

Chapter 10

SWMP PROGRAM MANAGEMENT

I. Annual Reports

The City will maintain records to document the implementation and annual progress of each of the eight control programs and any other programs included in the SWMP, such as those addressing TMDLs. The City will report the results of each of these programs to the RWQCB annually as part of the SWMP Annual Report.

The SWMP annual report will include information and a summary of the progress made relative to the measurable goals. The annual report will be used to identify strengths and weaknesses of the SWMP which the City will then use for adaptive management of the program. Methods to evaluate the SWMP are described below.

II. Program Evaluation

The City will evaluate the SWMP annually in order to assess BMPs and program effectiveness, and to determine if modifications will be needed for the following year or in future years. The measurable goals will be used to both document the City's efforts in the SWMP implementation and to assess the program's annual achievements. In addition, the City will conduct an Effectiveness Assessment of the SWMP as described below.

Effectiveness Assessment

Effectiveness assessment is a process used to evaluate whether a storm water program is meeting the performance standards and if the performance standards are being achieved efficiently and cost-effectively. The Phase II NPDES General Permit contains requirements for annual review of the SWMP effectiveness, BMPs' effectiveness and improvement opportunities to achieve MEP.

While it is known that effectiveness assessment is a fundamental and necessary component for developing and implementing a successful storm water program, the methods for conducting such assessments are less known. For over 10 years, Phase I storm water communities have been faced with increasing pressures to demonstrate effectiveness of programs without specific guidance in conducting these assessments. Therefore, these programs have historically relied on regular evaluation of program elements and control measures to ensure progress is being made towards achieving broader program goals.

In May 2007, the California Stormwater Quality Association (CASQA) developed *the Municipal Stormwater Program Effectiveness Assessment Guidance May 2007* to assist storm water program managers in designing and conducting program effectiveness assessment using a range of assessment methods. As described in the CASQA Guidance Document, BMPs, program elements or the overall storm water program can be categorized as having one or more of six

levels of outcomes. Outcomes being defined as the result of implementing a storm water BMP, program element, or overall program implementation.

The City will use the CASQA Guidance Document *Level One Outcomes* (documenting activities) during the first three years of program implementation. This will allow the appropriate City staff to become familiar with the implementation of the SWMP, and become fluent in the various BMPs and measurable goals of the SWMP. The City will use Level One Outcomes to assess the effectiveness of all applicable BMPs.

In Year 4, the City will develop an Effectiveness Assessment Strategy based on the principles outlined in the CASQA Guidance Document. The strategy will be submitted as an update to the SWMP with the Year 4 annual report. The strategy will describe actions that will be taken to assess the effectiveness of the SWMP in meeting regulatory requirements and improving water quality and beneficial use conditions. The strategy will specifically address the following:

- Identify a process to be used to conduct effectiveness assessments and improve BMP implementation.
- Identifying quantifiable BMP and program effectiveness measurements.
- Assessment of BMP implementation in terms of regulatory compliance, changing awareness, changing behavior, pollutant load reductions, and runoff and receiving water quality.
- Seek to identify links between BMP/program implementation and improvement in water quality and beneficial use conditions.

In addition to developing an Effectiveness Assessment Strategy, Level 1 outcomes will continue to be assessed in Year 4.

BMP #PM-1: Develop an Effectiveness Assessment Strategy

Table 10-1

Program Management

BMP #	BMPs	Measurable Goals	Responsible Dept. or Division	Implementation Schedule
PM-1	Develop an Effectiveness Assessment Strategy	1. Identify a process to be used to conduct effectiveness assessments and improve BMP implementation. 2. Identifying quantifiable BMP and program effectiveness measurements. 3. Assessment of BMP implementation.	Public Works: Engineering	Year 4