	The City's map shows all outfalls operated by the City. The drainage areas and land use(s) contributing to those outfalls will be added. Each outfall shall be mapped with GPS, alphanumeric identifier. Use photographs or electronic database to provide baseline information and track operation and maintenance needs over time.	0	
(b)	Include location, name, of all water bodies receiving direct discharges from outfalls.	Location, name, of all water bodies receiving direct discharges from outfalls to be included on the map.	0	
(c)	Include priority areas	Include priority areas: older infrastructure, industrial, commercial, or mixed use areas, areas with a history of illicit discharges, illegal dumping, onsite sewage disposal systems, or that are likely to have illicit discharges.	10	
(d)	Field sampling locations	Include field sampling locations if applicable.	1	
(e)	Permit boundary	The current stormwater system includes the City limits which is our permit boundary.	0	Completed
<i>E.9.b</i>	<i>Illicit Discharge Source/Facility Inventory</i>			
(a)	Create inventory of all industrial/commercial facilities and update annually	Maintain an inventory of all industrial/commercial facilities/sources that could discharge pollutants. Update annually with minimum information listed in the section.	100	100 hours first year to develop list.
(b)	Types of facilities.	The inventory must include: metal and other recycled material centers, vehicle repair, maintenance or cleaning, building trade central facilities or yards, corporation yards, building material retailers and storage and other facilities designated by the City or Regional Boards to have reasonable potential to contribute to polluted runoff.	0	
(c)	Industrial General Permit.	Determine if facilities have coverage under Industrial General Permit. Notify the RWQCB if not covered.	15	
(d)	Update inventory annually.	Update the inventory annually by contacts with commercial and industrial facility operators and owners, or through City databases such as business licenses, industrial waste inspections, and sewer connections.	40	

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(e)	Develop and implement procedures to identify illicit discharges from priority areas.	Develop and implement procedures to proactively identify illicit discharges from priority areas shown on the stormwater map at least once over the length of the permit term. The procedures must include field observations, field screening, inspections, and other appropriate and effective survey methods. OR the City may establish a self-certification program in which authorized parties can demonstrate the prevention and elimination of illicit discharges at their facilities at least once during the permit term.	100	20 hours for writing procedures. 80 hours for development of a self certification program.
<i>E.9.c</i>	<i>Field Sampling to Detect Illicit Discharges</i>			
E.9.c	Sample ANY flowing outfalls identified in E.9.a	Sample all City owned outfalls that are flowing or ponding 72 hours after the last rain event during outfall mapping.	0	
E.9.c	Annually sample priority area outfalls determined in E.9.a	Conduct annual dry weather sampling of outfalls identified in priority areas on the stormwater map.	2	Tracking
(a)	Conduct annual sampling for parameters on Table 1.	Test samples taken during the annual dry weather sampling for the following parameters to help determine the source of the discharge: Ammonia, color, conductivity, detergents, fluoride, hardness, pH, potassium and turbidity	0	
(b)	Determine if sample results exceed the action limits.	Determine if sample results exceed the action levels listed on Table 2 for the parameters listed in (b).	2	Tracking
(c)	Conduct follow up investigation within 72 hours if action levels exceeded	Conduct follow up investigations within 72 hours of becoming aware of the suspected illicit discharge to identify and locate the source of the illicit discharge.	0	
<i>E.9.d</i>	<i>Illicit Discharge Detection and Elimination Source Investigations and Corrective Actions</i>			
E.9.d	Develop written procedures for investigations and corrective actions	Develop written procedures for conducting investigation into the source of all non-stormwater discharges suspected to be illicit discharges. These procedures shall be part of the Illicit Discharge Detection and Elimination Program.	15	
E.9.d	Conduct investigations within 72 hours.	Conduct follow up investigations with 48 - 72 hours to identify and locate the source of a suspected illicit discharge. If the investigation requires longer than 72 hours, the actions being taken to identify and locate the source of the suspected illicit discharge.	20	
(a)	Non-stormwater discharges suspected of being sewage and/or significantly contaminated shall be investigated within 24 hours.	The City complies with the State Waste Discharge Requirements for Sanitary Sewer Systems. Any discharges suspected of being sewage are immediately responded to during working hours and by standby staff after hours. The City has procedures for receiving, responding to, and reporting sewer discharges. Any significantly contaminated discharges shall be investigated within 24 hours.	30	
(b)	Prioritize investigations suspected to be sewage and/or significantly contaminated over other discharges.	Discharges suspected to be sewage and/or significantly contaminated will be prioritized over investigations of non-stormwater discharges.	0	
(c)	Report any flows believed to be an immediate threat to human health or the environment to the Health Department.	The City has written procedures for reporting sewage spills to Health Dept. and the Office of Emergency Services. The City will immediately report any flows believed to be an immediate threat to human health or the environment to the local Health Department.	4	
(d)	Determine and document the source of non-stormwater discharges.	Determine and document the source of non-stormwater discharges. If the source is authorized under the permit no further action is required.	2	Tracking
(e)	Require the responsible party to conduct corrective actions. Conduct follow up investigation.	Immediately notify the responsible party of an illicit discharge and require corrective actions be taken within 72 hours to eliminate the discharge. Conduct follow-up investigation and field screening to verify discharge was eliminated.	0	

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E.9.e	<i>Spill Response Plan</i>			
E.9.e	Develop and implement a spill response plan.	Develop and implement a spill response plan which includes Agency roles and responsibilities, procedures for responding to complaints, conducting investigations and clean up, and reporting.	20	
E.10	CONSTRUCTION SITE STORMWATER RUNOFF CONTROL PROGRAM			
E.10.a	Construction Site Inventory	Create and maintain an inventory of all projects subject to the City's stormwater ordinance. Inventory shall include: contact and site information, location in respect to all waterbodies, threat to water quality, current construction phase, inspection frequency, project start and completion dates, and date the erosion and sediment control plan approved by the City.	0	
E.10.b	Construction Plan Review and Approval Procedures			
E.10.b	Develop procedures.	Develop procedures to review and approve relevant construction plan documents.	15	
(a)	Require the submittal of an Erosion and Sediment Control Plan (ESCP) for City approval prior to issuing a grading or building permit.	Require the submittal of a site-specific Erosion and Sediment Control Plan (ESCP). The City must review and written approval prior to issuing a grading or building permit.	8	
(b)	Require ESCP include rationale for selecting BMPs.	Require the ESCP include rationale for selecting BMPs including supporting soil loss calculations, if necessary.	8	
(c)	Require ESCPs list all applicable permits and submit evidence that permits have been obtained prior to soil disturbing activities.	Require ESCPs list all applicable permits directly associated with the grading activity and include a condition of the the grading permit that evidence will be submitted to the City that permits have been obtained prior to soil disturbing activities authorized by the grading permit.	8	
(d)	Develop a checklist or similar process to review ESCPs.	Conduct and document the review of each ESCP using a checklist or similar process.	10	
E.10.c	Construction Site Inspection and Enforcement			
E.10.c	Construction Site Inspection and Enforcement.	Implement procedures to verify compliance with the City's Water Quality Ordinance. Inspections to be conducted at priority sites prior to land disturbances (during the rainy season), during active construction and following active construction. Require all temporary ESC measures that are no longer needed have been removed.	8	
E.11	Pollution Prevention/Good Housekeeping for Permittee Operations Program			
E.11.a	Inventory of Permittee-Owned and Operated Facilities			
E.11.a	Develop and maintain an inventory of City owned or operated facilities.	Develop and maintain an inventory of City owned or operated facilities that are a threat to water quality.	1	
E.11.b	Map of Permittee-Owned or Operated Facilities			
E.11.b	Submit a map of inventoried City owned or operated facilities	Submit a map of the City showing all City-owned facilities inventoried in E.11.a. Include for each site: stormwater system, receiving waters which the facilities drain to, manager of each facility and contact information.	2	
E.11.c	Facility Assessment			
E.11.c	Conduct Facility Assessments	Conduct comprehensive annual assessments at all facilities inventoried in E.11.a. and identify pollutant hotspots.	32	

NPDES Permit Section	Permit Element	New Best Management Practice (BMP)	Stormwater Manager Estimated Annual Hours Required	Specific Tasks or Notes
(a)	Identification of hotspots.	Based on the annual assessment, identify facilities with a high potential to generate stormwater and non-stormwater pollutants as pollutant hotspots and assign them high priority. Hotspots shall include at a minimum maintenance yards, airports, hazardous waste facilities.	8	6 Sites
(b)	Documentation of the comprehensive assessment.	Document comprehensive assessment procedures and results.	20	
<i>E.11.d</i>	<i>Stormwater Pollution Prevention Plans (SWPPPs).</i>			
E.11.d	Develop and implement SWPPPs for hotspot facilities.	Develop and implement site-specific SWPPPs for hotspot facilities that do not have existing Hazardous Materials Plan, Spill Prevention Plan or other equivalent document. SWPPPs should include purpose of document, site map with drainage identified, significant materials handled and stored that are exposed to stormwater, potential pollutant sources, facility BMPs, Spill response and cleanup, inspection schedule, inspection procedures and checklist for inspections conducted to ensure proper selection, implementation and maintenance of BMPs.	80	80 hours first year for development of SWPPPs. 10 hours for annual updates.
E.11.e	Inspection, Visual Monitoring and Remedial Action			
(a)	Quarterly visual "hotspot" inspections	Develop inspection checklist. Conduct quarterly visual hotspot inspections. Note deficiencies and corrective actions taken to correct deficiencies. Track inspections in a log at each facility and keep records with the facility SWPPP.	50	Development of checklist. Quarterly inspections at the 6 sites. Documentation of results and discussion with site supervisors.
(b)	Annual comprehensive "hotspot" inspections	Conduct annual Hotspot comprehensive inspections. The inspection should cover all stormwater BMPs and include any identified deficiencies. Document each inspection and any corrective actions taken to correct deficiencies. The records will be kept with the SWPPP.	15	Inspections at 6 sites. Documentation, discussion with site supervisor, and follow-up inspections.
(c)	Quarterly visual "hotspot" observation of stormwater & non-stormwater discharges.	Observe discharge locations from hotspot facilities. If a discharge is observed, identify any problems associated with pollutant sources or BMPs shall be remedied as soon as possible or before next storm event. Document each inspection and any corrective actions taken to correct deficiencies. The records will be kept with the SWPPP.	4	
(d)	Inspection of non-hotspot facilities	Inspections of non-hotspot facilities are conducted once per permit term.	5	One time per term.
<i>E.11.f</i>	<i>Storm Drain System Assessment and Prioritization</i>			
E.11.f	Storm drain System Assessment & Prioritization	Implement procedures to assess and prioritize storm drain system maintenance, including but not limited to, catch basins, pipe and pump infrastructure, above-ground conveyances, including receiving water bodies with the City's boundary and detention basins.	0	

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E.11.f	Assign high priority to catch basins.	Assign high priority to catch basins meeting any of the following Criteria: 1: accumulates a significant amount of sediment, trash, and/or debris; 2) collecting large volumes of runoff; 3) collecting runoff from areas that do not receive street sweeping; 4) collects runoff from drainage area with exposed or disturbed soil; 5) receive citizen complaints/reports.	4	
<i>E.11.g</i>	<i>Maintenance of storm drain system</i>			
E.11.g	Maintenance of storm drain system	Begin maintenance of all high priority storm drain systems annually according to the procedures and priorities developed .	2	Tracking cleaning
(a)	Inspect storm drain systems.	Based on the priorities assigned E.11.f develop and implement a strategy to inspect storm drain systems. Inspect all high priority catch basins and systems annually.	0	
(c)	Labeling catch basins.	Ensure that each catch basin in high foot traffic areas includes a legible storm drain marker. Catch basins that are reported missing markers by the public or City staff shall be recorded and relabeled within one month of inspection.	4	
(d)	Maintain surface drainage structures.	High priority facilities, such as those with recurrent illegal dumping, shall be reviewed and maintained annually as needed. Non-priority facilities shall be reviewed as needed. Removal of trash and debris from high priority areas shall occur annually prior to the rainy season.	4	
(e)	Dispose of waste materials	Develop and implement a procedure to dewater and dispose of materials extracted from catch basins. The procedure shall ensure that water removed during the catch basin cleaning process and waste material will not reenter the MS4.	2	Write procedures.
<i>E.11.h</i>	<i>Operations and Maintenance Activities (O&M)</i>			
E.11.h	Assessment of O&M activities	Assess O&M activities for potential to discharge pollutants in stormwater and inspect all O&M BMPs on a quarterly basis.	24	
(a)	Develop and implement a program to assess O&M activities.	Develop and implement a program to assess O&M activities and develop applicable BMPs. Include the following O&M activities shall be included: 1) Road & parking lot maintenance including repair of sidewalks, potholes, curb and gutters; pavement marking, sealing and repaving; 2) Bridge maintenance including re-chipping, grinding, saw cutting and painting; 3) Right-of-way maintenance including mowing, herbicide & pesticide application, and planting vegetation; 4) Stormwater relevant City sponsored or sanctioned events; 5) Graffiti removal.	20	
(b)	Identify all materials that could be discharged from each O&M activity.	Identify all materials that could be discharged from each O&M activity, and which materials contain pollutants (metals, chlorides, hydrocarbons, sediment, green waste, herbicide, dried paint, and trash).	10	
(c)	Develop and implement a set of BMPs that will reduce pollutants during O&M activities.	Develop and implement a set of BMPs that will reduce pollutants in stormwater and non-stormwater discharges during O&M activities using the CASQA Municipal Handbook or equivalent.	20	
(d)	Evaluate BMPs quarterly.	Evaluate all BMPs implemented during O&M activities quarterly.	15	
<i>E.11.i</i>	<i>Incorporate Water Quality & Habitat Features in Flood Management facilities.</i>			

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E.11.i	Develop and implement a process to incorporate water quality and habitat enhancement features	Develop and implement a process to incorporate water quality and habitat enhancement features in the design of all new and rehabilitated flood management projects.	4	Meet with CCD and CIP Engineer to develop.
E.11.j	<i>Landscape Design & Maintenance</i>			
E.11.j	Landscape Design & Maintenance	Implement a landscape design and maintenance program to reduce the amount of water, pesticides, herbicides and fertilizers used during City operations and activities.	32	
(a)	Evaluate Pesticide, Herbicide, Fertilizer (PHF) Use	Evaluate PHF used and application activities performed and identify pollution prevention and source control opportunities.	5	
(b)	Pesticide, Fertilizer Use BMPs	Implement practices that reduce the discharge of PHFs. At a minimum include items listed below.	12	
(b)(1)	Implement educational activities for City applicators and distributors	City staff that apply herbicides attend 3 hours of training annually.	4	
(b)(2)	Implement landscape management measures that rely on non-chemical solutions.	Implement landscape management measures that rely on non-chemical solutions including: a) amend soils with compost to create drought-resistant soils. b) Create soil microbial community through the use of compost, compost tea, or inoculation, c) Use native and/or climate appropriate plants to reduce the amount of water, PHFs used. d) Practice grass recycling on decorative turf landscape. e) Keep grass clipping and leaves away from waterways by mulching, composting, or landfilling. f) Prevent application of PHFs during irrigation or within 48 hours of a 50% chance of rainfall. g) Limit or replace herbicide and pesticide use. h) Prohibit application of PHFs as required by Dept. of Pesticide Regulation. i) Reduce mowing of grass to allow for greater pollutant removal.	4	Tracking
(2)(b)(3)	Collect and properly dispose of PHFs.	Collect and properly dispose of PHFs.	0	Tracking
(2)(b)(4)	Minimize irrigation run-off by using evapotranspiration-based irrigation schedule and rain sensors	Minimize irrigation run-off by using evapotranspiration-based irrigation schedule and rain sensors.	0	Tracking
(2)(c)	Record the types and amounts PHFs used.	The City records the type and amounts of fertilizer and herbicides used. The City contracts pesticide work.	0	Tracking
E.12.a	Post-Construction Stormwater Management Program			
The City is participating in the Central Coast Joint Effort for Post Construction Requirements which falls under E.12.k and is only subject to E.12.j and E.12.e(ii)(e)				
E.12.d	<i>Source Controls Measures</i>			
E.12.d	Source Controls Measures	Regulated projects are required to implement source control measures for the listed pollutant generating activities a - r of this section.	3	
E.12.j	<i>Planning & Development Review Process</i>			
E.12.j	Planning & Development Review	Revised codes	4	
E.12.k	<i>Post-Construction Stormwater Management Requirements Based on Assessment and Maintenance of Watershed Processes</i>			

NPDES Permit Section	Permit Element	New Best Management Practice (BMP)	Stormwater Manager Estimated Annual Hours Required	Specific Tasks or Notes
E.12.k	Post-Construction Stormwater Management Requirements Based on Assessment and Maintenance of Watershed Processes.	The City of Paso Robles is part of the Central Coast RWQCB's Joint Effort for Post Construction and is currently implementing the following BMPs as required by the RWQCB.	0	See BMPs listed below.
E.12.k	Implementation Strategy for Low Impact Development (LID) and Hydromodification Control.	PC 1A: Apply LID principles and features to all applicable new and redevelopment projects during the two year period preceding the adoption of the hydromod criteria.	4	Apply interim criteria to new development and redevelopment projects until September 6, 2013.
		PC 1B: Establish a tracking mechanism/reporting system of PC stormwater controls installed.	80	
		PC 1C: Provide appropriate education and outreach for applicable target audiences.	5	
		PC 1D: Develop a tracking report indicating the accomplishments in education and outreach.	1	
		PC 1E: Develop, advertise, and make available LID BMP design guidance suitable for all stakeholders.	2	
		PC 1F: Develop specific guidance for development project applicants on how to achieve and demonstrate compliance with hydromod. control criteria and LID requirements.	10	
E.12.k	PC Watershed - Enforceable Mechanisms	PC 3A: The City will review all applicable codes, regulations, standards, and/or specifications to identify modifications and/or additions necessary to effectively implement hydromodification controls and LID. Modifications will be adopted and applied to any applicable new development and redevelopment projects.	3	New regulations are applied to applicable development and redevelopment projects
E.12.k	PC Watershed - Hydromodification Criteria	PC 5: Specific criteria for the City will be derived to control hydromodification in new development and redevelopment projects using Water Board approved methodology developed through the Joint Effort.	0	Criteria is developed
E.12.k	PC Watershed - Applicability Thresholds	PC 6: Select applicability thresholds for applying hydromodification control criteria to new development and redevelopment projects. Applicability thresholds will be consistent with long term watershed protection.	0	Thresholds have been established
E.13	WATER QUALITY MONITORING			
<i>E.13</i>	<i>Water Quality Monitoring</i>			
E.13(c)	Water Quality Monitoring - 303(d) monitoring	The City's stormwater system discharges to the Salinas River which is listed on the 303(d) list as being impaired by Chloride, Sodium and pH with urban runoff as one of the sources. The City shall meet with the RWQCB within the first year to assess whether monitoring is necessary and if so, determine the monitoring study design and implementation schedule. The City may choose to participate in a regional monitoring program to create a more comprehensive picture of water quality conditions within the watershed. The regional program must be reviewed and approved by the Executive Officer of the Regional Board.	20	If required by the Regional Board, monitoring could require an additional 40 hours per year.
E.14	PROGRAM EFFECTIVENESS ASSESSMENT AND IMPROVEMENT			
<i>E.14.a</i>	<i>Program Effectiveness Assessment and Improvement Plan</i>			

NPDES Permit Section	Permit Element	New Best Management Practice (BMP)	Stormwater Manager Estimated Annual Hours Required	Specific Tasks or Notes
E.14.a	Program Effectiveness Assessment and Improvement Plan (PEAIP)	Develop and implement a PEAIP that tracks annual and long-term effectiveness of the stormwater program. The plan shall identify the strategy used to gauge the effectiveness of prioritized BMPs and program implementation as a whole. Prioritized BMPs include those based on pollutants of concern.	0	
(a)	The Program Effectiveness Assessment and Improvement Plan shall include certain elements.	The PEAIP shall include: 1) Overall goal including pollutants of concern and prioritized BMPs. 2) Documentation of the level of implementation of the program elements. 3) Identification and targeting of target audiences. 4) Assessment of BMP performance at achieving outcome levels. 5) Assessment of pollutant source reductions achieved by individual BMPs. 6) Quantification of pollutant loads and pollutant load reductions achieved by the program as a whole. 7) Discharge quality, where available, including analysis of the data. 8) Receiving water quality data, including analysis of the data. 9) Identification of long-term effectiveness assessment, to be implemented beyond the permit term.	80	
(b)	The PEAIP shall assess BMP and program effectiveness in terms of outcome levels.	The PEAIP shall assess BMP and program effectiveness in terms of outcome levels: 1) Stormwater program activities. 2) Awareness. 3) Behavior 4) Pollutant load reductions 5) Discharge Quality, and 6) Receiving water conditions.	40	
(c)	The PEAIP shall identify assessment methods for privately owned BMPs	The PEAIP shall identify assessment methods for privately-owned BMPs	0	Workload included in (b) above.
(d)	The PEAIP shall identify assessment methods used to quantitatively assess BMP performance at reducing pollutant loads:	The PEAIP shall identify assessment methods used to quantitatively assess BMP performance at reducing pollutant loads: 1) Direct quantitative measurement of pollutant load removal, 2) Science-based estimates of pollutant load removal for BMPs where direct measurement of pollutant removal is overly challenging, 3) Direct quantitative measurement of behaviors that serve as proxies of pollutant removal or reduction, and 4) Visual comparison.	0	Workload included in (b) above.
(e)	The PEAIP shall ask and answer the following management questions for prioritized BMPs for which answers can be based on quantitative data.	The PEAIP shall ask and answer the following management questions for prioritized BMPs for which answers to management questions can be based on quantitative data. 1) Were prioritized BMPs implemented in accordance with the permit requirements? Develop quantitative data using confirmation and tabulation. 2) To what extent did prioritized BMPs change the target audience's behavior? Use: a) Surveys or interviews to discern knowledge, attitudes, awareness, behavior of specific population, etc. b) Interviews of site personnel to discern awareness and behavior. c) Inspections or site visits to observe or assess a practice. 3) To what extent did prioritized BMPs reduce pollutant loads from their sources to the storm drain system.	0	Workload included in (b) above.
(f)	The PEAIP shall include water quality monitoring data.	The PEAIP shall include water quality monitoring data where available to answer the following long-term management questions, effectiveness of BMPs and overall stormwater program will be assessed in future permit terms.	8	
E.14.b	<i>StormWater Program Modifications</i>			
E.14.b	<i>StormWater Program Modifications</i>		4	
E.15	TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS			
The City does not currently have any TMDLs.				
E.15.a	Comply with all approved TMDLs (Attachment G)		0	
E.15.b	Wasteload allocations are incorporated herein by reference as enforceable parts of this Order		0	

NPDES Permit Section	Permit Element	New Best Management Practice (BMP)	Stormwater Manager Estimated Annual Hours Required	Specific Tasks or Notes
E.15.c	Regional Board reviews TMDLs within one year of effective date and may propose modifications to requirements		0	
E.15.d	Report status of implementation via SMARTS		0	
E.15.e	Comply with Clean Water Act Sections 303d, 306B, and 314		0	
E.16	ANNUAL REPORTING PROGRAM			
E.16.a	Annual reporting on SMARTS	The State Water Board SMARTS shall be used to submit a summary of the past year activities for each program element and certify compliance with all requirements of the Permit.	70	
E.16.b	The City shall complete and retain all annual report information on the previous year beginning July 1, and ending June 30.	The City shall complete and retain all annual report information on the previous year beginning July 1, and ending June 30. All documentation to support the annual report shall be retained and be available for review during normal business hours.	4	
E.16.c	Submit a detailed written online annual report or in-person presentation of the annual report when requested.	Submit a detailed written online annual report or in-person presentation of the annual report when requested. The detailed annual report must clearly refer to the permit requirements and describe in quantifiable terms, the status of activities undertaken to comply with each requirement.	0	If required add 80 hours.
E.16.d	Permittees involved in regional programs may coordinate with the members to identify reporting responsibility. One report to be submitted.	Permittees involved in regional programs may coordinate with the members to identify reporting responsibility. The one report to be submitted must include a summary of requirements of the permit for each of the MS4s in the regional program.	0	

Total Annual Hours--> 2121

RESOLUTION NO. 14-xxx

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EL PASO DE ROBLES
TO ESTABLISH A FULL-TIME STORMWATER MANAGER POSITION

WHEREAS, the Federal Clean Water Act requires all cities to implement stormwater management programs, to protect waterways from urban stormwater pollution.

WHEREAS, the City of Paso Robles presently has a half-time Stormwater Manager to manage and implement its stormwater program. This person is also responsible for controlling industrial discharges to the sanitary sewer system.

WHEREAS, as a result of increasing regulation, management and implementation of the City's existing stormwater program has become more than a half-time commitment. Increased scrutiny of the City's industrial waste program by the U.S. Environmental Protection Agency, and the need to reduce salt discharges into the City sewer system, requires improved control of industrial discharges to the City sewer system.

WHEREAS, the State of California recently renewed its statewide municipal stormwater permit. The renewed permit requires extensive additional work. A workload analysis indicates that managing and implementing the City's stormwater program with this additional workload will require approximately 2,100 staff hours per year – equivalent to one full-time person.

WHEREAS, addition of a full-time Stormwater Manager position will not adversely impact the Sewer Enterprise Fund.

WHEREAS, the knowledge, skills, and abilities required of a Stormwater Manager are consistent with the City's Professional Manager II classification.

THEREFORE, BE IT RESOLVED AS FOLLOWS:

SECTION 1. The City Council hereby establishes a full-time Stormwater Manager position and authorizes the City Manager to recruit for the position.

PASSED AND ADOPTED by the City Council of the City of El Paso de Robles this 18th day of March 2014, by the following votes:

AYES:

NOES:

ABSTAIN:

ABSENT:

Duane Picanco, Mayor

ATTEST:

Caryn Jackson, Deputy City Clerk