

**Annual Report
Year 3
May 1, 2012 to April 30, 2013**

Table of Contents

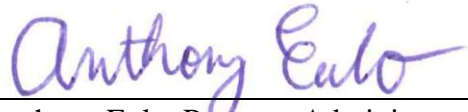
Executive Summary	2
Certification Letter.....	3
Permittee Information	4
Program Description and Management	5
Public Education And Outreach	7
Public Involvement and Participation	17
Illicit Discharge Detection and Elimination	23
Construction Site Stormwater Runoff Control	Error! Bookmark not defined.
Post Construction Storm Water Management in New and Redevelopment.....	40
Pollution Prevention/Good Housekeeping	50
TMDLs	61
Appendix.....	63

Executive Summary

The City of Morgan Hill is proud to have worked with the Morgan Hill community and surrounding jurisdictions in preventing pollution of our local waterways. While there is still much work to be accomplished, the City continues to take steps that will result in cleaner creeks and a healthier environment.

Certification Letter

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Anthony Eulo, Program Administrator

7/31/13

Date

Permittee Information

1. Permittee (Agency Name): City of Morgan Hill
2. Contact Person: Anthony Eulo
3. Mailing Address: 100 Edes Court, Morgan Hill, CA 95037
4. Contact Phone Number: 408-776-7333
5. WDID#: _343MS03020_

6. Have any areas been added/removed to the MS4 due to annexation or other legal means? Yes no
 - a. On 5/4/11, LAFCO issued a Certificate of Completion for a 0.74-acre property located on the east side of Shady Lane and on the north side of Dunne Avenue (APN 729-29-017).
7. Has a new map showing the urbanized area been developed? Yes no
 - a. If yes, see appendix

Program Description and Management

A.I Program Funding					
Description: Look for additional funding from general fund appropriation, fees, taxes and grants.	Status				
	Completed	Not applicable	Modified	Not Required This Fiscal Year	Joint Effort
1. Continuously investigate additional funding opportunities and report	X				X
2. Annual Report on any funding options researched and if there are any potential opportunities.	X				X

General Summary

Refer to Joint Report

Effectiveness Assessment

Refer to Joint Report

Proposed Modification

None

A.II Program Coordinator Work Group					
Description: Establish meetings for the program coordinators to discuss the progress of the program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Meet every other month.					X
2. Each year, develop a plan to accomplish the necessary BMPs for that year.					X
3. Summarize the meetings and if there will be any changes made and include report in annual report.					X

General Summary

Refer to Joint Report

Effectiveness Assessment

Refer to Joint Report

Proposed Modification

None

A.III Effectiveness Assessment Program Strategy

Description: Use the six “Outcome Levels” identified by CASQA to develop an effectiveness assessment strategy.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. During the first four year of the program use CASQA document “Level One Outcomes” (documenting activities) to assess program effectiveness.	X				
2. In years 3 and 4 develop an Effectiveness Assessment strategy.					X
3. Submit a draft strategy in the Year 3 Annual Report.					X
4. Submit a final strategy in the Year 4 Annual Report.				X	
5. Use the final strategy to evaluate program effectiveness				X	

General Summary

CASQA’s Level One –Document Activities was used to evaluate the effectiveness of the Program. Refer to the Joint Report for additional information.

Effectiveness Assessment

All BMPs effectiveness was evaluated using Level One Outcomes.

Proposed Modification

None.

Public Education And Outreach

1.I Brochures					
Description: Provide information about storm water pollution prevention. Make all brochures available to the public and for public distribution.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Revise existing brochures, as necessary.	X				X
2. Have new and existing brochures on display at City Hall.	X				
3. Pass out brochures at 100% of public events each municipality attends.	X				
4. Develop new brochures, as necessary, and include a copy of the brochure in the Annual Report once it has been finalized.					X
5. Identify the POCs and sources of POCs that are not adequately addressed in the existing education and outreach materials.					X
6. Develop education and outreach materials to address those POCs and sources of POCs that are not addressed in the existing materials. By the end of year three, the Municipality will have education and outreach material developed for all those POCs and sources of POCs that were identified as not previously addressed being in education and outreach materials.					X
7. Distribute utility bill insert relating to new or existing brochures.	X				

General Summary

<ol style="list-style-type: none"> 1. Addressed in Joint Effort Annual Report. 2. All brochures continued to be displayed at City Hall throughout the year. Brochures on display include: These Are Worth Protecting (Brochure); Stormwater Pollution Prevention (Activity Book); Be A Solution to Water Pollution (Activity Book); Greener Car Washing (Brochure); Connect the Drops (Brochure); Keeping It All In Tune (BASMAA Brochure); Home Maintenance Tips For A Cleaner Bay (BASMAA Brochure); The Bay Begins At Your Front Door (SCVURPPP Brochure). 3. Brochures were passed out at every public event attended including the 2012 Environmental Art & Science Fair held May 31, 2012. 4. Addressed in Joint Effort Annual Report. 5. Addressed in Joint Effort Annual Report. 6. Addressed in Joint Effort Annual Report. 7. Two bill inserts were distributed for the reporting year. The October 2012 insert focused on reducing irrigation times which reduces runoff.

Landscape runoff, which can carry sediments, pesticides, and nutrients, is primarily the result of excessive irrigation. The May 2013 insert addressed reducing the use of nitrogen-based fertilizers. (Attachment 1.I.1)

Effectiveness Assessment

The brochures and other informational materials that the City has available for distribution are comprehensive and, when distributed, do a good job of educating the populace.

Proposed Modification

None.

1.II Website

Description: Develop/modify website to include information about the Storm water program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Update/create a website on the storm water management program.	X				
2. Update website quarterly to include new events that happening for the next three months and as needed.	X				
3. Update website quarterly in years one through five.	X				

General Summary

1. The City’s website was updated to reflect information about the regional program. This includes: 2011-12 Annual Report, City Response to Regional Water Quality Control Board Enforcement Letter dated 10/1/12 and Monthly Program Coordinators Workgroup Agendas.
2. There were no events related to stormwater quality to load onto the website.
3. The website was monitored monthly to ensure that it reflected current issues and concerns.

Effectiveness Assessment

While a website is an essential tool for providing information to those looking for it, the City finds that a website is a poor vehicle for generating interest or involvement in stormwater issues – or any civic issue for that matter. Events like creek cleanups are promoted using other communication vehicles like Facebook, electronic bulletin boards, Constant Contact email blasts, and flyers.

Proposed Modification

1.III Public Events					
Description: Attend two public events per year to hand out information, answer questions and solicit feedback from residents.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Attend two public events each year.			X		
2. Annually report on the events that were attended and how many people were there.	X				

General Summary

<ol style="list-style-type: none"> 1. City staff handed out information at one public event this period, the 2012 Environmental Art & Science Fair held on May 31, 2012. The 2013 Earth Day celebration, originally scheduled for April 2013, was cancelled by the organizing committee. 2. This report completes the requirement. The approximate attendance at the event was: 2012 Environmental Art & Science Fair – 50
--

Effectiveness Assessment

Public events create opportunities to have engaging conversations with a small number of individuals. These interactions are often of high quality and real education occurs.

Proposed Modification

Only one event for this single reporting year due to the cancellation of the Earth Day event.

IV Outreach Program

Description: Advertise oil recycling, household hazardous waste management, and community clean up days using websites, government-access cable channels, City newsletters, garbage hauler newsletters, and public counters.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Advertise oil recycling, household hazardous waste management, and community clean up days using websites,	X				

government-access cable channels, City newsletters, garbage hauler newsletters, and public counters.					
--	--	--	--	--	--

General Summary

<p>1. These programs were advertised using numerous methods including: City website (Newsflashes, Events Calendar, Environmental Programs page, Household Hazardous Waste page, Clean & Healthy Creeks Page, Recycling at Home page), Recology South Valley biannual “Connection” Newsletter (Attachment 1.IV.1), “Business Connection” newsletter sent to all Morgan Hill businesses with their Business License renewal (Attachment 1.IV.2), Information sent by Recology to all new subscribers to garbage service, Slides running on Channel 17, the Morgan Hill Government Access Channel (Attachment 1.IV.3), Morgan Hill Environmental Services Facebook page, Flyers and Brochures available at City Hall.</p>
--

Effectiveness Assessment

The low number of reports of oil or other chemicals entering the waterways partially indicate that most residents are aware of these programs and utilize them.

Proposed Modification

--

1.V Non-English Speaking Outreach

Description: Provide educational material to non-English speaking residents.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. When developing new brochures, decide if it should be printed in both English and Spanish and include translated brochures in the Annual Report.					X
2. In each Annual Report, the Municipalities will summarize the extent and effectiveness of SCVURPPP’s outreach activities to non-English-speaking resident in the permit area.					X

General Summary

<p>1. Addressed in Joint Effort Annual Report. 2. Addressed in Joint Effort Annual Report.</p>
--

Effectiveness Assessment

Addressed in Joint Effort Annual Report

Proposed Modification

1.VI Disadvantaged Communities

Description: Some Communities may not be reached by initial outreach efforts. A program will be developed to provide outreach to disadvantaged communities.

Status				
Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
				X
				X
			X	
			X	

General Summary

1. Addressed in Joint Effort Annual Report.
2. Addressed in Joint Effort Annual Report.

Effectiveness Assessment

Not required.

Proposed Modification

1.VII Community-Based Social Marketing					
Description: Continually assess new public education methods in order to improve the effectiveness of education and outreach program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Assess community-based, social marketing strategies, and incorporate them into the educational BMPs where appropriate.					X
2. Implement revised educational BMP's				X	

General Summary

<ol style="list-style-type: none"> 1. Addressed in Joint Effort Annual Report. 2. Not required.

Effectiveness Assessment

Addressed in Joint Effort Annual Report.
--

Proposed Modification

--

1. VIII Education in Schools					
Description: Develop a school education program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Meet with school official to discuss school education program.	X				
2. Evaluate ways to provide school education, document which option will be used in the Annual Report.	X				
3. Implement school education program by the end of the third year. Reach 100% of schools by year 5.	X				
4. Develop an evaluation form.	X				
5. Administer evaluation form after education program has been conducted.	X				
6. Deliver appropriate school education program to a minimum of two schools.	X				

General Summary

1. The City provided funding to the School District to develop an educational program for 3rd grade students in FY 06-07. This program was piloted by three District teachers and found to be productive and consistent with the curriculum. This curriculum was made available to all 3rd grade teachers in the 07-08 school year and continues to be used. Data is not available on its use and performance.
2. The City has used a dual strategy for encouraging school education. The primary outreach tool the City uses is to focus the entries of the Environmental Art and Science Fair on the topic of stormwater pollution prevention. This year's event was held on May 31, 2012 in order to better accommodate school testing schedules and Spring Break (Attachment 1.VIII.1). The second method is to visit classrooms.
3. The City directly delivered school education during the reporting year as described in Attachment 1.VIII.2.
4. The City directly delivered school education during the reporting year as described in Attachment 1.VIII.2.
5. The City directly delivered school education during the reporting year as described in Attachment 1.VIII.2.
6. The City directly delivered school education during the reporting year as described in Attachment 1.VIII.2.

Effectiveness Assessment

Similar to public events, school presentations create a small number of opportunities for high quality education. The children who are present certainly understand the importance of preventing stormwater pollution after the presentation has been delivered.

Proposed Modification

--

1.IX Public Survey					
Description: Conduct a survey to determine the awareness of, and/or attitudes towards, storm water issues.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. In year one, conduct public survey to determine residents' knowledge of storm water issues and the willingness to change behaviors to benefit the watershed. At least 1,000 residents in the permit area shall be given the opportunity to participate in the survey.					X
2. Report results of survey.					X
3. Conduct public survey in year 5 to determine if there are any changes in awareness.				X	
4. Report on results from second survey and provide a comparison with the first survey. Include which efforts that were successful and efforts that will be discontinued.				X	

General Summary

<ol style="list-style-type: none"> 1. Addressed in Joint Effort Annual Report. 2. Addressed in Joint Effort Annual Report. 3. Not required. 4. Not required.
--

Effectiveness Assessment

Addressed in Joint Effort Annual Report.
--

Proposed Modification

--

1.X Mass Media					
Description: Monitor and report on the frequency and effectiveness of stormwater-related mass media messages available to residents and businesses within the permit area.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Monitor and report on the frequency and effectiveness of stormwater-related mass media messages available to residents and businesses within the permit area.					X

General Summary

1. Addressed in Joint Effort Annual Report.

Effectiveness Assessment

Addressed in Joint Effort Annual Report.

Proposed Modification

1.XI Morgan Hill Cable Channel Announcements					
Description: Place advertisements on the City's Government Access Channel.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Place stormwater pollution prevention messages on the City's cable channel a minimum of ten times annually.	X				

General Summary

The City ran a series of slides (Attachment 1.XI.1) containing stormwater pollution prevention messages on the local cable channel the entire year.

Effectiveness Assessment

The City does not estimate gross impressions for the government access channel.

Proposed Modification

1.XII Morgan Hill City Newsletter

Description: Place articles or advertisements in the City Newsletter.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Place one article or advertisement in City Connection once per year.	X				

General Summary

A large article reminding residents about stormwater pollution prevention was featured in the June 2012 “Water Connection” newsletter. This newsletter was mailed to all Morgan Hill residents. Attachment 1.XII.1 is a copy of this newsletter.

Effectiveness Assessment

The article was published.

Proposed Modification

Public Involvement and Participation

2.I Interested Parties List					
Description: Develop an interested parties list to inform those on the list of information about the program, events and activities.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop interested party list and add to the list as needed.	X				
2. Email interested party list quarterly on the next three months events and activities.	X				
3. Create a link on the website for interested parties to be added onto the interested parties email list.	X				
4. At all public events, activities, and meetings have a signup sheet that will allow people to be added to the interested parties list.			X		

General Summary

<ol style="list-style-type: none"> 1. This was done as a joint effort. 2. This was done as a joint effort. 3. There is a link on the City's website allowing people to be added to the list. 4. This would have been done at the Earth Day event, but was not done at the Art and Science Fair due to the competitive type of event that it was.
--

Effectiveness Assessment

To date, there are 34 subscribers to the Stormwater Notification List. There are only a small number of interested parties concerned about stormwater quality in this geographic area given the scarcity of water. An interested parties list is never likely to be a particularly effective tool.
--

Proposed Modification

See joint report for proposed modification.

2.II Public Involvement in SWMP Development	
Description: Involve the public in the development of the SWMP.	Status

	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Respond to 100% of public comments.				X	
2. Email interested parties with the public meeting date and time.				X	
3. Document the date and time of public meetings.				X	
4. In Morgan Hill, present program information at a public meeting	X				

General Summary

<ol style="list-style-type: none"> 1. Not required. 2. Not required. 3. Not required. 4. Information on the City's stormwater program was presented at a public meeting of the City Council on April 3, 2013.

Effectiveness Assessment

<p>The presentation made at the City Council meeting (Attachment 2.II.1) ensures that the Council remains aware of stormwater pollution prevention issues. It is unknown how many residents view the presentations on-line or on the government access cable channel.</p>

Proposed Modification

<p></p>

2.III Public Involvement with SWMP Review and Improvement

Description: Solicit review/evaluation from the public on the storm water management program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop the evaluation form for interested parties to fill out.					X
2. Send interested parties evaluation forms to complete.					X
3. Summarize evaluations from the public in the Annual Report.					X

General Summary

<ol style="list-style-type: none"> 1. Addressed in Joint Annual Report. 2. Addressed in Joint Annual Report. 3. Addressed in Joint Annual Report.
--

Effectiveness Assessment

Addressed in Joint Annual Report.

Proposed Modification

--

2.IV Storm Drain Awareness Program					
Description: Develop a storm drain-marking program where applicable.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Require 100% of all new/redevelopment projects to mark storm drains that are affected by the construction, storm drains that the project drains to, and any new drains that were created with the project.	X				
2. Track the number of storm drain inlets marked and locations. Mark an average of 20% of total storm drains per year to achieve a goal of 100% by the end of year 5. (100% by the end of year 3 in Morgan Hill)	X				
3. Inspect storm drains every two-years to determine when maintenance is needed.	X				
4. Report on the number of volunteers participating in storm drain marking events.	X				
5. Evaluate if volunteers are the best method for storm drain marking and modify method, if necessary.	X				
6. In the first year, evaluate a strategy for providing "no dumping" signage for roadside channels and ditches. Include in the Annual Report the results of the evaluation.				X	

General Summary

1. This has been completed and is a part of the City's basic requirements for new developments.
2. The City used paid staff to conduct marking in the third year of the program and completed the initial marking of all stormdrains in the City. Efforts in future years will focus on checking existing marked drains and repairing markings when needed.
3. This activity will begin the following year now that all of the drains are marked.
4. There were no volunteers marking drains this year.
5. This approach has been evaluated and the City has determined that a volunteer-based effort is not the best method for achieving comprehensive coverage. The City will continue to use volunteers, however, when available for drain monitoring efforts.

Effectiveness Assessment

This BMP was completed.

Proposed Modification

2.V Community Clean-up Events					
Description: Participate and publicize at least one cleanup day (National or local cleanup events).	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Annually help coordinate and sponsor either a national or local clean-up day.	X				
2. Annually post information on the storm water webpage and create a link for information about National River Cleanup Day and California Coastal Cleanup Day.	X				
3. Annually report on the number of Volunteers and either the weight or volume of trash collected.	X				
4. Measure the effectiveness of community clean-up events and modify if needed.	X				

General Summary

<p>1. Staff solicited volunteers for and coordinated Coastal Cleanup Day on September 15th, 2012 and held City Beautification Day: Creek Clean-Up on May 18th, 2013. Groups from local churches, businesses, and civic groups participated at a various sites along West Little Llagas Creek. Litter and nonnative vegetation was removed in many locations that would otherwise become stormwater pollution.</p> <p>2. Attachments 2.V.1 and 2.V.2 were posted to the City website.</p> <p>3. Approximately 51 individuals total participated in the two events. The collected materials included: Coastal Cleanup Day – .62 miles were cleaned and 322 pounds of trash was collected including 50 lbs. of scrap metal City Beautification Day – 1.5 miles were cleaned and 372 pounds of trash was collected</p> <p>4. The City believes that the results of the events are satisfactory and reflective of the watersheds in the community. No modifications are proposed.</p>
--

Effectiveness Assessment

--

Proposed Modification

--

2.VI Public Hotline					
Description: Continue to offer Public Hotline for the public to report complaints on storm water quality issues.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
SEE SECTION III: ILLICIT DISCHARGE AND DETECTION					

2.VII Morgan Hill Water Conservation Program					
Description: Discourage runoff from lawns and landscaping to prevent pollution.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Run a cable TV and web-based water conservation program to discourage water waste and runoff.					

General Summary

Promotional materials encouraging the reduction in lawn irrigation and other water conservation techniques were distributed throughout the year. Attachment 2.VII.1 is a collection of different slides that were run on the City’s cable television system at various times during the year. Attachment 2.VII.2 is the flyer for the rebate program that the City jointly sponsors with the Water District to replace lawns with more water-efficient plantings and Attachment 2.VII.3 is the flyer for the conservation programs offered to businesses. Attachment 2.VII.4 is the brochure for the WaterWise House Call program. The City website has a page devoted to Water Conservation (Attachment 2.VII.5). In addition, the City provides landscape planning software to encourage residents and businesses to install more water-efficient landscapes and has information available in the lobby of City Hall.

Effectiveness Assessment

The Santa Clara Valley Water District reported that over 90 households requested a house call during the reporting period.

Proposed Modification

Illicit Discharge Detection and Elimination

3.I Storm Water Infrastructure Map					
Description: Develop a storm water infrastructure map/GIS layer detailing outfalls, names and locations of receiving water.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Provide storm water infrastructure map/GIS layer.	X				
2. Update infrastructure map/GIS layer annually to include new facilities and to prioritize sites for inspection.	X				

General Summary

1. A map of the City's stormwater infrastructure has been developed and is maintained as development occurs.
2. The map is updated as areas develop in the community.

Effectiveness Assessment

The map has been completed and is useful in maintaining the stormwater system.

Proposed Modification

3.II Storm Water Ordinance					
Description: Develop/revise and document Storm Water Ordinance changes to prohibit the discharge of pollutants into the storm drain system and to establish enforcement procedures, such as notification and remediation requirements.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Evaluate effectiveness of the current Ordinance based on enforcement activities and abatement results.	X				

2. Document number of complaints and enforcement activities in Annual Report.	X				
3. Develop draft storm water Ordinance in year one.		X			
4. Hold public meeting to consider adopting an Ordinance by the end of year 2.		X			
5. Submit finalized Ordinance as part of the Annual Report for the year the Ordinance is adopted.		X			
6. Develop escalating enforcement strategy in year 3 and 4.	X				
7. Implement Ordinance once adopted.		X			
8. In Morgan Hill, implement existing ordinance.	X				
9. Evaluate effectiveness of the new ordinance based on enforcement activities and abatement results and revise, if necessary.				X	

General Summary

1. The City's ordinance seems to be reasonably effective. The City has not found in responding to complaints or addressing other circumstances that the ordinance does not provide enough regulation to be effective.
2. Three complaints of illicit discharges were received during the reporting period.
3. Not applicable – the City already has an ordinance.
4. Not applicable – the City already has an ordinance.
5. Not applicable – the City already has an ordinance.
6. The City established a new contract for fire services and will be working with fire companies to assist in enforcement during fire company inspections. The City's previous provider had declined to play this role.
7. Not applicable – the City already has an ordinance
8. The City's ordinance is in effect and used, when needed, to respond to complaints.
9. Not required.

Effectiveness Assessment

The City's ordinance seems to be reasonably effective. The City has not found in responding to complaints or addressing other circumstances that the ordinance does not provide enough regulation to be effective.

Proposed Modification

3.III Pet Waste Ordinance					
Description: Develop a pet waste ordinance to prohibit the deposition of pet waste on public property and require proper collection and disposal of pet waste	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop and include draft Pet Waste ordinance as part of the draft Ordinance		X			
2. Develop educational material.					X

General Summary

<ol style="list-style-type: none"> The City's illicit discharge ordinance was already adopted and outlaws the discharge of pet waste. Addressed in Joint Annual Report.

Effectiveness Assessment

Excessive pet waste does not seem to be a significant problem in the city. Mutt mitts are provided at most public spaces in the community and are heavily utilized.

Proposed Modification

--

3.IV Backyard Livestock/Hobby Farm					
Description: Coordinate with an existing education program to develop backyard livestock/hobby farm program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. During the first two years, contact the County of Santa Clara's Livestock Advisory Program or the Livestock and Land Program.					X
2. In years 3 and 4, develop education and review program. Submit a copy of the programs in the Annual Report.					X

3. In year 5, implement program and evaluate for effectiveness.				X	
---	--	--	--	---	--

General Summary

<ol style="list-style-type: none"> 1. Addressed in Joint Annual Report. 2. Addressed in Joint Annual Report 3. Not required.

Effectiveness Assessment

Addressed in Joint Annual Report.

Proposed Modification

--

3.V Detect and Eliminate Illicit (unauthorized) Non-storm water Discharges

Description: Develop/revise IDD&E program to include inspector training, complaint/incident response, field investigations of citizen complaints or incidents, enforcement and follow-up actions taken.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Inspect 100% of actionable complaints.	X				
2. Annually report on all actionable complaints and incident reports, field investigations, enforcement and follow-up actions taken.	X				
3. Evaluate effectiveness of existing program based on the enforcement activities and abatement results.	X				
4. Evaluate existing IDD&E program and submit, as part of the Annual Report, program elements that will be added to the IDD&E program.	X				
5. Modify the IDD&E program and include a summary, in the Annual Report of all new program elements.	X				
6. Train all staff involved in the IDD&E program on the new program elements.	X				
7. Implement the new program.	X				
8. Evaluate new IDD&E program and modify, if necessary.				X	

General Summary

<ol style="list-style-type: none"> 1. All actionable complaints received were followed up on. Three complaints were received during the reporting year. 2. There were three complaints to follow up on. The first reported garbage, a shopping cart and other debris in the Hale Avenue channel which is SCCO jurisdiction. The complaint was forwarded to Superintendent Michael Hurley. The second reported dirt and debris entering the storm drain during construction at 18330 Crystal Drive. City Code Enforcement issued a Stop Work Notice for grading without a permit. It was determined
--

that a water line break on the property had caused erosion and mud to enter the storm drains. The third reported cars parked in the street on Romal Court that were leaking oil. City Work Order was issued and vehicle was removed from the street and oil was cleaned up.

3. The City's resources and programs were adequate in responding to these complaints.
4. No changes are planned to be implemented since the reports of illicit discharge are so low.
5. Not required.
6. Not required as there were no changes
7. Not required as there were no changes
8. Not required.

Effectiveness Assessment

While the City's response has been effective, getting additional complaints and reports would further protect the watershed. City staff are routinely reminded about the City's ordinance and the need to respond when complaints are received.

Proposed Modification

3.VI Authorized Non-Storm Water Discharges

Description: Develop classification and control measures for authorized non-storm water discharges to indicate when authorized non-storm water discharges are a significant contributor of POCs and what treatment is required before discharging.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop 8 to 9 classifications and control measures annually.					X
2. Implement limitations once ordinance is adopted	X				
3. In Annual Report, document any significant discharge contributors that are also sources of pollutants and document the pollutant, source and actions taken.	X				
4. Measure the effectiveness of the authorized non-storm water discharge program and modify as needed.				X	

General Summary

1. Addressed in Joint Annual Report.
2. Limitations, when needed, were already in place for authorized pollutants identified. For most of the pollutants, no limitations were called for.
3. None identified
4. Not required.

Effectiveness Assessment

Developing the lists were a productive start to this task.

Proposed Modification

3.VII Public Hotline

Description: Continue to offer a hotline for the public to report illicit discharges and other water quality issues.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Continue to accept calls and log what type of storm water pollution the caller is concerned about, and route the complaint to the appropriate staff.	X				
2. Annually report on the number and type of complaints received, as well as, any enforcement and/or follow-up actions taken.	X				
3. Respond to 100% of actionable complaints within ten business days.	X				
4. Reports on spills or discharges having the potential to discharge pollutants into surface waters or the storm drain system will be investigated with 48 hours.	X				
5. Each year the Municipalities will evaluate the effectiveness of the hotline and compliant-processing protocols and revise them, of necessary.	X				

General Summary

1. Any calls placed would have been received and the City’s website continues to have a fairly prominent “Report a Concern” button relating to stormwater.
2. As reported above, three complaints were received.
3. As reported above, three complaints were responded to.
4. The three complaints were responded to the same or next business day.
5. No revisions are planned.

Effectiveness Assessment

N/A

Proposed Modification

3.VIII Commercial/ Industrial Facilities Inspections					
Description: Inspect commercial and industrial facilities that potentially discharge to waterways. Examples of facilities that have potential and shall be inspected includes but not limited to: <ul style="list-style-type: none"> • Food service facilities • Vehicle service facilities 	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Continue to inspect 100% of commercial/industrial facilities every three years.	X				
2. Hand out brochures to facilities as appropriate.	X				
3. Document the results of each inspection as part of the annual report.	X				
4. Submit strategy for prioritizing commercial/industrial inspections.		X			
5. Measure effectiveness of the new commercial/industrial facilities inspection program and modify if needed.				X	
6. Implement an enforcement program to achieve 100% correction of illegal dumping, connection, and discharging activities.				X	

General Summary

Commercial inspections continue to be a challenging task for City staff as the City of Morgan Hill does not employ inspectors that visit existing facilities – unless they are responding to a complaint. Nonetheless, the Gilroy Chemical Control employees, who are responsible for pretreatment sewer inspections, continued to inspect facilities during the reporting period and conducted additional preliminary reviews on many more. During their inspections, they search for illicit discharges and ensure that the facility’s operators are not contributing to stormwater pollution. Morgan Hill and Gilroy staff will be further refining this process to ensure that the cities are able to accurately document the results of these inspections. In addition, the City is now establishing a new fire contract, with Cal Fire, that was specifically negotiated to include stormwater issues as a component of inspections. These activities will begin in January, 2013.

Effectiveness Assessment

The current inspection staff from Gilroy Chem Control are well-qualified and do a comprehensive job at the facilities they inspect. The hole in the current system is other facilities that are not subject to wastewater inspections. The inspection frequency for these facilities will be dramatically increased under the new fire contract.

Proposed Modification

3.IX Used Oil Disposal

Description: Continue curbside recycling program and provide locations for residents to bring used motor oil and oil filters.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Report number of gallons collected by the curbside recycling program, Certified collection centers and Countywide Household Hazardous Waste Management program in the Annual Report.					X
2. Pick up used oil on the frequency specified above.	X				
3. Visit each used South County Certified Collection Center twice a year.		X			
4. Measure the effectiveness of the used oil program and modify as needed.	X				

General Summary

<p>1. Addressed in Joint Effort Report.</p> <p>2. Oil was collected biweekly throughout the City.</p> <p>3. Not applicable.</p> <p>4. The program is very effective for single family households and used oil is not frequently found in the community improperly disposed of. The service does not reach multifamily dwellings, however, so City promotional efforts, as identified in Section 1, will be focused on educating apartment residents.</p>
--

Effectiveness Assessment

Biweekly oil collection is a very effective tool for conveniently collecting oil from do it yourselfers. 15,021 gallons of used oil were collected during the reporting period.

Proposed Modification

--

3.X Household Hazardous Waste Collection

Description: Participate in Countywide Household Hazardous Waste Program.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Continue to offer program and track residents and small businesses that participate in the program.					X
2. Document pounds of hazardous waste collected.					X
3. Measure the effectiveness of the used oil program and modify as needed	X				

General Summary

1. Addressed in Joint Effort Report.
 2. Addressed in Joint Effort Report.
 3. The program is freely available to everyone. Modifications for the upcoming year include the establishment of a new collection center in San Jose that will be open several days a week. This will make the service more freely available to City residents which will enhance its effectiveness.

Effectiveness Assessment

Addressed in Joint Effort Report.

Proposed Modification

3XI Onsite Sewer (septic) System					
Description: Develop an Onsite Wastewater Management Program. This program will include PE&O for owners of onsite wastewater systems.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop and implement the onsite Wastewater Management program. Including public outreach and education plan and material.		X			
2. Conduct at least one public workshop a year.		X			
3. Provide a summary of workshop topics and number of attendees.		X			
4. Measure the effectiveness of the onsite sewer or septic system program and modify if needed.		X			

General Summary

1. Not applicable.
2. Not applicable.
3. Not applicable.
4. Not applicable.

Effectiveness Assessment

Not applicable.

Proposed Modification

--

3.IX Education/Training					
Description: Provide annual training on procedures and recordkeeping.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
See Section 1: Public education and outreach for more information on public training.					

2. Provide annual training to 100% of Municipal staff (staff who is involved in IDD&E program).	X				
3. Document participation of annual Illicit Discharge Detection and Elimination training for Municipal staff.	X				
4. Measure the effectiveness of training and modify if needed.	X				

General Summary

- 2. Since City staff do not conduct onsite inspections, training is limited to those answering the phone and responding to e-mails + ensuring that the Code Enforcement Officer is aware of City rules and regulations.
- 3. The two receptionists who staff the hotline phone number, all backup receptionists and the maintenance supervisor participated in the training held on March 26, 2013. Attendees were: Tina Rodriguez, Elizabeth Armendariz, Jay Jaso, Andi Borowski and Anne Beale. The Code Enforcement Officer, John Amos, received training via a one-on-one conversation with the program coordinator about the City's ordinance and his responses.
- 4. Staff have been quizzed about how to respond to complaints and have answered correctly, indicating that the training was effective.

Effectiveness Assessment

Since we are a small community with a small number of staff, it is easy to train everyone and to communicate when a call or e-mail reporting a problem is received.

Proposed Modification

--

Construction Site Stormwater Runoff Control

4.I Erosion and Sediment Control Ordinance					
Description: Review existing erosion and sediment control ordinances.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Report on existing erosion and sediment control ordinances. Identify where improvements can be made.				X	
2. Existing erosion and sediment control requirements will continue to be required and enforced at 100% of construction sites until the new requirements are developed.				X	
3. Evaluate the effectiveness of the current ordinance based on enforcement activities, abatement results and water quality protection objectives.				X	
4. Modify/create new ordinances, if necessary.				X	
5. Require and enforce new ordinances and requirements at 100% of construction sites.	X				
6. Measure the effectiveness of the new ordinance and revise it, if necessary.				X	

General Summary

As of FY 2005/2006, the City of Morgan Hill has addressed items of 1-6 of this section, which has resulted in the adoption of a storm water ordinance requiring Erosion and Sediment Control among other urban storm water quality issues (see Morgan Hill Attachment 4.1).

In June 2, 2010, the City of Morgan Hill adopted the URBAN STORM WATER QUALITY MANAGEMENT AND DISCHARGE CONTROL ordinance, as Chapter 13.30 of the City's Municipal Code.

With regards to Erosion and Sediment Control, Chapter 13.30 addresses the following:

- 1) Construction activities of areas greater than one acre must meet the requirements of the most current NPDES General Permit No. CAS000002 (Muni Code 13.30.250), which includes providing a Storm Water Pollution Prevention Plan (SWPPP) Manual (Muni Code 13.30.260).

Regardless of construction sites shall be conditioned to provide drawings for erosion and sediment control, showing how to stabilize soil and sediment on the construction site. Erosion control shall occur between September 15th and May 1st, and sediment control shall be planned year round for the life of the

project (Muni Code 13.30.270).

Effectiveness Assessment

Per Chapter 13.30 of Municipal codes, all sites are required to address erosion and sediment control.

Proposed Modification

None.

4.II Construction Site BMP Requirements and Standards

Description: Establish or Adopt a manual on construction sites BMPs that includes standard for BMP selection, implementation and performance standards for construction site BMPs.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Establish or adopt a BMP manual for construction sites BMPs in year one.				X	
2. Include in the Ordinance a requirement that projects subject to storm water BMPs must comply with the criteria and standards for BMP selection, implementation, and performance standards established in the BMP manual.				X	

General Summary

As of FY 2005/2006, the City of Morgan Hill as addressed items of 1-2 of this section:

The City has adopted the CASQA BMP manuals for construction activities. Per Muni Code section 13.30.270 water pollution control for construction activities need to meet the minimum standards and specification of the CASQA BMP manuals.

Effectiveness Assessment

SWPPP manuals for each project are reviewed to see that proper BMPs are selected per project. SWPPP manuals are not approved until BMPs meet the projects specific site conditions. All SWPPPs and Erosion and Sediment plans for projects have consistent and standard details.

Proposed Modification

None.

4.III Site Plan Review and Plan Check					
Description: Develop and implement a site plan review and plan check process to ensure erosion and sediment ordinance requirements are met.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Submit a summary on the current site plan review and plan check process, and those processes to be modified.				X	
2. Evaluate existing erosion and sediment control ordinances to ensure the proper authority is established to enforce erosion and sediment control requirements.				X	
3. Develop draft language for inclusion in the Ordinance.				X	
4. Require appropriate erosion and sediment control BMPs for all construction sites. Require 100% of all new/redevelopment projects over an acre of land disturbance to show proof of filing an NOI with the SWRCB prior to being issued a building permit or commencing construction.					
5. Evaluate the new site plan review/check process and revise if necessary.					

General Summary

As of FY 2005/2006, the City of Morgan Hill has addressed items of 1-5 of this section, which has resulted in the adoption of a storm water ordinance requiring the plan review and plan check for urban storm water quality issues related to construction activities.

Site Plan Review/Check Process – Projects grading greater than one acre, with the submittal of the project’s improvement plans:

- 1) Projects are required to submit SWPPP manual as required per the current NPDES General Permit No. CAS000002 (Muni Code 13.30.250 and 260).
- 2) Project plans include Water Pollution Control Drawings for Erosion and Sediment Control (Muni Code 13.30.270), which mirrors the requirements of the SWPPP manual.
- 3) Projects are to provide an NPDES General Permit NOI and WDID number.
- 4) Improvement plans are not deemed complete until the above items 1-3 are met.
- 5) No permits (grading, building, encroachment, etc), among other conditions of approval, are issued until the above items are met.

Site Plan Review/Check Process – Projects grading less than one acre, with the submittal of the project’s improvement plans:

- 1) Project plans include Water Pollution Control Drawings for Erosion and Sediment Control (Muni Code 13.30.270).

All reviews/approvals require that selected BMPs are site specific and meet the needs of the site terrain.

Effectiveness Assessment

All sites regardless of size are required to have Water Pollution Control Drawings for Erosion and Sediment Control (Muni Code 13.30.270).

Proposed Modification

None.

4.IV Construction Site Inspections And Enforcement					
Description: Develop/revise the construction inspection program to ensure storm water quality control measures are being implemented.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop/modify inspection program to ensure water quality control measures are being implemented at construction sites.					
2. Evaluate effectiveness of the current ordinances based on enforcement activities, abatement results, and water quality protection objectives					
3. Update inspection procedures, as necessary, to stay consistent with new standards as they are developed and adopted.					
4. Inspect 100% of high priority construction sites at a minimum of once, every month during the rainy season from October 15 th to April 15 th .					
5. Monitor inspection results and follow-up violations with additional enforcement activities. When a violation is reported, a notice of violation will be issued requiring immediate correction, and providing for escalated enforcement, based on current conditions and the nature of the violation - but not to exceed 10 days. Notices shall be issued within 72 hours after discovery.					
6. Notify all construction project managers that the site will need to be "winterized" prior to October 15th, or the first forecasted significant rainfall, whichever comes first for inspection by Municipal staff or a third party agent.					
7. Inspect all construction sites prior to the wet season.					
8. In Morgan Hill require inspections at all sites disturbing an acre or more using the following schedule: 1) Within 24 hours prior to a rain event forecasted by the National Weather Service that is anticipated to bring one-half inch or more of precipitation in a 24-hour period; 2) Weekly from October 15th to April 15th; and 3) Every other week from April 16th to October 14th.					
9. Summarize the results of all inspections and submit in the Annual Report.					
10. Record and track all inspections using the Construction Site Tracking system. The results of inspections will be summarized for inclusion in the Annual Report.				X	

11. Measure effectiveness for new inspections. Measure the speed and effectiveness of enforcement actions. Revise the goals if necessary.				X	
---	--	--	--	---	--

General Summary

As of FY 2005/2006, the City of Morgan Hill has addressed items of 1-11 of this section, which has resulted in the adoption of a storm water ordinance allowing for inspection and enforcement for urban storm water quality issues.

All projects with grading activities greater than one acre are conditioned with the following SWPPP inspection and enforcement requirements:

A. PRIOR TO ANY GRADING OR CONSTRUCTION ACTIVITY, DEVELOPER/OWNER SHALL OBTAIN THE SERVICES OF A QUALIFIED THIRD PARTY SWPPP INSPECTOR (TPSI)

- 1) Qualified Third Party SWPPP Inspector (TPSI) shall hold certification of a Qualified SWPPP Practitioner (QSP) or a Qualified SWPPP Developer (QSD) issued by the State Water Resources Control Board (SWRCB).
- 2) Developer shall provide contact information of the projects Third Party SWPPP Inspector (TPSI) to Public Works Engineering.
- 3) Public Works Engineering shall go over the requirements of SWPPP Inspections with the TPSI.
- 4) Public Works Engineering shall coordinate with TPSI in maintaining an inspection log of all SWPPP Inspections and their respective sites.

B. SITE SWPPP INSPECTIONS VIA THIRD PARTY SWPPP INSPECTOR (TPSI)

- 1) DEVELOPER/OWNER shall have the site inspected by the TPSI.
- 2) SWPPP Inspections shall occur between 48 to 24 hours prior to a forecasted rain event and immediately following the rain event.
- 3) SWPPP Inspections shall occur weekly between September 15th and May 1st.
- 4) SWPPP Inspections shall occur bi-weekly between May 1st and September 14th.
- 5) For each SWPPP Inspection, the TPSI shall certify in writing to the Building and Public Works Engineering Division if the site is in compliance/non-compliance with the NPDES General Permit for Stormwater, site SWPPP Manual, and Water Pollution Control Drawings, using the City standard SWPPP Checklist (contact Public Works for standard SWPPP Checklist). TPSI shall forward onsite and offsite information/certification to the Building (on-site private property issues) and Public Works (public right-of-way issues) inspectors respectively.
- 6) Prior to rain events, BMPs not in compliance will need to be corrected immediately.
- 7) Illicit discharges per the NPDES General Permit, non-compliance of tracking control, and inlet protection within the public right of way shall be addressed immediately.
- 8) Other non-compliance issues need to be addressed within a 24 hour period.
- 9) Non-compliance issues which have been corrected shall be verified by the TPSI by a follow up inspection.

C. CITY INSPECTORS OVERSIGHT OF TPSI INSPECTIONS

- 1) City Inspectors and Engineering shall receive site inspection information/certification from the TPSI per items B.2, B.3, or B4.
- 2) City Inspectors and Engineering shall coordinate with TPSI to address any outstanding items within the required time frame.
- 3) Sites that are not able to address non-compliance issues shall be denied further Building/Public Works inspections OR required to stop work until non-compliance issues are corrected.

See the attached third party SWPPP inspection chart for site inspections (See Morgan Hill Attachment 4.2).

Effectiveness Assessment

As part of the projects condition of approval, all sites greater than one acre of grading activity are required to be inspected by an independent-qualified third party NPDES/SWPPP inspector, which reports directly to the city inspector/engineering staff.

Currently all projects under the NPDES General Construction permit are conditioned to have a qualified third NPDES/SWPPP inspector.

Proposed Modification

The City is in the process of incorporating Third Party NPDES/SWPPPP inspection requirement into the Municipal Code, which will mirror our current condition above. This ordinance will give the City definitive control over who the Third Party NPDES/SWPPPP inspector will be, as it will allow the City to determine if the project is allowed to hire a third party inspector or the project will pay into a SWPPP inspection fund in which the third party inspector is hired by the City.

In Spring of 2012, the City Council approved a SWPPP inspection fee/fund; this fee can be used to fund in house SWPPP inspectors or allow the City to choose a third party inspector in lieu of the developer’s choice to hire one. With this fee in place, this is the first step in codifying the Third Party NPDES/SWPPPP inspection ordinance.

The next phase is to develop the ordinance language which is still under development.

4.V Training

Description: Provide inspectors, permit reviewers and other staff members a minimum of once-a- year training on construction storm water BMPs.

Status				
Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
			X	

1. Provide training to 100% of inspectors; permit reviewers and other staff on storm water implementation details as it relates to construction annually.

2. Report attendance at training events as part of the Annual Report.

3. Measure the effectiveness of training and modify if necessary.

General Summary

The City, due to budget constraints, was not financially feasible to obtain QSD/QSP training.

With implementation of the qualified third party SWPPP inspection requirements, on the job training by inspectors and engineering occurred through the observation of the third party inspection activities and interaction with the third party inspectors.

Effectiveness Assessment

Engineers and inspectors are able to get more field experience through observation and interaction with qualified third party SWPPP inspectors.

Proposed Modification

Post Construction Storm Water Management in New and Redevelopment

5.I Post-Construction Storm Water Ordinance					
Description: Develop a post-construction ordinance to address various post construction storm water issues.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Analyze all applicable codes, regulations, standards, and/or specifications to identify the modifications and/or additions needed to effectively implement hydromodification controls and LID.				X	
2. During Q3-Q8, the Municipalities will work together to develop/revise ordinance language based on the above analysis.					
3. Each Municipality will adopt the Ordinance by the end of Q8 and will implement and enforce the new ordinance for 100% of new development and redevelopment projects thereafter.				X	
4. In Morgan Hill, implement and enforce its post- construction ordinance that incorporates all of the supplemental provisions.					
5. Develop a review program to measure the effectiveness of the Ordinance.				X	
6. Measure effectiveness of the Ordinance and modify as needed				X	

General Summary

As of FY 2009/2010, the City of Morgan Hill has addressed items of 1-4 of this section, which has resulted in the adoption of a post construction storm water development standard ordinance.

In October 2, 2010, the City of Morgan Hill adopted the POST CONSTRUCTION STORMWATER POLLUTION PREVENTION ordinance, as Chapter 18.71 of the City's Municipal code (see Attachment 5.1).

Effectiveness Assessment

Based on above standard conditions and Chapter 18.71 of the Municipal code, all new proposed sites are required to have applicable post construction storm water development standards.

Proposed Modification

The Central Coast RWQB has developed post construction development standards as outlined in Resolution No. R3-2013-0032, which shall apply to all

regulated projects by March 6, 2013. By March 6, 2013, all projects will be conditioned with the updated standards of Resolution No. R3-2012-032. Chapter 18.71 will be amended to include the storm water development standards as outlined in Resolution No. R3-2012-032.

5.II Development Review Process

Description: Review the development review process to ensure that storm water issues are considered throughout the development review process	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. During Q3-Q8, each Municipality will review their existing development review process and CEQA review checklist and modify them to ensure that storm water control requirements are incorporate into in the development review process and conditions of approval and that each municipality has the proper authority to require them.				X	
2. Evaluate the effectiveness of the existing process based on if all new/redevelopment projects receive a CEQA review, development review, and final submittal review.				X	
3. Review 100% of new /redevelopment projects using the existing process and CEQA checklist in years 1-2, and the new development review process and CEQA checklist in years 3-5.	X				
4. Develop a review program to measure the effectiveness of the conditions of approval.				X	
5. Measure effectiveness of the development review process and modify as needed.				X	

General Summary

Currently all projects receiving CEQA review are informed that projects will be subject to post construction storm water development standards.

Effectiveness Assessment

Projects under CEQA are aware that post construction storm water development standards need to be incorporated in design submittals.

Proposed Modification

Based on Resolution No. R3-2012-0032 by the Central Coast RWQB, a post construction development standard manual has been developed. This manual will be made available on-line, which will help developers incorporate appropriate post construction development standards into project design, prior to application submittals to Planning, Building, and Engineering for review.

5.III General Permit Attachment 4 BMPs					
Description: Review the development review process to ensure that storm water issues are considered throughout the development review process. Develop, implement and enforce a post construction storm water control program to mitigate runoff from new and redevelopment projects as required by General Permit Attachment 4.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. The County and Gilroy will require design standards for projects that fall under Attachment 4 requirements, beginning in Q9.				X	
2. Morgan Hill will require Attachment 4 design standards for applicable projects in years 1 through 5.					

General Summary

As part of a project's condition of approval and Municipal Code Chapter 18.71, Attachment 4 requirements are to be met for all applicable projects submitted for review.

Effectiveness Assessment

All new projects have been conditioned with the requirements of Attachment 4 (see Project NPDES Tracking Chart, Morgan Hill Attachment 5.3a).

Proposed Modification

5.IV Low Impact Development (LID)					
Description: Develop, implement and require all new and redevelopment projects to optimize implementation of LID planning principles and storm water management practices, subject to hydromodification control criteria and applicability criteria.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop LID criteria for new/redevelopment projects consistent with hydromodification control criteria derived through the Joint Effort.				X	
2. Integrate the LID criteria into the Ordinance.				X	
3. Apply and enforce the LID criteria for all applicable new and redevelopment projects, beginning in Q9 and continuing thereafter.				X	

General Summary**Effectiveness Assessment****Proposed Modification****5.V Riparian/Wetland Setback Ordinance**

Description: Require a minimum 20-foot setback for new and redevelopment projects from riparian/wetland areas. More definitive setback standards will be developed that will reflect certain conditions of the water body.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Require all projects to have a minimum 20-foot setback from riparian/wetland areas.					
2. Develop language to include in the storm water ordinance.				X	
3. Implement revised setbacks for projects through the ordinance, beginning in Q9 and continuing there after.				X	

General Summary

- 1) As part of the standard conditions, applicable projects are conditioned per the following: Project shall not grade within 30 feet of a perennial or intermittent stream or within 30 feet of riparian habitat.
- 2) The above language shall be made part of the Municipal Code Chapter 18.71 through and amendment of the ordinance (to be determined).

Effectiveness Assessment

Applicable projects can be conditioned with this standard.

Proposed Modification

5.VI Post Construction BMP Inspection					
Description: Develop procedures for inspecting post-construction BMPs to ensure they are constructed properly and in accordance with the approved plan.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Evaluate effectiveness of the current post-construction BMP inspection procedures				X	
2. Develop procedures for inspecting post-construction structural and non-structural controls.				X	
3. Update construction checklist to include post construction BMPs.					
4. Provide training to 100% of inspectors on how to perform inspections.				X	
5. Inspect 100% of post-construction BMPs required for each project. All inspections will be documented and included in each Annual Report, starting Q9 and in all subsequent years.				X	
6. Develop a review program to measure the effectiveness of the post-construction site inspections.				X	
7. Measure effectiveness of inspections and modify as needed.				X	

General Summary

Projects which are conditioned with post construction storm water development standards are required to have an executed **Stormwater BMP Operation and Maintenance Agreement** and a certified **Storm Water Runoff Management Plan (SWRMP)** prepared by a registered engineer upon completion of the project. Both the agreement and SWRMP are submitted to Engineering for review and approval. The agreement binds the owner of the project/property to perpetually maintain the storm water BMPS. The SWRMP outlines all the BMPs of the project/property that requires maintenance and verifies the BMPs were installed per plan. The SWRMP further outlines the required maintenance and inspections of the BMPs; the maintenance and inspections are required to be certified by a responsible licensed Civil Engineer.

Effectiveness Assessment

Projects conditioned with post construction storm water development standards have executed the **Stormwater BMP Operation and Maintenance Agreement** and have certified **Storm Water Runoff Management Plans**. With both agreement and SWRMP, this ensures the storm water BMPs that help treat water quality are perpetually maintained. Reports submitted to City Engineering every 6 months ensure that the City is aware of the status of existing projects post construction BMPs.

Proposed Modification

5.VII Post-Construction Site Tracking

Description: Develop a post-construction site inspection tracking system for post-construction BMP inspections.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop a post-construction site tracking system.				X	
2. Implement tracking system to keep track of construction, performance and inspection history Of post-construction BMPs				X	
3. Track inspections and summarize inspection results as part of the Annual Report.				X	

General Summary

Chapter 18.71 of the Municipal Code has the provision which requires projects to provide perpetual inspections of the BMPs on an annual basis through a qualified Third Party Inspector.

Effectiveness Assessment

We have developed a chart for tracking project with post construction development standards. The chart allows us to see which projects have post construction BMPs, maintenance agreements, SWRMPs, and inspection histories (see Morgan Hill Attachment 5.3a and 5.3b).

Proposed Modification

5.VIII Long-term Maintenance of BMPS

Description: Develop an O&M program for long-term maintenance of BMPs.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop O&M program for private projects.				X	

2. Require 100% of private projects requiring post-construction BMPs to enter into a long-term maintenance agreement. Beginning Q9 and in all subsequent years.				X	
3. Develop a self-certification O&M program for all public projects				X	
4. Require all projects to report all maintenance activities and inspections, beginning Q9 and in all subsequent years.				X	
5. Submit annual maintenance/inspection reports for both private and public projects.				X	
6. Report results of inspections and compliance status.				X	
7. Evaluate O&M program requirements and revise policies, procedures and ordinances, as needed.				X	

General Summary

Chapter 18.71 of the Municipal Code has provision which require projects to go into a long-term maintenance agreement with the City.

Effectiveness Assessment

See Parts VI and VII above.

Proposed Modification

5.IX Joint Effort For Developing Hydromodification Control Criteria					
Description: Participate in joint effort.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Analyze all applicable codes, regulations, standards, and/or specifications to identify modifications and/or additions necessary to implement hydromodification controls and LID.				X	
2. Provide outreach and education about the storm water management objectives on code changes to municipal officials.				X	
3. Approve new and/or modified enforceable mechanisms that effectively resolve regulatory conflicts and implement hydromodification controls and LID in new and redevelopment projects.				X	
4. Apply new and/or modified enforceable mechanisms to all applicable new/redevelopment projects, beginning in Q9 and in all subsequent years.				X	
5. Coordinate with consultant team when they are developing the methodology to ensure that local hydrologic conditions are included.				X	
6. Develop hydromodification control criteria for controlling hydromodification in new/redevelopment projects using methodology developed by joint effort.				X	

7. Apply hydromodification control criteria beginning in Q9 and in all subsequent years.				X	
8. Compile and analyze information, to prepare hydromodification control criteria, on the scale, type and potential for new and redevelopment.				X	
9. Derive applicability thresholds that are consistent with long-term watershed protection.				X	
10. Develop a schedule that allows for the simultaneous development of hydromodification control criteria and applicability thresholds with optimal cross communication to ensure a cohesive product.				X	
11. Develop, advertise and make available LID BMP Design Guidance suitable for all stakeholders.				X	
12. Specific guidance on how to achieve and demonstrate compliance with the hydromodification control criteria and LID requirements made available to new and redevelopment project applicant.				X	
13. Documentation of goals, schedules, and target audiences for education and outreach the municipality will conduct in support of the following strategic objectives: enforceable mechanisms, hydromodification control criteria, applicability thresholds, LID BMP design, and compliance with LID and hydromodification control criteria.				X	
14. Tracking Report indicating municipality's accomplishments in education and outreach supporting implementation of LID and hydromodification control for new and redevelopment projects.				X	
15. Apply LID principles and features to all applicable new and redevelopment projects.				X	
16. Tracking Report, for the period Q2 to Q8, identifying LID design principles and features incorporated into each applicable new and redevelopment project.					

General Summary

1) The City of Morgan Hill has developed interim LID requirements. As part of a project's conditions of approval the interim LID requirements need to be address for applicable projects (See LID Standard Conditions, Morgan Hill Attachment 5.4).

Effectiveness Assessment

All current projects have been conditioned with interim LID standards.

Proposed Modification

By March 2014 the interim LID standards shall be updated with LID provisions established by Resolution No. R3-2013-0032.

5. X Training	
Description: Offer annual training on new and redevelopment requirements to both Municipal and the development	Status

community staff.	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Provide annual training to Municipal staff and the development community.					X
2. Provide training to 100% of municipal staff on post construction requirements.	X				
3. Annually report on training opportunities and attendance at training covering for new and redevelopment requirements.	X				
4. Develop and administer evaluation forms.					X
5. Evaluate effectiveness based on the results from evaluation forms.	X				

General Summary

Gilroy, Morgan Hill, and South Santa Clara County have developed a post construction development standard manual base on Resolution No. R3-2013-0032. In August of 2013, a scheduled meeting /training session with cities staff, developers, engineers, architects, and interested parties shall be held to go over the requirements of Resolution No. R3-2013-003 and the manual.

Effectiveness Assessment

TBD

Proposed Modification

TBD

5. XI. Long-term Watershed Management for Storm drain Facilities					
Description: Review and revise Master Drainage or General Plan to integrate storm water management measures and water quality objectives into land-use planning and development policies.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Review the County General Plan and the Cities' Master Plans for existing long-term watershed management efforts.					
2. Work with other agencies to pool resources and define desired watershed conditions and the scope of long-term					

watershed management plan.					
3. Generally characterize the watershed and sub-watersheds.					
4. Develop goals and schedule for regional, long-term watershed management and revise the County General Plan, if appropriate, and Master Plans to incorporate them.				X	
5. Where feasible, quantifiable measures will be developed to evaluate how the watershed protection efforts, relative to storm water management, to achieve desired watershed conditions.				X	

General Summary

Currently this measure is being considered to be studied under our the City’s updated General Plan amendment and Stormdrain Master Plan, which will begin in 2014/2015.

Effectiveness Assessment

N/A

Proposed Modification

5.XII Land Use Policies

Description: Review existing General Plan/Local Land Use Plan policies to determine if these policies provide implementation framework for compliance with this MCM.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Annually report implementation of existing and new policies and procedures as applicable.					
2. Require 100% of all development and land use projects to meet watershed protection measures included in the existing land use policies, ordinances and/or procedures.				X	
3. Review existing land use policies, ordinances and procedures, compare existing policies to post construction MCM, and identify necessary changes.					
4. Work with other agencies to define desired watershed conditions.					X
5. Modify land use development policies and ordinances as necessary to achieve desired watershed conditions and protect watershed health.					
6. Require 100% of all development and land use projects to meet watershed protection measures included in the revised land use policies, ordinances and/or procedures.				X	
7. Develop and implement a program to measure the effectiveness of the land use policies and ordinance.				X	

8. Measure effectiveness of the policies/ordinances and modify as needed.				X	
---	--	--	--	---	--

General Summary

To date we have adopted no new policies.

Effectiveness Assessment

N/A

Proposed Modification

CORRECTIVE ACTION TO LETTER DATED OCTOBER 1, 2012: CENTRAL COAST WATER BOARD STAFF ENFORCEMENT LETTER BASED ON RESULTS OF LIMITED COMPLIANCE INSPECTION, CITY OF MORGAN HILL STORMWATER MANAGEMENT PROGRAM, WDID NO. 343MS03020, SANTA CLARA COUNTY

Summary:

On May 9, 2012, PG Environmental, a USEPA contractor, and Central Coast Water Board staff (Inspection Team), conducted a partial compliance inspection of the City's Program (Inspection). During the Inspection, the Inspection Team focused on the following two of the six Minimum Control Measures (MCMs) required in the General Permit.

MCM 4 Construction Site Stormwater Runoff Control

MCM 5 Post-Construction Stormwater Management in New Development and Redevelopment

The following are program violations/deficiencies and the corrective actions taken by the City of Morgan Hill.

Program Violations:

1. ***Violation of General Permit section D.2.d(6) for failure to “develop procedures for site inspection and enforcement of control measures.” Violation of Construction Site Stormwater Runoff Control BMP 4.IV.5 for failure to “monitor inspection results and follow-up violations with additional enforcement activities” at public construction sites.***

The City had not fully developed and implemented a procedure for inspecting public construction sites for stormwater runoff controls.

CORRECTIVE ACTION:

The following standard SWPPP inspection requirements were put in to place for all public Capital Improvement Projects (CIPs) under the SWRCB NPDES General Permit for construction activities as of July of 2012.

- A. **PRIOR TO ANY GRADING OR CONSTRUCTION ACTIVITY, CITY SHALL OBTAIN THE SERVICES OF A QUALIFIED THIRD PARTY SWPPP INSPECTOR (TPSI)**
 - 1) Qualified Third Party SWPPP Inspector (TPSI) shall hold certification of a Qualified SWPPP Practitioner (QSP) or a Qualified SWPPP Developer (QSD) issued by the State Water Resources Control Board (SWRCB).
 - 2) Primary Contractor (CONTRACTOR) shall provide contact information of the projects Third Party SWPPP Inspector (TPSI) to the CIP Project Engineer (CITY).
 - 3) CITY shall go over the requirements of SWPPP Inspections with the TPSI.
 - 4) CITY shall coordinate with TPSI in maintaining an inspection log of all SWPPP Inspections and their respective sites.
- B. **SITE SWPPP INSPECTIONS VIA THIRD PARTY SWPPP INSPECTOR (TPSI)**
 - 1) CITY shall have the site inspected by the TPSI.
 - 2) SWPPP Inspections shall occur between 48 to 24 hours prior to a forecasted rain event and immediately following the rain event.
 - 3) SWPPP Inspections shall occur weekly between September 15th and May 1st.

- 4) SWPPP Inspections shall occur bi-weekly between May 1st and September 14th.
- 5) For each SWPPP Inspection, the TPSI shall certify in writing to the CITY if the site is in compliance/non-compliance with the NPDES General Permit for Stormwater, site SWPPP Manual, and Water Pollution Control Drawings, using the City standard SWPPP Checklist (contact Public Works for standard SWPPP Checklist). TPSI can forward SWPPP Checklist to CITY by e-mail in PDF format.
- 6) Prior to rain events, BMPs not in compliance will need to be corrected immediately.
- 7) Illicit discharges per the NPDES General Permit, non-compliance of tracking control, and inlet protection within the public right of way shall be address immediately.
- 8) Other non-compliance issues need to be addressed within a 24 hour period.
- 9) Non-compliance issues which have been corrected shall be verified by the TPSI by a follow up inspection.

C. CITY OVERSIGHT OF TPSI INSPECTIONS

- 1) CITY shall receive site inspection information/certification from the TPSI per items B.2, B.3, or B4.
- 2) CITY shall coordinate with TPSI to address any outstanding items within the required time frame.
- 3) Sites that are not able to address non-compliance issues shall be denied further Public Works inspections OR required to stop work until non-compliance issues are corrected.

2. City had not developed an inventory of publicly or privately owned post construction BMPs or BMPs regulated under Attachment 4 of the General Permit.

The City must develop and implement a procedure during the development review process for tracking new development and redevelopment projects subject to post-construction requirements. The tracking procedure must address both private and public projects. In addition, the City must develop and implement an inventory to track post-construction stormwater management BMPs after construction is completed. The inventory must include information about individual post-construction BMPs, such as the location of the BMP and how the BMP was designed to function, that will enable the City to effectively ensure that postconstruction BMPs are adequately maintained.

CORRECTIVE ACTION:

The City has developed spreadsheets to track the inventory of publicly or privately owned post construction BMPs regulated under Attachment 4. From project approval to completed construction, The STORM WATER RUNOFF MANAGEMENT PLANS AND POST CONSTRUCTION BMPS INVENTORY (see Attachment 5.3b) tracks the following information:

- 1) Project and location
- 2) Tentative Map approval (if applicable)
- 3) Final Map approval/recordation (if applicable)
- 4) Construction Status
- 5) If Post Construction BMPs are required
- 6) If Low Impact Development is required
- 7) If detention/retention is required
- 8) BMPs/LID inspected and Civil Engineer of Record has certified the projects BMPs/LID (items 5, 6, and 7).
- 9) If a Stormwater BMP Operation and Maintenance Agreement is required
- 10) When the Stormwater BMP Operation and Maintenance Agreement has recorded (if applicable)
- 11) If a Storm Water Runoff Management Plan is required
- 12) A Storm Water Runoff Management Plan has been approved

- 13) Has the public improvements been accepted by the City
- 14) Has the project been completed

To track the projects specific BMPs, the Stormwater Runoff Management Plan (SWRMP) provides BMP location, function, and maintenance requirements, see completed SWRMPs under Attachment 5.3c and 5.3d.

The spreadsheet and SWRMP are located on the City's computer network and can be accessed by the development staff.

3. *The City was not maintaining an adequate level of erosion and sediment control at the Butterfield Boulevard South Extension Capital Improvement Project construction site.*

The City must develop, distribute, and implement consistent standards for BMP selection, maintenance, inspection, and enforcement for public construction sites. The City must also modify its training efforts for managers of public construction site to ensure that they are adequately trained to implement the standards.

CORRECTIVE ACTION:

In the same manner that private construction sites are monitored for SWPPP activity, the City immediately obtained the services of a third party QSD/QSP SWPPP (Mark Thomas and Company) inspector for the Butterfield Boulevard project. Inspection procedures outline in item 1 above were set in to place. The inspection summary log can be found in Attachment 4.2, under Butterfield Blvd. The third party inspector worked closely with the city inspectors and engineers on the weekly status of the stormwater BMPs, through this process city staff gained valuable on the job training.

Program Deficiencies:

4. *The City was not ensuring proper installation of post-construction BMPs.*

The City must develop and implement a procedure for ensuring that newly-constructed post-construction stormwater management BMPs are installed correctly and in accordance with approved plans. Central Coast Water Board staff recommends that the City identify a point in the construction process (such as the final site inspection prior to occupancy) when City staff will inspect for proper installation and operation of post-construction BMPs on both private and public construction sites.

CORRECTIVE ACTION:

The City requires that prior to acceptance of the Public Improvements of the development (or phase) the post construction BMPs are inspected by the City inspector(s) and the Civil Engineer of record verifies the BMPs are installed correctly and in accordance with the approved plans. The Civil Engineer of record also provides a letter of certification of the BMPs; the inspection and certification is tracked on the STORM WATER RUNOFF MANAGEMENT PLANS AND POST CONSTRUCTION BMPS INVENTORY spreadsheet, for a sample BMP certification letter see Attachment 5.3e.

5. *The City had not fully developed or implemented a program to ensure the long-term operation and maintenance of post-construction BMPs.*

The City must develop and implement a procedure to track reports to ensure they are submitted as required. In addition, the City must develop and implement a procedure for reviewing submitted reports, evaluating the operation and maintenance of BMPs, and enforcing proper operation and maintenance of BMPs. The procedure should include measures to address publicly-owned BMPs. Central Coast Water Board staff recommends that the City develop a database of all post-construction BMPs installed in the City that contains the location, ownership, maintenance and reporting status, enforcement actions, and any other information needed for City staff to be able to demonstrate compliance for each BMP; and that the City establish a prioritization system for reviewing and following up on reports. Additionally, the City should consider providing education to private owners of post-construction BMPs regarding proper operation and maintenance.

CORRECTIVE ACTION:

To ensure long-term operation and maintenance of post construction BMPs, projects are required to:

- 1) Execute and record a Stormwater BMP Operation and Maintenance Agreement, see Attachment 5.3c and 5.3d.
- 2) Provide and approved Stormwater Runoff Maintenance Plan, see Attachment 5.3c and 5.3d.

Items 1 and 2 are tracked on the spreadsheets:

- STORM WATER RUNOFF MANAGEMENT PLANS AND POST CONSTRUCTION INVENTORY, Attachment 5.3b.
- STORM WATER RUNOFF MANAGEMENT PLAN ANNUAL (SWRMP) CERTIFICATION, see Attachment 5.3a.

To insure BMPs are functioning properly, the SWRMPs require:

- a) BMPs inspected for compliance by May 15th
- b) BMPs Inspected for compliance by September 15th
- c) Certified by September 30th that BMPs in compliance with the SWRMP

With regards to City CIP development, staff is currently working on compiling a list of public facilities that function/address water quality BMPs.

Pollution Prevention/Good Housekeeping

6.I Evaluation of Existing Housekeeping Practices					
Description: Review/research existing housekeeping practices.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Evaluate effectiveness of current good housekeeping practices based on if the activities listed above use good housekeeping practices while implementing the current practices at 100% of the properties listed above during years one - four.	X				
2. Determine which housekeeping practices need to be modified.	X				
3. Report on which activities will be modified and include any additional housekeeping practices that will be created.	X				
4. Revise existing practices and create new practices, if needed.	X				
5. Submit a report on the modified/new housekeeping practices.				X	
6. Develop procedures for inspecting municipal facilities and properties.				X	
7. Implement the modified/new housekeeping practices at 100% of the specified properties.				X	
8. Include the results of municipal facility inspections in Annual Report.				X	
9. Evaluate the effectiveness of the new housekeeping practices and pollution prevention measures and revise them if necessary. Include in the Annual Report any revisions that are planned.				X	

General Summary

<ol style="list-style-type: none"> The City's stormwater coordinator visited all of the City's facilities to observe housekeeping practices. In conversation with the utilities and maintenance supervisors, it was determined that some tank draining practices could be modified to eliminate any discharge to the stormdrain system. In addition, some additional physical improvements at the corporation yard can be made that will further protect the stormdrains. Tank draining practices have been modified to eliminate discharges to the stormwater system. Tank draining practices have been modified to eliminate discharges to the stormwater system. In addition, funding has been budgeted in the FY 13/14 budget to construct a permanent cover over the bin area to reduce the discharge of sediments.
--

Effectiveness Assessment

N/A

Proposed Modification

N/A

6.II Street Cleaning

Description: Establish a street sweeping schedule and provide additional cleaning on an as needed basis.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Review existing street sweeping schedule.	X				
2. Include a report on the findings of the street sweeping schedule review.	X				
3. Morgan Hill will sweep commercial streets every week and residential streets every other week. Gilroy will sweep both residential and commercial streets every other week.	X				
4. Document curb miles swept and volume of materials collected.	X				
5. Assess street sweeping program and document possible improvements.	X				
6. In Morgan Hill, inspect street sweeping equipment annually.	X				

General Summary

Recology South Valley, the City’s franchise waste management company, continues to provide regular street sweeping service in the City. Commercial areas are swept weekly and residential areas are swept every two weeks. Streets staff works closely with Recology to ensure that their regular schedule is maintained and adequately performed. The City also maintains a small street sweeper to respond to special situations such as traffic accidents which result in broken glass or other debris in the roadway.

In addition to the street sweeping program to remove debris and prevent it from entering the storm drain system, Operations workers respond to spills of automotive products in the roadway and contain them within the concrete gutter or roadway shoulder preventing entry into storm drain inlets and drainage channels. In the event of a hazardous material spill of materials other than automotive products, the fire department is called and the spill is contained by a company licensed to handle and dispose of hazardous materials.

City staff inspect street sweeping performance weekly and communicate problems to Recology. Attachment 6.II.2 is the equipment inspection report from Recology.

Effectiveness Assessment

Attachment 6.II.1 reports the total amount of silt/debris collected by the sweeping contractor during the report period expressed in tons.

Proposed Modification

In September 2011, Recology South Valley began sweeping the Jackson Oaks area on a trial basis. Most streets in this neighborhood are relatively steep and there are no curbs/gutters in most locations so street sweeping may be problematic. The neighbors seemed to feel that the streets were cleaner so the program will be continued.

6.III Storm Water Pollution Prevention Plan for Corporation Yard

Description: Develop and implement a SWPPP for corporation yards.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop a SWMPP for all corporation yards.	X				
2. Implement the SWPPP at all corporation yards.	X				
3. Assess the corporation yard SWPPPs and update as needed.	X				
4. In Morgan Hill, include all required SWPPP information in the Annual Report.	X				

General Summary

The City is implementing the SWPP established for the Corporation Yard. The yard is routinely swept, catch basins have been fitted with hydrocarbon filters and are regularly inspected and cleaned, recycling dumpsters and material bins are covered and a spill response plan is in place.

Effectiveness Assessment

The yard is inspected visually daily.

Proposed Modification

N/A

6.IV Program for Cleaning Storm Drain Facilities

Description: Develop and implement a schedule for inspecting/cleaning of critical storm drain facilities.	Status
---	--------

	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Evaluate the effectiveness of the storm drain facility-cleaning program based on inspection and cleaning efforts.	X				
2. Establish a list of critical storm drain facilities.	X				
3. All critical storm drains will be inspected annually prior to rainy season.	X				
4. In Morgan Hill clean major storm drain facilities annually in years one through five.	X				
5. Document number of facilities cleaned.	X				
6. Assess list of critical storm drain facilities and inspect and modify the list, as needed.	X				
7. Develop criteria for storm drain cleaning and maintenance that include water quality protection, aquatic habitat protection, and watershed health as factors to consider.	X				
8. Implement the criteria developed for storm drain facility cleaning and maintenance.	X				

General Summary

City storm drain facilities are inspected on an annual basis prior to the rainy season. Inspection findings are prioritized based on conditions found in the field and flooding history. Facilities are cleared, cleaned and prepared for the winter season using available resources. Attachment 6.IV.1 documents the City's activities. This list is assessed annually based on the flooding that occurs. Because flooding onto land results in substantial increases in sediments and other pollutants into the system, the City's efforts to minimize flooding exactly correlate with the concepts of protecting water quality, protecting aquatic habitat through pollutant reductions, and maintaining the health of the watershed.

Effectiveness Assessment

Critical storm drain facilities are maintained to the extent possible. The lack of rain during the reporting year resulted in minimal flooding regardless of the City's efforts to clean storm drain facilities.

Proposed Modification

No SWPP changes proposed.

6.V Water Utility Discharge Pollution Prevention Plan	
Description: Develop and implement a Water Utility Pollution Prevention Plan.	Status

	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Develop a Water Utility Pollution Prevention Plan.		X			
2. Provide training to 100% of applicable staff.		X			
3. In Morgan Hill, implement Water Utility Pollution Prevention Plan	X				

General Summary

The City's water utility is implementing the pollution prevention plan developed during the City's previous SWMP. In addition to normal housekeeping-level activities when conducting work on the City's facilities, the primary area of concern addresses the potential for pollution entering the stormdrain system during line flushing. The City developed a specific form to assist field crews in this activity (Attachment 6.V.1) that allows them to document their activities to prevent pollution.

Effectiveness Assessment

Utility workers report that the flushing form works well and that stormwater pollution is prevented on a daily basis as a result.

Proposed Modification

N/A

6.VI Training					
Description: Provide annual training to applicable staff regarding water quality and impacts of their actions on pollutant reduction.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Provide annual training to 100% of Municipal maintenance staff and other applicable staff, as appropriate, on good housekeeping practices	X				
2. Measure effectiveness training and modify as needed.				X	
3. In Morgan Hill, administer quiz after training events.	X				

General Summary

This year, the City provided a specific training to field staff on April 11, 2013 addressing sources of stormwater pollution and approaches to minimizing pollution. These activities addressed both utility operations as well as parks and street operations.

27 attendees were present and were given a quick follow-up quiz designed to stimulate their thoughts by asking an open ended question to end the quiz asking what the best opportunity they had to prevent pollution was in their day-to-day work. The answers appropriately reflected their opportunities and realistic roles.

In addition to this specific training, the administers several other trainings which contribute to stormwater pollution prevention.

Finally, in addition to the above trainings, each week the entire field crew is reminded of a City policy that addresses their work. Many of these policies have been amended to specifically prevent and minimize stormwater pollution.

Effectiveness Assessment

With the low turnover in City staff, this integrated approach is the best way to encourage a sense of “we are all on the same team” among the crews.

Proposed Modification

N/A

TMDLs

7.I Nitrate Evaluation Plan Description: Develop a Plan to evaluate the sources of nitrate in storm water. The Plan will include identification and prioritization of potential nitrate sources and investigate/evaluate methods for potential source reduction. For example, use permits for hobby farms and other land uses may be potential sources investigated. The Plan will also include identifying target audiences for outreach.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort
1. Review existing use permits and other resources to identify and prioritize potential sources of nitrates with emphasis on hobby farms and backyard livestock.	X				
2. Establish priority list for nitrate sources.					X
3. Conduct inspections of high priority sites. Coordinate with IDD&E MCM on reporting results.	X				
4. Identify target audiences for outreach. Coordinate with Pubic Education and Outreach MCM on reporting results.					X

5. Conduct workshop or similar outreach event (specific outreach type will be based on identified audience). Coordinate with Pubic Education and Outreach MCM on conducting outreach.					X
6. Develop a review program to measure the effectiveness of SWMP BMPs related to the nitrates TMDL.					X
7. Measure Effectiveness of the TMDL program and modify as needed.				X	

General Summary

1. The City does not have a significant number or hobby farms or other livestock-based sources of pollutants. Given this, the City has determined that overfertilization and pet waste are the two priority potential sources in Morgan Hill. The target audience for outreach activities will be general residents.
 2. Refer to Joint Effort report.
 3. Given that the high priority sites include all landscaped areas, inspections are not possible. Instead the City receives reports of water waste and responds accordingly since water running from the landscape is likely to carry nitrates.
 4. Refer to Joint Effort report.
 5. Refer to Joint Effort report.
 6. Refer to Joint Effort report.

Effectiveness Assessment

N/A

Proposed Modification

N/A

7.II Sediment Evaluation Plan					
Description: Develop a Plan to evaluate the sources of sediment in storm water and to reduce them. Please See Section 4: Construction Site Storm Water Runoff Control for more information.	Status				
	Completed	Not applicable	Modified	Not Required this Fiscal Year	Joint Effort

1. Develop plan.					X
2. Develop a review program to measure the effectiveness of SWMP BMPs related to the sediment TMDL.					X
3. Measure effectiveness of the TMDL program and modify as needed.				X	

General Summary

- | |
|--|
| <ol style="list-style-type: none"> 1. Refer to Joint Effort report. 2. Refer to Joint Effort report. |
|--|

Effectiveness Assessment

--

Proposed Modification

--

Fecal Coliform monitoring activities were conducted by the City of Gilroy via a cooperative agreement and will be reported by Gilroy. The City of Morgan Hill was poised to begin monitoring at identified outfall locations in the Spring of 2013 but the lack of rainfall resulted in no discernable amount of water in West Little Llagas Creek. The City will begin with the Fall rains, assuming they occur.

Appendix