



Linda S. Adams
Agency Secretary

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzenegger
Governor

Internet Address: <http://www.waterboards.ca.gov/centralcoast>
895 Aerovista Place, Suite 101, San Luis Obispo, California 93401-7906
Phone (805) 549-3147 • FAX (805) 543-0397

March 12, 2009

BY ELECTRONIC AND REGULAR MAIL

Gina Davis
gina@oceanocsd.org
Oceano Community Services District
1655 Front Street, P.O. Box 599
Oceano, CA 93475

Dear Ms. Davis:

NOTICE OF ENROLLMENT – NPDES SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS GENERAL PERMIT; OCEANO COMMUNITY SERVICES DISTRICT, SAN LUIS OBISPO COUNTY, WDID # 3 40MS05106

Central Coast Regional Water Quality Control Board (Water Board) staff received a Notice of Intent, Storm Water Management Plan (SWMP), and fee for the Oceano Community Services District's (CSD) Municipal Separate Storm Sewer System (MS4). These items are required to enroll in the National Pollutant Discharge Elimination System General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer Systems, Order No. 2003-0005-DWQ (General Permit).

Water Board staff reviewed the CSD's SWMP and found it to be in compliance with the General Permit and to meet the maximum extent practicable (MEP) standard set forth in the General Permit. The CSD's September 5, 2008 SWMP was available to the public for a 60-day comment period, and Water Board staff received comments from stakeholders. The comments are contained in Attachment 1. Water Board staff responses to these comments are contained in Attachment 2. On December 1, 2008, the CSD submitted an updated SWMP as a public comment that incorporated the Water Board's October 2, 2008 Draft Required Revisions.

The public did not request a hearing for the Water Board to consider approval of the SWMP and enrollment of the CSD under the General Permit. The General Permit states that if no hearing is requested, the Water Board Executive Officer will notify the regulated MS4 that it has obtained permit coverage only after Water Board staff has reviewed the SWMP and has determined that the SWMP meets the MEP standard established in the General Permit.

I am hereby approving the version of the SWMP submitted by the CSD on December 1, 2008.

California Environmental Protection Agency



Recycled Paper

As of the date of this letter, discharges from the CSD's MS4 are authorized by the General Permit. The CSD is required to implement the SWMP and comply with the General Permit. The CSD's first annual reporting period ends March 31, 2010. The CSD's first annual report is due to Water Board staff on July 1, 2010 (90 days after the reporting period ends).

Thank you for your cooperation and efforts to enroll the Oceano CSD under the General Permit. If you have questions regarding this matter, please contact **Tamara Presser at (805) 549-3334 or tpresser@waterboards.ca.gov**, or Matt Thompson at (805) 549-3159 or mthompson@waterboards.ca.gov.

Sincerely,



Roger W. Briggs
Executive Officer

cc: (by electronic mail)

Gordon Hensley: coastkeeper@epicenteronline.org
Loch Dreizler: LochD@wallacegroup.us
Jill Falcone: jfalcone@co.slo.ca.us

Attachment 1: Comment Letters Received during 60-day Public Comment Period
Attachment 2: Response to Comments

S:\Stormwater\Stormwater Facilities\San Luis Obispo Co\Municipal\Oceano CSD\SWMP - 2009 - 2014\EO Approval\SWMP Approval.doc



Attachment 1

From: "Loch Dreizler" <LochD@wallacegroup.us>
To: "Tamara Presser" <TPresser@waterboards.ca.gov>
CC: "Gina Davis" <gina@oceanocsd.org>, "Doug Groshart" <DougG@wallacegroup.us>
Date: 12/1/2008 10:28 AM
Subject: Revised Oceano SWMP Attached
Attachments: RWQCB Submit Revised Dec 1, 2008.pdf; Oceano SWMP Revision Notations.pdf

Tamara,

Please find attached the revised Ocean SWMP and a notation page indicating where the changes were made.

Thank you,

Loch

TABLE of REQUIRED REVISIONS
Oceano CSD Draft SWMP February 2009 – February 2014

Acronyms/Abbreviations:

- NA - Not Applicable
- BMP - Best Management Practice
- SWMP - Storm Water Management Program

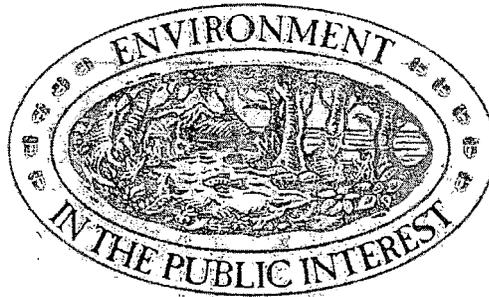
Item Number	SWMP Section	BMP ID#	Subject	Problem	Revisions
1	1.0	NA	CSD responsibilities	The Background section lists the CSD and County stormwater management responsibilities. The listed services do not specify that the CSD is responsible for stormwater management at the CSD-owned and operated facilities (listed in Section 7.6).	Modify the Background section to specify that, in addition to the listed responsibilities, the CSD is also responsible for stormwater management at CSD owned and operated facilities.
2	9.2	PP2	Illicit discharges in basins	The SWMP provides insufficient details for procedures to deal with illicit discharges to the CSD's basins.	Modify BMP PP2 and/or add a new BMP to commit the CSD to: post signage at basins with the County's stormwater phone hotline for citizen reports of illicit discharges, coordinate with the County on enforcement procedures for illicit discharges to the basins, and develop cleanup procedures in the event of an illicit discharge to the basins.
3	9.6	GH5	CSD facility inspections	The SWMP does not provide adequate details for CSD-owned and operated facility inspections.	Modify BMP GH5 and/or add a new BMP to commit the CSD to, in addition to developing an annual self-inspection checklist for CSD-owned facilities, develop a tracking system for problem areas and a follow-up system. Additionally, the CSD shall commit to, at a minimum, conduct annual facility inspections prior to the wet season.

Page 2 "Background" Revised
 Revised table language PP2
 Revised BMP GH5 language

Item Number	SWMP Section	BMP ID#	Subject	Problem	Revisions
4	9.6	NA	Vehicle and equipment storage	The SWMP does not specify a designated area for vehicle and maintenance equipment storage at CSD-maintained facilities.	Add details to an existing BMP, or add a new BMP, to ensure the CSD will store vehicle and maintenance equipment in a designated area.
5	9.6	GH7	Municipal staff training	The SWMP specifies the year the CSD employee training will commence, but the SWMP does not specify the frequency (i.e., annually, as needed basis) of the training.	Modify BMP GH7 or add a new BMP to specify the frequency of CSD employee training.

Revised BMP
GH6

Modified BMP
GH7



EPI-Center, 1013 Monterey Street, Suite 207 San Luis Obispo, CA 93401
Phone: 805-781-9932 • Fax: 805-781-9384

San Luis Obispo COASTKEEPER®

Central Coast Regional Water Quality Control Board
ATTN: Tamara Presser
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

December 2, 2008

Via: Email (tpresser@waterboards.ca.gov)

Subject: Oceano Community Services District Stormwater Management Plan

Dear Ms Presser,

Thank you for the opportunity to review and comment on the proposed Stormwater Management Plan of the Oceano Community Services District.

San Luis Obispo COASTKEEPER®, a program of Environment in the Public Interest, is organized for the purpose of ensuring that the public has a voice with agencies and officials responsible for enforcing water quality, watershed and coastal planning regulations on the California Central Coast. As such, the SLO Coastkeeper and our 800 central coast supporters are concerned that the proposed SWMP:

- Is impermissibly vague for many components.
- Does not clearly identify the financial resources available to implement the proposed program.
- Fails to provide RWQCB with measurable conditions to support enforcement of the proposed permit should that become necessary.

Specific comments, included in the table below, outline SLO Coastkeeper concerns. I urge the Regional Board to direct additional modification of the proposal to meet federally mandated MEP standards prior to final approval.

Respectfully Submitted,

Gordon Hensley, San Luis Obispo COASTKEEPER®



San Luis Obispo COASTKEEPER® a Program of Environment in the Public Interest is a trademark and service mark of WATERKEEPER® Alliance, Inc. and is licensed for use herein.

Minimum Control Measure 1:

Public Education Outreach

OBJECTIVE: E and O to inform public

MCM	WHAT IS REQUIRED	WHAT IT DOES PLAN NAME: Oceano CSD	COASTKEEPER REQUESTED CHANGES
Intent	<p>1. BMP intent must be measurable and outcomes must be consistent with the objectives of the NPDES Phase II program.</p> <p>2. Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure.</p> <p>3. Intent must articulate the objective of understanding the public's perceptions & attitudes regarding the problem of stormwater pollution.</p>	<p>These functions are performed by the County of San Luis Obispo, public agencies, non-profits and other volunteer organizations. Public education efforts aim to project information to the audience, while the goal of a public participation is to encourage volunteerism, public comment, input on policy, and activism in the community. The County of San Luis Obispo has produced a set of public outreach materials for distribution to Oceano residents and has made public appearances to local schools and community groups.</p>	<p>While we applaud the effort to partner with other agencies, this MCM is impermissibly vague:</p> <ol style="list-style-type: none"> 1. Revise program intent to demonstrate what OCSD will do as part of the Public Education & Outreach component of the SLO Co SWMP. 2. Clarify details of what OCSD will do and what measurable outcomes will be used to demonstrate that the proposed E&O program is MEP. 3. Clarify what budget and staff support is proposed to support this MCM.
PE1		<p>BMP: Cooperate with the County of San Luis Obispo, other agencies and groups to distribute outreach materials, when practical, in Oceano CSD scheduled mailings.</p> <p>GOAL: To share resources and reduce the source of storm water pollutants by distributing printed materials.</p> <p>METRIC: The CSD will include County (other agency) produced stormwater brochures to CSD water service customers.</p> <p>TIMETABLE: Coordinate with County's 5 year plan</p>	<ol style="list-style-type: none"> 1. Clarify whether OCSD will modify the general County materials to target their local Oceano community. 2. Clarify what target audiences OCSD intends to reach and what strategies will be used to reach them. 3. Clarify how many brochures (or other educational materials) will be used and what topics will be covered. 4. Clarify what measurable outcomes will be used to demonstrate that this strategy meets MEP requirements.

Minimum Control Measure 1:

Public Education Outreach

OBJECTIVE: E and O to inform public

PE2		<p>BMP: Provide links to county website storm water information.</p> <p>GOAL: Provide another way to inform the public about storm water prevention.</p> <p>METRIC: Oceano CSD adds link to County website during update.</p> <p>TIMETABLE: Implement with 2008 / 2009 website update.</p>	<p>1. Clarify who the target audience is and what education and/or outreach objective is to be reached. 2.</p> <p>Clarify what topics are to be covered and what will be measured.</p>
-----	--	--	--

Minimum Control Measure 2:

Public Participation
and Involvement

OBJECTIVE: Public participation / develop, impliment, review

MCM	WHAT IS REQUIRED	WHAT IT DOES PLAN NAME: Oceano CSD	COASTKEEPER REQUESTED CHANGES
Intent	<p>1. Must include a detailed Public Participation & Outreach Program that covers the entire permit term.</p> <p>2. Comply w/ all State and local notice requirements</p> <p>3. Objectives must be oriented toward public participation in program development and implementation rather than education.</p>	<p>These functions are performed by the County of San Luis Obispo, public agencies, non-profits and other volunteer organizations. The minimum requirements of Public Participation / Involvement are to provide opportunities for citizens to participate in program development and implementation, including effectively publicizing public hearings and/or encouraging citizen representatives on a storm water management panel.</p>	<p>The objectives of the proposed Public Participation & Involvement Program must be reoriented toward program development and implementation, rather than education.</p> <p>1. Clearly distinguish this MCM from the Public Education and Outreach component</p> <p>2. Include a detailed Public Participation and Involvement program details what program development and implementation OCSD will conduct, in addition to, or separate from, the actions required of SLO County in their SWMP.</p>
PP1		<p>BMP: Cooperate with County, other agencies and groups to promote public participation in Coastal Cleanup Day and Creek Cleanups.</p> <p>GOAL: Promote community support for SWMP and to reduce pollution from litter, trash, and illegal dumping.</p> <p>METRIC: Keep apprised of SLO County Partners for Water Quality meetings and participate in local clean-up days.</p> <p>TIMETABLE: Coordinate with SLO County's 5 year plan.</p>	<p>1. Clarify what mechanisms OCSD will use to engage citizens from the CSD in these activities.</p> <p>2. Provide details on what OCSD will do to engage all economic and ethnic groups within the jurisdiction of the CSD.</p> <p>3. Clarify what measurable goals OCSD will use to demonstrate that the proposed action fully addresses the requirements and intent of this MCM.</p>
PP2		<p>BMP: Post signs at storm basin asking for public assistance in reporting pollution threats and activities.</p> <p>GOAL: To give the public the opportunity to be proactive in stopping storm water pollution and inhibit polluters by posting penalties.</p> <p>METRIC: Phone records, memos and district follow-up regarding public reports. Establish system for enforcement and penalties.</p> <p>TIMETABLE: Implement 2009/2010 fiscal year.</p>	<p>1. This propped BMP lacks meaningful public participation and/or involvement in the development or implementation of this component.</p> <p>2. Provide details of the program and the measurable goals expected to result in stopping water pollution.</p> <p>3. Clarify how this program will be carried out during the entire term of the permit.</p>

Minimum Control Measure 3:

Illicit Discharge
Detection and Elimination

OBJECTIVE: Detect, eliminate, prohibit illicit discharges.

MCM	WHAT IS REQUIRED	WHAT IT DOES PLAN NAME: Oceano CSD	COASTKEEPER REQUESTED CHANGES
Intent	<p>Recognizing the adverse effects illicit discharges can have on receiving waters, the final rule requires an operator of a regulated small MS4 to develop, implement and enforce an illicit discharge detection and elimination program. This program must include the following:</p> <ul style="list-style-type: none"> • A storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls; • Through an ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State or local law) on non-storm water discharges into the MS4, and appropriate enforcement procedures and actions; • A plan to detect and address non-storm water discharges, including illegal dumping, into the MS4; • The education of public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and • The determination of appropriate best management practices (BMPs) and measurable goals for this minimum control measure. 	<p>The minimum requirements of Illicit Discharge Detection and Elimination are to develop and implement a plan to detect and eliminate illicit discharges to the storm sewer system. The County will be the enforcement authority for Best Management Practices (BMP) as outlined in their SWMP.</p> <p>Oceano CSD will be responsible for Illicit Discharge Detection and Elimination from their facilities, including the water and wastewater systems.</p>	<p>The minimum requirement of a regulated small MS4 is to develop, implement, and enforce an illicit discharge detection and elimination program. OCSD must:</p> <ol style="list-style-type: none"> 1) Adopt and enforce an IDDE ordinance to prohibit illicit discharges from OCSD facilities to the County Stormwater system. 2) Create a storm water system map showing the location of all outfalls from OCSD facilities and identifying the waters that receive discharges from those outfalls. 3) Provide a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community. 5) As the wastewater service provider in Oceano, the CSD should implement a regular system management program to detect and eliminate illicit discharges from the waste water collection system. 6) Conduct IDDE education and training for OCSD emergency and water service personnel.

Minimum Control Measure 3:

**Illicit Discharge
Detection and Elimination**

OBJECTIVE: Detect, eliminate, prohibit illicit discharges.

IL1		<p>BMP: Develop Sanitary Sewer Overflow Plan as part of Sewer System Management Plan (SSMP).</p> <p>GOAL: To reduce pollutants in storm water runoff from sanitary overflows and spills from Oceano CSD operated water and wastewater systems.</p> <p>METRIC: Log sanitary sewer system overflows, responses and time to implement corrective and preventative measures.</p> <p>TIMETABLE: 2009.</p>	<p>As part of this BMP, OCSD should map their collection system and identify waters of the US likely to receive overflows and/or spills.</p>
IL2		<p>BMP: Develop a plan to help reduce the risk of spills and improve response and cleanup when they occur in the maintenance yard.</p> <p>GOAL: To reduce pollutants in storm water runoff from maintenance yard and above ground storage tank.</p> <p>METRIC: Track hazardous spills and implement standard clean-up procedures plus corrective and preventative measures.</p> <p>TIMETABLE: Implement in 2008/2009 fiscal year.</p>	<p>This BMP may not describe an illicit discharge and seems better suited in the Post-Construction MCM.</p>

Minimum Control Measure 4:

Construction Site
Runoff Control

OBJECTIVE: Reduce pollutants from construction sites

MCM	WHAT IS REQUIRED	WHAT IT DOES	COASTKEEPER REQUESTED CHANGES
Intent	<p>The Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in storm water runoff to their MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. The small MS4 operator is required to:</p> <ul style="list-style-type: none"> • Have an ordinance or other regulatory mechanism requiring the implementation of proper erosion and sediment controls, and controls for other wastes, on applicable construction sites; • Have procedures for site plan review of construction plans that consider potential water quality impacts; • Have procedures for site inspection and enforcement of control measures; • Have sanctions to ensure compliance (established in the ordinance or other regulatory mechanism); • Establish procedures for the receipt and consideration of information submitted by the public; and • Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure. 	<p>PLAN NAME: Oceano CSD</p> <p>These functions are performed by the County of San Luis Obispo. The minimum requirements of construction Site Runoff Control are to develop, implement, and enforce an erosion and sediment control program for construction activities that disturb one or more acres of land.</p> <p>Oceano CSD does not issue or enforce construction permits. The District must submit permit applications to the County for District construction projects. Therefore, the District has not included any new BMPs in the SWMP. BMPs for Construction Site Runoff Control will be represented in the County of San Luis Obispo's SWMP.</p>	<p>An appropriate roll for OCSD would be to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges from construction projects in the community.</p>

Minimum Control Measure 5:

Post-Construction
Runoff Control

OBJECTIVE: Reduce pollution / new and redevelopment

MCM	WHAT IS REQUIRED	WHAT IT DOES PLAN NAME: Oceano CSD	COASTKEEPER REQUESTED CHANGES
Intent	<p>The Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in post-construction runoff to their MS4 from new development and redevelopment projects. The small MS4 operator is required to:</p> <ul style="list-style-type: none"> • Develop and implement strategies which include a combination of structural and/or nonstructural best management practices (BMPs); • Have an ordinance or other regulatory mechanism requiring the implementation of post construction runoff controls to the extent allowable under State or local law, • Ensure adequate long-term operation and maintenance of controls; • Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure. 	<p>These functions are performed by the County of San Luis Obispo. The minimum requirements for Post-Construction Runoff Control are to develop, implement, and enforce programs to address discharges of post-construction storm water runoff from new development and redevelopment areas. Applicable controls could include preventative actions such as protecting sensitive areas (e.g. wetlands) or the use of structural BMP such as grassed swales or porous pavement.</p> <p>Oceano CSD does not issue or enforce construction permits. The District must submit permit applications to the County for District construction projects. Therefore, the District has not included any new BMP in the SWMP. BMP for Post-Construction Runoff Control will be presented in the County of San Luis Obispo's SWMP.</p>	<p>As suggested for MCM 4, it would be for OCSD to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community.</p>

Minimum Control Measure 6:

Good Housekeeping
and Pollution Prevention

OBJECTIVE: MS4 operations
minimize contaminating stormwater discharge

MCM	WHAT IS REQUIRED	WHAT IT DOES PLAN NAME: Oceano CSD	COASTKEEPER REQUESTED CHANGES
Intent	<p>Recognizing the benefits of pollution prevention practices, the rule requires an operator of a regulated small MS4 to:</p> <ul style="list-style-type: none"> • Develop and implement an operation and maintenance program with the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system; • Include employee training on how to incorporate pollution prevention/good housekeeping techniques into municipal operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. To minimize duplication of effort and conserve resources, the MS4 operator can use training materials that are available from the U.S. EPA or the NYS DEC; • Determine the appropriate best management practices (BMPs) and measurable goals for this minimum control measure. Some program implementation approaches, BMPs (i.e., the program actions/activities), and measurable goals are suggested below. 	<p>Oceano CSD provides Pollution Prevention and Good Housekeeping by implementing Best Management Practices (BMP) for their facilities. These facilities include;</p> <ul style="list-style-type: none"> • One stormwater basins • One well water overflow basin • The District Office and Fire Station • Maintenance yard. • Water and wastewater systems 	<p>The intent of this control measure is to ensure that OCSD operations are performed in a manner that minimizes contamination of storm water discharges. To enhance the effectiveness of the proposed list of BMP's should explicitly include Low Impact Development Standards (LID) in any facility improvements and landscaping.</p>

Minimum Control Measure 6:

Good Housekeeping
and Pollution Prevention

OBJECTIVE: MS4 operations
minimize contaminating stormwater discharge

GH1		<p>BMP: Monitor hazardous materials storage and spill prevention procedures to avoid entrance into County storm water systems from Oceano CSD facilities. GOAL: to reduce the possibility on pollutants entering County storm water system. METRIC: Include checks list for proper hazardous materials storage and spill prevention. TIMETABLE: Impliment in 2008/2009 fiscal year.</p>	
GH2		<p>BMP: Develop procedures to prevent maintenance yard storm water runoff pollution from vehicle washing and fuel dispensing. GOAL: To prevent storm water runoff pollution from District vehicle washing, fuel dispensing and maintenance facilities. METRIC: Inspect for compliance on an ongoing basis. Include frequency and document. TIMETABLE: Implement in 2008/2009 fiscal year.</p>	
GH3		<p>BMP: Develop procedures to prevent water line and hydrant flushing that might impact storm water runoff, including water discharged during flushing activities associated with line disinfections. GOAL: To prevent flushing runoff pollution from maintenance related line and hydrant flushing. METRIC: Develop flow chart for line and hydrant flushing to use as determination for the disposal of chlorinated water. TIMETABLE: Implement in 2009/2010 fiscal year.</p>	

Minimum Control Measure 6:

**Good Housekeeping
and Pollution Prevention**

OBJECTIVE: MS4 operations
minimize contaminating stormwater discharge

GH4		<p>BMP: Develop basin maintenance tasks and schedule to reduce basin impact to storm water systems. GOAL: Through quarterly inspections, non-storm water discharges can be discovered and subsequently stopped, maintenance needs can be identified, pollutants and erosion problems can be detected. METRIC: Develop quarterly basin maintenance checklist to help identify any visual pollutants and erosion problems that can be detected and eliminated.</p> <p>TIMETABLE: Implement in 2008/2009 fiscal year.</p>	
GH5		<p>BMP: Conduct Oceano CSD Stormwater Pollution Prevention inspections including, but not limited to Oceano CSD office, fire station, maintenance yard, vehicle and service equipment. GOAL: To reduce pollutants in stormwater runoff from Oceano CSD facilities.</p> <p>METRIC: Develop annual self-inspection checklist for district facilities to identify any visual pollutants and erosion problems that can be detected and eliminated.</p> <p>TIMETABLE: Implement in 2009/2010 fiscal year.</p>	

Minimum Control Measure 6:

Good Housekeeping
and Pollution Prevention

OBJECTIVE: MS4 operations
minimize contaminating stormwater discharge

GH6		<p>BMP: Store vehicle and maintenance equipment in a designated area that protects the stormwater system from vehicle and equipment leaks and spills.</p> <p>GOAL: To prevent stormwater runoff pollution from District vehicle and equipment leaks and spills.</p> <p>METRIC: Include checks for vehicle and equipment leak/spill prevention on the inspection checklist described in GH5 above.</p> <p>TIMETABLE: Implement in 2008/2009 fiscal year.</p>	
GH7		<p>BMP: Develop a training program for employees that incorporate an overview of spill prevention and the Storm Water Management Plan.</p> <p>GOAL: To help Oceano CSD employees understand the purpose and benefit of the local and County Storm Water Management Plan.</p> <p>METRIC: District employee training programs should be designed to teach staff about potential sources of stormwater contamination and ways to minimize the water quality impact of district activities, such as basin maintenance, hydrant line flushing, vehicle and building maintenance. Training programs should include a general stormwater awareness message, pollution prevention/good housekeeping measures, Spill Response and Prevention. Finally, District field staff should be trained to recognize, track, and report illicit discharges. Selfinspection facility checklist will help determine the effectiveness of training.</p> <p>TIMETABLE: Begin in 2008/2009 and implement in 2009/2010 fiscal year.</p>	

**ATTACHMENT 2
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

**Response to Comments
Oceano Community Services District Stormwater Management Plan September 2008**

Introduction

This document includes the Central Coast Regional Water Quality Control Board (Water Board) staff responses to the comments received during the Water Board's 60-day public comment period (October 3 – December 2, 2008) for the Oceano Community Services District's (CSD) Stormwater Management Plan (SWMP) and Water Board staff's Draft Table of Required Revisions. Water Board staff received comments from the following parties:

- December 1, 2008: Oceano CSD
- December 2, 2008: San Luis Obispo Coastkeeper

Comments from the Oceano CSD

The Oceano CSD presented their comments in the form of a revised SWMP. The revisions reflect the CSD's efforts to address Water Board staff's October 3, 2008 Draft Table of Required Revisions. In Table 1, Water Board staff indicates whether or not the CSD's SWMP, including the December 1, 2008 revisions submitted as public comment, are acceptably responsive to Water Board staff's Draft Table of Required Revisions.

Table 1: Water Board staff's responses to Oceano CSD's December 1, 2008 SWMP Revisions Addressing the Draft Table of Required Revisions

Subject	Required Revisions (from October 2, 2008 Water Board staff comments on September 5, 2008 Draft SWMP)
Acronyms/Abbreviations BMP - Best Management Practice	
1 CSD Responsibilities	Modify the Background section to specify that, in addition to the listed responsibilities, the CSD is also responsible for stormwater management at CSD owned and operated facilities.
Staff Response:	The CSD revised the SWMP as required by adding language to the Background section. The revision is in Section 1.0, page 2.
2 Illicit Discharges in Basins	Modify BMP PP2 and/or add a new BMP to commit the CSD to: post signage at basins with the San Luis Obispo County's (County) stormwater phone hotline for citizen reports of illicit discharges, coordinate with the County on enforcement procedures for illicit discharges to the basins, and develop cleanup procedures in the event of an illicit discharge to the basins.
Staff Response:	The CSD revised the SWMP as required by revising the discussion of BMP PP2. The revision is in Section 9.0, page 8.

	Subject	Required Revisions (from October 2, 2008 Water Board staff comments on September 5, 2008 Draft SWMP)
3	CSD Facility Inspections	Modify BMP GH5 and/or add a new BMP to commit the CSD to, in addition to developing an annual self-inspection checklist for CSD-owned facilities, develop a tracking system for problem areas and a follow-up system. Additionally, the CSD shall commit to, at a minimum, conduct annual facility inspections prior to the wet season.
	Staff Response:	The CSD revised the SWMP as required by revising the discussion of BMP GH5. The revision is in Section 9.0, page 9.
4	Vehicle and Equipment Storage	Add details to an existing BMP, or add a new BMP, to ensure the CSD will store vehicle and maintenance equipment in a designated area.
	Staff Response:	The CSD revised the SWMP as required by revising the discussion of BMP GH6. The revision is in Section 9.0, page 10.
5	Municipal Staff Training	Modify BMP GH7 or add a new BMP to specify the frequency of CSD employee training.
	Staff Response:	The CSD revised the SWMP as required by revising the discussion of BMP GH7. The revision is in Section 9.0, page 10.

Comments from San Luis Obispo Coastkeeper

Comment: Thank you for the opportunity to review and comment on the proposed Stormwater Management Plan of the Oceano Community Services District. San Luis Obispo Coastkeeper, a program of Environment in the Public Interest, is organized for the purpose of ensuring that the public has a voice with agencies and official responsible for enforcing water quality, watershed and coastal planning regulations on the California Central Coast. As such, the SLO Coastkeeper and our 800 central coast supporters are concerned that the proposed SWMP:

1. Is impermissibly vague for many components.
2. Doesn't clearly identify the financial resources available to implement the proposed program.
3. Fails to provide RWQCB with measurable conditions to support enforcement of the proposed permit should that become necessary.

Staff Response: 1) The CSD's SWMP is meant to establish a framework to outline how the CSD will manage stormwater runoff. It contains a suite of minimum control measures (MCMs) that complement the County's MCMs to protect water quality from urban runoff. The CSD only has responsibilities for managing stormwater related to portions of the Illicit Discharge Detection and Elimination MCM and the Pollution Prevention Good Housekeeping for Municipal Operations MCM (refer to Section 6.0, page 4 in the SWMP). Water Board staff finds that the program provides adequate detail and focus. Water Board staff expects the CSD's SWMP to evolve over the permit life and respond to new information and evolving conditions on the ground. The CSD's annual reports will convey programmatic details and allow the Water Board to determine if additional detail or additional control measures are necessary to achieve water quality protection to the maximum extent practicable. 2) The Phase II Small Municipal Separate Storm Sewer Systems (MS4) General Permit (General Permit) requires the CSD to submit a SWMP that meets the maximum extent practicable (MEP) standard and therefore include BMPs that are within the CSD's fiscal means. The General Permit contains no explicit

requirement to demonstrate ability to pay. 3) Water Board staff finds that the CSD has provided sufficient measurable goals for tracking the portions of the stormwater program that the CSD oversees in the Oceano community. As explained previously, the County is responsible for the majority of stormwater regulation in Oceano. The County's BMPs for MCMs #1 through #6 are outlined in the County SWMP.

MCM #1: PUBLIC EDUCATION AND OUTREACH

Comment: While we applaud the effort to partner with other agencies, this MCM is impermissibly vague:

1. Revise program intent to demonstrate what OCSD will do as part of the Public Education and Outreach Component of the SLO Co SWMP.
2. Clarify details of what OCSD will do and what measurable outcomes will be used to demonstrate that the proposed E&O program is MEP.
3. Clarify what budget and staff support is proposed to support this MCM.

Staff Response: The County is responsible for implementing and overseeing BMPs in Oceano for MCM #1, MCM #2, MCM #4, and MCM #5. The CSD and County share responsibilities for implementing and overseeing BMPs in Oceano for MCM #3 and MCM #6. The CSD has sufficiently described the roles of both the County and the CSD for managing stormwater in Oceano. We anticipate once the CSD's program is established, the roles of both entities will become more clear. We expect both the County and the CSD to update their SWMPs accordingly, and to notify us of updates in their annual reports. See Water Board's response to Coastkeeper's first comment.

Comment: Coastkeeper requests the following for PE1:

1. Clarify whether OCSD will modify the general County materials to target their local Oceano community.
2. Clarify what target audiences OCSD intends to reach and what strategies will be used to reach them.
3. Clarify how many brochures (or other educational materials) will be used and what topics will be covered.
4. Clarify what measureable outcomes will be used to demonstrate that this strategy meets the MEP requirements.

Staff Response: See Water Board staff's response to the Coastkeeper's previous comment.

Comment: Coastkeeper requests the following for PE2:

1. Clarify who the target audience is and what education and/or outreach objective is to be reached.
2. Clarify what topics are to be covered and what will be measured.

Staff Response: See Water Board staff's response to the Coastkeeper's second comment.

MCM #2: PUBLIC PARTICIPATION AND INVOLVEMENT

Comment: The objectives of the proposed Public Participation & Involvement Program must be reoriented toward program development and implementation, rather than education.

1. Clearly distinguish this MCM from the Public Education and Outreach component.
2. Include a Public Participation and Outreach program that details the program development and implementation the OCSD will conduct, in addition to, or separate from, the actions required of SLO County in their SWMP.

Staff Response: 1) The CSD has adequately addressed public participation and involvement. Water Board staff expects some overlap between the Public Education and Outreach BMPs and the Public Participation and Involvement BMPs due to the inherent nature of the MCMs. Water Board staff does not consider subject overlap between MCMs to be a problem as long as all of the necessary BMPs are included in the SWMP. 2) See Water Board staff's response to the Coastkeeper's second comment.

Comment: Coastkeeper requests the following for PP1:

1. Clarify what mechanism OCSD will use to engage citizens from the CSD in these activities.
2. Provide details on what OCSD will do to engage all economic and ethnic groups within the jurisdiction of the CSD.
3. Clarify what measureable goals OCSD will use to demonstrate that the proposed action fully addresses the requirements and intent of the MCM.

Staff Response: See Water Board's response to the Coastkeeper's second comment.

Comment: Coastkeeper requests the following for PP2:

1. This proposed BMP lacks meaningful public participation and/or involvement in the development or implementation of this component;
2. Provide details of the program and the measureable goals expected to result in stopping water pollution;
3. Clarify how this program will be carried out during the entire term of the permit.

Staff Response: See Water Board staff's response to the Coastkeeper's second comment.

MCM #3 ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE):

Comment: The minimum requirement of a regulated small MS4 is to develop, implement, and enforce an illicit discharge detection and elimination program. The CSD must:

1. Adopt and enforce an IDDE ordinance to prohibit illicit discharges from the CSD facilities to the County Stormwater system.
2. Create a stormwater system map showing the location of all outfalls from the CSD facilities and identifying the waters that receive discharges from those outfalls.
3. Provide a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community.
4. As the wastewater service provider in Oceano, the CSD should implement a regular system management program to detect and eliminate illicit discharges from the wastewater collection system.

5. Conduct IDDE education and training for the OCSD emergency and water service personnel.

Staff Response: 1) The County utilizes the same regulatory mechanisms to control illegal discharges from CSD facilities to the County's MS4 as it would to control any other discharger in County jurisdiction. 2) The CSD Facility Map, included in the SWMP, shows the location of all CSD-owned facilities. This Facility Map is sufficient for showing the location of the CSD-owned facilities. The County is responsible for the stormwater conveyance system in Oceano. 3) The CSD is responsible for illicit discharges on its facilities, and the County is responsible for managing all other illicit discharges in Oceano. At this stage in the program, it is sufficient for the County to receive all illicit discharge reports and to re-direct these reports to the CSD when appropriate. 4) The CSD's Sanitary Sewer Overflow Plan, outlined in BMP IL1, will provide a sufficient framework for the CSD to track sanitary sewer overflows, take corrective actions, and implement preventative measures. 5) The CSD's training program, outlined in BMP GH7, will provide sufficient illicit discharge and elimination training for CSD employees. The training program will include education and training components for basin maintenance, pollution prevention, spill response and prevention, and recognition and tracking of illicit discharges.

Comment: Coastkeeper requests the following for IL1:

1. As part of this BMP, OSCD should map their collection system and identify waters of the US likely to receive overflows and/or spills.

Staff Response: The CSD Facility Map, included in the SWMP, shows the location of all CSD-owned facilities. This Facility Map adequately explains the location of CSD-owned facilities. The County is responsible for the stormwater conveyance system in Oceano.

Comment: Coastkeeper requests the following for IL2:

1. This BMP may not describe an illicit discharge and seems better suited in the Post-Construction MCM.

Staff Response: The CSD has placed BMP IL2 in an appropriate location in their SWMP. BMP IL2 covers spill prevention and cleanup procedures for CSD-owned facilities.

MCM #4: CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

Comment: An appropriate role for OCSD would be to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges from construction projects in the community.

Staff Response: The County has a stormwater pollution prevention hotline reporting program. The County is responsible for illicit discharges on all construction sites in Oceano. A separate hotline in Oceano is unnecessary.

MCM #5: POST-CONSTRUCTION STORMWATER MANAGEMENT

Comment: As suggested for MCM 4, it would be [appropriate] for OCSD to cooperate with the enforcement requirements of the County SWMP by providing a stormwater pollution prevention hotline for the public to use to report illicit discharges in the community.

Staff Response: See response to previous comment.

MCM #6: POLLUTION PREVENTION / GOOD HOUSEKEEPING

Comment: The intent of this control measure should be to ensure that OCSD operations are performed in a manner that minimizes contamination of stormwater discharges. To enhance the effectiveness of the proposed list of BMPs, [OCSD] should explicitly include Low Impact Development Standards (LID) in any facility improvements and landscaping.

Staff Response: The County will review future improvements to CSD facilities. Since the County must develop and implement hydromodification control criteria, any CSD projects that meet the County's "applicability criteria" will be required to control hydromodification through application of LID. No changes to the CSD's SWMP are necessary.